

## **Title V Permit Evaluation**

**Site Number:** A8664

**Site Name :** Crockett Cogeneration, A California Limited Partnership

**Site Address:** 550 Loring Avenue, Crockett, CA 94525

### **Periodic Monitoring:**

#### Discussion

All sources are equipped with continuous emission monitors for NO<sub>x</sub> and CO emission concentration. Therefore, no additional monitoring is necessary for those pollutants.

Because all sources are fired exclusively on PUC-quality natural gas, annual source testing is sufficient to insure compliance with SO<sub>2</sub> and PM<sub>10</sub> emission limitations and no additional monitoring is necessary.

Because POC emission rates correlate with CO emission rates and all sources are equipped with continuous emission monitors for CO, annual source testing for POC is sufficient to insure compliance with POC emission limitations and no additional monitoring is necessary.

### **Permit Shield:**

The applicant requested a permit shield from the notification and recordkeeping requirements of 40 CFR Part 60.7 and 60.13 on the basis that these requirements are redundant with BAAQMD requirements. However, this request has been denied since the federal and District requirements are not equivalent.

The applicant requested a permit shield for S-201 Gas Turbine from the fuel sulfur and nitrogen content monitoring requirement of 40 CFR 60, Subpart GG, section 60.334(b)(2) for Stationary Gas Turbines. Because the S-201 gas turbine is fired exclusively with natural gas and is subject to a BAAQMD permit condition (#14970, part 1) requiring the use of "PUC-quality" natural gas, a permit shield has been granted for S-201 Gas Turbine from the federal requirement cited above.

The applicant requested a permit shield for S-201 Gas Turbine from the excess NO<sub>x</sub> emission standard of 40 CFR 60, Subpart GG, section 60.334(c)(1). Because S-201 is subject to BAAQMD permit condition (#14790, part 23(b)) that requires the use of a continuous emission monitor for NO<sub>x</sub>, a permit shield has been granted for S-201 Gas Turbine from the subsumed federal requirement cited above.

The applicant requested a permit shield for S-202 Heat Recovery Steam Generator from the continuous monitoring of nitrogen oxides requirement of 40 CFR 60, Subpart Da, section 60.47a(c). Because S-202 is subject to BAAQMD permit condition (#14790, part 23(b)) that requires the use of a continuous emission monitor for NO<sub>x</sub>, a permit shield has been granted for S-202 Heat Recovery Steam Generator from the subsumed federal requirement cited above.

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The applicant requested a permit shield for S-203, S-204, & S-205 Auxiliary Boilers from the continuous monitoring of nitrogen oxides requirement of 40 CFR 60, Subpart Db, section 60.48b(b). Because S-203, S-204, & S-205 are subject to BAAQMD permit condition (#14790, part 23(b)) that requires the use of a continuous emission monitor for NOx, a permit shield has been granted for S-203, S-204, & S-205 Auxiliary Boilers from the subsumed federal requirement cited above.

**Alternate Operating Scenario:**

No alternate operating scenarios were requested by the applicant.

**Compliance Status:**

There are currently no sources out of compliance at the facility.

**Alignment of Information in Application and Proposed Permit:**

There are no substantive discrepancies between the content of the application and the proposed permit.