

PLACER COUNTY AIR POLLUTION CONTROL DISTRICT

Statement of Basis

Proposed Title V Permit to Operate – Renewal

Rio Bravo Rocklin

Permit Number RB-001

Issued to:

Rio Bravo Rocklin
3100 Thunder Valley Court
Rocklin, CA 95648

Issued by:

Placer County Air Pollution Control District
110 Maple Street
Auburn, CA 95603

Proposed:

January 22, 2015

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1. Background

This document supports the Placer County Air Pollution Control District's ("District") renewal of the Rio Bravo Rocklin RB-001 Title V permit. Rio Bravo Rocklin operates a 25 MW waste-wood fired boiler. The Title V permit No. RB-001 was originally issued by the District on November 7, 2008.

As a major source of NO_x, VOC, and CO emissions, a Title V permit is required under District Rule 507, Federal Operating Permit Program, and 40 CFR Part 70.

The Title V permit life is 5 years from date of issue, expiring on November 7, 2013. This document amends the Statement of Basis documents prepared for the previous two Title V permits issued on November 7, 2008 and November 7, 2003. A permit renewal application was submitted by Rio Bravo to the District on January 14, 2013, as required by District Rule 507, Federal Operating Permit Program. The application serves as a temporary permit until the permit renewal is issued.

2. Permit Renewal Evaluation

The District has reviewed Federal, California State, and District rules, regulations, and operating permits for applicable requirements for incorporation into the Title V permit renewal.

2.1 Federal

Federal rules and regulations promulgated or amended since the previous Title V permit issuance on November 7, 2008, that are applicable to Rio Bravo plant operations are limited to a U.S. EPA issued final rule titled "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters," referred to as the "Boiler MACT Rule," issued on January 31, 2013. Rio Bravo is a major source for hazardous air pollutants, because as shown in Table 1, HCl emissions are greater than 10 tons/year, based on Rio Bravo's 2013 Toxic Emissions Inventory Report (TEIR), for compliance with AB2588, received on August 29, 2013. The effective compliance date for the Boiler MACT Rule for Rio Bravo, which is an existing major source, is January 31, 2016. The District has chosen to incorporate permit conditions into the Title V permit renewal that are required by the Boiler MACT Rule, with note that they are not effective until January 31, 2016. In the top of Table 2, permit conditions are listed which have been added to meet the Boiler MACT rule. They are selected considering Rio Bravo's fluidized bed boiler design that burns a single woody biomass fuel.

The second bottom part of Table 2 lists Title V permit renewal condition additions based on a re-evaluation of Compliance Assurance Monitoring Plan requirements.

Greenhouse Gases: On June 3, 2010, U.S. EPA issued a rule addressing greenhouse gases (GHG) from stationary industrial sources (75 FR 31514, "Prevention of Significant Deterioration (PSD) and Title V Greenhouse Gas (GHG) Tailoring Rule Final Rule"). The rule sets GHG permitting thresholds and schedules for both existing and new sources, and BACT requirements for certain new and modified sources. Subsequently, the District, on February 10, 2011, adopted Rule 517, Permitting Requirements for Stationary Sources Emitting Greenhouse Gases, which implemented certain Tailoring rule permitting requirements. GHG emissions from Rio Bravo Rocklin were reported as 305,389 metric tons of CO₂e for the year 2013. Since the facility is already under a Title V permit, the reporting of their GHG emissions is all that is required by the Tailoring rule and District Rule 517. There are no specific operating requirements or permit condition limits that are needed specific for GHGs.

2.2 State of California

State rules and regulations are contained in the California Health and Safety Code. All current State requirements that are applicable to Rio Bravo operations are already contained in the Title V permit issued previously on November 7, 2008. Thus, no Title V permit revisions are required based on California Health and Safety Code updates since the Title V permit issuance on November 7, 2008.

2.3 Placer County Air Pollution Control District Rules and Regulations

District rules and regulations promulgated or amended since the Title V permit issuance of November 7, 2008, and those which are applicable to Rio Bravo operations, are identified in Table 3. Permit condition additions and revisions based on these rules are listed in Table 3.

2.4 Placer County Air Pollution Control District-Issued Authority to Construct, Permits to Operate

District Permits to Operate and Authorities to Construct issued or amended since the Title V permit issuance of November 7, 2008, include:

- Authority to Construct No. AC-10-79.
- Authority to Construct No. AC-11-42.
- Authority to Construct No. AC-13-41.
- Authority to Construct No. AC-15-01.
- Permit to Operate No. RIOB-90-01, issue date 9/25/13.

Table 4 lists each of the permit conditions from the Authority to Construct and Permit to Operate and how they were considered for the Title V permit renewal.

3. Draft Renewed Permit

The proposed Title V Permit to Operate RB-001 renewal is provided in Attachment I. A version of the permit with changes identified with underline / strikeout is provided in Attachment II.

Attachment I

Proposed Title V Operating Permit RB-001

Attachment II

**Proposed Title V Operating Permit RB-001
Showing Underline / Strikeout Changes from Permit Issued November 7, 2008**

Attachment III

Rio Bravo Title V Renewal Application