

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT STATIONARY SOURCE AND COMPLIANCE DIVISION <i>Large Coating, Printing and Chemical Operations Team</i> APPLICATION PROCESSING AND CALCULATIONS	PAGE	1 of 9
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	REVIEWED BY	
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**PERMIT TO CONSTRUCT EVALUATION
NATURAL GAS FUELED BOILER**

Applicant's Name	THE BOEING COMPANY C-17 PROGRAM
Company I.D.	800038
Mailing Address	3855 LAKEWOOD BLVD., LONG BEACH, CA 90846
Equipment Address	3855 LAKEWOOD BLVD., LONG BEACH, CA 90846

EQUIPMENT DESCRIPTION

Application No. 556846
RECLAIM/TITLE V PERMIT REVISION, Minor
Application No. 556847 (New construction, functionally identical replacement for D196)

Section H

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
Process 2: BOEING C-17 OPERATIONS					
System 1: EXTERNAL COMBUSTION OPERATIONS					
BOILER, NATURAL GAS, CLEAVER BROOKS, MODEL FLX-700-800-160HW, WATER TUBE TYPE, WITH LOW NOX BURNER, FLUE GAS RECIRCULATION, 8.0 MMBTU/HR BURNER, CLEAVER BROOKS, MODEL NTH080-GX-9S-3, WITH LOW NOX BURNER, 8.0 MMBTU/HR A/N 556847	D571		NOx: PROCESS UNIT	CO: 2000 PPMV [RULE 407], CO: 400 PPMV [RULE 1146], CO: 100 PPMV [RULE 1303(A)(1)], NOX: 9 PPMV [RULE 2005, 2012], PM: 0.1 GRAINS/SCF [RULE 409]	D28.1 D332.1 H23.16 I297.3

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HISTORY

The Boeing Company – C17 program (Boeing) submitted application no. 556847 for a Permit to Construct a new 8.0 MMBtu/hr water tube boiler. The boiler will replace an existing 12.0 MMBtu/hr boiler (device no. D196, A/N 177707). Unlike the old boiler, the new boiler is fitted with both a low-NOx burner and flue-gas recirculation. The old boiler was previously Rule 219 exempt (application date of December 1988). Once the new boiler is constructed and fully operational, D196 will be inactivated.

Boeing is a RECLAIM/Title V facility. A Title V renewal permit was issued to this facility on January 20, 2013. Boeing has proposed to revise their Title V renewal permit with application no. 556846. The proposed revision is considered as a “minor permit revision” for RECLAIM pollutants, non-RECLAIM pollutants and hazardous air pollutants (HAPs) to the RECLAIM/Title V permit for this facility. This is the third revision since the renewal.

The District database shows that the applicant has not received any odor nuisance complaints from the public in the last two years. The company also has not received any Notices to Comply or Notice of Violation in the last two years.

PROCESS DESCRIPTION

Boeing manufactures military and civilian aircrafts at this location. The company operates a number of permitted equipment such as spray booths, boilers, I.C. engines, storage tanks, etc. under a RECLAIM/Title V permit. The boiler will be used to provide comfort air and heating to the spray booths (hangars) and buildings. This boiler is equipped with a low-NOx burner and flue gas recirculation to meet the BACT requirements for NOx emissions (9 ppmv). Low NOx burners reduce NOx emissions by combusting in stages. Staging partially delays the combustion process, resulting in a cooler flame which suppresses NOx formation.

In the flue gas recirculation system, a portion of the flue gas is recycled from the stack to the burner wind box. Upon entering the wind box, the gas is mixed with combustion air prior to be fed to the burner. The recycled flue gas contains combustion products which act as inert materials during combustion. This additional mass is heated in the combustion zone, thereby lowering the peak flame temperature and reducing the NOx formation. To a lesser extent, flue gas recirculation also reduces oxygen content in the flame zone and as a result forms less NOx.

OPERATING HOURS

Average: 24 hour/day, 7 day/week, 52 weeks/year
Maximum: 24 hour/day, 7 day/week, 52 weeks/year

EMISSION CALCULATIONS

New Boiler Emissions:

The burner was designed to emit NOx at 9 ppmv, corrected to 3% O₂.

	<u>maximum</u>	<u>normal</u>					
<u>hr/dy</u>	24	24	<u>max heat input</u>	8.00E+06 (BTU/hr)			
<u>dy/wk</u>	7	7	<u>gross heating value</u>	1050 (BTU/scf)			
<u>wk/yr</u>	52	52					
<u>load</u>	100%	100%					

	<u>Emission</u>	<u>MAX</u>	<u>AVE</u>	<u>MAX</u>	<u>30-DAY</u>	<u>MAX</u>	<u>MAX</u>
	<u>Factors</u>	(lb/hr)	(lb/hr)	(lb/dy)	(lb/dy)	(lb/yr)	(ton/yr)
SO ₂ (R1)	0.6	0.005	0.005	0.110	NA	40	0.020
SO ₂ (R2)	0.6	0.005	0.005	0.110	0.110	40	0.020
NO ₂ (R1)	130	0.990	0.990	23.771	NA	8,653	4.326
NO ₂ (R2)	11.65	0.089	0.089	2.130	2.130	775	0.388
CO (R1)	39.5	0.301	0.301	7.223	NA	2,629	1.315
CO (R2)	39.5	0.301	0.301	7.223	7.223	2,629	1.315
PM, PM ₁₀ (R1=R2)	7.6	0.058	0.058	1.390	1.390	506	0.253
TOC (R1=R2)	5.5	0.042	0.042	1.006	1.006	366	0.183
acetaldehyde	0.0043	3.3E-05	3.3E-05	7.9E-04	NA	2.86E-1	1.43E-4
acrolein	0.0027	2.1E-05	2.1E-05	4.9E-04	NA	1.80E-1	8.99E-5
ammonia	3.2	2.4E-02	2.4E-02	5.9E-01	NA	2.13E+2	1.06E-1
benzene	0.008	6.1E-05	6.1E-05	1.5E-03	NA	5.32E-1	2.66E-4
ethyl benzene	0.0095	7.2E-05	7.2E-05	1.7E-03	NA	6.32E-1	3.16E-4
formaldehyde	0.017	1.3E-04	1.3E-04	3.1E-03	NA	1.13E+0	5.66E-4
hexane	0.0063	4.8E-05	4.8E-05	1.2E-03	NA	4.19E-1	2.10E-4
napthalene	0.0003	2.3E-06	2.3E-06	5.5E-05	NA	2.00E-2	9.98E-6
PAH's	0.0001	7.6E-07	7.6E-07	1.8E-05	NA	6.66E-3	3.33E-6
propylene	0.731	5.6E-03	5.6E-03	1.3E-01	NA	4.87E+1	2.43E-2
toluene	0.0366	2.8E-04	2.8E-04	6.7E-03	NA	2.44E+0	1.22E-3
xylenes	0.0272	2.1E-04	2.1E-04	5.0E-03	NA	1.81E+0	9.05E-4

NO ₂ @ 3% excess O ₂ ----->>>	8.98	(ppmv)	SO ₂ @ 3% excess O ₂ ----->>>	0.33	(ppmv)
CO @ 3% excess O ₂ ----->>>	49.98	(ppmv)	PM @ 12% CO ₂ ----->>>	5.6E-09	(grain/ft ³)

Old Boiler Emissions:

	<u>maximum</u>	<u>normal</u>					
<u>hr/dy</u>	24	24		<u>max heat input</u>	1.20E+07 (BTU/hr)		
<u>dy/wk</u>	7	7		<u>gross heating value</u>	1050 (BTU/scf)		
<u>wk/yr</u>	52	52					
<u>load</u>	100%	100%					

	<u>Emission</u>	<u>MAX</u>	<u>AVE</u>	<u>MAX</u>	<u>30-DAY</u>	<u>MAX</u>	<u>MAX</u>
	<u>Factors</u>	(lb/hr)	(lb/hr)	(lb/dy)	(lb/dy)	(lb/yr)	(ton/yr)
SO ₂ (R1)	0.6	0.007	0.007	0.165	NA	60	0.030
SO ₂ (R2)	0.6	0.007	0.007	0.165	0.165	60	0.030
NO ₂ (R1)	130	1.486	1.486	35.657	NA	12,979	6.490
NO ₂ (R2)	130	1.486	1.486	35.657	35.657	12,979	6.490
CO (R1)	84	0.960	0.960	23.040	NA	8,387	4.193
CO (R2)	84	0.960	0.960	23.040	23.040	8,387	4.193
PM, PM ₁₀ (R1=R2)	7.6	0.087	0.087	2.085	2.085	759	0.379
TOC (R1=R2)	5.5	0.063	0.063	1.509	1.509	549	0.275
acetaldehyde	0.0043	4.9E-05	4.9E-05	1.2E-03	NA	4.29E-1	2.15E-4
acrolein	0.0027	3.1E-05	3.1E-05	7.4E-04	NA	2.70E-1	1.35E-4
ammonia	3.2	3.7E-02	3.7E-02	8.8E-01	NA	3.19E+2	1.60E-1
benzene	0.008	9.1E-05	9.1E-05	2.2E-03	NA	7.99E-1	3.99E-4
ethyl benzene	0.0095	1.1E-04	1.1E-04	2.6E-03	NA	9.48E-1	4.74E-4
formaldehyde	0.017	1.9E-04	1.9E-04	4.7E-03	NA	1.70E+0	8.49E-4
hexane	0.0063	7.2E-05	7.2E-05	1.7E-03	NA	6.29E-1	3.14E-4
naphthalene	0.0003	3.4E-06	3.4E-06	8.2E-05	NA	3.00E-2	1.50E-5
PAH's	0.0001	1.1E-06	1.1E-06	2.7E-05	NA	9.98E-3	4.99E-6
propylene	0.731	8.4E-03	8.4E-03	2.0E-01	NA	7.30E+1	3.65E-2
toluene	0.0366	4.2E-04	4.2E-04	1.0E-02	NA	3.65E+0	1.83E-3
xylenes	0.0272	3.1E-04	3.1E-04	7.5E-03	NA	2.72E+0	1.36E-3

NO ₂ @ 3% excess O ₂ ----->>>	100.16	(ppmv)	SO ₂ @ 3% excess O ₂ ----->>>	0.33	(ppmv)
CO @ 3% excess O ₂ ----->>>	106.29	(ppmv)	PM @ 12% CO ₂ ----->>>	5.6E-09	(grain/ft ³)

Emissions Summary (Max. lb/day)

	NOx	CO	PM	ROG	SOx
Old Boiler	35.66	23.04	2.09	1.51	0.17
New Boiler	2.13	7.22	1.39	1.01	0.11

Greenhouse Gas Emissions:

New Boiler:

CO₂ = 8 MMBtu/hr * 116.89 lb/MMBtu = 935.1 lb/hr

CH₄ = 8 MMBtu/hr * 0.002 lb/MMBtu = 0.02 lb/hr

Old Boiler:

CO₂ = 12 MMBtu/hr * 116.89 lb/MMBtu = 1,402.7 lb/hr

CH₄ = 12 MMBtu/hr * 0.002 lb/MMBtu = 0.024 lb/hr

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RULES/REGULATION EVALUATION

RULE 212 (c)(1): This section requires a public notice for all new or modified permit units that emit air contaminants located within 1,000 feet from the outer boundary of a school. The facility is not located within 1,000 feet of the outer boundary of a school, the closest school (Long Beach City College) is over 2,600 feet away. A public notice is not required under this section of the rule.

Rule 212 (c)(2): This section requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212 (g). The proposed project will not result in an emission increase from the facility. There will be an emission decrease with the functionally identical replacement boiler. A public notice is not required under this section of the rule.

Rule 212 (c)(3): This section requires a public notice for any new or modified permit unit with increases in emissions of toxic air contaminants (TAC) listed in Table I of Rule 1401 resulting in an MICR equal or greater than one in a million per permit unit or ten in a million per facility. The proposed project will not result in a cancer risk equal or greater than one in a million or ten in a million for the facility. There will be a TAC emission decrease with the replacement boiler. A public notice is not required under this section of the rule.

Rule 212 (g): This section requires a public notice for all new or modified sources that result in emission increases exceeding any of the daily maximums specified by 212 (g). The proposed project will not result in an emission increase from the source in excess of the limits. There will be an emission decrease with the replacement boiler. A public notice is not required under this section of the rule.

RULES 401 & 402: AQMD database has no records of visible emissions or nuisance complaints against this facility. Compliance with these requirements is expected with the proper operation of the equipment.

RULE 1146: The boiler is expected to operate at a CO concentration less than 400 ppmv (100 ppmv expected). A source test will verify compliance.

REGULATION XIII: Though Boeing is a NOx RECLAIM facility, compliance with Reg. XIII is still required for other criteria pollutants.

RULE 1303(a): The boiler will be fitted with a low NOx burner that is designed to operate at 9 ppmv or less of NOx and 100 ppmv or less of CO. A source test will verify compliance.

RULE 1303(b)(1): Modeling for CO or PM10 is not required since the hourly emissions are less than the allowable limits.

Modeling Analysis	CO (lb/hr)	PM10 (lb/hr)
Hourly Emissions	0.301	0.058
Allowable Limit	25.9	2.8

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RULE 1303(b)(2): Emission offsets are not required. There is an emission decrease with the replacement boiler.

RULE 1303(b)(4): The facility is expected to be in full compliance with all applicable rules and regulations of the District.

RULE 1401: There will not be an increase in toxic air contaminants with the replacement boiler.

RULE 2005: Boeing is a NOx RECLAIM facility. The proposed modification will not result in a NOx emission increase.

RULE 2005(c)(1)(A): The boiler will be fitted with a low NOx burner and FGR that is designed to operate at 9 ppmv or less of NOx. A source test will verify compliance.

RULE 2005(c)(1)(B): Modeling is not required since the estimated hourly NOx emissions of 0.089 lb/hr is below the allowable limit of 0.47 lb/hr.

NESHAP/NSPS – this boiler is not subject to NESHAP (DDDDD) emission limits or NSPS (Dc) since the maximum heat input is less than 10 mm Btu/hr; it is subject to the work practice requirements which requires tune-up every 2 years. A permit condition will be added to ensure compliance.

REGULATION XXX: This facility is in the RECLAIM program. The proposed project is considered as a “minor permit revision” for RECLAIM pollutants, non-RECLAIM pollutants, and hazardous air pollutants (HAPs) to the RECLAIM/Title V permit for this facility. Rule 3000(b)(12) specifies that a “minor permit revision” includes, but is not limited to any Title V permit revision that:

- Rule 3000(b)(12)(A)(v) – does not result in an emission increase of any RECLAIM pollutant over the facility’s starting Allocation plus the non-tradable Allocation, or higher Allocation amount which has previously undergone a significant permit revision process.
- Rule 3000(b)(12)(A)(vi) – does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP).

The proposed project is not expected to result in an emission increase of any RECLAIM pollutant or an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP), and therefore is considered as a “minor permit revision” pursuant to Rule 3000(b)(12)(A)(v) and Rule 3000(b)(12)(A)(vi).

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Since NO_x is a RECLAIM pollutant for this facility, a separate analysis shall be made to determine if the proposed permit revision is considered a “minor permit revision” for RECLAIM pollutants. Section B of the Title V permit shows that this facility’s NO_x starting Allocation plus the non-tradable Allocation is 27,126 pounds. The proposed project is not expected to result in a NO_x emission increase. As a result, this proposed project is considered as a “minor permit revision” for RECLAIM pollutants.

This proposed project is the 3rd permit revision to the Title V renewal permit issued to this facility on January 20, 2013. The following table summarizes the permit revisions since the Title V renewal permit was issued:

Revision	HAP	VOC	NO _x *	PM10	SO _x	CO
1 st Permit Revision: Correct equipment descriptions for three boilers (D549, D551 and D553) and one ICE (D567) (Minor revision)	0	0	0	0	0	0
2 nd Permit Revision: P/C to P/O for three ICEs (D568, D569 and D570) and update equipment description for three boilers (D549, D551 and D553) and one ICE (D567) (Administrative)	0	0	0	0	0	0
3 rd Permit Revision: Add new boiler (D571) to replace D196 boiler (Minor revision)	0	-0.5	-33.5	-0.7	0	-15.8
Cumulative Emissions Total	0	-0.5	-33.5	-0.7	0	-15.8
Maximum Daily	30	30	40*	30	60	220

CONCLUSIONS/RECOMMENDATIONS

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “minor permit revision”, it is exempt from the public participation requirements under Rule 3006(b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V permit (Section H) will be issued to this facility.

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CONDITIONS

D28.1: THE OPERATOR SHALL CONDUCT SOURCE TEST(S) IN ACCORDANCE WITH THE FOLLOWING SPECIFICATIONS:

THE TEST SHALL BE CONDUCTED WITHIN 90 DAYS AFTER ACHIEVING MAXIMUM PRODUCTION RATE, BUT NO LATER THAN 180 DAYS AFTER INITIAL START-UP.

THE TEST SHALL BE CONDUCTED PURSUANT TO A SOURCE TEST PROTOCOL THAT SHALL BE SUBMITTED TO THE DISTRICT NO LATER THAN 60 DAYS AFTER THE INITIAL START-UP OF THIS EQUIPMENT UNLESS OTHERWISE APPROVED BY THE DISTRICT. THE PROTOCOL SHALL BE APPROVED IN WRITING BY THE DISTRICT BEFORE THE TEST COMMENCES, INCLUDE COMPLETED DISTRICT FORMS ST-1 AND ST-2, IDENTIFY THE TESTING LAB, INCLUDE A STATEMENT FROM THE LAB CERTIFYING IT MEETS DISTRICT RULE 304(K) AND INCLUDE A DESCRIPTION OF THE SAMPLING AND ANALYTICAL PROCEDURES TO BE USED.

THE TEST SHALL BE CONDUCTED TO DETERMINE OXIDES OF NITROGEN, CARBON MONOXIDE, OXYGEN CONTENT, MOISTURE CONTENT, FLOW RATE AND TEMPERATURE AT THE EXHAUST OF THE BOILER.

THE DISTRICT SHALL BE NOTIFIED OF THE DATE AND TIME OF THE TEST AT LEAST 14 DAYS PRIOR TO THE TEST.

THE TEST SHALL BE CONDUCTED BY A TESTING LAB CERTIFIED BY THE CALIFORNIA AIR RESOURCES BOARD IN THE REQUIRED TEST METHODS FOR CRITERIA POLLUTANTS TO BE MEASURED AND IN COMPLIANCE WITH DISTRICT RULE 304 (NO CONFLICT OF INTEREST).

THE TEST SHALL BE CONDUCTED USING SAMPLING FACILITIES THAT COMPLY WITH THE DISTRICT GUIDELINES FOR CONSTRUCTION OF SAMPLING AND TESTING FACILITIES, PURSUANT TO RULE 217.

D332.1: THE OPERATOR SHALL DETERMINE COMPLIANCE WITH THE CO EMISSION LIMIT(S) BY CONDUCTING A TEST AT LEAST ONCE EVERY FIVE YEARS USING A PORTABLE ANALYZER AND AQMD-APPROVED TEST METHOD OR, IF NOT AVAILABLE, A NON-AQMD APPROVED TEST METHOD. THE TEST SHALL BE CONDUCTED WHEN THE EQUIPMENT IS OPERATING UNDER NORMAL CONDITIONS TO DEMONSTRATE COMPLIANCE WITH RULE 1146 CONCENTRATION LIMIT. THE OPERATOR SHALL COMPLY WITH ALL GENERAL TESTING, REPORTING, AND RECORDKEEPING REQUIREMENTS IN SECTIONS E AND K OF THIS PERMIT.

I297.3: THIS EQUIPMENT SHALL NOT BE OPERATED UNLESS THE FACILITY HOLDS 775 POUNDS OF NOX RTCS IN ITS ALLOCATION ACCOUNT TO OFFSET THE ANNUAL EMISSIONS INCREASE FOR THE FIRST YEAR OF OPERATION. RTCS HELD TO SATISFY THIS CONDITION MAY BE TRANSFERRED ONLY AFTER ONE YEAR FROM THE INITIAL START OF OPERATION. IF THE 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.

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In lieu of holding RTCs for the entire duration specified above, RTCs held for the purpose of demonstrating compliance with this condition may be transferred as specified below, provided quarterly emissions do not exceed the corresponding quarterly limit listed in the table below. The amount available for transfer shall be as specified in Rule 2005(f)(3). Such amount may be transferred only after the end of the subject quarter. If the first day of operation does not coincide with the first day of a calendar quarter, the emission limit for that calendar quarter shall be prorated based on the number of days remaining in the calendar quarter as of the first day of operation and the amount available for transfer after that calendar quarter shall be the prorated emission limit minus the actual emissions reportable for that calendar quarter pursuant to RECLAIM Monitoring, Recordkeeping, and Reporting protocols (MRR) and the emission limit for the portion of the first year of operation falling in the fifth calendar quarter shall be prorated based on the number of days of the first year of operation occurring in that calendar quarter and the amount available for transfer after that calendar quarter shall be the prorated emission limit minus the actual emissions reportable for the portion of the first year of operation occurring in that calendar quarter pursuant to RECLAIM MRR. If the quarterly certified emissions for any quarter (or portion of a quarter occurring within the first year of operation) exceed the corresponding quarterly emission limit or prorated quarterly emission limit, as applicable, the facility may only sell RTCs held pursuant to Rule 2005(f) after the first calendar quarter ending at least one year after operation commences.

Calendar Quarter	Emission Limit (Pounds of NOx RTCs)
July 1 through September 30	193
October 1 through December 31	194
January 1 through March 31	194
April 1 through June 30	194

H23.16

THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES OR REGULATIONS:

CONTAMINANT	RULE	RULE/SUBPART
HAPS	40CFR63, SUBPART	DDDDD