

**MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT
DRAFT TITLE V OPERATING PERMIT**

24580 Silver Cloud Court
Monterey, CA 93940
Telephone: (831) 647-9411

ISSUED TO:

Ameresco Crazy Horse LLC
111 Speen Street, Suite 410
Framingham, MA 01701

PLANT SITE LOCATION:

350 Crazy Horse Canyon Road
Salinas, CA 93907

ISSUED BY:

Richard Stedman, Air Pollution Control Officer

Effective Date

Nature of Business: Landfill gas to energy facility

SIC Code: 4911 - Electric Power Generation

RESPONSIBLE OFFICIAL:

Name: Joseph P. DeManche
Title: Executive Vice President
Phone: (508) 661-2266

FACILITY CONTACT PERSON:

Name: Steve Simmons
Title: Senior Plant Specialist
Phone: (831) 970-1026

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FACILITY DESCRIPTION

The Ameresco Crazy Horse LLC facility is an alternative energy facility. This facility treats and combusts landfill gas from the Salinas Valley Solid Waste Authorities' Crazy Horse Landfill in two internal combustion engines which drive generators to create electricity. The electricity generated is then sold to the local utility company.

EQUIPMENT DESCRIPTION

1. Landfill Gas Treatment System, System To Filter, De-water, Compress, And Remove Siloxane From Landfill Gas. Treated Gas Routed To GE Jenbacher Engines, Waste Gas Routed To Enclosed Flare.
2. ABUTECH Landfill Gas Fired Enclosed Flare, 4.44 MMBtu/Hr Maximum Heat Input.
3. GE Jenbacher Model JGS 616 GS-L.L, Spark Ignited Lean-Burn Engines, Each 3,012 BHp @ 1,500 RPM, Turbocharged And Intercooled; With GE Jenbacher Generators, 2,175 KW Output.

FEDERALLY ENFORCEABLE EMISSION LIMITS AND STANDARDS

1. The mass emission rates from each engine shall not exceed the following limits [District Rule 207, District Rule 404 NOx limit of 140 lbs/hr]:

<u>Pollutant</u>	<u>Grams/bhp-hr</u>	<u>ppm @ 15% O₂</u>
Oxides of Nitrogen	0.6	---
Volatile Organic Compounds	---	362
Carbon Monoxide	3.6	---

2. The mass emission rates from the flare shall not exceed the following limits [District Rule 207, District Rule 404 NOx limit of 140 lbs/hr]:

<u>Pollutant</u>	<u>Grams/bhp-hr</u>	<u>ppm @ 15% O₂</u>
Oxides of Nitrogen	0.06	---
Volatile Organic Compounds	---	362
Carbon Monoxide	0.20	---

3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark or darker than Ringelmann 1, or equivalent 20% opacity. [District Rule 400]
4. Sulfur compounds calculated as sulfur dioxide (SO₂) shall not exceed 0.2 percent by volume in the exhaust

stream. [District Rule 404]

5. The landfill gas combusted shall contain no more than 50 grains of sulfur compounds (calculated as hydrogen sulfide) per 100 cubic feet of gas. [District Rule 412]
6. Ameresco Crazy Horse LLC shall install, operate, and maintain a fuel flow meter on each of the engines and the flare. The fuel flow meter shall be installed, operated, and maintained per the manufacturer's specifications. [District Rule 207 and 40 CFR Part 60, Subpart JJJJ]
7. Ameresco Crazy Horse LLC shall keep a maintenance plan and to the extent practicable, maintain and operate the engines in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR Part 60, Subpart JJJJ]
8. Ameresco Crazy Horse LLC shall limit emissions of volatile organic compounds from the use of architectural coatings pursuant to the requirements of District Rule 426. [District Rule 426]
9. Should the facility, as defined in 40 CFR §68.3 become subject to Part 68, then Ameresco Crazy Horse LLC shall submit a risk management plan (RMP) by the date specified in 40 CFR §68.10. Once subject to Part 68, Ameresco Crazy Horse LLC shall certify compliance with these requirements as part of the annual compliance certification required by 40 CFR Part 70 and this permit. [40 CFR Part 68]
10. Ameresco Crazy Horse LLC shall comply with the requirements of 40 CFR Part 82 - Protection of Stratospheric Ozone. [40 CFR Part 82]

TESTING REQUIREMENTS AND PROCEDURES

11. Annual performance testing of the Landfill Gas Engines and the flare shall be conducted. Ameresco Crazy Horse LLC shall conduct performance tests in accordance with the requirements of 40 CFR Part 60.4244 and CARB Method 100 to verify compliance with condition numbers 1 and 2. Ameresco Crazy Horse LLC shall furnish the District written results of such performance tests within sixty (60) days of the test completion. A testing protocol shall be submitted to the District for approval at least thirty (30) days prior to the scheduled testing date. Written notice of the performance test shall be provided to the District a minimum of ten (10) days prior to the test so that a District observer may be present. [District Rules 207 and 218, and 40 CFR Part 60]
12. No testing is specified for the generic (Rule 400) opacity requirement from condition number 3. The Landfill Gas Engines and Flare are assumed to be in compliance with the opacity requirement due to their being fired on gaseous fuel. If testing is conducted for condition number 3, Ameresco Crazy Horse LLC should conduct testing in accordance with the methodology contained in EPA Method 9 and the data reduction procedures contained in District Rule 400. [District Rule 218]

- 13 Annual testing of the landfill gas to determine the sulfur content shall be conducted. Ameresco Crazy Horse LLC shall conduct testing in accordance with ASTM D 1072-80, ASTM D 3031-81, ASTM D 3246-81 or SCAQMD Method 307-91 to verify compliance with condition number 5. Ameresco Crazy Horse LLC shall furnish the District written results of the test within sixty (60) days of completion. [District Rule 218]

RECORD KEEPING REQUIREMENTS

14. As required in Section 60.4245 of the NSPS for Stationary Spark Ignition Internal Combustion Engines, Ameresco Crazy Horse LLC shall maintain the following specific monitoring records: [40 CFR Part 60, Subpart JJJJ]
- A) all notifications submitted to comply with Subpart JJJJ and all documentation supporting any notification;
 - B) maintenance conducted on the engine; and
 - C) documentation from the engine manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable.
15. As applicable Ameresco Crazy Horse LLC shall maintain the following general records of required monitoring information: [District Rule 218]
- A) the date and time of sampling or measurements;
 - B) the date(s) analyses were performed;
 - C) the company or entity that performed the analyses;
 - D) the analytical techniques or methods used;
 - E) the results of such analyses;
 - F) the operating conditions existing at the time of sampling or measurement; and
 - G) the records of quality assurance for continuous monitoring systems (including, but not limited to quality control activities, audits, and calibration drift checks) and source testing methods.
16. Ameresco Crazy Horse LLC shall maintain records on the occurrence and duration of any start-up, shutdown, or malfunction in the operation of the equipment under this permit. [District Rule 218]
17. Ameresco Crazy Horse LLC shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring, sample collection, measurement, report, and copies of all reports required by the permit. [District Rule 218]

REPORTING REQUIREMENTS

18. For potential protection from an enforcement action, Ameresco Crazy Horse LLC shall report breakdowns to the Air Pollution Control Officer (APCO) within 1 hour of the occurrence. This one hour period may be

extended up to six hours for good cause by the APCO.

The estimated time for repair of the breakdown shall be supplied to the APCO within 24 hours of the occurrence and a written report shall be supplied to the APCO within 5 days after the occurrence has been corrected. This report shall include at a minimum [District Rule 214]:

- A) a statement that the condition or failure has been corrected and the date of the correction; and
- B) a description of the reasons for the occurrence; and
- C) a description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future; and
- D) an estimate of the emissions caused by the condition or failure.

19. Ameresco Crazy Horse LLC shall submit the test report for annual Engine Testing conducted pursuant to condition number 11 to EPA Region IX within 60 days after the test is conducted. [40 CFR Part 60, Subpart JJJJ]

20. Ameresco Crazy Horse LLC shall submit semiannual monitoring reports to the District, in a District approved format, no later than August 15 for the period of January 1 through June 30 and no later than February 15 for the period of July 1 through December 31.

These monitoring reports shall include at a minimum:

- A) the time intervals, date and magnitude of excess emissions, nature and cause of the excess (if known), corrective actions and preventative measures adopted; and
- B) the averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard for the pollutant in question; and
- C) all information pertaining to any monitoring as required by the permit; and
- D) a negative declaration specifying when no excess emissions occurred.

21. Ameresco Crazy Horse LLC shall submit an annual compliance certification report to the District and U.S. EPA, in a District approved format, no later than February 15 for the period of January 1 through December 31 of the preceding year.

This report shall include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report and shall include at a minimum:

- A) identification of each term or condition of the permit that is the basis of the certification; and
- B) the compliance status; and
- C) whether compliance was continuous or intermittent; and
- D) the method(s) used for determining the compliance status of the source, currently and over the reporting period.

GENERAL CONDITIONS

22. Ameresco Crazy Horse LLC shall comply with all conditions of this federal operating permit. Any noncompliance with a permit condition constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [District Rule 218]
23. In an enforcement action, the fact that Ameresco Crazy Horse LLC would have to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit is not a defense. [District Rule 218]
24. This permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by the District. The filing of a request by Ameresco Crazy Horse LLC for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 218]
25. This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. [District Rule 218]
26. Ameresco Crazy Horse LLC shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. [District Rule 218]
27. For applicable requirements that will become effective during the permit term, Ameresco Crazy Horse LLC shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement. [District Rule 218]
28. Any document submitted to the District pursuant to this permit shall contain certification by the responsible official of truth, accuracy and completeness. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Ameresco Crazy Horse LLC shall promptly, upon discovery, report to the District a material error or omission in these records, reports, plans, or other documents. [District Rule 218]
29. Ameresco Crazy Horse LLC shall report any violation of any requirement contained in this permit to the District within 96 hours after such occurrence. The violation report shall include the time intervals, date and magnitude of excess emissions; nature and cause of the excess (if known), corrective actions and preventive measures adopted. [District Rule 218]
30. Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, record keeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with. [District Rule 218]

31. For this federal operating permit to remain valid through the permit term of five years from the date of issuance, Ameresco Crazy Horse LLC shall pay an annual emission fee based upon the requirements of District Rule 308. [District Rule 218]
32. Ameresco Crazy Horse LLC shall have available at the facility at all times a copy of this federal operating permit. [District Rule 218]
33. For protection from enforcement action based upon an emergency, as defined in District Rule 218, the responsible official for Ameresco Crazy Horse LLC shall submit to the District relevant evidence which demonstrates: [District Rule 218]
 - A) an emergency occurred; and
 - B) that Ameresco Crazy Horse LLC can identify the cause(s) of the emergency; and
 - C) that the facility was being properly operated at the time of the emergency; and
 - D) that all steps were taken to minimize the emissions resulting from the emergency; and
 - E) within two working days of the emergency event, Ameresco Crazy Horse LLC provided the District with a description of the emergency and any mitigating or corrective actions taken.
34. Upon presentation of credentials, Ameresco Crazy Horse LLC shall allow the District, the ARB, the EPA, or an authorized representative, to perform the following [District Rule 218]:
 - A) enter upon the premises where the federal operating permit source is located or in which any records are required to be kept under the terms and conditions of this federal operating permit;
 - B) to have access to and copy any records required to be kept under the terms and conditions of this federal operating permit;
 - C) to inspect any equipment, operation, or process described or required in this federal operating permit; and,
 - D) to sample emissions from the source.
