



FW: Pacific Ultrapower Chinese Camp: Proposed Title V Permit Renewal
Bill Sandman

to:

Andrew Chew

01/15/2013 09:34 AM

Cc:

Eugene Chen, Vicki Helmar , Jim Roehl

Hide Details

From: Bill Sandman <BSandman@co.tuolumne.ca.us>

To: Andrew Chew/R9/USEPA/US@EPA,

Cc: Eugene Chen/R9/USEPA/US@EPA, Vicki Helmar <VHelmar@co.tuolumne.ca.us>,

Jim Roehl <JRoehl@co.tuolumne.ca.us>

History: This message has been forwarded.

Good morning Andrew:

I wanted to follow up again on your email. I apologize for not calling you toward the end of the comment period, especially with all of the guidance you provided. I just figured your agency did not have any comments. Regarding your comments, I can incorporate into PUCS' 2013 District permit and reference the TV permit, not sure that's going to help anything. But, I will also incorporate into the SPI Sonora TV Evaluation/SOB and permit.

Speaking of SPI Sonora, they have submitted their ATC application for the proposed increases in their boiler limits and averaging times, which we discussed several months ago. Is this something that EPA would like to see or is required to review prior to us making determinations and issuing the District permit to operate, which will mirror the TV permit?

One of our concerns, is SPI's request for 24 hour averaging periods (from 3 hours) for their lbs/hr limits for NOx and CO. We realize they are required to submit justification for these increases, but there is a lack of data that may support their argument for the averaging increase.

Vicki and I are wondering if EPA allows an evaluation period (i.e. for one year) while still issuing a TV permit, for SPI to acquire data from their CEMS to make a case for their proposed 24 hr averaging periods. Is there any guidance you could provide for this circumstance?

If you would like to talk rather than email, please let me know and I can set up a time to call you.

Thanks,

Bill

Bill Sandman
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From: Chew.Andrew@epamail.epa.gov [<mailto:Chew.Andrew@epamail.epa.gov>]

Sent: Friday, December 21, 2012 9:16 PM

To: Bill Sandman

Cc: Vicki Helmar; Chen.Eugene@epamail.epa.gov; R9airpermits_CA@epa.gov

Subject: Pacific Ultrapower Chinese Camp: Proposed Title V Permit Renewal

Dear Bill/Vicki:

Thank you for providing us the opportunity to review the District's proposed renewal title V permit for Pacific Ultrapower Chinese Station, which we received on November 6, 2012, by U.S. Mail. We reviewed the proposed permit in light of our discussions that began as early as March of this year as the District was drafting the permit.

These discussions were helpful to our office to better understand the PUCS' specific circumstances and requirements. While the comments in this e-mail do not capture the multitude of topics discussed or a few that are still evolving, this e-mail identifies issues that must be addressed before the permit is issued. We believe that these comments can be addressed adequately that also would allow the permit to be issued without additional delay. Our comments are as follows.

1. To help the reader understand the factual and legal bases that underlie the NOx and CO startup emission limits selected in the proposed permit, please explain in the engineering evaluation how the 1399.2 pounds per day NOx emission limit and 3,500 pounds per day CO emission limit for startup events are justified. The criteria the District should use for evaluating and approving an emission limit and period for startup and shutdown periods is what is realistic for the source during those operations. The explanation may include emissions information/profile particular to PUCS' bubbling bed combustor as appropriate. We previously explained why such explanations were needed in our e-mail on 3/20/12.
2. Also, in the Statement of Basis, please include a table that conveys the PTE's and annual actual emissions for the following pollutants: NOx, CO, VOC, SOx, PM10, PM2.5, GHGs, and total HAPs. Please also include the PUCS' emission totals for each individual HAP that exceeds 9 tons per year.
3. For the permit, please add a permit condition to require that the NOx CEM be operating during all startup and shutdown periods (to the extent that the District believes is feasible) so it can measure emissions to verify compliance with the emission limit. In the 3/20/12 e-mail, we indicated that it would ensure enforceability.
4. Please add a permit condition for the definition of curing startup such that the duration for curing startup (allowing up to 96 hours) can be better distinguished from that for a conventional startup event (allowing up to 24 hours).
5. Finally, please add narrative to the Statement of Basis on the District's determination on how particular Part 63 NESHAP/MACT provisions for boilers would apply to the PUCS' unit. On December 20, 2012, our agency finalized a specific set of adjustments to the NESHAP/MACT standard; thus, air permitting agencies must now consider the revised standards in proposed permits. Before issuing the proposed permit, please add permit conditions to reflect the applicable NESHAP/MACT provisions.

We are committed to working with you to resolve these issues as expeditiously as possible. Please contact me if you have questions or want to discuss any of the comments. Thank you again.

- Andrew

Andrew Chew, P.E.

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