

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING DIVISION</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 5	PAGE 1
	APPL. NO. 548966	DATE 9/2/2014
	PROCESSED BY LC02	CHECKED BY

TITLE V PERMIT RENEWAL

COMPANY NAME AND ADDRESS:

Glendale City, Glendale Water and Power
141 N. Glendale Avenue
Glendale, CA 91206

EQUIPMENT LOCATION:

800 Air Way
Glendale, CA 91201

BACKGROUND:

This is an existing facility which is in the business of providing electrical power to the city of Glendale. The facility operates three boiler steam generators and three gas turbine generators for power generation. The gas turbines are equipped with selective catalytic reduction (SCR) systems for control of NOx emissions. The facility has auxiliary equipment that include an emergency diesel generator, two gasoline storage tanks with gasoline dispensers, two ammonia storage tanks, a spray paint booth, and other Rule 219 exempted equipments.

The facility was issued its initial Title V permit on August 23, 1999. The last Title V permit was renewed on January 9, 2009. The Title V permit will expire on January 8, 2014. The facility is required to submit an application to renew the Title V permit at least 180 days before the permit expiration date. The facility submitted this Title V renewal application on February 1, 2013 (deemed complete on February 20, 2013), which is within the 180-day timeframe. Therefore, the facility is complying with the Title V regulations.

The application package contained the required forms, appropriately completed and signed, as follows:

- | | | | |
|--------|--------|----------|----------|
| 400-A | 500-C1 | 500-B | 500-MACT |
| 500-A2 | 500-H | 400-CEQA | 500-F1 |

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The facility submitted the Title V permit renewal application A/N548966 and a fee of \$2,031.86.

COMPLIANCE RECORD REVIEW:

The facility was issued 0 Notice of Violation (NOV) and 1 Notice to Comply (N/C) in the last five year. There are no outstanding compliance issues.

Notice #	Date	Description
NC #D12760	10/11/2010	Request to provide CEMS documentations

DISCUSSION:

Since the Title V permit was re-issued in August 2009 there have been new regulatory requirements and rules revisions. Updates to the permit conditions will be incorporated if they are required.

Boiler Generators Nos. 3, 4, 5, Device Nos. D2, D1, D3

40CFR Part 60 Subpart Da – Standards of Performance for Electric Utility Steam Generating Units

The rule applies to boiler generators greater than 250 MMBtu/hr and were installed after September 18, 1978. The subject three boilers are installed in the 1950s. This rule does not apply.

There are no updates requested for the three boilers.

Gas Turbine Generators Nos. 8A, 8B, 8C, 9, Devices Nos. D4, D5, D6 and D58

40CFR Part 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines

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Subpart KKKK applies to gas turbines that are installed after February 18, 2005, and have a heat input greater than 10.7 gigajoules per hour (10 MMBtu/hr). Since the gas turbines were installed before February 18, 2005 this rule does not apply.

Rule 1325 – Federal PM2.5 New Source Review Program

This is the new source review rule for PM2.5. SCAQMD adopted this rule in June 2011. This rule requires a pre-construction review for a new major source, a major modification to a major source, and any modification to an existing facility that would constitute a major polluting facility in and of itself. A major source is defined as a facility whose total PM2.5 emissions exceed 100 tons per year.

This rule is triggered only if there is emission increase.

Rule 1714 – Prevention of Significant Deterioration for Greenhouse Gases

This rule sets forth preconstruction review requirements for greenhouse gases (GHG). SCAQMD adopted this rule in November 2010.

This rule is triggered only if there is emission increase.

Therefore, there are no rule updates for the turbines.

Emergency generator, Devices D12

This is an existing 465 bhp diesel emergency generator that was permitted before 1990.

Title 40 Part 60, Subpart III – NSPS for IC Engines

This subpart applies only to engines that were installed after April 1, 2006. It does not apply to this engine.

40 CFR Part 63, Subpart ZZZZ – NESHAP for IC Engines

According to this regulation this is an existing emergency compression ignition engine less than 500 HP located at an area source of HAPS. For such an emergency engine the requirements are listed in Table 2d of this subpart. The detailed requirements are:

- a. Change oil and filter every 500 hours of operation or annually, whichever comes first.
- b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Other requirements including fuel, monitoring, and recording keeping are consistent with Rule 1470 requirements.

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Rule 1470 – Requirements for Stationary Diesel-Fueled IC Engines

District Rule 1470 applies to the diesel fueled internal combustion engine. The requirements are:

- 1) Use of CARB diesel fuel, consistent with Rule 431.2 requirement
- 2) Subject to Diesel PM standard and hours of operation standards

The facility is required to comply with Rule 431.2 and to use CARB diesel only. Based on the PM10 emission limit the generator may operate for up to 20 hours per year for maintenance and tests. The limit has been incorporated in the existing condition C1.2.

The following modifications to D12 conditions will be made:

B59.2 The operator shall only use the following material(s) in this device :

Fuel oil no. 2 or lighter grade with a sulfur content of not more than 15 ppm by weight

[RULE 431.2, Rule 1470, 40 CFR Part 63 Subpart ZZZZ]

~~C1.1 The operator shall limit the operating time to no more than 20.2 hour(s) in any one day.~~

~~[RULE 1304(a)]~~

~~[Devices subject to this condition : D12]~~

Note: Condition C1.1 limits the IC engine to operate less than 20.2 hours per day. This condition is outdated since Condition C1.2 allows only 20 hours per year. Therefore, Condition C1.1 will be deleted from the permit.

D12.1 The operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine.

[RULE 1304(a), Rule 147040, CFR Part 63 Subpart ZZZZ]

[Devices subject to this condition : D12]

K67.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

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An engine operating log listing on a monthly basis the emergency use hours of operation, maintenance and testing hours of operation, and any other hours of use with a description of the reason for operation. Additionally, each time the engine is started manually, the log shall include the date of operation and the timer reading in hours at the beginning and end of operation

The log shall be kept for a minimum of three calendar years prior to the current year and be made available to District personnel upon request. The total hours of operation for the previous calendar year shall be recorded sometime during the first 15 days of January of each year

[RULE 1304(a), RULE 1470, 40 CFR Part 60 Subpart ZZZZ]

[Devices subject to this condition : D12]

Title V Facility Permit Requirement

This application is submitted as a Title V renewal as required by Rule 3004. As required by Rule 3003, the permit renewal is subject to a 30 day public notice and a 45 day EPA review process. The permit will be eligible for issuance after EPA review and the public notice ends.

RECOMMENDATION:

After completion of the public notice and EPA review period, a Title V renewal permit should be issued for a new 5 year period, incorporating the above-described changes.