



**South Coast
Air Quality Management District**

Engineering Division
Application Processing & Calculations

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APPL NO. 556920	DATE 10/31/2014
PROCESSED BY CGP	CHECKED BY

TITLE V PERMIT RENEWAL

COMPANY NAME AND ADDRESS:

Burbank City, Burbank Water and Power, SCPPA
164 W Magnolia Blvd.
Burbank, CA 91502

EQUIPMENT LOCATION:

164 W Magnolia Blvd.
Burbank, CA 91502

BACKGROUND:

This is an existing facility that is in the business of producing electrical power. The facility is a joint ownership project, consisting of 1 combined cycle gas turbine generator which produces power for the 12 member agencies (11 cities and 1 irrigation district), including the cities of Burbank, Anaheim, Glendale, Pasadena, and others. The plant is operated by the City of Burbank. Approximate total power output is 343 MW.

The facility was issued its initial Title V permit on May 23, 2003. The permit expired on May 22, 2008, and was renewed for a new 5 year term on April 10, 2009. The latest permit expiration was on April 9, 2014. The facility submitted its Title V renewal application on October 8, 2013, which is within the timeframe required to obtain an application shield.

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

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

Along with a fee of \$2,072.50, which was the correct filing fee at the time the application was submitted.



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COMPLIANCE RECORD REVIEW:

There are currently no outstanding compliance issues with the facility. The facility has been issued 3 Notices to Comply and 1 Notices of Violation since the last Title V permit renewal. The notices are summarized below:

Notice #	Violation Date	Description
D12220	3/31/10	Calculate and list all incidents where NOx is over 2 ppm
D20375	4/15/11	Provide information on the storage silo
D20379	7/29/11	Conduct RATA's on time
P55706	8/6/09	Exceeding 6 hour start up time

DISCUSSION:

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 facility has requested several changes to their permit under the renewal application. These requests are discussed below.

Change the Name that appears on the permit from 'Burbank City, Burbank Water and Power, SCPPA' to 'Southern California Public Power Authority' and the legal operator to 'Burbank Water and Power.'

The facility was advised to fill out Form 200-A for the name change.

Change the Responsible Official from Bill Carnahan to Ronald E. Davis, and change the mailing address to 164 W Magnolia Blvd, Burbank, CA 91502

The requested changes were made.

- Change the CO Oxidation Catalyst device C9 description from 'Engelhard' to 'Emerachem' and change the volume from 300 ft³ to 236 ft³.

The requested change will not be made at this time as it is outside the scope of the Title V renewal application. The facility has been advised to submit a separate application.

- Change the diameter of the soda ash storage silo from 9 ft to 12 ft.



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The requested change will not be made at this time as it is outside the scope of the Title V renewal application. The facility has been advised to submit a separate application.

- Change the diameter of the lime storage silo from 8 ft to 12 ft.

The requested change will not be made at this time as it is outside the scope of the Title V renewal application. The facility has been advised to submit a separate application.

- Change the reference in condition A433.1 from A195.1 to A195.2

The requested change was made.

- Change the testing requirement in Condition D29.1 (SCR device C10) from 'at least annually' to 'at least once every calendar year.'

The requested change will not be made at this time as it is outside the scope of the Title V renewal application. The facility has been advised to submit a separate application.

Additionally, the RTC hold requirement of Condition I298.1 will be split between the turbine and the duct burner in accordance with the latest Reclaim Administration policy direction. The split is calculated based on heat rate as follows:

Turbine	=	132,962 [1787/(1787+583)]	=	100,254
Duct Burner	=	132,962 [583/(1787+583)]	=	32,708

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.

CONDITIONS:

The following conditions are being modified:

D4 and D6

A433.1

The operator shall comply with the 2.0 ppmv NOx BACT emission concentration limit at all times, except as specified in Condition ~~A195.1~~ **A195.2** and under the following conditions:



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Emission Limits	Averaging Time	Operation Requirements
440 lbs/start up	6 hours	The 440 lbs/startup emission limit shall apply to a startup event which shall not exceed 6 hours per day

For the purposes of this condition, the limit(s) shall be based on the total combined emissions from equipment D4 (Gas Turbine 1) and D6 (Duct Burner).

[RULE 2005, 5-6-2005]

[Devices subject to this condition : D4, D6]

I298.1

This equipment shall not be operated unless the facility holds ~~132962~~ **100,254** pounds of NOx RTCs in its allocation account to offset the annual emissions increase for the first year of operation. The RTCs held to satisfy the first year of operation portion of this condition may be transferred only after one year from the initial start of operation. In addition, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds ~~132962~~ **100,254** pounds of NOx RTCs valid during that compliance year. RTCs held to satisfy the compliance year portion of this condition may be transferred only after the compliance year for which the RTCs are held. If the initial or annual hold amount is partially satisfied by holding RTCs that expire midway through the hold period, those RTCs may be transferred upon their respective expiration dates. This hold amount is in addition to any other amount of RTCs required to be held under other condition(s) stated in this permit.

[RULE 2005, 5-6-2005]

[Devices subject to this condition : D4]

I298.2

This equipment shall not be operated unless the facility holds 32,708 pounds of NOx RTCs in its allocation account to offset the annual emissions increase for the first year of operation. The RTCs held to satisfy the first year of operation portion of this condition may be transferred only after one year from the initial start of operation. In addition, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds 32,708 pounds of NOx RTCs valid during that compliance year. RTCs held to satisfy the compliance year portion of this condition may be transferred only after the compliance year for which the RTCs are held. If the initial or annual hold amount is partially satisfied by holding RTCs that expire midway through the hold period, those RTCs may be transferred upon their respective expiration dates. This hold amount is in addition to any other amount of RTCs required to be held under other condition(s) stated in this permit.

[RULE 2005, 5-6-2005]

[Devices subject to this condition : D6]