

December 10, 2021

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

**Re: Notice of Preliminary Decision – Title V Permit Renewal**  
**Facility Number: N-2073**  
**Project Number: N-1203838**

Dear Mr. Coble:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Covanta Stanislaus, Inc. at 4040 Fink Road, Crows Landing, California.

The notice of preliminary decision for this project has been posted on the District's website ([www.valleyair.org](http://www.valleyair.org)). After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

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

Sincerely,



Brian Clements  
Director of Permit Services

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email  
cc: Laura Yannayon, EPA (w/enclosure) via EPS

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

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**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT**

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

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# **TITLE V PERMIT RENEWAL EVALUATION**

## **Municipal Solid Waste Electric Power Generation Plant**

**Engineer:** Jagmeet Kahlon  
**Date:** December 10, 2021

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

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

**Responsible Official:** Eric Schneider  
**Title:** Facility Manager

**Project # :** N-1203838  
**Deemed Complete:** September 4, 2020

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## **I. PROPOSAL**

Covanta Stanislaus, Inc. (hereafter referred to as "CSI") submitted an application to renew their Title V permit on August 31, 2020, which was within the timeframe required by Section 5.2 of District Rule 2520. Therefore, all terms and conditions of the Title V permit shall remain in effect until the renewal permit has been issued pursuant to Section 8.3 of District Rule 2520. During this renewal process, the existing permits will be revised to include any updated or new requirements from District, State and Federal rules that were adopted or amended since the issuance of the previous Title V permit renewal that was finalized on July 14, 2017.

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. This document also identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

In addition to the changes outlined in the following Sections, the District added a Rule 4352 rule reference to condition #108 of draft Permit to Operate (PTO) N-2073-1-19, as that condition is used to both satisfy the PSD limitations of the permit and to demonstrate compliance with the 165 ppm NO<sub>x</sub> @ 12% CO<sub>2</sub> limitation of District Rule 4352 (on a 24-hr block average). Also, the Rule 4352

reference was removed from condition #24, as the more stringent Rule 4352 NOx limit (165 ppm NOx @ 12% CO2) applies to each unit. Lastly, a Rule 4352 reference was also added to condition # 82 to satisfy section 6.2.1 of District Rule 4352.

## **II. FACILITY LOCATION**

The facility is located at 4040 Fink Road in Crows Landing, California.

## **III. EQUIPMENT LISTING**

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

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

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

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

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

## **V. SCOPE OF EPA AND PUBLIC REVIEW**

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

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

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

Conditions #1 through #26 and #29 through #40 of the facility wide requirements of the draft Title V Permit to Operate (PTO) N-2073-0-4 were issued under the umbrella template.

## VI. FEDERALLY ENFORCEABLE REQUIREMENTS

### A. Rules Updated

The following rules have been modified since the date the previous Title V renewal was finalized, July 14, 2017:

District Rule 2201, District New and Modified Stationary Source Review Rule  
(as amended February 18, 2016 → August 15, 2019)

District Rule 2520, Federally Mandated Operating Permits  
(as amended June 21, 2001 → August 15, 2019)

District Rule 4601, Architectural Coatings  
(as amended December 17, 2009 → April 16, 2020)

District Rule 4702, Internal Combustion Engines  
(as amended November 14, 2013 → August 19, 2021)

40 CFR 60 Subpart IIII, Standards of Performance for Stationary  
Compression Ignition Internal Combustion Engines  
(as amended June 29, 2021)

40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air  
pollutants for Stationary Reciprocating Internal Combustion Engines  
(as amended December 4, 2020)

40 CFR 82 Subpart B, Stratospheric Ozone  
(as amended March 24, 2021)

40 CFR 82 Subpart F, Stratospheric Ozone  
(as amended April 10, 2020)

### B. Rules Removed

None

### C. Rules Added

None

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

40 CFR 60 Subpart Ea, Standards of Performance for Municipal Waste  
Combustors for which Construction is Commenced After December 20, 1989  
and on or Before September 20, 1994 (as amended October 17, 2000)<sup>1</sup>

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

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<sup>1,2</sup>Covanta Stanislaus combustors were constructed prior to December 20, 1989 and have not been modified or reconstructed since that time. Therefore, Subparts Ea and Eb do not directly apply to the municipal solid waste combustion units at this facility. However, the state plan for 40 CFR 60 Subpart Cb requires the combustors at this site to comply with several of the requirements of Subpart Eb, as described in the facility's previous Title V permit renewal.

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

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

## VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

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

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

### A. Rules Added

No rules have been added.

### B. Rules Not Updated

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

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

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

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

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

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

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



## VIII. PERMIT REQUIREMENTS

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

### A. District Rule 2020 – Exemptions

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

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

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

### C. District Rule 2520 – Federally Mandated Operating Permits

This rule has been amended since this facility's previous Title V permit was issued. The amendments enhanced the public notice process by making public notice information available on the District's website 24 hours/day, 7 days/week, in both Spanish and English. This rule amendment did not require any changes to existing permit conditions. Thus, continued compliance is expected.

### D. District Rule 4601 – Architectural Coatings

This rule was amended on April 16, 2020. However, the amended rule has not yet been approved by the EPA into California State Implementation Plan (SIP). The previous version of this rule (amended December 17, 2009) was approved by EPA into California's SIP and was addressed by the District's facility-wide umbrella template. Because it has not yet been approved into the SIP, the updated rule is not Federally Enforceable; therefore, the applicants permit continues to comply with the SIP-approved version of this rule.

### E. District Rule 4702 – Internal Combustion Engines

This rule was amended on August 19, 2021. However, the amended rule has not yet been approved by EPA into the California SIP. Furthermore, the latest amendments to the rule have compliance deadlines in the future; therefore, the amendments are not yet applicable to the engines at this site. This rule's previous version (November 14, 2013) was approved by EPA into California's

SIP. Conditions enforcing the previous version of this rule were incorporated into permit N-2073-4 during previous Title V renewal project N-1153508. Therefore, continued compliance is expected.

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

*§ 60.4200 Am I subject to this subpart?*

Per Section 40 CFR 60.4200(a)(2)(ii), owners and operators of stationary compression ignited (CI) internal combustion engines (ICE) that commence construction after July 11, 2005, where the stationary CI ICE are manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006 are subject to the requirements of this subpart.

CSI has one 175 bhp Tier-3 certified diesel-fueled emergency fire pump engine under permit N-2073-4. This engine is a 2012 model year engine. Since the engine was manufactured and installed after cut-off dates in the above section, this engine is subject to the requirements of this subpart.

*§ 60.4205 What emission standards must I meet for emergency engines if I am an owner or operator of a stationary CI internal combustion engine?*

Section 60.4205(c) states 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 to this subpart, for all pollutants.

Table 4 to this subpart requires emission standards of 3.0 g/bhp-hr for NMHC + NO<sub>x</sub>, and 0.15 g/bhp-hr for PM for engines rated 175≤HP<300 that are 2009 or later model year.

The engine under permit N-2073-4 has certified emission levels of 2.7 g/bhp-hr for NO<sub>x</sub>+NMHC, and 0.09 g/bhp-hr for PM emissions. Conditions #5 and #6 in draft Title V PTO N-2073-4 ensure on-going compliance with these limits.

*§ 60.4207 What fuel requirements must I meet if I am an owner or operator of a stationary CI internal combustion engine subject to this subpart?*

Per Section 60.4207(b), beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart 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 1090.305 for nonroad diesel fuel, except that any

existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted.

Section 40 CFR 1090.305 (b) lists sulfur standard that limits the maximum fuel sulfur content to 15 ppm.

Section 40 CFR 1090.305 (c) lists cetane index or aromatic content. Diesel fuel must meet one of the following standards: (1) Minimum cetane index of 40 or (2) Maximum aromatic content of 35 volume percent.

The engine under permit N-2073-4 is required to use California Air Resources Board (CARB) certified diesel containing no more than 15 ppm sulfur by weight. Further, the CARB diesel fuel specification requires no more than 10 v% of aromatic hydrocarbon content (<https://ww2.arb.ca.gov/sites/default/files/2020-03/dieselspecs.pdf>). Condition #4 in the draft Title V permit N-2073-4 ensures on-going compliance with this section.

*§ 60.4209 What are the monitoring requirements if I am an owner or operator of a stationary CI internal combustion engine?*

If you are an owner or operator, you must meet the monitoring requirements of this section. In addition, you must also meet the monitoring requirements specified in § 60.4211.

Per Section 60.4209(a), if you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine.

Per Section 60.4209(b), if you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in § 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached.

The engine under permit N-2073-4 is required to use a non-resettable elapsed time meter or other approved alternative. Condition #3 in the draft Title V PTO N-2073-4 ensures on-going compliance with this section.

As noted in the previous Title V renewal, this engine is not equipped with a diesel particulate filter, therefore, requirements of section 60.4209(b) do not apply to this engine.

*§ 60.4211 What are my compliance requirements if I am an owner or operator of a stationary CI internal combustion engine?*

Per Section 60.4211(a), if you are an owner or operator and must comply with the emission standards specified in this subpart, you must do all of the following, except as permitted under paragraph (g) of this section:

- (1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;
- (2) Change only those emission-related settings that are permitted by the manufacturer; and
- (3) Meet the requirements of 40 CFR part 1068, as they apply to you.

Conditions #7 in the draft permit N-2073-4 ensures on-going compliance with this section.

Per Section 60.4211(c), if you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in § 60.4204(b) or § 60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in Table 3 to this subpart and must comply with the emission standards specified in § 60.4205(c), you must comply by purchasing an engine certified to the emission standards in § 60.4204(b), or § 60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in paragraph (g) of this section.

The engine under N-2073-4 is a Tier 3 certified engine. The equipment description and the emission limits (conditions #5 and #6) in the draft permit N-2073-4 enforce on-going compliance with this section.

Per Section 60.4211(f), if you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (f)(1) through (3) of this section. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (3) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (3) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary ICE in emergency situations.

(2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (f)(3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraph (f)(3)(i) of this section, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

The engine under permit N-2073-4 is limited to operate up to 100 hours per year during non-emergency scenarios including testing and maintenance of the engine or any other required regulatory purpose. Condition #9 in the draft permit N-2073-4 enforces on-going compliance with this section.

*§ 60.4214 What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary CI internal combustion engine?*

Section 60.4214(b) states if the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in table 5 to this subpart, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time.

The engine under permit N-2073-4 is an existing Tier-3 certified emergency stationary IC engine. The applicant is required to maintain records of engine operation during emergency and non-emergency periods. Conditions #10 and #12 in Title V PTO N-2073-4 ensure on-going compliance with this section.

Compliance is expected with this subpart.

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

*§ 63.6590 What parts of my plant does this subpart cover?*

Pursuant to 40 CFR 63.6590(c), Stationary Reciprocating Internal Combustion Engine (RICE) subject to Regulations under 40 CFR Part 60 - An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

- (1) A new or reconstructed stationary RICE located at an area source;
- (2) A new or reconstructed 2 stroke lean-burn (SLB) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;
- (3) A new or reconstructed 4SLB stationary RICE with a site rating of less than 250 brake HP located at a major source of HAP emissions;
- (4) A new or reconstructed spark ignition 4 stroke rich burn (4SRB) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;
- (5) A new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis;
- (6) A new or reconstructed emergency or limited use stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;
- (7) A new or reconstructed compression ignition (CI) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions.

The engine under permit N-2073-4 falls within the above categories; therefore, Subpart ZZZZ requires compliance with Subpart IIII requirements. Conditions #3,

#4, #5, #6, #7, #9, #10, and #12 of the draft Title V permit N-2073-4 ensures on-going compliance with 40 CFR Part 60 Subpart IIII requirements.

**H. 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners & 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction**

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources in general. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC). These subparts has been updated. The updated requirements does not alter the renewed permits. These requirements are enforced by conditions #27 and 28 of draft Title V PTO (N-2073-0-4).

**I. 40 CFR Part 64 – Compliance Assurance Monitoring**

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

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

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

Pollutant	Major Source Threshold (lb/year)
NOx	20,000
SOx	140,000
PM10	140,000
CO	200,000
VOC	20,000

**N-2073-1: Municipal Solid Waste(MSW) Combustion Units**

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

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



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

Pursuant to 40 CFR 64.2(b)(1)(vi):

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

The municipal solid waste combustors are equipped with continuous emissions monitoring (CEMS) systems that measure NOx and SOx emissions from the combustors without any assumed control device emission reduction factors. Therefore, the municipal solid waste combustors are exempt from the requirements of CAM for NOx and SOx emissions.

As noted in the previous Title V renewal (N-1153508), the units are subject to CAM requirements for PM<sub>10</sub> emissions. CAM requirements for PM10 emissions were addressed in the previous TV renewal and the applicant is not proposing to change any of the current CAM requirements for PM10 emissions; nor have any modifications occurred to the units which would necessitate a reconsideration of the CAM requirements. Conditions #2, #22, #40, #72, #121 through #125 enforce the CAM requirements for PM10.

N-2073-4: 175 Bhp Tier-3 Certified Emergency Fire Pump Engine

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

## **IX. PERMIT SHIELD**

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

### **A. Requirements Addressed by Model General Permit Templates**

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

N-2073-0-4, Condition 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]*

N-2073-0-4, Condition 40: *Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2]*

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

The applicant requested several permit shields. Most of these permit shields are same as the ones requested in the previous Title V renewal. The Clean Air Act allows for a permit shield to be granted if:

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

Refer to Attachment D for permit shield analysis.

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

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

## **X. CALIFORNIA ENVIRONMENTAL QUALITY ACT**

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

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

## **XI. PERMIT CONDITIONS**

See Attachment A - Draft Renewed Title V Operating Permit.

## **XII. ATTACHMENTS**

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List
- D. District Analysis of Proposed Permit Shields

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# ATTACHMENT A

Draft Renewed Title V Operating Permit

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# *San Joaquin Valley Air Pollution Control District*

FACILITY: N-2073-0-4

EXPIRATION DATE: 10/31/2021

## **FACILITY-WIDE REQUIREMENTS**

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; Stanislaus County Rule 110; and PSD SJ 86-03] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; Stanislaus County Rule 110; and PSD SJ 86-03] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: COVANTA STANISLAUS, INC  
Location: 4040 FINK RD, CROWS LANDING, CA 95313  
N-2073-0-4 : Dec 10 2021 8:58AM -- KAH/LONJ

10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101 and Stanislaus County Rule 401] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 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
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

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

36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. In the event of changes in control or ownership, this Operating Permit shall be binding on new owners and operators. The applicant shall notify successor of the existence of this Operating Permit and its conditions in writing and forward a copy to the District, California Air Resources Board, and EPA. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
42. The applicant shall construct and operate the facility in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable Federal, State and District air quality regulations. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
43. All correspondence as required by this Operating Permit shall be forwarded to: the District; Director, Air & Toxics Div. (Attn: A-3-3), EPA Region 9, 75 Hawthorne St. San Francisco, CA 94105; and Director, Stationary Source Div., CARB, Box 2815, Sacramento, CA 95812. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
44. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
45. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
46. Compliance with permit conditions in the Title V permit shall be deemed compliance with following applicable requirements: 40 CFR 82 Subparts A, B, C, D, E and F. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
47. A permit shield from the requirements of District Rule 4106 (6/11/2001) is granted since this facility does not perform prescribed burning nor does the facility perform hazard reduction burning in a wildland or urban interface. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
48. A permit shield from the requirements of District Rule 4204 (2/17/05) is granted since this facility does not meet the definition of a cotton ginning facility. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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



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

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

DRAFT

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2073-1-19

**EXPIRATION DATE:** 10/31/2021

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. The ash shall be handled in such a manner as to mitigate fugitive emissions to the maximum extent possible. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rules 2520, 9.3.2 and NSR] Federally Enforceable Through Title V Permit
11. The facility shall not cause visible emissions from ash conveying systems, including transfer points, in excess of 5% of the observation period, as determined by performing EPA Method 22 on a quarterly basis. Fugitive ash emissions do not include emissions within a building, an enclosed ash conveyor, or during periods of maintenance and repair of the ash conveyor systems. [40 CFR 60.36b] Federally Enforceable Through Title V Permit
12. Fuel Oil #2, with a sulfur content not to exceed 0.25% by weight, may be used as necessary to maintain the minimum combustion zone temperature requirements and annual usage shall not exceed 1,108,321 gallons for each combustor. [District NSR Rule, 40 CFR 60. 44b(c) & PSD SJ 86-03] Federally Enforceable Through Title V Permit
13. A furnace roof temperature of 1,100 degrees F shall be stabilized, as measured by multiple thermocouples, to ensure that a minimum temperature of 1,800 degrees F is established above the grate prior to the ignition of MSW. [District NSR Rule] Federally Enforceable Through Title V Permit
14. During any period of time that MSW is burning on the grates, the combustion gas retention time shall be maintained at a minimum of one second, the combustion zone temperature shall be maintained at a minimum of 1,800 degrees F, and the furnace roof temperature shall be maintained at an average (4 hour arithmetic block) of 1,100 degrees F, except during periods of start-up, shutdown, and malfunction, as defined in 40 CFR 60.58b(a). [District NSR Rule] Federally Enforceable Through Title V Permit
15. Hazardous materials shall not be burned in this equipment. Hazardous materials are that portion of solid waste which, by reason of its composition or characteristics, is: (a) hazardous waste as defined in the Solid Waste Disposal Act, 42 USC section 6901 et. seq., and the regulations thereunder, the California Health & Safety Code, Div. 20, Chs. 6.5, 6.7, and 6.8 (section 25100 et. seq.), the California Code of Regulations, Title 22, Div. 4.5, and any similar or substituted legislation or regulations or amendments to the foregoing; (b) any other materials which any governmental agency or unit having appropriate jurisdiction shall determine from time to time is harmful, toxic, or dangerous, or otherwise ineligible for disposal through the facility; and (c) any material, other than residential or commercial solid waste of the type historically collected by the County and the City as acceptable for disposal into non-hazardous waste landfills, which would result in process residue being hazardous waste under (a) or (b) above. [District Rule 4102]
16. Hazardous waste, as defined in 40 CFR 261.3, shall not be combusted by the municipal solid waste combustors. [40 CFR 63 Subpart EEE] Federally Enforceable Through Title V Permit
17. The facility shall develop and annually update a site-specific operating manual in accordance with 40 CFR 60.54b(e). [40 CFR 60.35b] Federally Enforceable Through Title V Permit
18. Each operator and all maintenance personnel shall receive initial and annual training on the site-specific operating manual in accordance with 40 CFR 60.54b(f). [40 CFR 60.35b] Federally Enforceable Through Title V Permit
19. The site-specific operating manual and operating manual training records shall be accessible to all operations and maintenance personnel and shall be made available to the enforcement agency upon request. [40 CFR 60.35b] Federally Enforceable Through Title V Permit
20. The District reserves the right to require the permittee to re-evaluate the health risk assessment if there is a significant change in population locations as projected in the currently approved health risk assessment, or new health data becomes available. [District Rule 4102]
21. During any 3-hour periods of startup, shutdown, and malfunction, the facility shall be exempt from emission limits identified in this permit which are based upon 40 CFR 60 Subpart Cb or Subpart Eb. This exemption shall not apply to CO emission limits of 40 CFR 60.53b(a) if the malfunction is a loss of boiler water level control. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Opacity exhibited by the gases discharged to the atmosphere from each combustion unit, other than water vapor, shall not exceed 10 percent based on a six minute average as measured by EPA Method 9. [40 CFR 60.33b and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. The carbon monoxide (CO) emissions from each combustion unit shall not exceed 100 ppmv, dry, corrected to 7% O<sub>2</sub>, as measured utilizing EPA Methods 1-4 and 10. Compliance with this limit shall be determined based on a four hour block arithmetic average as defined in 40 CFR 60.51b. [District Rule 4352 and 40 CFR 60.34b] Federally Enforceable Through Title V Permit
24. The NO<sub>x</sub> emissions from each combustion unit shall not exceed 200 ppmv, dry, corrected to 12% CO<sub>2</sub> as measured by EPA Methods 1-4 and 7E. Compliance with this limit shall be determined based on an eight rolling hour average. [District NSR Rule, and 40 CFR 60.33b] Federally Enforceable Through Title V Permit
25. Either the SO<sub>2</sub> emissions from each combustion unit shall not exceed 30 ppmv, dry, corrected to 12% CO<sub>2</sub>, based on an eight hour rolling average, or the SO<sub>2</sub> removal efficiency shall be at least 80% as measured by EPA Methods 1-4 and 6C. The SO<sub>2</sub> 80% removal efficiency shall be based on the measurement of the inlet and outlet SO<sub>2</sub> concentrations, corrected to 12% CO<sub>2</sub>. [District NSR Rule] Federally Enforceable Through Title V Permit
26. The SO<sub>2</sub> emissions from each combustion unit shall not exceed 29 ppmv, dry, corrected to 12% CO<sub>2</sub>, or the SO<sub>2</sub> removal efficiency shall be at least 75% (by weight or volume), whichever is less stringent as measured by EPA Methods 1-4 and 6C. Compliance with this limit shall be determined based on a 24-hour daily geometric mean. EPA method 19 shall be used to calculate the daily geometric average sulfur dioxide emission concentration and removal efficiency. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
27. Particulate matter emissions from each combustion unit shall not exceed 0.0275 gr/dscf, corrected to 12% CO<sub>2</sub>, as measured by EPA Methods 1 through 5, including the condensable portion in the "back-half". [District Rule 4201 and District NSR Rule] Federally Enforceable Through Title V Permit
28. Filterable particulate matter (i.e. front half) emissions from each combustion unit shall not exceed any of the following emission limits: 0.011 gr/dscf, corrected to 12% CO<sub>2</sub>; 25 milligrams/dscf, corrected to 7% O<sub>2</sub>; 0.10 lb/MMBtu heat input. Owner or operator shall conduct a performance test for particulate matter on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test, and must complete five performance tests in each 5-year calendar period) with EPA Method 1; EPA Method 3, 3A, or 3B; and EPA Method 5. The minimum sample volume shall be 1.7 cubic meters. The probe and filter holder heating systems in the sample train shall be set to provide a gas temperature no greater than 160 degrees C. An oxygen or carbon dioxide measurement shall be obtained simultaneously with each Method 5 run. [District NSR Rule, 40 CFR 60.33b, 40 CFR 60.38b, and 40 CFR 60.43b(d)(1)] Federally Enforceable Through Title V Permit
29. Filterable particulate matter emissions from each combustion unit shall not exceed 0.008 gr/dscf, corrected to 12% CO<sub>2</sub>, for the fraction of particles less than 2 $\mu$  in diameter, as measured by Andersen Cascade Impactor, Flow Sensor Multiclone or any other equivalent measurement as validated by EPA Method 301. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Each combustion unit shall only be allowed to emit half of the total allowable (mass) emission rate for each pollutant. [District NSR Rule] Federally Enforceable Through Title V Permit
31. The CO emissions shall not exceed 800 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
32. The CO emissions shall not exceed 121.9 tons/yr. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
33. The NO<sub>x</sub> emissions shall not exceed 2,260 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
34. The NO<sub>x</sub> emissions shall not exceed 344.4 tons/year. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
35. The SO<sub>2</sub> emissions shall not exceed 800 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit

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

36. The SO<sub>2</sub> emissions shall not exceed 121.9 tons/year. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
37. The PM emissions shall not exceed 475 pounds in any one day. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E=3.59 \times P^{0.62}$  if P is less than or equal to 30 tons per hour, or  $E=17.37 \times P^{0.16}$  if P is greater than 30 tons per hour. Particulate emissions shall be no more than 0.1 lbs per 100 lbs of combustible refuse charged. [District Rules NSR, 4202, and 4203, 4.3] Federally Enforceable Through Title V Permit
38. Permittee shall not discharge into the atmosphere, from either combustor, any particles which are individually large enough to be visible while suspended in the atmosphere. [District Rule 4203]
39. The PM emissions shall not exceed 72.4 tons/year. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District NSR Rule] Federally Enforceable Through Title V Permit
40. The combined post-control PM<sub>10</sub> emissions from the combustion units shall not exceed 70 ton/yr. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
41. Emissions of combustion contaminants from each fuel burning equipment unit shall not exceed 0.1 gr/dscf, corrected to 12% CO<sub>2</sub>, and 10 lb/hr. Combustion contaminants are defined as total PM (filterable plus condensable) minus the ammonium salts (e.g. ammonium chloride, ammonium sulfate, ammonium bisulfate, etc.) present in the condensable PM fraction. A "fuel burning equipment unit" is the minimum number of fuel burning equipment required to operate simultaneously for the production of useful heat. Compliance with this emission limit shall be demonstrated annually by source test conducted according to EPA Methods 5 and 202 (or other APCO approved methods). Ammonium salts in the condensable PM fraction shall be determined by analysis of the condensable PM fraction by ion chromatography (or other APCO approved method). [District Rule 4301] Federally Enforceable Through Title V Permit
42. The THC emissions shall not exceed 96 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
43. The THC emissions shall not exceed 14.6 tons/year. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District NSR Rule] Federally Enforceable Through Title V Permit
44. The THC emissions (as CH<sub>4</sub>) from each combustion unit shall not exceed 70 ppmv, dry, corrected to 12% CO<sub>2</sub> as measured by EPA Methods 1-4 and 25A. [District NSR Rule] Federally Enforceable Through Title V Permit
45. Ammonia (NH<sub>3</sub>) breakthrough of the exhaust shall not exceed 50 ppmv, dry, as measured by BAAQMD Method ST-1B. The facility shall be exempt from this condition for periods of start-up, shutdown, and malfunction as defined in 40 CFR 60.58b(a). [District Rule 4102]
46. The Antimony emissions from each combustion unit shall not exceed 0.0315 g/s as measured by CARB Method 436. [District Rule 4102]
47. The Arsenic emissions from each combustion unit shall not exceed 0.0005 g/s as measured by CARB Method 436. [District Rule 4102]
48. The Beryllium emissions from each combustion unit shall not exceed 0.00005 g/s as measured by CARB Method 436. [District Rule 4102]
49. The Cadmium emissions from each combustion unit shall not exceed either of the following: 0.0013 g/s; 0.035 milligrams/dscf, corrected to 7% O<sub>2</sub>; each as measured by EPA Methods 1, 3, and 29 [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
50. The Chromium +6 emissions from each combustion unit shall not exceed 0.00005 g/s as measured by CARB Method 436 (5% of the total chromium shall be considered to be hexavalent chromium). [District Rule 4102]
51. The Copper emissions from each combustion unit shall not exceed 0.155 g/s as measured by CARB Method 436. [District Rule 4102]

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52. The Dioxin/Furan emissions from each combustion unit shall not exceed 30 ng/dscm (total mass), corrected to 7% O<sub>2</sub>, as measured by EPA Method 23. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
53. The Dioxin/Furan emissions from each combustion unit shall not exceed 50 ng/s, based on the Department of Health Services toxic equivalent calculation. [District Rule 4102]
54. The Hydrogen Fluoride (HF) emissions from each combustion unit shall not exceed 0.05 g/s as measured by EPA Method 26. [District Rule 4102]
55. The Hydrogen Chloride (HCl) emissions from each combustion unit shall not exceed either of the following: 1.4 g/s; 29 ppmv or the HCl removal efficiency shall be at least 95% (by weight or volume), whichever is less stringent, corrected to 7% O<sub>2</sub>; each as measured by EPA Method 26. [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
56. The Lead emissions from each combustion unit shall not exceed either of the following: 0.014 g/s; 0.400 milligrams/dscf, corrected to 7% O<sub>2</sub>; each as measured by EPA Methods 1, 3, and 29. [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
57. The Manganese emissions from each combustion unit shall not exceed 0.055 g/s as measured by CARB Method 436. [District Rule 4102]
58. The Mercury emissions from each combustion unit shall not exceed 0.050 mg/dscm, corrected to 7% O<sub>2</sub>, or the mercury removal efficiency shall be at least 85% by weight, whichever is less stringent, as measured by EPA Methods 1, 3, and 29. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
59. The Mercury emissions from each combustion unit shall not exceed 0.0025 g/s (3-hour average). [PSD ATC SJ 86-03 and District Rule 4102] Federally Enforceable Through Title V Permit
60. The Nickel emissions from each combustion unit shall not exceed 0.025 g/s as measured by CARB Method 436. [District Rule 4102]
61. The Selenium emissions from each combustion unit shall not exceed 0.055 g/s as measured by CARB Method 436. [District Rule 4102]
62. The Vanadium emissions from each combustion unit shall not exceed 0.15 g/s as measured by CARB Method 436. [District Rule 4102]
63. The Zinc emissions from each combustion unit shall not exceed 0.315 g/s as measured by CARB Method 436. [District Rule 4102]
64. The mass emission rates shall be calculated from the hourly stack concentrations and the volumetric flow rate using municipal solid waste Carbon Dioxide based F-factor of 1820 dscf/MMBtu (EPA Method 19, Table 19-2). [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
65. The total steam generated from each boiler shall not exceed 110% of the maximum demonstrated combustion unit load achieved in the most recent Dioxin/Furan performance test, as defined in 40 CFR 60.51b. [40 CFR 60.34b(b)] Federally Enforceable Through Title V Permit
66. The maximum flue gas temperature, measured at the particulate matter control device inlet from each boiler, shall not be higher than 17 deg. C (31 deg. F) above the maximum demonstrated particulate matter control device temperature as defined in 40 CFR 60.51b. [40 CFR 60.34b(b)] Federally Enforceable Through Title V Permit
67. The steam load and particulate matter control device inlet flue gas temperature limitations shall apply at all times except during the annual Dioxin/Furan performance test, the two weeks preceding the annual Dioxin/Furan performance test, and when the facility obtains a waiver in accordance with permission granted by the Administrator or the Air Pollution Control Officer. [40 CFR 60.53b(b)] Federally Enforceable Through Title V Permit
68. The ammonia (NH<sub>3</sub>) injection rate shall be measured and recorded continuously. [District NSR Rule] Federally Enforceable Through Title V Permit

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69. For the purpose of demonstrating compliance with NO<sub>x</sub>, SO<sub>x</sub> and CO emissions limits using CEMS data, at least 75% of hourly averages comprising the applicable averaging period must be valid, as defined in 40 CFR 60.13. [District Rule 2080] Federally Enforceable Through Title V Permit
70. The facility may install, calibrate, maintain, and operate a backup CEM to monitor NO<sub>x</sub>, SO<sub>2</sub>, CO and CO<sub>2</sub> in accordance with 40 CFR 60.58b and Appendices B and F. Permittee shall identify all periods during which backup CEMS data has been used in the monthly report submitted pursuant to condition 101 of this permit. [District Rule 1080] Federally Enforceable Through Title V Permit
71. The facility shall install, calibrate, maintain, and operate a carbon dioxide CEM at the economizer and stack locations of each combustion unit, in accordance with 40 CFR 60.58b(b) and Appendices B and F. [40 CFR 60.38b and District Rule 4352] Federally Enforceable Through Title V Permit
72. The facility shall install, calibrate, maintain, and operate a continuous opacity monitoring system in accordance with 40 CFR 60.13 and Appendix B. [40 CFR 60.38b and 40 CFR Part 64] Federally Enforceable Through Title V Permit
73. The facility shall install, calibrate, maintain, and operate a sulfur dioxide CEM at the stack locations in accordance with 40 CFR 60.58b(e) and Appendices B and F. [40 CFR 60.38b] Federally Enforceable Through Title V Permit
74. The facility shall install, calibrate, maintain, and operate a nitrogen oxides CEM at the stack locations in accordance with 40 CFR 60.58b(h) and Appendices B and F. [40 CFR 60.38b and District Rule 4352] Federally Enforceable Through Title V Permit
75. The facility shall install, calibrate, maintain, and operate a carbon monoxide CEM at the stack locations in accordance with 40 CFR 60.58b(i) and Appendices B and F. [40 CFR 60.38b] Federally Enforceable Through Title V Permit
76. The facility shall install, calibrate, maintain, and operate a continuous steam flow monitoring and recording device and a device to measure temperature at the inlet of each particulate matter control device in accordance with 40 CFR 60.58b(i). [40 CFR 60.38b] Federally Enforceable Through Title V Permit
77. The permittee shall be responsible for providing the District access, via telemetry, to the stored computerized data associated with the continuous emission monitoring system. [District Rule 1080, 7.0] Federally Enforceable Through Title V Permit
78. Continuous monitoring and recording equipment shall be provided for the following: No. 2 fuel oil burning rate and temperature. Each combustion unit shall have sufficient monitors to demonstrate combustion unit temperature profile as required in condition 13 and flue gas temperature into the particulate matter control device as required by condition 64. [District Rule 1080, 7.0] Federally Enforceable Through Title V Permit
79. In the event that monitoring or test data show that emissions from the facility exceed any emission limitation conditions of this Permit to Operate, the permittee shall take immediate corrective action to bring the plant's emissions within these limitations. [District NSR Rule] Federally Enforceable Through Title V Permit
80. Emissions in excess of those allowed by this permit shall be cause for the District to order an immediate reduction in fuel feed rate or to take other appropriate abatement action. [District Rule 2080] Federally Enforceable Through Title V Permit
81. The permittee shall notify the District of any emission violation by the next working day after such violation has occurred. [District Rule 2080] Federally Enforceable Through Title V Permit
82. Performance testing to demonstrate compliance with permit conditions shall be conducted annually (at least every calendar year but no later than 12 months from previous performance testing). The main exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples using approved test methods. [District Rules 1081 - 3.0, 4.0, 4352 - 6.2.1 & PSD SJ 86-03] Federally Enforceable Through Title V Permit
83. All emission measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in this Permit to Operate. [District Rule 4352] Federally Enforceable Through Title V Permit
84. No compliance determination shall be established within two hours after a period in which fuel flow to the unit is zero, or is shut off for 30 minutes or longer. [District Rule 4352] Federally Enforceable Through Title V Permit

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85. Performance testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any performance test, and a test plan must be submitted for approval 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
86. The results of each performance test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
87. Performance tests shall include a test of both combustion unit exhausts following the baghouse for the following parameters, corrected to 12% CO<sub>2</sub> on a dry basis: Oxides of nitrogen emissions; Total hydrocarbons, as methane; Carbon monoxide; Sulfur dioxide; Concentrations of gaseous ammonia (NH<sub>3</sub>); and Exhaust flow rate, wet and dry. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
88. Performance tests shall include: Total particulate matter emission concentration corrected to 12% CO<sub>2</sub> and shall be conducted including the condensable portion in the "back half"; and Filterable particulate matter emission concentration corrected to 12% CO<sub>2</sub> and shall be conducted including only "front-half". If the measured Filterable particulate matter emission concentration is greater than 0.008 gr/dscf, corrected to 12% CO<sub>2</sub>, testing shall be conducted to verify compliance with condition 32. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
89. Performance tests shall include a test of both combustion unit exhausts following the baghouse for the following parameters, corrected to 12% CO<sub>2</sub> on a dry basis: Polynuclear aromatic hydrocarbons (Benzo-A-Pyrene, Benzo-E-Pyrene, Benzo-A-Anthracene, and Coronene and PCB); and Dioxins and Furans. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
90. The following Dioxin isomers & homologues shall be measured in both the combustion unit exhausts: 2,3,7,8 tetra CDD; total tetra CDD; 1,2,3,7,8 penta CDD; total penta CDD; 1,2,3,4,7,8 hexa CDD; 1,2,3,6,7,8 hexa CDD; 1,2,3,7,8,9 hexa CDD; total hexa CDD; 1,2,3,4,6,7,8 hepta CDD; total hepta CDD; total octa CDD. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
91. The following Furan isomers & homologues shall be measured in both the combustion unit exhausts: 2,3,7,8 tetra CDF; total tetra CDF; 1,2,3,7,8 penta CDF; 2,3,4,7,8 penta CDF; total penta CDF; 1,2,3,4,7,8 hexa CDF; 1,2,3,6,7,8 hexa CDF; 1,2,3,7,8,9 hexa CDF; 2,3,4,6,7,8 hexa CDF; total hexa CDF; 1,2,3,4,6,7,8 hepta CDF; 1,2,3,4,7,8,9 hepta CDF; total hepta CDF; total octa CDF. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
92. The facility may elect to alternate Dioxin/Furan testing on each stack, if the previous two years indicate Dioxin/Furan emissions levels are less than or equal to 15 ng/dscm total mass, corrected to 12% CO<sub>2</sub>. [40 CFR 60.38b and District Rule 4102] Federally Enforceable Through Title V Permit
93. Performance tests of both combustion unit exhausts shall be performed for HCl, corrected to 12% CO<sub>2</sub> on a dry basis, and for the following heavy metals, corrected to 12% CO<sub>2</sub> on a dry basis: Antimony, Arsenic, Beryllium, Cadmium, Total Chromium (5% of the total chromium shall be considered to be hexavalent chromium), Copper, Lead, Manganese, Mercury, Nickel, Selenium, Vanadium, and Zinc. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
94. A performance test of both combustion unit exhausts shall be performed for HF, corrected to 12% CO<sub>2</sub> on a dry basis. [District Rule 4102]
95. Cooling tower drift shall not exceed 0.005 percent of the circulating water flow or a maximum annual drift emission rate of 1,090,000 kg/year as demonstrated by design calculations. Chromium compounds shall not be used as an additive in the cooling tower water. [District Rule 4102 and 40 CFR 63 Subpart Q] Federally Enforceable Through Title V Permit
96. Soot blowers or super heater rappers shall be operated in a mode consistent with normal cleaning requirements of the system during the performance tests. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
97. The facility shall submit an annual report in accordance with 40 CFR 60.59b(g) by February 1 of each year following the calendar year in which the data were collected. [40 CFR 60.39b] Federally Enforceable Through Title V Permit
98. The facility shall submit semiannual reports within 31 days following the end of each 6 month period in accordance with 40 CFR 60.59b(h). [40 CFR 60.39b] Federally Enforceable Through Title V Permit

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99. A monthly report summarizing the quantity of pollutant emissions of SO<sub>2</sub>, NO<sub>x</sub>, and CO, based on data from the CEM system, shall be included in the information required by following condition. Copies of the monthly reports prepared pursuant to this condition shall be sent to the district office by the 15th day of the following month. For all pollutants monitored by the CEM system which require correction or adjustment of the raw values reported by the CEM system for flue gas diluent concentrations, a diluent cap equivalent to a minimum carbon dioxide (CO<sub>2</sub>) concentration of 5 percent (%) or a maximum oxygen (O<sub>2</sub>) concentration of 14% shall be applied for purposes of demonstrating compliance with all limits on emissions of such pollutants during any period of startup, shutdown, or malfunction, including, but not limited to, a loss of boiler water level control or loss of combustion air control. Permittee shall identify all periods during which a diluent cap has been applied in the monthly reports submitted pursuant to this condition [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
100. Permittee shall maintain a complete file containing all measurements, records, required monitoring data and support information. Support information includes copies of all reports required by this permit and for continuous monitoring instrumentation, and all calibration and maintenance records. This file shall include, but not be limited to: (a) Data collected from in-stack monitoring instruments; (b) Input rate records for all fuels burned; (c) Purchase records that indicate the sulfur content, by weight, of all fuel oil #2 purchased; (d) Results of all source tests; (e) All other air pollution system performance evaluations and records of calibration checks, calibration gas cylinder changes, adjustments and maintenance performed on all equipment (including CEM adjustment or maintenance). [District Rule 1070, 4.0 & PSD SJ 86-03] Federally Enforceable Through Title V Permit
101. Records shall be kept for each unit with the following: (a) Specific time of operation of each combustion unit; (b) Specific time of operation of the auxiliary burners; (c) Equipment breakdowns or malfunctions; (d) Exceedances of emission standards. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
102. The permittee shall follow all written maintenance procedures and schedules for the following: all emissions control equipment, combustion units, and monitoring equipment for measuring emission levels. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
103. Operating and maintenance manuals, subject to District review, shall be provided for the equipment covered by this permit. The permittee's operators shall be trained in the operation and maintenance of both fuel burning and pollution control equipment. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
104. If the Fuel Oil #2 is Air Resources Board regulated diesel fuel, with a supplier certified sulfur content less than 0.25% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
105. If the Fuel Oil #2 is non-certified for sulfur content of less than 0.25% by weight, then the owner or operator shall determine the sulfur content of each delivery of Fuel Oil being fired. The sulfur content shall be determined using ASTM method D 2880. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
106. Permittee shall provide access to all sampling ports and platforms on boiler exhaust stacks in accordance with 40 CFR 60.8(e) and District Rule 1081 (as amended 12/16/93). [District Rule 1081, 3.3; & PSD SJ 86-03] Federally Enforceable Through Title V Permit
107. The SO<sub>2</sub> emissions from both combustion units shall be more stringent of 35.6 lb/hr or 42 ppm, dry, corrected to 12% CO<sub>2</sub>, averaged over three hour period and more stringent of 33.3 lb/hr or 40 ppm, dry, corrected to 12% CO<sub>2</sub>, averaged over a 24 hour period. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
108. The NO<sub>x</sub> emissions from both combustion units shall be more stringent of 107 lb/hr or 175 ppm, dry, corrected to 12% CO<sub>2</sub>, averaged over three hour period and more stringent of 100 lb/hr or 165 ppm, dry, corrected to 12% CO<sub>2</sub>, averaged over a 24 hour period. [PSD SJ 86-03 and Rule 4352] Federally Enforceable Through Title V Permit
109. The CO emissions from both combustion units shall be 33.3 lb/hr or 400 ppm, dry, corrected to 12% CO<sub>2</sub> (3-hour average). [PSD SJ 86-03] Federally Enforceable Through Title V Permit
110. The Mercury emissions from both combustion units shall not exceed 0.083 lb/hr (3-hour average) as measured by EPA Method 101. Upon EPA approval of a change to the facility PSD permit allowing Method 29 to be used in place of Method 101, Method 29 may be used to measure Mercury emissions. (40 CFR Part 61, Appendix B). [PSD SJ 86-03] Federally Enforceable Through Title V Permit

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111. Permittee shall submit a written report of all excess emissions to EPA (Attn: A-3-3) for every calendar quarter. The report shall include the following: (a) the magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions. (b) Specific identification of each time period of excess emissions that occurs during startups, shutdowns, and malfunctions of furnace/boiler system. The nature and cause of malfunction (if known) and corrective action taken or preventive measures adopted shall be reported. (c) The date and time identifying each period during which continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs and adjustments. (d) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in report. (e) Excess emissions shall be defined as any three-hour period during which the average emissions of NO<sub>x</sub>, SO<sub>2</sub>, and/or CO, as measured by continuous monitoring system exceeds the NO<sub>x</sub>, SO<sub>2</sub>, and/or CO emission limit set for each of the pollutants. (f) Excess emissions indicated by the CEM system shall be considered violations of the applicable emission limit for purposes of PSD permit. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
112. The calculation of annual emissions shall commence with the submission of the first fourth-quarter report, and will continue to be calculated and submitted with each successive quarterly report. The quarterly reports shall contain highest annual emissions computed for each week in the quarter, as well as all excesses of the annual emissions limits. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
113. Permittee shall meet all applicable requirements of Subparts A, Db, and E of 40 CFR 60. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
114. Permittee shall comply with following activated carbon mass feed requirements: (1) During the initial performance test and each subsequent performance test for dioxins/furans and mercury, as applicable, the permittee shall calculate and record an average carbon mass feed rate in pounds per hour being employed based on load cell measurements of carbon feed during the test; (2) During operation of the facility, the carbon injection mass feed rate must be measured using load cells, calculated and recorded on an eight (8) hour block average basis, and must equal or exceed the level(s) documented during the most recent performance tests for dioxins/furans and mercury. When calculating the eight (8) hour block average, exclude the hours when the combustion unit is not operational and include the hours when the combustion unit is operating but the carbon feed system is not working properly. [40 CFR 60.38b & 40 CFR 60.58b(m)(1), (2)] Federally Enforceable Through Title V Permit
115. The permittee shall estimate the total carbon usage of the plant (kilograms or pounds) for each calendar quarter by two independent methods, according to the following procedures: (1) The weight of carbon delivered to the plant. (2) The permittee shall estimate the average carbon mass feed rate for each during the operation of each combustion unit, and sum the results for both units at the plant for the total number of hours of operation during the calendar quarter. [40 CFR 60.38b & 40 CFR 60.58b(m)] Federally Enforceable Through Title V Permit
116. Should additional guidance related to the June 3, 1986 PSD remand, applicable to PSD permit action, be developed, the Permittee shall provide to EPA any such analysis, data, or demonstration of compliance with the other requirements within the time required by the guidance. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
117. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in Section VIII of these conditions. In addition, the Regional Administrator shall be notified in writing within fifteen (15) days of any such failure. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under Section IX of these conditions, and the methods utilized to restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violations of this permit or of any law or regulations which such malfunction may cause. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
118. Facility shall operate only when a fully certified chief facility operator or fully certified shift supervisor is on duty, except as allowed under 40 CFR 60.54b(c)(2). [40 CFR 60.35b] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

119. All chief facility operators, shift supervisors, and control room operators shall have completed the EPA or State municipal waste combustor operator training course. [40 CFR 60.35b] Federally Enforceable Through Title V Permit
120. Owner or operator shall conduct a performance test for opacity on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test, and must complete five performance tests in each 5-year calendar period) using EPA Method 9 and the average of three test runs to determine compliance. [40 CFR 60.38b] Federally Enforceable Through Title V Permit
121. Permittee shall establish parameters for the differential pressure across the baghouse filter, which provides a reasonable assurance of ongoing compliance with emission limitations stated in this permit. The initial parameters shall be established using manufacturer/supplier recommendations and by correlating with opacity readings and source test results. These parameters shall be reviewed annually and revised if necessary based on PM10 source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR Part 64] Federally Enforceable Through Title V Permit
122. The baghouse differential operating pressure shall be monitored and recorded on each day the solid waste combustors/boilers operate. The permittee shall compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
123. 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
124. If the District or EPA determine that a Quality improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
125. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9 [40 CFR Part 64] Federally Enforceable Through Title V Permit
126. During any 96-hour periods of startup or 12-hour periods of shutdown, the facility shall be exempt from emission limits identified in this permit which are based upon District Rule 4352. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shutdown. [District Rule 4352] Federally Enforceable Through Title V Permit
127. Upon detecting any excursion from the 10% opacity limit, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR Part 64] Federally Enforceable Through Title V Permit
128. The baghouse shall operate at all times with a minimum differential pressure of 2 inches water column and a maximum differential pressure of 10 inches water column [40 CFR Part 64] Federally Enforceable Through Title V Permit
129. The baghouse differential operating pressure shall be monitored and recorded on each day the solid waste combustors/boilers operate. The permittee shall compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR Part 64] Federally Enforceable Through Title V Permit
130. Each time SO<sub>2</sub> emissions from each combustion unit exceeds 30 ppmv, dry, corrected to 12% CO<sub>2</sub>, based on an eight-hour rolling average, facility shall demonstrate that SO<sub>2</sub> removal efficiency is at least 80% as measured by EPA Methods 1-4 and 6C, based on the measurement of the inlet and outlet SO<sub>2</sub> concentrations. [40 CFR Part 64] 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.

131. A permit shield is granted from 40 CFR 60 Subpart Db (2/27/14) requirements for these units because the combustors are exempt from the requirements of Subpart Db since the facility meets the applicability requirements and is subject to an EPA approved State Section 111(d)/129 plan implementing 40 CFR 60 Subpart Db. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
132. A permit shield is granted from 40 CFR 60 Subpart Dc requirements for these units because the units are rated greater than 100 MMBtu/hr and thus don't meet the applicability criteria of Subpart Dc. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
133. A permit shield is granted from District Rule 4305 (8/21/03) requirements since section 4.1.1 of this rule exempts solid fuel fired units. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
134. A permit shield is granted from District Rule 4351 (8/21/03) requirements since section 4.1.2 of this rule exempts solid fuel fired units. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
135. Compliance with the permit conditions in this permit shall be deemed compliance with the requirements of District Rule 4352 (12/15/11). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
136. A permit shield is granted from District Rule 4802 (12/17/92) requirements since the combustors do not meet the definition of sulfuric acid production units. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
137. A permit shield is granted from District Rule 7012 (12/17/92) requirements since the use of cooling water additives containing hexavalent chromium is prohibited. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2073-4-2

**EXPIRATION DATE:** 10/31/2021

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

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# ATTACHMENT B

Previous Title V Operating Permit

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# *San Joaquin Valley*

## *Air Pollution Control District*

**FACILITY:** N-2073-0-3

**EXPIRATION DATE:** 10/31/2021

### **FACILITY-WIDE REQUIREMENTS**

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; Stanislaus County Rule 110; and PSD SJ 86-03] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; Stanislaus County Rule 110; and PSD SJ 86-03] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: COVANTA STANISLAUS, INC  
Location: 4040 FINK RD, CROWS LANDING, CA 95313  
N-2073-0-3 : Dec 10 2021 8:52AM -- KAHOLONJ



10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101 and Stanislaus County Rule 401] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. In the event of changes in control or ownership, this Operating Permit shall be binding on new owners and operators. The applicant shall notify successor of the existence of this Operating Permit and its conditions in writing and forward a copy to the District, California Air Resources Board, and EPA. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
42. The applicant shall construct and operate the facility in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable Federal, State and District air quality regulations. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
43. All correspondence as required by this Operating Permit shall be forwarded to: the District; Director, Air & Toxics Div. (Attn: A-3-3), EPA Region 9, 75 Hawthorne St. San Francisco, CA 94105; and Director, Stationary Source Div., CARB, Box 2815, Sacramento, CA 95812. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
44. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
45. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
46. Compliance with permit conditions in the Title V permit shall be deemed compliance with following applicable requirements: 40 CFR 82 Subparts A, B, C, D, E and F. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
47. A permit shield from the requirements of District Rule 4106 (6/11/2001) is granted since this facility does not perform prescribed burning nor does the facility perform hazard reduction burning in a wildland orurban interface. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
48. A permit shield from the requirements of District Rule 4204 (2/17/05) is granted since this facility does not meet the definition of a cotton ginning facility. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

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

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

# *San Joaquin Valley*

## *Air Pollution Control District*

**PERMIT UNIT:** N-2073-1-18

**EXPIRATION DATE:** 10/31/2021

**EQUIPMENT DESCRIPTION:**

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

### **PERMIT UNIT REQUIREMENTS**

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

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10. The ash shall be handled in such a manner as to mitigate fugitive emissions to the maximum extent possible. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rules 2520, 9.3.2 and NSR] Federally Enforceable Through Title V Permit
11. The facility shall not cause visible emissions from ash conveying systems, including transfer points, in excess of 5% of the observation period, as determined by performing EPA Method 22 on a quarterly basis. Fugitive ash emissions do not include emissions within a building, an enclosed ash conveyor, or during periods of maintenance and repair of the ash conveyor systems. [40 CFR 60.36b] Federally Enforceable Through Title V Permit
12. Fuel Oil #2, with a sulfur content not to exceed 0.25% by weight, may be used as necessary to maintain the minimum combustion zone temperature requirements and annual usage shall not exceed 1,108,321 gallons for each combustor. [District NSR Rule, 40 CFR 60. 44b(c) & PSD SJ 86-03] Federally Enforceable Through Title V Permit
13. A furnace roof temperature of 1,100 degrees F shall be stabilized, as measured by multiple thermocouples, to ensure that a minimum temperature of 1,800 degrees F is established above the grate prior to the ignition of MSW. [District NSR Rule] Federally Enforceable Through Title V Permit
14. During any period of time that MSW is burning on the grates, the combustion gas retention time shall be maintained at a minimum of one second, the combustion zone temperature shall be maintained at a minimum of 1,800 degrees F, and the furnace roof temperature shall be maintained at an average (4 hour arithmetic block) of 1,100 degrees F, except during periods of start-up, shutdown, and malfunction, as defined in 40 CFR 60.58b(a). [District NSR Rule] Federally Enforceable Through Title V Permit
15. Hazardous materials shall not be burned in this equipment. Hazardous materials are that portion of solid waste which, by reason of its composition or characteristics, is: (a) hazardous waste as defined in the Solid Waste Disposal Act, 42 USC section 6901 et. seq., and the regulations thereunder, the California Health & Safety Code, Div. 20, Chs. 6.5, 6.7, and 6.8 (section 25100 et. seq.), the California Code of Regulations, Title 22, Div. 4.5, and any similar or substituted legislation or regulations or amendments to the foregoing; (b) any other materials which any governmental agency or unit having appropriate jurisdiction shall determine from time to time is harmful, toxic, or dangerous, or otherwise ineligible for disposal through the facility; and (c) any material, other than residential or commercial solid waste of the type historically collected by the County and the City as acceptable for disposal into non-hazardous waste landfills, which would result in process residue being hazardous waste under (a) or (b) above. [District Rule 4102]
16. Hazardous waste, as defined in 40 CFR 261.3, shall not be combusted by the municipal solid waste combustors. [40 CFR 63 Subpart EEE] Federally Enforceable Through Title V Permit
17. The facility shall develop and annually update a site-specific operating manual in accordance with 40 CFR 60.54b(e). [40 CFR 60.35b] Federally Enforceable Through Title V Permit
18. Each operator and all maintenance personnel shall receive initial and annual training on the site-specific operating manual in accordance with 40 CFR 60.54b(f). [40 CFR 60.35b] Federally Enforceable Through Title V Permit
19. The site-specific operating manual and operating manual training records shall be accessible to all operations and maintenance personnel and shall be made available to the enforcement agency upon request. [40 CFR 60.35b] Federally Enforceable Through Title V Permit
20. The District reserves the right to require the permittee to re-evaluate the health risk assessment if there is a significant change in population locations as projected in the currently approved health risk assessment, or new health data becomes available. [District Rule 4102]
21. During any 3-hour periods of startup, shutdown, and malfunction, the facility shall be exempt from emission limits identified in this permit which are based upon 40 CFR 60 Subpart Cb or Subpart Eb. This exemption shall not apply to CO emission limits of 40 CFR 60.53b(a) if the malfunction is a loss of boiler water level control. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Opacity exhibited by the gases discharged to the atmosphere from each combustion unit, other than water vapor, shall not exceed 10 percent based on a six minute average as measured by EPA Method 9. [40 CFR 60.33b and 40 CFR Part 64] Federally Enforceable Through Title V Permit

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23. The carbon monoxide (CO) emissions from each combustion unit shall not exceed 100 ppmv, dry, corrected to 7% O<sub>2</sub>, as measured utilizing EPA Methods 1-4 and 10. Compliance with this limit shall be determined based on a four hour block arithmetic average as defined in 40 CFR 60.51b. [District Rule 4352 and 40 CFR 60.34b] Federally Enforceable Through Title V Permit
24. The NO<sub>x</sub> emissions from each combustion unit shall not exceed 200 ppmv, dry, corrected to 12% CO<sub>2</sub> as measured by EPA Methods 1-4 and 7E. Compliance with this limit shall be determined based on an eight rolling hour average. [District NSR Rule, District Rule 4352, and 40 CFR 60.33b] Federally Enforceable Through Title V Permit
25. Either the SO<sub>2</sub> emissions from each combustion unit shall not exceed 30 ppmv, dry, corrected to 12% CO<sub>2</sub>, based on an eight hour rolling average, or the SO<sub>2</sub> removal efficiency shall be at least 80% as measured by EPA Methods 1-4 and 6C. The SO<sub>2</sub> 80% removal efficiency shall be based on the measurement of the inlet and outlet SO<sub>2</sub> concentrations, corrected to 12% CO<sub>2</sub>. [District NSR Rule] Federally Enforceable Through Title V Permit
26. The SO<sub>2</sub> emissions from each combustion unit shall not exceed 29 ppmv, dry, corrected to 12% CO<sub>2</sub>, or the SO<sub>2</sub> removal efficiency shall be at least 75% (by weight or volume), whichever is less stringent as measured by EPA Methods 1-4 and 6C. Compliance with this limit shall be determined based on a 24-hour daily geometric mean. EPA method 19 shall be used to calculate the daily geometric average sulfur dioxide emission concentration and removal efficiency. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
27. Particulate matter emissions from each combustion unit shall not exceed 0.0275 gr/dscf, corrected to 12% CO<sub>2</sub>, as measured by EPA Methods 1 through 5, including the condensable portion in the "back-half". [District Rule 4201 and District NSR Rule] Federally Enforceable Through Title V Permit
28. Filterable particulate matter (i.e. front half) emissions from each combustion unit shall not exceed any of the following emission limits: 0.011 gr/dscf, corrected to 12% CO<sub>2</sub>; 25 milligrams/dscf, corrected to 7% O<sub>2</sub>; 0.10 lb/MMBtu heat input. Owner or operator shall conduct a performance test for particulate matter on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test, and must complete five performance tests in each 5-year calendar period) with EPA Method 1; EPA Method 3, 3A, or 3B; and EPA Method 5. The minimum sample volume shall be 1.7 cubic meters. The probe and filter holder heating systems in the sample train shall be set to provide a gas temperature no greater than 160 degrees C. An oxygen or carbon dioxide measurement shall be obtained simultaneously with each Method 5 run. [District NSR Rule, 40 CFR 60.33b, 40 CFR 60.38b, and 40 CFR 60.43b(d)(1)] Federally Enforceable Through Title V Permit
29. Filterable particulate matter emissions from each combustion unit shall not exceed 0.008 gr/dscf, corrected to 12% CO<sub>2</sub>, for the fraction of particles less than 2 $\mu$  in diameter, as measured by Andersen Cascade Impactor, Flow Sensor Multiclone or any other equivalent measurement as validated by EPA Method 301. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Each combustion unit shall only be allowed to emit half of the total allowable (mass) emission rate for each pollutant. [District NSR Rule] Federally Enforceable Through Title V Permit
31. The CO emissions shall not exceed 800 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
32. The CO emissions shall not exceed 121.9 tons/yr. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
33. The NO<sub>x</sub> emissions shall not exceed 2,260 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
34. The NO<sub>x</sub> emissions shall not exceed 344.4 tons/year. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
35. The SO<sub>2</sub> emissions shall not exceed 800 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit

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36. The SO<sub>2</sub> emissions shall not exceed 121.9 tons/year. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
37. The PM emissions shall not exceed 475 pounds in any one day. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E=3.59 \times P^{0.62}$  if P is less than or equal to 30 tons per hour, or  $E=17.37 \times P^{0.16}$  if P is greater than 30 tons per hour. Particulate emissions shall be no more than 0.1 lbs per 100 lbs of combustible refuse charged. [District Rules NSR, 4202, and 4203, 4.3] Federally Enforceable Through Title V Permit
38. Permittee shall not discharge into the atmosphere, from either combustor, any particles which are individually large enough to be visible while suspended in the atmosphere. [District Rule 4203]
39. The PM emissions shall not exceed 72.4 tons/year. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District NSR Rule] Federally Enforceable Through Title V Permit
40. The combined post-control PM<sub>10</sub> emissions from the combustion units shall not exceed 70 ton/yr. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
41. Emissions of combustion contaminants from each fuel burning equipment unit shall not exceed 0.1 gr/dscf, corrected to 12% CO<sub>2</sub>, and 10 lb/hr. Combustion contaminants are defined as total PM (filterable plus condensable) minus the ammonium salts (e.g. ammonium chloride, ammonium sulfate, ammonium bisulfate, etc.) present in the condensable PM fraction. A "fuel burning equipment unit" is the minimum number of fuel burning equipment required to operate simultaneously for the production of useful heat. Compliance with this emission limit shall be demonstrated annually by source test conducted according to EPA Methods 5 and 202 (or other APCO approved methods). Ammonium salts in the condensable PM fraction shall be determined by analysis of the condensable PM fraction by ion chromatography (or other APCO approved method). [District Rule 4301] Federally Enforceable Through Title V Permit
42. The THC emissions shall not exceed 96 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
43. The THC emissions shall not exceed 14.6 tons/year. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District NSR Rule] Federally Enforceable Through Title V Permit
44. The THC emissions (as CH<sub>4</sub>) from each combustion unit shall not exceed 70 ppmv, dry, corrected to 12% CO<sub>2</sub> as measured by EPA Methods 1-4 and 25A. [District NSR Rule] Federally Enforceable Through Title V Permit
45. Ammonia (NH<sub>3</sub>) breakthrough of the exhaust shall not exceed 50 ppmv, dry, as measured by BAAQMD Method ST-1B. The facility shall be exempt from this condition for periods of start-up, shutdown, and malfunction as defined in 40 CFR 60.58b(a). [District Rule 4102]
46. The Antimony emissions from each combustion unit shall not exceed 0.0315 g/s as measured by CARB Method 436. [District Rule 4102]
47. The Arsenic emissions from each combustion unit shall not exceed 0.0005 g/s as measured by CARB Method 436. [District Rule 4102]
48. The Beryllium emissions from each combustion unit shall not exceed 0.00005 g/s as measured by CARB Method 436. [District Rule 4102]
49. The Cadmium emissions from each combustion unit shall not exceed either of the following: 0.0013 g/s; 0.035 milligrams/dscf, corrected to 7% O<sub>2</sub>; each as measured by EPA Methods 1, 3, and 29 [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
50. The Chromium +6 emissions from each combustion unit shall not exceed 0.00005 g/s as measured by CARB Method 436 (5% of the total chromium shall be considered to be hexavalent chromium). [District Rule 4102]
51. The Copper emissions from each combustion unit shall not exceed 0.155 g/s as measured by CARB Method 436. [District Rule 4102]

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52. The Dioxin/Furan emissions from each combustion unit shall not exceed 30 ng/dscm (total mass), corrected to 7% O<sub>2</sub>, as measured by EPA Method 23. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
53. The Dioxin/Furan emissions from each combustion unit shall not exceed 50 ng/s, based on the Department of Health Services toxic equivalent calculation. [District Rule 4102]
54. The Hydrogen Fluoride (HF) emissions from each combustion unit shall not exceed 0.05 g/s as measured by EPA Method 26. [District Rule 4102]
55. The Hydrogen Chloride (HCl) emissions from each combustion unit shall not exceed either of the following: 1.4 g/s; 29 ppmv or the HCl removal efficiency shall be at least 95% (by weight or volume), whichever is less stringent, corrected to 7% O<sub>2</sub>; each as measured by EPA Method 26. [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
56. The Lead emissions from each combustion unit shall not exceed either of the following: 0.014 g/s; 0.400 milligrams/dscf, corrected to 7% O<sub>2</sub>; each as measured by EPA Methods 1, 3, and 29. [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
57. The Manganese emissions from each combustion unit shall not exceed 0.055 g/s as measured by CARB Method 436. [District Rule 4102]
58. The Mercury emissions from each combustion unit shall not exceed 0.050 mg/dscm, corrected to 7% O<sub>2</sub>, or the mercury removal efficiency shall be at least 85% by weight, whichever is less stringent, as measured by EPA Methods 1, 3, and 29. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
59. The Mercury emissions from each combustion unit shall not exceed 0.0025 g/s (3-hour average). [PSD ATC SJ 86-03 and District Rule 4102] Federally Enforceable Through Title V Permit
60. The Nickel emissions from each combustion unit shall not exceed 0.025 g/s as measured by CARB Method 436. [District Rule 4102]
61. The Selenium emissions from each combustion unit shall not exceed 0.055 g/s as measured by CARB Method 436. [District Rule 4102]
62. The Vanadium emissions from each combustion unit shall not exceed 0.15 g/s as measured by CARB Method 436. [District Rule 4102]
63. The Zinc emissions from each combustion unit shall not exceed 0.315 g/s as measured by CARB Method 436. [District Rule 4102]
64. The mass emission rates shall be calculated from the hourly stack concentrations and the volumetric flow rate using municipal solid waste Carbon Dioxide based F-factor of 1820 dscf/MMBtu (EPA Method 19, Table 19-2). [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
65. The total steam generated from each boiler shall not exceed 110% of the maximum demonstrated combustion unit load achieved in the most recent Dioxin/Furan performance test, as defined in 40 CFR 60.51b. [40 CFR 60.34b(b)] Federally Enforceable Through Title V Permit
66. The maximum flue gas temperature, measured at the particulate matter control device inlet from each boiler, shall not be higher than 17 deg. C (31 deg. F) above the maximum demonstrated particulate matter control device temperature as defined in 40 CFR 60.51b. [40 CFR 60.34b(b)] Federally Enforceable Through Title V Permit
67. The steam load and particulate matter control device inlet flue gas temperature limitations shall apply at all times except during the annual Dioxin/Furan performance test, the two weeks preceding the annual Dioxin/Furan performance test, and when the facility obtains a waiver in accordance with permission granted by the Administrator or the Air Pollution Control Officer. [40 CFR 60.53b(b)] Federally Enforceable Through Title V Permit
68. The ammonia (NH<sub>3</sub>) injection rate shall be measured and recorded continuously. [District NSR Rule] Federally Enforceable Through Title V Permit

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69. For the purpose of demonstrating compliance with NO<sub>x</sub>, SO<sub>x</sub> and CO emissions limits using CEMS data, at least 75% of hourly averages comprising the applicable averaging period must be valid, as defined in 40 CFR 60.13. [District Rule 2080] Federally Enforceable Through Title V Permit
70. The facility may install, calibrate, maintain, and operate a backup CEM to monitor NO<sub>x</sub>, SO<sub>2</sub>, CO and CO<sub>2</sub> in accordance with 40 CFR 60.58b and Appendices B and F. Permittee shall identify all periods during which backup CEMS data has been used in the monthly report submitted pursuant to condition 101 of this permit. [District Rule 1080] Federally Enforceable Through Title V Permit
71. The facility shall install, calibrate, maintain, and operate a carbon dioxide CEM at the economizer and stack locations of each combustion unit, in accordance with 40 CFR 60.58b(b) and Appendices B and F. [40 CFR 60.38b and District Rule 4352] Federally Enforceable Through Title V Permit
72. The facility shall install, calibrate, maintain, and operate a continuous opacity monitoring system in accordance with 40 CFR 60.13 and Appendix B. [40 CFR 60.38b and 40 CFR Part 64] Federally Enforceable Through Title V Permit
73. The facility shall install, calibrate, maintain, and operate a sulfur dioxide CEM at the stack locations in accordance with 40 CFR 60.58b(e) and Appendices B and F. [40 CFR 60.38b] Federally Enforceable Through Title V Permit
74. The facility shall install, calibrate, maintain, and operate a nitrogen oxides CEM at the stack locations in accordance with 40 CFR 60.58b(h) and Appendices B and F. [40 CFR 60.38b and District Rule 4352] Federally Enforceable Through Title V Permit
75. The facility shall install, calibrate, maintain, and operate a carbon monoxide CEM at the stack locations in accordance with 40 CFR 60.58b(i) and Appendices B and F. [40 CFR 60.38b] Federally Enforceable Through Title V Permit
76. The facility shall install, calibrate, maintain, and operate a continuous steam flow monitoring and recording device and a device to measure temperature at the inlet of each particulate matter control device in accordance with 40 CFR 60.58b(i). [40 CFR 60.38b] Federally Enforceable Through Title V Permit
77. The permittee shall be responsible for providing the District access, via telemetry, to the stored computerized data associated with the continuous emission monitoring system. [District Rule 1080, 7.0] Federally Enforceable Through Title V Permit
78. Continuous monitoring and recording equipment shall be provided for the following: No. 2 fuel oil burning rate and temperature. Each combustion unit shall have sufficient monitors to demonstrate combustion unit temperature profile as required in condition 13 and flue gas temperature into the particulate matter control device as required by condition 64. [District Rule 1080, 7.0] Federally Enforceable Through Title V Permit
79. In the event that monitoring or test data show that emissions from the facility exceed any emission limitation conditions of this Permit to Operate, the permittee shall take immediate corrective action to bring the plant's emissions within these limitations. [District NSR Rule] Federally Enforceable Through Title V Permit
80. Emissions in excess of those allowed by this permit shall be cause for the District to order an immediate reduction in fuel feed rate or to take other appropriate abatement action. [District Rule 2080] Federally Enforceable Through Title V Permit
81. The permittee shall notify the District of any emission violation by the next working day after such violation has occurred. [District Rule 2080] Federally Enforceable Through Title V Permit
82. Performance testing to demonstrate compliance with permit conditions shall be conducted annually (at least every calendar year but no later than 12 months from previous performance testing). The main exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples using approved test methods. [District Rule 1081, 3.0, 4.0 & PSD SJ 86-03] Federally Enforceable Through Title V Permit
83. All emission measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in this Permit to Operate. [District Rule 4352] Federally Enforceable Through Title V Permit
84. No compliance determination shall be established within two hours after a period in which fuel flow to the unit is zero, or is shut off for 30 minutes or longer. [District Rule 4352] Federally Enforceable Through Title V Permit

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85. Performance testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any performance test, and a test plan must be submitted for approval 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
86. The results of each performance test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
87. Performance tests shall include a test of both combustion unit exhausts following the baghouse for the following parameters, corrected to 12% CO<sub>2</sub> on a dry basis: Oxides of nitrogen emissions; Total hydrocarbons, as methane; Carbon monoxide; Sulfur dioxide; Concentrations of gaseous ammonia (NH<sub>3</sub>); and Exhaust flow rate, wet and dry. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
88. Performance tests shall include: Total particulate matter emission concentration corrected to 12% CO<sub>2</sub> and shall be conducted including the condensable portion in the "back half"; and Filterable particulate matter emission concentration corrected to 12% CO<sub>2</sub> and shall be conducted including only "front-half". If the measured Filterable particulate matter emission concentration is greater than 0.008 gr/dscf, corrected to 12% CO<sub>2</sub>, testing shall be conducted to verify compliance with condition 31. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
89. Performance tests shall include a test of both combustion unit exhausts following the baghouse for the following parameters, corrected to 12% CO<sub>2</sub> on a dry basis: Polynuclear aromatic hydrocarbons (Benzo-A-Pyrene, Benzo-E-Pyrene, Benzo-A-Anthracene, and Coronene and PCB); and Dioxins and Furans. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
90. The following Dioxin isomers & homologues shall be measured in both the combustion unit exhausts: 2,3,7,8 tetra CDD; total tetra CDD; 1,2,3,7,8 penta CDD; total penta CDD; 1,2,3,4,7,8 hexa CDD; 1,2,3,6,7,8 hexa CDD; 1,2,3,7,8,9 hexa CDD; total hexa CDD; 1,2,3,4,6,7,8 hepta CDD; total hepta CDD; total octa CDD. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
91. The following Furan isomers & homologues shall be measured in both the combustion unit exhausts: 2,3,7,8 tetra CDF; total tetra CDF; 1,2,3,7,8 penta CDF; 2,3,4,7,8 penta CDF; total penta CDF; 1,2,3,4,7,8 hexa CDF; 1,2,3,6,7,8 hexa CDF; 1,2,3,7,8,9 hexa CDF; 2,3,4,6,7,8 hexa CDF; total hexa CDF; 1,2,3,4,6,7,8 hepta CDF; 1,2,3,4,7,8,9 hepta CDF; total hepta CDF; total octa CDF. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
92. The facility may elect to alternate Dioxin/Furan testing on each stack, if the previous two years indicate Dioxin/Furan emissions levels are less than or equal to 15 ng/dscm total mass, corrected to 12% CO<sub>2</sub>. [40 CFR 60.38b and District Rule 4102] Federally Enforceable Through Title V Permit
93. Performance tests of both combustion unit exhausts shall be performed for HCl, corrected to 12% CO<sub>2</sub> on a dry basis, and for the following heavy metals, corrected to 12% CO<sub>2</sub> on a dry basis: Antimony, Arsenic, Beryllium, Cadmium, Total Chromium (5% of the total chromium shall be considered to be hexavalent chromium), Copper, Lead, Manganese, Mercury, Nickel, Selenium, Vanadium, and Zinc. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
94. A performance test of both combustion unit exhausts shall be performed for HF, corrected to 12% CO<sub>2</sub> on a dry basis. [District Rule 4102]
95. Cooling tower drift shall not exceed 0.005 percent of the circulating water flow or a maximum annual drift emission rate of 1,090,000 kg/year as demonstrated by design calculations. Chromium compounds shall not be used as an additive in the cooling tower water. [District Rule 4102 and 40 CFR 63 Subpart Q] Federally Enforceable Through Title V Permit
96. Soot blowers or super heater rappers shall be operated in a mode consistent with normal cleaning requirements of the system during the performance tests. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
97. The facility shall submit an annual report in accordance with 40 CFR 60.59b(g) by February 1 of each year following the calendar year in which the data were collected. [40 CFR 60.39b] Federally Enforceable Through Title V Permit
98. The facility shall submit semiannual reports within 31 days following the end of each 6 month period in accordance with 40 CFR 60.59b(h). [40 CFR 60.39b] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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99. A monthly report summarizing the quantity of pollutant emissions of SO<sub>2</sub>, NO<sub>x</sub>, and CO, based on data from the CEM system, shall be included in the information required by following condition. Copies of the monthly reports prepared pursuant to this condition shall be sent to the district office by the 15th day of the following month. For all pollutants monitored by the CEM system which require correction or adjustment of the raw values reported by the CEM system for flue gas diluent concentrations, a diluent cap equivalent to a minimum carbon dioxide (CO<sub>2</sub>) concentration of 5 percent (%) or a maximum oxygen (O<sub>2</sub>) concentration of 14% shall be applied for purposes of demonstrating compliance with all limits on emissions of such pollutants during any period of startup, shutdown, or malfunction, including, but not limited to, a loss of boiler water level control or loss of combustion air control. Permittee shall identify all periods during which a diluent cap has been applied in the monthly reports submitted pursuant to this condition [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
100. Permittee shall maintain a complete file containing all measurements, records, required monitoring data and support information. Support information includes copies of all reports required by this permit and for continuous monitoring instrumentation, and all calibration and maintenance records. This file shall include, but not be limited to: (a) Data collected from in-stack monitoring instruments; (b) Input rate records for all fuels burned; (c) Purchase records that indicate the sulfur content, by weight, of all fuel oil #2 purchased; (d) Results of all source tests; (e) All other air pollution system performance evaluations and records of calibration checks, calibration gas cylinder changes, adjustments and maintenance performed on all equipment (including CEM adjustment or maintenance). [District Rule 1070, 4.0 & PSD SJ 86-03] Federally Enforceable Through Title V Permit
101. Records shall be kept for each unit with the following: (a) Specific time of operation of each combustion unit; (b) Specific time of operation of the auxiliary burners; (c) Equipment breakdowns or malfunctions; (d) Exceedances of emission standards. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
102. The permittee shall follow all written maintenance procedures and schedules for the following: all emissions control equipment, combustion units, and monitoring equipment for measuring emission levels. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
103. Operating and maintenance manuals, subject to District review, shall be provided for the equipment covered by this permit. The permittee's operators shall be trained in the operation and maintenance of both fuel burning and pollution control equipment. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
104. If the Fuel Oil #2 is Air Resources Board regulated diesel fuel, with a supplier certified sulfur content less than 0.25% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
105. If the Fuel Oil #2 is non-certified for sulfur content of less than 0.25% by weight, then the owner or operator shall determine the sulfur content of each delivery of Fuel Oil being fired. The sulfur content shall be determined using ASTM method D 2880. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
106. Permittee shall provide access to all sampling ports and platforms on boiler exhaust stacks in accordance with 40 CFR 60.8(e) and District Rule 1081 (as amended 12/16/93). [District Rule 1081, 3.3; & PSD SJ 86-03] Federally Enforceable Through Title V Permit
107. The SO<sub>2</sub> emissions from both combustion units shall be more stringent of 35.6 lb/hr or 42 ppm, dry, corrected to 12% CO<sub>2</sub>, averaged over three hour period and more stringent of 33.3 lb/hr or 40 ppm, dry, corrected to 12% CO<sub>2</sub>, averaged over a 24 hour period. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
108. The NO<sub>x</sub> emissions from both combustion units shall be more stringent of 107 lb/hr or 175 ppm, dry, corrected to 12% CO<sub>2</sub>, averaged over three hour period and more stringent of 100 lb/hr or 165 ppm, dry, corrected to 12% CO<sub>2</sub>, averaged over a 24 hour period. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
109. The CO emissions from both combustion units shall be 33.3 lb/hr or 400 ppm, dry, corrected to 12% CO<sub>2</sub> (3-hour average). [PSD SJ 86-03] Federally Enforceable Through Title V Permit
110. The Mercury emissions from both combustion units shall not exceed 0.083 lb/hr (3-hour average) as measured by EPA Method 101. Upon EPA approval of a change to the facility PSD permit allowing Method 29 to be used in place of Method 101, Method 29 may be used to measure Mercury emissions. (40 CFR Part 61, Appendix B). [PSD SJ 86-03] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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111. Permittee shall submit a written report of all excess emissions to EPA (Attn: A-3-3) for every calendar quarter. The report shall include the following: (a) the magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions. (b) Specific identification of each time period of excess emissions that occurs during startups, shutdowns, and malfunctions of furnace/boiler system. The nature and cause of malfunction (if known) and corrective action taken or preventive measures adopted shall be reported. (c) The date and time identifying each period during which continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs and adjustments. (d) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in report. (e) Excess emissions shall be defined as any three-hour period during which the average emissions of NO<sub>x</sub>, SO<sub>2</sub>, and/or CO, as measured by continuous monitoring system exceeds the NO<sub>x</sub>, SO<sub>2</sub>, and/or CO emission limit set for each of the pollutants. (f) Excess emissions indicated by the CEM system shall be considered violations of the applicable emission limit for purposes of PSD permit. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
112. The calculation of annual emissions shall commence with the submission of the first fourth-quarter report, and will continue to be calculated and submitted with each successive quarterly report. The quarterly reports shall contain highest annual emissions computed for each week in the quarter, as well as all excesses of the annual emissions limits. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
113. Permittee shall meet all applicable requirements of Subparts A, Db, and E of 40 CFR 60. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
114. Permittee shall comply with following activated carbon mass feed requirements: (1) During the initial performance test and each subsequent performance test for dioxins/furans and mercury, as applicable, the permittee shall calculate and record an average carbon mass feed rate in pounds per hour being employed based on load cell measurements of carbon feed during the test; (2) During operation of the facility, the carbon injection mass feed rate must be measured using load cells, calculated and recorded on an eight (8) hour block average basis, and must equal or exceed the level(s) documented during the most recent performance tests for dioxins/furans and mercury. When calculating the eight (8) hour block average, exclude the hours when the combustion unit is not operational and include the hours when the combustion unit is operating but the carbon feed system is not working properly. [40 CFR 60.38b & 40 CFR 60.58b(m)(1), (2)] Federally Enforceable Through Title V Permit
115. The permittee shall estimate the total carbon usage of the plant (kilograms or pounds) for each calendar quarter by two independent methods, according to the following procedures: (1) The weight of carbon delivered to the plant. (2) The permittee shall estimate the average carbon mass feed rate for each during the operation of each combustion unit, and sum the results for both units at the plant for the total number of hours of operation during the calendar quarter. [40 CFR 60.38b & 40 CFR 60.58b(m)] Federally Enforceable Through Title V Permit
116. Should additional guidance related to the June 3, 1986 PSD remand, applicable to PSD permit action, be developed, the Permittee shall provide to EPA any such analysis, data, or demonstration of compliance with the other requirements within the time required by the guidance. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
117. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in Section VIII of these conditions. In addition, the Regional Administrator shall be notified in writing within fifteen (15) days of any such failure. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under Section IX of these conditions, and the methods utilized to restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violations of this permit or of any law or regulations which such malfunction may cause. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
118. Facility shall operate only when a fully certified chief facility operator or fully certified shift supervisor is on duty, except as allowed under 40 CFR 60.54b(c)(2). [40 CFR 60.35b] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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119. All chief facility operators, shift supervisors, and control room operators shall have completed the EPA or State municipal waste combustor operator training course. [40 CFR 60.35b] Federally Enforceable Through Title V Permit
120. Owner or operator shall conduct a performance test for opacity on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test, and must complete five performance tests in each 5-year calendar period) using EPA Method 9 and the average of three test runs to determine compliance. [40 CFR 60.38b] Federally Enforceable Through Title V Permit
121. Permittee shall establish parameters for the differential pressure across the baghouse filter, which provides a reasonable assurance of ongoing compliance with emission limitations stated in this permit. The initial parameters shall be established using manufacturer/supplier recommendations and by correlating with opacity readings and source test results. These parameters shall be reviewed annually and revised if necessary based on PM10 source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR Part 64] Federally Enforceable Through Title V Permit
122. The baghouse differential operating pressure shall be monitored and recorded on each day the solid waste combustors/boilers operate. The permittee shall compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
123. 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
124. If the District or EPA determine that a Quality improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
125. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9 [40 CFR Part 64] Federally Enforceable Through Title V Permit
126. During any 96-hour periods of startup or 12-hour periods of shutdown, the facility shall be exempt from emission limits identified in this permit which are based upon District Rule 4352. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shutdown. [District Rule 4352] Federally Enforceable Through Title V Permit
127. Upon detecting any excursion from the 10% opacity limit, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR Part 64] Federally Enforceable Through Title V Permit
128. The baghouse shall operate at all times with a minimum differential pressure of 2 inches water column and a maximum differential pressure of 10 inches water column [40 CFR Part 64] Federally Enforceable Through Title V Permit
129. The baghouse differential operating pressure shall be monitored and recorded on each day the solid waste combustors/boilers operate. The permittee shall compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR Part 64] Federally Enforceable Through Title V Permit
130. Each time SO<sub>2</sub> emissions from each combustion unit exceeds 30 ppmv, dry, corrected to 12% CO<sub>2</sub>, based on an eight-hour rolling average, facility shall demonstrate that SO<sub>2</sub> removal efficiency is at least 80% as measured by EPA Methods 1-4 and 6C, based on the measurement of the inlet and outlet SO<sub>2</sub> concentrations. [40 CFR Part 64] 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.

131. A permit shield is granted from 40 CFR 60 Subpart Db (2/27/14) requirements for these units because the combustors are exempt from the requirements of Subpart Db since the facility meets the applicability requirements and is subject to an EPA approved State Section 111(d)/129 plan implementing 40 CFR 60 Subpart Db. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
132. A permit shield is granted from 40 CFR 60 Subpart Dc requirements for these units because the units are rated greater than 100 MMBtu/hr and thus don't meet the applicability criteria of Subpart Dc. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
133. A permit shield is granted from District Rule 4305 (8/21/03) requirements since section 4.1.1 of this rule exempts solid fuel fired units. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
134. A permit shield is granted from District Rule 4351 (8/21/03) requirements since section 4.1.2 of this rule exempts solid fuel fired units. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
135. Compliance with the permit conditions in this permit shall be deemed compliance with the requirements of District Rule 4352 (12/15/11). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
136. A permit shield is granted from District Rule 4802 (12/17/92) requirements since the combustors do not meet the definition of sulfuric acid production units. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
137. A permit shield is granted from District Rule 7012 (12/17/92) requirements since the use of cooling water additives containing hexavalent chromium is prohibited. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

# *San Joaquin Valley*

## *Air Pollution Control District*

**PERMIT UNIT:** N-2073-4-1

**EXPIRATION DATE:** 10/31/2021

**EQUIPMENT DESCRIPTION:**

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

### **PERMIT UNIT REQUIREMENTS**

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



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

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

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# ATTACHMENT C

Detailed Facility List

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### Detailed Facility Report

For Facility=2073

Sorted by Facility Name and Permit Number

<b>COVANTA STANISLAUS, INC</b> <b>4040 FINK RD</b> <b>CROWS LANDING, CA 95313</b>	FAC # STATUS: TELEPHONE:	<b>N 2073</b> <b>A</b> <b>2098374423</b>	TYPE: TOXIC ID:	<b>TitleV</b> <b>10746</b>	EXPIRE ON: AREA: INSP. DATE:	10/31/2021 6 / 02/22
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-2073-1-18	21.5 MW	3020-07 E	1	65,545.00	65,545.00	A	TWO 400 TON/DAY MUNICIPAL SOLID WASTE COMBUSTOR/BOILERS PRODUCING 21.5 MW OF ELECTRICITY EQUIPPED WITH DRY LIME SCRUBBERS, FLY ASH BAGHOUSE, AMMONIA INJECTION SYSTEM, LIME SLURRY INJECTION, ACTIVATED CARBON INJECTION SYSTEM, LIME AND SODA AND CARBON SILOS WITH FILTER VENTS, WASTE RECEIVING, ASH CONVEYING, AND ASH RESIDUE ENCLOSURE
N-2073-2-2	187 HP	3020-10 B	1	143.00	143.00	D	187 HP DIESEL EMERGENCY IC ENGINE SERVING THE MAIN FIRE PUMP
N-2073-4-1	175 BHP	3020-10 B	1	143.00	143.00	A	175 BHP CLARKE/JOHN DEERE MODEL JU6H-UFADMG TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIRE PUMP

Number of Facilities Reported: 1

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# ATTACHMENT D

## District Analysis of Proposed Permit Shields

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### Proposed Permit Shields & District’s Basis for Granting/Denying Permit Shields

Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant’s provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District’s Basis for Granting/Denying Permit Shield
All Sources	Federal Test Methods	Certain performance test methods are based on California Air Resources Board (CARB) Test Methods for Determination of Compliance with State and Local emission limits that may not have a corresponding approved EPA Federal test method.	N	This request doesn’t adequately identify the specific regulation the applicant is requesting a permit shield from; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
All Sources	Regulations or Portions Thereof Not Explicitly Listed in this Title V Application	These regulations are only applicable upon an action initiated by CSI; otherwise, they are administratively acknowledged.	N	This request doesn’t adequately identify the specific regulation the applicant is requesting a permit shield from; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
All Sources	Regulations or Portions Thereof Not Explicitly Listed in this Title V Application	Regulations for which require an action by the “Administrator”, “Administrating Agency”, “EPA”, or any other government agency are requirements applying to the government agency and not requirements applies to the CSI facility.	N	This request doesn’t adequately identify the specific regulation the applicant is requesting a permit shield from; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
All Sources	40 CFR Appendix A- Test Methods 40 CFR Appendix B – Performance Specifications; Appendix F	CSI is deemed to be in compliance with all requirements under 40 CFR Appendix A, B, and F by way of submittal of this Title V Renewal Application	N	The permit allows the use of test methods under 40 CFR Appendix A and requires the use of Appendix B and Appendix F performance specifications for the installed CEMs. Therefore, the source is not exempt from these requirements. The provided basis, “submittal of the Title V Renewal Application” isn’t sufficient to demonstrate compliance with all the requirements of these regulations; therefore a Permit shield was not granted.
All Sources	40 CFR Part 70 State Operating Permit Programs	CSI is deemed to be in compliance with all applicable requirements under 40 CFR Part 70 by way of submittal of this Title V Renewal Application and by Compliance with SJVAPCD Rule 2520	N	40 CFR Part 70 and District Rule 2520 certainly apply to this facility; therefore, the facility is not exempt from such requirements. Submittal of the TV renewal application does not satisfy all the requirements of 40 CFR Part 70 and District Rule 2520, nor are all of the specific requirements of these rules included on the Title V permit; therefore, a permit shield has not been granted.

Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
All Sources	40 CFR Part 82 Protection of Stratospheric Ozone Subparts A through F	Current Permit Shield on current PTO	Y	The current permit shield is not obsolete and the permit shield will continue to be included on the proposed TV permit. See Condition #46 of draft TV PTO N-2073-0-4.
All Sources	Title IV of the Federal Clean Air Act Amendments – Acid Rain NOx allowance and trading as incorporated in 40 CFR 78	CSI facility is not a fossil fuel electric utility or have sources that meet the definition of sources applicable to this regulation.	N	The District does not grant permit shields for Acid Rain requirements; therefore, a permit shield has not been granted.
Boilers/ Combustors	40 CFR 60 Subpart Db – Standards of Performance for Industrial, Commercial, Institutional steam generating units	As long as 40 CFR Subpart E is applicable to this facility, CSI is then subject only to the particulate matter standards under 40 CFR 60 Subpart Db [40 CFR 60.40b(d)].	Y	As noted in the previous Title V renewal (project N-1153508), Subpart Db is not applicable since the facility meets the applicability requirements and is subject to an EPA approved State Section 111(d)/129 plan implementing Subpart Cb. A permit shield has been granted for the boilers/combustors on this basis. See Condition #131 of draft TV PTO N-2073-1-19.
Boilers/ Combustors	40 CFR 60 Subpart Dc - Standards of Performance for small Industrial, Commercial, and Institutional steam generating units	The CSI facility was constructed prior to June 9, 1989 – Therefore, this federal regulation is not applicable.	Y	Each of the municipal solid waste fired combustors is rated at greater than 100 MMBtu/hr; therefore, Subpart Dc does not apply to the combustors and a permit shield has been granted. See Condition #132 of draft TV PTO N-2073-1-19.

Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
Boilers/ Combustors	40 CFR 60 Subpart Ea – Standards of Performance for Municipal Waste Combustors	The CSI Facility was constructed prior to December 20, 1989 – Therefore, this federal regulation is not applicable except for sections 40 CFR 60.56(a), 60.58(a) and 60.59(a) as referenced by 40 CFR 60 Subpart Ca.	N	This regulation is also applicable to units that were modified or reconstructed after December 20, 1989 and on or before June 19, 1996. The provided basis isn't sufficient to demonstrate that a modification did not occur during this time period. Therefore, the permit shield hasn't been granted.
Boilers/ Combustors	40 CFR 60 Subpart Eb –Standards of Performance for Municipal Waste Combustors	The CSI facility was constructed prior to September 20, 1994; therefore, this Federal regulation is not applicable.	N	Subpart Eb requirements are also applicable to units that have been modified or reconstructed after June 19, 1996. The provided basis isn't sufficient to demonstrate that a modification did not occur during this time period. Therefore, the permit shield hasn't been granted.
All Sources	40 CFR 60	Applicable Federal Requirements that are equivalent to or less stringent than contained in this Title V application are assumed to be complied with. [Reference: Martin Keast of the SJVUAPCD, March 5, 1997]	N	This request doesn't adequately identify the specific regulation the applicant is requesting a permit shield from; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
All Sources	40 CFR 60	The notification requirements listed in various 40 CFR 60 Subparts concerning facility startup and initial installation of monitoring systems have been complied with. [Reference: Martin Keast of the SJVUAPCD, March 5, 1997]	N	This request doesn't adequately identify the specific regulation the applicant is requesting a permit shield from; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
All Sources	40 CFR 60	CSI met the requirements for initial compliance testing and monitoring referenced in various applicable 40 CFR 60 Subparts. CSI has demonstrated compliance by the acceptance of the facility acceptance tests report for tests conducted in December 1988 and January 1989. [Reference: Martin Keast of the SJVUAPCD, March 5, 1997]	N	This request doesn't adequately identify the specific regulation the applicant is requesting a permit shield from; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.

Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
All Sources	Proposition 65 as referenced in the California Code of Regulations, Title 22, Chapter 3 – Safe Drinking Water and Enforcement Act of 1986	Any mandates or requirements under California's Proposition 65 is State Only	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
All Sources	AB2588 (Air Toxics Hot Spots) as referenced in the California Health and Safety Code – Division 26, Part 6 Chapters 1 through 6 and in the California Code of Regulations, Title 17, Division 3, Subchapter 7.6	Any mandates or requirements under California's AB 2588 "Air Toxics hot Spots" law is state only.	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
All Sources	SB1731 (Amendment to Air Toxic Hot Spots Law) As referenced in the California Health and Safety Code- Division 26, Chapters 1 through 6 and in the California Code of Regulations Title 17, Division 3 Subchapter 7.6	Any mandates or requirements under California's AB 2588 "Air Toxics hot Spots" law is state only.	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.



Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
All Sources	SB1889 as signed into regulation in 1988. This law is currently referenced in the California Health and Safety Code (25531).	Any mandates or requirements under California's SB1889 law is state only. CSI does have an RMP for anhydrous ammonia.	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
Motor Vehicles	SJVAPCD Reg. II, Rule 2020, Item 4.2.5	All motor vehicles as defined by the vehicle code of California are exempt from having to obtain air quality permits	N	District Rule 2020 does not list applicable requirements; rather, District Rule 2020 lists sources that are exempt from the requirement to obtain a District permit. Since District Rule 2020 does not list applicable requirements, a permit shield is not necessary for the sections of District Rule 2020.
Drums and Totes	SJVAPCD Reg II, Rule 2020, Item 5.7	All drums and totes are for temporary storage and dispensing and are not emission sources.	N	District Rule 2020 does not list applicable requirements; rather, District Rule 2020 lists sources that are exempt from the requirement to obtain a District permit. Since District Rule 2020 does not list applicable requirements, a permit shield is not necessary for the sections of District Rule 2020.
Storage Tanks	SJVAPCD Reg II., Rule 2020, item 5.7	Storage tanks at the CSI facility meeting the exemption provisions under SJVAPCD Reg. II. Rule 2020, Sec 5.7 would not need to obtain permits nor require recordkeeping or reporting	N	District Rule 2020 does not list applicable requirements; rather, District Rule 2020 lists sources that are exempt from the requirement to obtain a District permit. Since District Rule 2020 does not list applicable requirements, a permit shield is not necessary for the sections of District Rule 2020.
All Sources	SJVAPCD Reg. II, Rule 2201	The regulation is not applicable to the CSI Facility because it does not have or meet the definition of modifications pursuant to item 3.20 and the facility was in operation prior to the promulgation of this Rule.	N	Per EPA Guidance <sup>2</sup> , the provided basis isn't adequate to grant a Permit Shield for District Rule 2201 requirements.

<sup>2</sup> <https://www.epa.gov/sites/production/files/2015-08/documents/pgtnsr.pdf>

Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
All Sources	SJVAPCD Reg. II, Rule 2250	This rule is not applicable since CSI has not been required to obtain a Permit Exempt Equipment Registration (PEER)	N	A permit shield has not been granted, for the same reason that the request for a District Rule 2201 permit shield was not granted.
All Sources	SJVAPCD Reg. II, Rule 2280	This rule is not applicable since CSI does not operate portable equipment as defined in the Rule	N	A permit shield has not been granted, for the same reason that the request for a District Rule 2201 permit shield was not granted.
All Sources	SJVAPCD Reg. II, Rule 2520	Compliance with this rule (as are applicable to CSI) is by way of this Title V Renewal Application Submittal	N	The requirement to submit a TV renewal is only one component of compliance with District Rule 2520 requirements; furthermore, that requirement is periodic and the submittal of the current Title V renewal does not ensure future compliance with the Rule requirement. Therefore a permit shield has not been granted for this request.
All Sources	SJVAPCD Reg. II, Rule 2530	This rule is not applicable since CSI is not opting to take federally mandated enforceable emission limits	N	The District does not grant permit shields for District Rule 2530 requirements; therefore, a permit shield has not been granted.
All Sources	SJVAPCD Reg. II, Rule 2540	CSI is exempt from this regulation because the sources are not regulated under Part 72, Title 40 CFR	N	The District does not grant permit shields for Acid Rain requirements; therefore, a permit shield has not been granted.
All Sources	SJVAPCD Reg. II, Rule 2550	This rule is not applicable since CSI has not applied to construct or reconstruct a Major Air Toxics source as defined in Rule	N	The provided basis doesn't demonstrate conclusively that the facility is not a Major Toxics Source; therefore a permit shield has not been granted.

<b>Sources for Permit Shield</b>	<b>Regulation For Which Applicant is Requesting a Permit Shield</b>	<b>Applicant's provided basis for Permit Shield</b>	<b>Permit Shield Issued? (Y/N)</b>	<b>District's Basis for Granting/Denying Permit Shield</b>
All Sources	SJVAPCD Reg. II, Rule 4001 – New Source Performance Standards	Compliance with this rule is by way of compliance with all applicable federal regulations identified in this permit application submittal.	N	District Rule 4001 references multiple Subparts of 40 CFR 60, as in effect on April 14, 1999. Since the District does not issue blanket permit shields and this rule references multiple subparts, a permit shields has not been granted.
All Sources	SJVAPCD Reg. II, Rule 4002 – National Emission Standards for Hazardous Air Pollutants	Federal Regulations (40 CFR 61) that are incorporated by reference are not applicable to the CSI facility because the facility does not meet the definitions contained in these regulations.	N	District Rule 4002 references multiple Subparts of 40 CFR 63, as in effect on May 20, 2004. Since the District does not issue blanket permit shields and this rule references multiple subparts, a permit shields has not been granted.
All Sources	SJVAPCD Reg. IV, Rule 4105	CSI is exempt from this regulation because the sources do not meet the definition of a disposal facility contained in this Rule	N	The basis provided by the applicant does not provide enough detail to make a conclusive determination that District Rule 4105 is not applicable. Therefore, a permit shield has not been granted.
All Sources	SJVAPCD Reg. IV, Rule 4106	CSI is exempt from this regulation because the sources do not meet the definition for conducting prescribed burning.	Y	The CSI facility is exempt from this regulations since they do not perform prescribed burning and hazard reduction burning in a wildland or urban interface. Therefore, a permit shield has been granted. See condition #47 of Draft TV PTO N-2073-0-4.
All Sources	SJVAPCD Reg. IV, Rule 4204	CSI is exempt from this regulation because the sources don't meet the definition of operating a cotton gin	Y	CSI does not own/operate a cotton ginning facility; therefore, District Rule 4204 requirements do not apply to this facility and a permit shield has been granted. See condition #48 of Draft TV PTO N-2073-0-4.
All Sources	SJVAPCD Reg. IV, Rule 4302 Incinerator Burning	Applicable rule contains no applicable requirements.	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
Boilers/ Combustors	SJVAPCD Reg. IV, Rule 4305 and Rule 4351	CSI Boilers are exempt from these regulations because the sources meet the definition of units fired with solid fuel as exempted under sections 4.1.1 and 4.1.2 respectively	Y	As noted in the previous Title V renewal (project N-1153508), District Rules 4305 and 4351 are not applicable to solid fuel-fired units such as those operated at this facility. Therefore, a permit shield has been granted. See Conditions #133 and #134 of draft TV PTO N-2073-1-19.

<b>Sources for Permit Shield</b>	<b>Regulation For Which Applicant is Requesting a Permit Shield</b>	<b>Applicant's provided basis for Permit Shield</b>	<b>Permit Shield Issued? (Y/N)</b>	<b>District's Basis for Granting/Denying Permit Shield</b>
Boilers/ Combustors	SJVAPCD Rule 4352, items 6.1 and 7.1.2 – Emission Control Plan and Demonstrate Compliance	Compliance with this rule has been demonstrated through reporting of compliance testing on file with the SJVAPCD as of July, 2020	Y	The permittee has satisfied the requirements of Sections 6.1 and 7.1.2 of District Rule 4352 and all of the applicable provisions of District Rule 4352 are included on the permits for the combustors. Therefore, a permit shield has been granted. See Condition #135 of draft TV PTO N-2073-1-19.
Mobile Vehicles and Mobile Equipment Coating Operations	SJVAPCD Reg IV Rule 4602: Mobile vehicles and mobile equipment coating operations	CSI only conducts touch up coating operations which is exempt from Rule 4602 per item 4.1.1.	N	The current version of District Rule 4602 does not include a Section 4.1.1. Since the provided basis for the permit shield is not valid, a permit shield has not been granted.
Storage of Organic Liquids	SJVAPCD Reg IV, Rule 4623 Storage of Organic Liquids	Only certain sections of this rule apply to CSI because the organic liquids, including petroleum distillates stored at CSI do not have a true vapor pressure of greater than 0.5 psia per item 4.4.	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
Organic Liquid Loading	SJVAPCD Reg. IV, Rule 4624 Organic Liquid Loading	This rule does not apply to CSI because the organic liquids, including petroleum distillates, stored at CSI do not have a true vapor pressure greater than 1.5 psia per item 4.3	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
All Sources	SJVAPCD Reg. IV, Rule 4625 – Waste Water Separators	There are no sources of this type at the CSI Facility	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
Organic Solvents	SJVAPCD Reg. IV, Rule 4661 – organic Solvents	There are no sources of this type at the CSI Facility	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.

<b>Sources for Permit Shield</b>	<b>Regulation For Which Applicant is Requesting a Permit Shield</b>	<b>Applicant's provided basis for Permit Shield</b>	<b>Permit Shield Issued? (Y/N)</b>	<b>District's Basis for Granting/Denying Permit Shield</b>
Organic Solvent Degreasing Operations	SJVAPCD Reg.IV, Rule 4662 Organic Solvent Degreasing Operations	CSI does not use degreasers regulated in this rule	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
IC Engine serving Fire Pump	SJVAPCD Reg. IV, Rule 4701 Internal Combustion Engines	The IC engine is exempt from Rule 4701 per Item 4.2.2. Engine is used exclusively for firefighting purposes	Y	The IC engine is only exempt from a portion of the rule requirements; however, All applicable rule requirements are included on the permit. Therefore, a permit shield has been granted. See Condition #13 of draft TV PTO N-2073-4-1.
IC Engine serving Fire Pump	SJVAPCD Reg. IV, Rule 4702 Internal Combustion Engines	The IC engine is exempt from Rule 4702 per item 4.3 (except certain recordkeeping requirements). The engine is used exclusively for firefighting purposes	Y	The IC engine is only exempt from a portion of the rule requirements; however, All applicable rule requirements are included on the permit. Therefore, a permit shield has been granted. See Condition #14 of draft TV PTO N-2073-4-1.
All Sources	SJVAPCD Reg IV, Rule 4802 Sulfuric Acid Mist	CSI does not meet the definition of a manufacturer of sulfuric acid.	Y	The boilers/combustors not meet the definition of a sulfuric acid production unit; therefore, a permit shield has been granted for the boilers/combustors. See Condition #136 of draft TV PTO N-2073-1-19.
All Sources	SJVAPCD Reg VI – Air Pollution Emergency Contingency Plan	Regulations applies to SJVAPCD on episode procedures and alerts	N	Some regulation VI requirements, such as the requirements of Rule 6130 may apply to the facility in the event of a Stage 1, 2, or 3 air pollution event. Since the facility is not exempt from such requirements and since the requirements are not included on the proposed TV PTO, a permit shield cannot be granted.
All Sources	SJVAPCD Reg. VII Rule 7011 Hexavalent Chromium	The CSI facility does not meet the definition or conduct this type of activity	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
Cooling Towers	SJVAPCD Reg VII, Rule 7012	No cooling water additives containing hexavalent chromium are used at this facility	Y	Condition #96 of the Draft Title V PTO (N-2073-1-19) ensures cooling water additives containing hexavalent chromium are not utilized. Therefore, the cooling tower is exempt from Rule 7012 requirements and a permit shield has been granted. See Condition #137 of draft TV PTO N-2073-1-19.

<b>Sources for Permit Shield</b>	<b>Regulation For Which Applicant is Requesting a Permit Shield</b>	<b>Applicant's provided basis for Permit Shield</b>	<b>Permit Shield Issued? (Y/N)</b>	<b>District's Basis for Granting/Denying Permit Shield</b>
Fugitive Dust	SJVAPCD Reg VIII, Rule 8011- General Requirements	Regulation is not applicable since no other SJVUAPCD REG VIII are applicable to the CSI facility.	N	The applicant requested the use of the umbrella template, which includes permit requirements for potentially applicable Regulation VIII requirements.
Construction, Demolition, Excavation, and Extraction Activities	SJVAPCD Reg VIII, Rule 8021 – Construction, demolition, excavation, extraction, and other earthmoving activities	No such activities occur at CSI	Y	Such activities could occur at this facility; therefore, a permit shield cannot be granted for the provided basis. However, the applicant also requested the utilization of the Umbrella Template, which includes conditions for complying with this rule and includes a permit shield for this rule. Thus, a permit shield was granted for this rule based on the umbrella template.
Handling and Storage of Bulk Materials	SJVAPCD Reg VIII, Rule 8031 – Bulk Materials	All handling of bulk materials occur within an enclosed structure, materials are sufficiently moist, and materials do not contain a silt content > 5%.	Y	The applicant has requested the utilization of the Umbrella Template, which includes conditions for complying with this rule and includes a permit shield for this rule. Thus, a permit shield was granted for this rule based on the umbrella template.
Carryout – Trackout	SJVAPCD Reg VIII, Rule 8041- Carryout and Trackout	CSI is exempt since no carryout/trackout falls on public roads per section 3.8 of Rule 8041	Y	The applicant has requested the utilization of the Umbrella Template, which includes conditions for complying with this rule and includes a permit shield for this rule. Thus, a permit shield was granted for this rule based on the umbrella template.
Open Areas	SJVAPCD Reg VIII, Rule 8051 - Open Areas	The CSI is exempt since it has not open areas as specified in Section 2.0 greater than 3.0 acres.	Y	The applicant has requested the utilization of the Umbrella Template, which includes conditions for complying with this rule and includes a permit shield for this rule. Thus, a permit shield was granted for this rule based on the umbrella template.
Paved and Unpaved Roads	SJVAPCD REG VIII Rule 8061 – Fugitive Dust Requirements	Applies only to affected activities constructed or modified after December 10, 1993. Affected activities at CSI commenced prior to this date.	Y	The applicant has requested the utilization of the Umbrella Template, which includes conditions for complying with this rule and includes a permit shield for this rule. Thus, a permit shield was granted for this rule based on the umbrella template.
Unpaved Vehicle/ Equipment Traffic Areas	SJVAPCD Reg VIII, Rule 8071 – Fugitive Dust Requirements	Affected areas are less than one (1) acre and less than 50 average annual daily trips (AADT)	Y	The applicant has requested the utilization of the Umbrella Template, which includes conditions for complying with this rule and includes a permit shield for this rule. Thus, a permit shield was granted for this rule based on the umbrella template.

Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
Boilers/ Combustors	Health Risk Assessment Referenced in this permit to operate is the HRA conducted by Radian and CSI submitted August 1986 and approved by the California Department of Health Services	Only the most recent DHS approved health risk assessment associated with operation of the WTE at Crows Landing California is applicable to this operating permit	N	This request doesn't adequately identify the specific regulation the applicant is requesting a permit shield from; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
All Sources	SJVAPCD Regulations or Portions thereof not explicitly listed in this Title V Renewal Application	Regulations for which require an action by the "APCO", "District", "EPA", or any other government agency are requirements applying to the government agency and not requirements applied to the CSI facility.	N	This request doesn't adequately identify the specific regulation the applicant is requesting a permit shield for; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
IC engine serving generating set under Permit No. N-3817-1-0	Not subject to this Title V renewal application or Permit to Operate	This IC engine source is not located at the same contiguous property as CSI facility ID N-2073. In addition, this source with assigned facility ID 3817 is not a Major Source and not subject to Title V operating permit program. [Reference: Chris Valverde of the SJVAPCD, Feb 25, 1997]	N	This request doesn't identify any specific regulation the applicant is requesting a permit shield for; therefore, a permit shield was not granted.
All Sources	Demonstration of Compliance for permit conditions contained in the compliance plan	Compliance with each listed permit condition contained in the CSI compliance plan – Form TV 004 will be demonstrated via permit conditions that specifically outline monitoring, reporting, and recordkeeping protocols and via referenced federal compliance methods. [Martin Keast of the SJVAPCD – March 5, 1997]	N	This request doesn't identify any specific regulation the applicant is requesting a permit shield for; therefore, a permit shield was not granted.

Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
All Sources	Demonstration of Compliance with outdated SIP requirements	Compliance with permit conditions in the Title V permit shall be deemed compliance with all the following outdated SIP requirements: Stanislaus County Rules 108, 108.1, 110, 201, 202, 203, 204, 208, 209, 401, 404, 405, 406, 408, 417, 422, and 423. A permit shield is granted from these requirements per SJVAPCD Rule 2520 Section 13.2.	N	The provided basis isn't adequate for granting a Permit Shield.
All sources	Demonstration of Compliance with outdated SIP requirements	Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVAPCD Rules 1100, items 6.1 and 7.0; 2010, items and 4.0; 2031; 2040; 2070, item 7.0; 2080; 4101; 4601 items 5.1, 5.2, 5.4, 5.5, 6.1 and 6.2; a permit shield is granted from these requirements per SJVAPCD Rule 2520, sec. 13.2.	Y	As noted in condition #40 of the existing Title V permit N-2073-0-3, the District had granted the requested permit shield. This permit shield is being retained in the draft Title V PTO N-2073-0-4.
All Sources	State only designated permit conditions	Permit conditions that are identified as state only are not federally enforceable. Some federally enforceable conditions listed in the applicable requirements section of this Title V renewal have state only components that are not federally enforceable.	N	This request doesn't identify any specific regulation the applicant is requesting a permit shield for; therefore, a permit shield was not granted.



Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
All sources	Regulations or portions thereof not explicitly listed in this Title V renewal application.	For Federal, State or SJVAPCD air quality regulation not included in the SJVAPCD compliance plan TVFORM 004 but that is determined to be applicable to CSI, or based upon an action initiated by CSI becomes applicable; then CSI will comply with said applicable requirement(s).	N	This request doesn't identify any specific regulation the applicant is requesting a permit shield for; therefore, a permit shield was not granted.
All sources	Permits other than Title V	Upon issuance of this Title V operating permit, CSI assumes compliance with all of the applicable requirements and permit conditions. This permit supersedes all previous permits issued by the SJVAPCD to facility ID N-2073.	N	This request doesn't identify any specific regulation the applicant is requesting a permit shield for; therefore, a permit shield was not granted.