



RE: T5_BlytheEnergyLLC_12072011_ReissueDraft 

Lisa Beckham to: Sam Oktay

01/18/2012 05:55 PM

Cc: Alan De Salvio, Gerardo Rios, "Darmody, Michael", Stationary Sources

Hi Sam (and others),

Attached are EPA's comments for Blythe Energy's title V renewal permit. The proposed permit was received by EPA on December 7, 2011. Subsequently, the statement of basis was requested and received on December 8, 2011. My comments are generally concerned with ensuring all federally applicable requirements are included in the title V permit. Without including the conditions of all the applicable requirements I'm concerned the source is vulnerable to compliance issues (as the permit shield generally does not extend to requirements not specifically identified in the permit).

I believe the changes to the permit will require the permit to go back through public notice. If the District has a different interpretation, please let me know and we can discuss.

While I've included some links with additional information in the comments, later this week or early next week I will also send examples Mojave can use to address the comments. Of course, you won't be obligated to use this information, but it would probably be helpful to at least have a starting point or information as a reference.

Finally, I'll note that the District appears to not provide the permit application (or, alternatively, an application summary) with proposed title V permits, as required by Rule 1203(B)(1)(c)(ii) and 40 CFR Part 70.8. The proposed permit, statement of basis, and application/application summary need to be sent to EPA to begin the 45-day review period. In the future, if proposed title V permits are sent without these documents I will be requesting them and EPA's 45-day review period will not begin until all documents are received. I highly recommend preparing an application summary as an alternative to sending the entire application to EPA. If the District is interested in this option please let me know and I will provide a list of the information needed in the summary and a couple of examples from other agencies. Application summaries are usually 1-3 pages long.

If you have any questions or need additional clarification please let me know.



Blythe Renewal Comments 01182011.docx

Thanks,
Lisa Beckham
Environmental Engineer
Air Division, Permits Office (Air-3)
U.S. EPA Region 9
(415) 972-3811

Sam Oktay	Thanks Lisa; FYI, I will be out on travel beginni...	01/17/2012 10:34:04 AM
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From: Sam Oktay <soktay@mdaqmd.ca.gov>
 To: Lisa Beckham/R9/USEPA/US@EPA
 Cc: Alan De Salvio <Adesalvio@mdaqmd.ca.gov>, Gerardo Rios/R9/USEPA/US@EPA, Stationary Sources <StationarySources@mdaqmd.ca.gov>, "Darmody, Michael" <Michael.Darmody@fpl.com>
 Date: 01/17/2012 10:34 AM
 Subject: RE: T5_BlytheEnergyLLC_12072011_ReissueDraft

Thanks Lisa; FYI, I will be out on travel beginning tomorrow, returning next Monday.

Samuel (Sam) J. Oktay, PE
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From: Lisa Beckham [<mailto:Beckham.Lisa@epamail.epa.gov>]
Sent: Tuesday, January 17, 2012 9:24 AM
To: Sam Oktay
Cc: Alan De Salvio; Gerardo Rios; Stationary Sources
Subject: RE: T5_BlytheEnergyLLC_12072011_ReissueDraft

Hi Sam,

I just wanted to let you know that I will also be commenting on this permit. I've been working from the initial version, but I don't think it will have too much of an effect on my comments. My major concerns are with including all federally applicable requirements in the permit and conducting a CAM applicability analysis (including adding CAM requirements to the permit, if applicable). I hope to have my comments to you by COB tomorrow.

Thanks,
Lisa Beckham
Environmental Engineer
Air Division, Permits Office (Air-3)
U.S. EPA Region 9
(415) 972-3811

From: Sam Oktay <soktay@mdaqmd.ca.gov>
To: Sam Oktay <soktay@mdaqmd.ca.gov>, Gerardo Rios/R9/USEPA/US@EPA, Roberto Gutierrez/R9/USEPA/US@EPA, Shaheerah Kelly/R9/USEPA/US@EPA, Manny Aquitania/R9/USEPA/US@EPA, Lisa Beckham/R9/USEPA/US@EPA, "Darmody, Michael" <Michael.Darmody@fpl.com>
Cc: Stationary Sources <StationarySources@mdaqmd.ca.gov>, Alan De Salvio <Adesalvio@mdaqmd.ca.gov>
Date: 01/13/2012 03:23 PM
Subject: RE: T5_BlytheEnergyLLC_12072011_ReissueDraft

The draft T5 Permit was revised based on comments from the permitted source. Permit revision section of the T5 permit summarizes the changes. The MDAQMD considers these changes to be administrative in nature and does not plan to change the comment periods at this time.

Thanks,
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From: Sam Oktay
Sent: Wednesday, December 07, 2011 10:44 AM
To: Rios.Gerardo@epamail.epa.gov; 'Gutierrez.Roberto@epamail.epa.gov'; 'kelly.shaheerah@epa.gov'; aquitania.manny@epa.gov; Beckham.Lisa@epamail.epa.gov
Cc: Stationary Sources; Alan De Salvio
Subject: T5_BlytheEnergyLLC_12072011_ReissueDraft

Attached is T5 Permit # 130202262 Renewal draft, last revised 12/07/11, for BLYTHE ENERGY, LLC and public notice copy.

Public Comment Period will end January 9, 2012, and USEPA Comment Period will end January 23, 2012.

Note: In an effort to conserve paper and postage, and to expedite T5 processing, hard copies will not be sent; please print provided attachments if a hard copy is required.

Thanks,
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[attachment "T5_BlytheEnergyLLC_01132012_ReissueDraft.doc" deleted by Lisa

Beckham/R9/USEPA/US]