



AUG 23 2011

Raul Campos  
Fresno/Clovis Wastewater Reclamation Facility  
5607 W. Jensen  
Fresno, CA 93706-9458

**Re: Notice of Minor Title V Permit Modification  
District Facility # C-535  
Project # C-1112843**

Dear Mr. Campos:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct C-535-6-10 into the Title V operating permit. The modifications will consist of lowering the NOx emission limit of the boiler to 9 ppmvd @ 3% O2 (equivalent to 0.011 lb/MMBtu) and limiting the fuel sulfur content of the fuel burner to 5 grains per 100 dscf to meet the requirements of District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct C-535-6-10, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,



 David Warner  
Director of Permit Services

Enclosures

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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

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

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



**AUG 23 2011**

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

**Re: Notice of Minor Title V Permit Modification  
District Facility # C-535  
Project # C-1112843**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Fresno/Clovis Wastewater Reclamation Facility is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct C-535-6-10 into the Title V operating permit. The modifications will consist of lowering the NOx emission limit of the boiler to 9 ppmvd @ 3% O2 (equivalent to 0.011 lb/MMBtu) and limiting the fuel sulfur content of the fuel burner to 5 grains per 100 dscf to meet the requirements of District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct C-535-6-10, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,

  
David Warner  
Director of Permit Services

Enclosures

**Seyed Sadredin**  
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Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: C-1112843

Engineer: Derek Fukuda  
Date: August 22, 2011

Facility Number: C-535  
Facility Name: Fresno/Clovis Wastewater Reclamation Facility  
Mailing Address: 5607 W. Jensen  
Fresno, CA 93706-9458

Contact Name: Raul Campos  
Phone: (559) 621-5132

Responsible Official: Stephen A. Hogg  
Title: Public Utilities Assistant Director-Wastewater

---

## I. PROPOSAL

Fresno/Clovis Wastewater Reclamation Facility is proposing a Title V minor permit modification to incorporate the recently issued C-535-6-10 into the Title V operating permit. The modifications will consist of lowering the NO<sub>x</sub> emission limit of the boiler to 9 ppmvd @ 3% O<sub>2</sub> (equivalent to 0.011 lb/MMBtu) and limiting the fuel sulfur content of the fuel burner to 5 grains per 100 dscf to meet the requirements of District Rule 4320, *Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr.*

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

## II. FACILITY LOCATION

The facility is located at 5607 W. Jensen Avenue in Fresno, CA.

## III. EQUIPMENT DESCRIPTION

**C-535-6-11:** 16.7 MMBTU/HR CLEAVER-BROOKS MODEL CBI-700-400 DIGESTER GAS-FIRED BOILER WITH AN ALZETA MODEL CSB167R ULTRA LOW NOX BURNER

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

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

#### **V. APPLICABLE REQUIREMENTS**

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

#### **VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

Fresno/Clovis Regional Wastewater Reclamation Facility is proposing to lower their NO<sub>x</sub> emissions factor and limit the sulfur content of their fuel for compliance with District Rule 4320. The exceptions will be listed under the specific permit units below:

S-1127-162-13:

- Permit conditions 1 through 3 on the current Permit to Operate (PTO) were included as permit conditions 1 through 3 on the proposed PTO.
- Permit condition 4 on the current PTO was replaced with permit condition 4 on the proposed PTO. The new permit condition reflects the proposed reduction in NO<sub>x</sub> emissions.
- Permit condition 5 on the current PTO was included as permit condition 5 on the proposed PTO.
- Permit condition 6 was added to the proposed PTO to specify that the sulfur content of the fuel should not exceed the facility's proposed limit.
- Permit conditions 7 and 8 on the current PTO were replaced with permit conditions 7 and 8 on the proposed PTO. The new permit conditions reflect the proposed reduction in the sulfur concentration of the fuel.
- Permit conditions 9 through 25 on the current PTO were replaced with permit conditions 9 through 25 on the proposed PTO. The new permit conditions reflect the boilers compliance with the source testing, monitoring, and recordkeeping requirements of District Rule 4320.

## VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. C-535-6-11
- B. Authority to Construct No. C-535-6-10
- C. Application
- D. Previous Title V Operating Permit No. C-535-6-4

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
(C-535-6-11)

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-535-6-11

**EXPIRATION DATE:** 9/31/2016

**EQUIPMENT DESCRIPTION:**

16.7 MMBTU/HR CLEAVER-BROOKS MODEL CBI-700-400 DIGESTER GAS-FIRED BOILER WITH AN ALZETA MODEL CSB167R ULTRA LOW NOX BURNER

## PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO<sub>2</sub>. [District Rules 4201 and 4301, 5.1] Federally Enforceable Through Title V Permit
3. The boiler may only be fired on digester gas except pilot light which may be fueled with PUC natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Emissions from the boiler shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu, 0.026 lb-SO<sub>x</sub>/MMBtu, 0.0048 lb-PM<sub>10</sub>/MMBtu, 100 ppmvd CO @ 3% O<sub>2</sub> or 0.061 lb-CO/MMBtu, or 0.004 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
5. Digester gas fuel consumption shall not exceed 730,400 cubic feet per day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The sulfur content of the fuel used by the boiler shall not exceed 5 gr/100 dscf. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
7. Daily testing of digester gas is required so as to not exceed an average of 79.6 ppm as hydrogen sulfide (H<sub>2</sub>S). Corrections shall be made, and re-tested within three (3) hours in order to maintain average below 79.6 ppm. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. The sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D-1072, D-3031, D-4084, D3246, D-4810, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rules 2520, 9.3.2, and 4320] Federally Enforceable Through Title V Permit
9. The boiler shall be equipped with an operational non-resettable, totalizing mass or volumetric flow meter in the digester gas fuel supply line. [District Rules 2201 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
10. Source testing to measure digester gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
11. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
17. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. Records of daily fuel consumption and daily sulfur testing results shall be maintained. [District Rules 1070, 2520, 9.3.2, and 40 CFR 60.48 (c)(g)] 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.

25. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

DRAFT

# ATTACHMENT B

Authority to Construct No.  
(C-535-6-10)



## AUTHORITY TO CONSTRUCT

PERMIT NO: C-535-6-10

ISSUANCE DATE: 07/14/2010

LEGAL OWNER OR OPERATOR: FRESNO/CLOVIS REGIONAL WWTP

MAILING ADDRESS: 5607 W JENSEN AVE  
FRESNO, CA 93706-9458LOCATION: 5607 W JENSEN AVE  
FRESNO, CA 93706**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 16.7 MMBTU/HR CLEAVER-BROOKS MODEL CBI-700-400 DIGESTER GAS-FIRED BOILER WITH AN ALZETA MODEL CSB167R ULTRA LOW NOX BURNER: LOWER NOX EMISSION TO 9 PPMVD-NOX @ 3% O2 (0.011 LB-NOX/MMBTU) AND LIMIT THE FUEL SULFUR CONTENT TO 5 GR/100 DSCF FOR RULE 4320 COMPLIANCE

### CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2. [District Rules 4201 and 4301, 5.1] Federally Enforceable Through Title V Permit
6. The boiler may only be fired on digester gas except pilot light which may be fueled with PUC natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emissions from the boiler shall not exceed any of the following limits: 9 ppmvd NOx @ 3% O2 or 0.011 lb-NOx/MMBtu, 0.026 lb-SOx/MMBtu, 0.0048 lb-PM10/MMBtu, 100 ppmvd CO @ 3% O2 or 0.061 lb-CO/MMBtu, or 0.004 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

  
 DAVID WARNER, Director of Permit Services

07/14/2010 9:27AM - FUKUDAD : Joint Inspection NOT Required

Conditions for C-535-6-10 (continued)

8. Digester gas fuel consumption shall not exceed 730,400 cubic feet per day. [District Rule 2201]
9. The sulfur content of the fuel used by the boiler shall not exceed 5 gr/100 dscf. [District Rules 2201 and 4320]
10. Daily testing of digester gas is required so as to not exceed an average of 79.6 ppm as hydrogen sulfide (H<sub>2</sub>S). Corrections shall be made, and re-tested within three (3) hours in order to maintain average below 79.6 ppm. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. The sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D-1072, D-3031, D-4084, D3246, D-4810, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rules 2520, 9.3.2, and 4320] Federally Enforceable Through Title V Permit
12. The boiler shall be equipped with an operational non-resettable, totalizing mass or volumetric flow meter in the digester gas fuel supply line. [District Rules 2201 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
13. Source testing to measure digester gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

## Conditions for C-535-6-10 (continued)

20. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
23. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Records of daily fuel consumption and daily sulfur testing results shall be maintained. [District Rules 1070, 2520, 9.3.2, and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

# ATTACHMENT C

Application

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

Received

AUG 19 2011

## Permit Application For:

Permits Srvc  
SJVAPCD

[ ] ADMINISTRATIVE AMENDMENT    [X] MINOR MODIFICATION    [ ] SIGNIFICANT MODIFICATION

<b>1. PERMIT TO BE ISSUED TO:</b> <p style="text-align: center;"><b>Fresno/Clovis Regional Wastewater Reclamation Facility</b></p>	
<b>2. MAILING ADDRESS:</b>  STREET/P.O. BOX: <u>5607 W. Jensen</u>  CITY: <u>Fresno</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93706-9458</u>	
<b>3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:</b>  STREET: <u>same</u> CITY: <u>same</u>  <u>NW</u> ¼ SECTION <u>Fresno</u> TOWNSHIP <u>14</u> RANGE <u>South</u> RANGE <u>19 East</u>	<b>INSTALLATION DATE:</b>  <p style="text-align: center;"><b>N/A</b></p>
<b>4. GENERAL NATURE OF BUSINESS: Sewage Treatment Plant</b>	
<b>5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE</b> (include Permit #'s if known, and use additional sheets if necessary)  <p style="text-align: center;"><b>Application for Title V Minor Modification to incorporate ATC-C-535-6-10 into the Title V Permit.</b></p>	
<b>6. TYPE OR PRINT NAME OF APPLICANT:</b>  <b>Raul Campos</b>	<b>TITLE OF APPLICANT:</b> <b>Environmental Control Officer- Air Resources</b>
<b>7. SIGNATURE OF APPLICANT:</b>  	DATE: <u>8/10/11</u>  PHONE: (559) 621-5132 FAX: (559) 457-1168 EMAIL: <u>Raul.Campos@fresno.gov</u>

**For APCD Use Only:**

DATE <b>RECEIVED</b>  AUG 19 2011  FINANCE SJVUAPCD	FILING FEE RECEIVED: \$ <u>19.00</u> CHECK#: <u>713167</u>  DATE PAID: <u>8.19.11</u>  PROJECT NO: <u>C-1112843</u> FACILITY ID: <u>C-535</u>
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# San Joaquin Valley Unified Air Pollution Control District

## TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

### I. TYPE OF PERMIT ACTION (Check appropriate box)

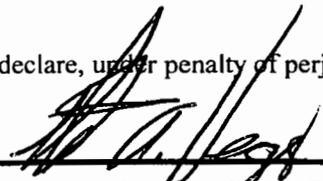
- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: <b>Fresno/Clovis Regional Wastewater Reclamation Facility</b>	FACILITY ID: <b>C - 535</b>
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input checked="" type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <b>City of Fresno</b>	
3. Agent to the Owner: <b>Stephen A. Hogg</b>	

### II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
 \_\_\_\_\_  
 Signature of Responsible Official

8-17-11  
 \_\_\_\_\_  
 Date

**Stephen A. Hogg**  
 \_\_\_\_\_  
 Name of Responsible Official (please print)  
  
**Public Utilities Assistant Director-Wastewater**  
 \_\_\_\_\_  
 Title of Responsible Official (please print)

# ATTACHMENT D

Previous Title V Operating Permit No.  
(C-535-6-4)

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-535-6-4

**EXPIRATION DATE:** 01/31/2016

**EQUIPMENT DESCRIPTION:**

16.7 MMBTU/HR CLEAVER-BROOKS MODEL CBI-700-400 DIGESTER GAS-FIRED BOILER WITH AN ALZETA MODEL CSB167R ULTRA LOW NOX BURNER

## PERMIT UNIT REQUIREMENTS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO<sub>2</sub>. [District Rules 4201 and 4301, 5.1] Federally Enforceable Through Title V Permit
3. The boiler shall only be fired on digester gas except pilot light which shall be fueled with PUC natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from the boiler shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.018 lb-NO<sub>x</sub>/MMBtu, 0.0482 lb-SO<sub>x</sub>/MMBtu, 0.0048 lb-PM<sub>10</sub>/MMBtu, 100 ppmvd CO @ 3% O<sub>2</sub> or 0.061 lb-CO/MMBtu, or 0.004 lb-VOC/MMBtu. [District NSR Rule, 4305, and 4306] Federally Enforceable Through Title V Permit
5. Digester gas fuel consumption shall not exceed 730,400 cubic feet per day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Daily testing of digester gas is required so as to not exceed an average of 200 ppm as hydrogen sulfide (H<sub>2</sub>S). Corrections shall be made, and re-tested within three (3) hours in order to maintain average below 200 ppm. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The hydrogen sulfide content shall be tested daily except that if compliance with the hydrogen sulfide content limit has been demonstrated for 21 consecutive days, then the testing frequency shall be monthly. If a test shows noncompliance with the hydrogen sulfide content requirement, the source must return to daily testing until 21 consecutive days shows compliance. [District Rule 2520 9.3.2] Federally Enforceable Through Title V Permit
8. The sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D-1072, D-3031, D-4084, D3246, D-4810, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. The boiler shall be equipped with an operational non-resettable, totalizing mass or volumetric flow meter in the digester gas fuel supply line. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Source testing to measure digester gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
12. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100 (12/17/92), the permittee may fully comply with Rule 1100 (12/17/92) in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
13. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
14. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
15. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306 (10/16/08). [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
16. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081(12/16/93). [District Rule 1081] Federally Enforceable Through Title V Permit
17. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
22. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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23. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
24. Records of daily fuel consumption and daily sulfur testing results shall be maintained. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

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