



DEC 21 2009

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Proposed Authority to Construct / Certificate of Conformity (Minor Mod)**
District Facility # N-770
Project # N1093498

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for Ripon Cogen, LLC, located at 944 S Stockton Ave Ripon, CA, which has been issued a Title V permit. Ripon Cogen, LLC is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. Ripon Cogen, LLC has proposed to designate the 94 MMBtu/hr Holman Boiler operating under permit unit N-770-7 a dormant emissions unit.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authority to Construct # N-770-7-8 with Certificate of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

DW: RD/cm

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



DEC 22 2009

Paulette Heuer
Ripon Cogen, LLC
944 S Stockton Ave
Ripon, CA 95366-2784

**Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)
District Facility # N-770
Project # N1093498**

Dear Ms. Heuer:

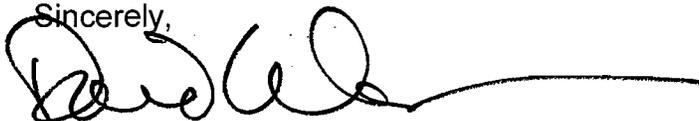
Enclosed for your review is the District's analysis of your application for Authority to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. Ripon Congen, LLC has proposed to designate the 94 MMBtu/hr Holman Boiler operating under permit unit N-770-7 a dormant emissions unit.

After addressing any EPA comments made during the 45-day comment period, the Authority to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

DW: RD/cm

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San Joaquin Valley Air Pollution Control District Application Review

Designate Existing Boiler as a Dormant Emissions Unit

Facility Name: Ripon Cogen, LLC Date: September 23, 2009
Mailing Address: 944 S Stockton Ave Engineer: Rick Dyer
Ripon, CA 95366-2784 Lead Engineer: Nick Peirce
Contact Person: Paulette Heuer
Telephone: (281) 370-1612
Application #: N-770-7-8
Project #: N-1093498
Deemed Complete: July 28, 2009

I. Proposal

Ripon Cogen, LLC proposes to designate permit unit N-770-7 as a dormant emission unit (DEU). The purpose of obtaining this designation results from the loss of their customer taking steam from the facility. The purpose of this boiler was to provide steam to the Neenah Paper Company when the natural gas-fired turbine was not operating. Neenah Paper Company has shutdown and there is no requirement to operate the boiler. District policy SSP 1705 (Additional Permit Conditions for Dormant Emission Units) requires that the facility take measures to ensure the unit does not operate while it is designated as a DEU. To render the unit incapable of operating, the applicant proposes to physically disconnect the fuel line to by removing a section of the natural gas supply pipeline. The fuel supply piping will be blanked-off with a blind flange. The applicant states the unit last operated on May 23, 2009, and the fuel meter reading is currently 1097036 cubic feet.

Ripon Cogeneration LLC is an existing major stationary source and has received their Title V permit. Per Rule 2520, Section 3.20, this proposed project constitutes a minor modification to the facility's Title V permit and may be processed with a Certificate of Conformity (COC). The facility requests that the ATC permit be issued with a COC and has submitted a Compliance Certification form (see Appendix B). Therefore, Ripon Cogeneration LLC will be required to submit a Title V administrative amendment application prior to operating under the ATC permit issued under this proposed project.

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (9/21/06)
Rule 2520 Federally Mandated Operating Permits (6/21/01)
Rule 4101 Visible Emissions (2/17/05)

- Rule 4102 Nuisance (12/17/92)
- Rule 4201 Particulate Matter Concentration (12/17/92)
- Rule 4301 Fuel Burning Equipment (12/17/92)
- Rule 4305 Boilers, Steam Generators and Process Heaters, Phase 2 (8/21/03)
- Rule 4306 Boilers, Steam Generators and process Heaters, Phase 3 (10/16/08)
- Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater Than 5.0 MMBtu/hr
- Rule 4351 Boilers, Steam Generators, and Process Heaters - Phase 1 (8/21/03)
- Rule 4801 Sulfur Compounds (12/17/92)
- CH&SC 42301.6 California Health & Safety Code (School Notice)

III. Project Location

944 S Stockton Ave
Ripon, CA

The facility is not located within 1,000 feet of a K-12 school. Therefore, school noticing requirement CH&SC 42301.6 is not required.

IV. Process Description

The 94 MMBtu/hr Holman boiler was used to provide steam to the Neenah Paper Company for their paper making operations when the Ripon Cogen's gas turbine engine (GTE) did not operate. Note: under normal operating conditions steam would have been provided to Neenah Paper Company from a heat exchanger when the GTE was operating.

V. Equipment Listing

Pre-modification Equipment Description:

94.0 MMBTU/HR HOLMAN MODEL WT9609-1004 GP BOILER WITH A NATCOM ULTRA LOW NOX HYPER-MIX BURNER AND A FLUE GAS RECIRCULATION SYSTEM (LOAD-FOLLOWING UNIT).

Post-modification Equipment Description:

94 MMBTU/HR HOLMAN MODEL WT9609-1004 GP BOILER WITH A NATCOM ULTRA LOW NOX HYPER-MIX BURNER AND A FLUE GAS RECIRCULATION SYSTEM (LOAD-FOLLOWING UNIT). ***THIS IS A DORMANT EMISSIONS UNIT.***

VI. Emission Control Technology Evaluation

There are no proposed changes to the emission unit. Therefore, an emission control technology evaluation is not necessary.

VII. General Calculations

District Policy SSP 1705 (9/13/99) states that the designation of a permit unit as a Dormant Emission Unit is an administrative modification that is not subject to Rule 2201 (New and Modified Stationary Source Review). There will be no emissions and calculations are not necessary.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

As previously stated, this modification is not subject to the requirements of Rule 2201.

Rule 2520 Federally Mandated Operating

Ripon Cogen, LLC is subject to Rule 2520 (Title V) and has received their Title V Operating Permit. Section 3.20 of this rule defines Minor Permit Modifications as permit modifications that:

- Do not violate requirements of any applicable federally enforceable local or federal regulations;
- Do not relax monitoring, reporting, or record keeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
- Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject such as a federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act or an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act;
- Are not Title I modifications as defined in this rule or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
- Do not seek to consolidate overlapping applicable requirements.

The changes in this project constitute a Minor Modification to the Title V Permit. The applicant has requested that the ATC in this project be issued with a Certificate of Conformity, in accordance with the requirements of 40 CFR 70.6(c), 70.7 and 70.8. Therefore, the 45-day EPA comment period will be satisfied prior to the issuance of the

ATC. The facility's Compliance Certification Form is included in Appendix B. Prior to operating with modifications authorized by this ATC, the facility is required to submit an application to modify their Title V permit as administrative amendments in accordance with Rule 2520, Section 11.4.2.

The following conditions will be added to ensure compliance with this rule:

- *{1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Y*
- *{1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Y*

- Rule 4001 Visible Emissions**
- Rule 4102 Nuisance**
- Rule 4201 Particulate Matter Concentration**
- Rule 4301 Fuel Burning Equipment**
- Rule 4801 Sulfur Compounds**
- Rule 4305 Boilers, Steam Generators and Process Heaters – Phase 2**
- Rule 4306 Boilers, Steam Generators and Process Heaters – Phase 3**

Since the unit will not be operated and is currently in compliance with the above rules, continued compliance is expected.

Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters

This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a rated heat input greater than 5 million Btu/hr.

Presently, this boiler has not been modified to be in compliance with District Rule 4320. The emission limits, monitoring provisions, and testing requirements of this rule will be satisfied when the facility applies for an ATC to operate in compliance with this rule. The following conditions will be incorporated into the permit to enforce the dormant emission unit status pursuant to District Policy SSP 1705 and will be placed ahead of the existing permit conditions:

- *No modifications to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rule 2010]*
- *The fuel supply line shall be physically disconnected from this unit. [District Rules 4305 and 4306]*

- *The fuel flow meter reading shall not exceed 1097036 cubic feet. [District Rules 4305 and 4306]*
- *This equipment shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits to comply with the applicable requirements of District Rule 4320 and all other applicable District regulations. [District Rule 4320]*

Rule 4351 Boilers, Steam Generators and Process Heaters – Phase I

This rule applies to boilers, steam generators, and process heaters at NO_x Major Sources that are not located west of Interstate 5 in Fresno, Kings, or Kern counties. This unit is not located in Fresno, Kings or Kern counties. Therefore, this rule is not applicable to this unit.

IX. Recommendation

Issue an Authority to Construct with the conditions on the attached draft Authority to Construct. In accordance with District Policy SSP 1705, convert the Authority to Construct to a Permit to Operate immediately following issuance of the Authority to Construct.

X. Billing Information

Permit Number	Fee Description	Fee Schedule	Previous Fee Schedule
N-770-7-8	94 MMBtu/hr	3020-2-H	3020-2-H

Appendices:

- Appendix A: Draft Authority to Construct
- Appendix B: Compliance Certification Form
- Appendix C: Current Permit to Operate

Appendix A
Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-770-7-8

LEGAL OWNER OR OPERATOR: RIPON COGENERATION LLC
MAILING ADDRESS: 944 S STOCKTON AVE
RIPON, CA 95366

LOCATION: 944 S STOCKTON AVE
RIPON, CA 95366

EQUIPMENT DESCRIPTION:

MODIFICATION OF THE 94 MMBTU/HR HOLMAN BOILER MODEL #WT9609-1004 GP WITH A NATCOM ULTRA LOW NOX HYPER-MIX BURNER AND A FLUE GAS RECIRCULATION SYSTEM (LOAD-FOLLOWING BOILER) TO DESIGNATE THE UNIT AS A DORMANT EMISSION UNIT.

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. No modifications to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
4. The fuel supply line shall be physically disconnected from this unit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
5. The fuel flow meter reading shall not exceed 1097036 cubic feet. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
6. This boiler shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4320 and all other applicable District regulations. [District Rule 4320]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

DRAFT

DAVID WARNER, Director of Permit Services

N-770-7-8 : Sep 30 2009 2:38PM - DYERR : Joint Inspection NOT Required

7. The boiler's testing and monitoring requirements shall not be applicable during the time period the boiler is designated as a dormant emissions unit. [District Rules 4305, 4306, and 4320]
8. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
10. Particulate matter emissions from any combustion source shall not exceed 0.1 grains/dscf (calculated to 12% CO₂). [District Rules 4201, 3.0; and 4301, 5.1] Federally Enforceable Through Title V Permit
11. The boiler shall be fired only on natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The NO_x emissions concentration shall not exceed 15 ppmv, dry, corrected to 3% oxygen (O₂) or 0.018 pounds per MMBtu. [District NSR Rule, District Rule 4305, 5.1.1, and 4306, 5.1.1] Federally Enforceable Through Title V Permit
13. The CO emissions concentration shall not exceed 280 ppmv, dry, corrected to 3% oxygen (O₂). [District NSR Rule, District Rule 4305, 5.1.1, and 4306, 5.1.1] Federally Enforceable Through Title V Permit
14. The VOC emissions rate shall not exceed 0.0055 lb/MMBtu. [District Rules 2201] Federally Enforceable Through Title V Permit
15. The PM₁₀ emissions rate shall not exceed 0.0076 lb/MMBtu. [District Rules 2201] Federally Enforceable Through Title V Permit
16. The SO_x emissions rate shall not exceed 0.00285 lb/MMBtu. [District Rules 2201] Federally Enforceable Through Title V Permit
17. Performance testing for NO_x and CO emissions shall be conducted annually using the following test methods: EPA Method 7E (or ARB Method 100) for NO_x (ppmv), EPA Method 10 (or ARB Method 100) for CO, EPA Method 3 or 3A (or ARB Method 100) for stack gas oxygen, EPA Method 2 for stack gas velocity, and EPA Method 4 for stack gas moisture content. [District Rules 4305, 6.2 & 6.3; 4306, 6.2 & 6.3; and 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. The unit may be tested once every 36 months, if the performance testing shows compliance for two consecutive years. If a performance test shows noncompliance with any of the requirements, the source shall return to annual performance testing until compliance is again shown for two consecutive years. [District Rules 4305, 6.3; 4306, 6.3; and 2520, 9.4.2] Federally Enforceable Through Title V Permit
19. The stack height shall be adequate for stack sampling pursuant to EPA reference methods for performance testing and shall meet all the requirements of District Rule 1081. [District Rule 1081, 3.2] Federally Enforceable Through Title V Permit
20. The District must be notified 30 days prior to any performance testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
21. Performance testing shall be witnessed or authorized by District personnel. Test results must be submitted to the District within 60 day of performance testing. [District Rules 1081, 7.2, 7.3] Federally Enforceable Through Title V Permit
22. If the boiler is fired on PUC-regulated natural gas, then the operator shall maintain copies of natural gas bills. [District Rule 2520, 9.4.2 and 40 CFR 60.40c - 48c] Federally Enforceable Through Title V Permit
23. If the boiler is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the boiler shall be calculated using ASTM method D 1072, D 3031, D 4084 or D 3246. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. If the boiler is not fired on PUC-regulated natural gas, then the sulfur content of each fuel source shall be less than 0.0062% by weight, tested weekly except that if the fuel sulfur content requirement has been met for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a quarterly test does not meet the sulfur content requirement, the source must return to weekly testing until eight consecutive weekly tests meet the sulfur content requirement. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

25. The stack concentration of NO_x (as NO₂), CO, and O₂ shall be measured and recorded at least on a monthly basis using an ECOM Model AC portable emission analyzer, or other District approved portable emission analyzer. [District Rules 4305; 4306, 5.4; and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of the date and time of NO_x, CO, and O₂ measurements, the measured NO₂ and CO concentrations corrected to 3% O₂, and the O₂ concentration. The records must also include a description of any corrective action taken to maintain the emissions within the acceptable range. These records shall be retained at the facility for a period of no less than five years and shall be made available for District inspection upon request. [District Rules 4305; 4306, 5.4; and 2520, 9.5.2] Federally Enforceable Through Title V Permit
27. If the NO_x or CO concentrations, as measured by the ECOM Model AC, or other District approved portable emissions analyzer, exceed the allowable emissions rate, the permittee shall notify the District and take corrective action within one hour after detection. If the portable analyzer readings continue to exceed the allowable emissions rate, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emissions limits. [District Rules 4305; 4306, 5.4; and 2520, 9.4.2] Federally Enforceable Through Title V Permit
28. The portable emissions analyzer shall be calibrated as recommended by the manufacturer. All instrument calibration data shall be kept on file including the date of calibration. The calibration date shall not exceed 6 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305; 4306, 5.4; and 2520, 9.4.2] Federally Enforceable Through Title V Permit
29. Concentration measurements shall not be taken until the sample acquisition probe has been exposed to the stack gas for at least 150% of the response time. Measurements shall be taken in triplicate. [District Rules 4305, 2520, 9.4.2, and 4306, 5.4] Federally Enforceable Through Title V Permit
30. If water vapor is not removed prior to measurement, the absolute humidity in the gas stream must be determined so that the gas concentrations may be reported on a dry basis. [District Rules 4305 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
31. If water vapor creates an interference with the measurement of any component, then the water vapor must be removed from the gas stream prior to concentration measurements. [District Rules 4305 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
32. The source test plan shall identify which basis (ppmvd or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5] Federally Enforceable Through Title V Permit
33. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2; and 4306, 5.5.2] Federally Enforceable Through Title V Permit
34. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.5.4; and 4306, 5.5.4] Federally Enforceable Through Title V Permit
35. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305; 5.5.5; and 4306, 5.5.5] Federally Enforceable Through Title V Permit
36. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1; and 4306, 6.1] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: SJVUAPCD Rules 4201, 4301, & 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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Appendix B
Compliance Certification Form

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

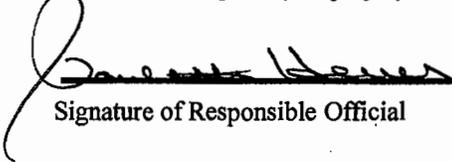
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Ripon Cogeneration LLC	FACILITY ID: N - 770
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility <input checked="" type="checkbox"/> Limited Liability Company	
2. Owner's Name:	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official

June 30, 2009

Date

Paulette Heuer

Name of Responsible Official (please print)

Vice President Operations

Title of Responsible Official (please print)

Certification of Truth and Accuracy

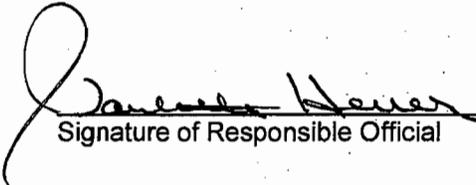
Company: Ripon Cogeneration LLC

Facility Identification: N-770

Telephone: (281) 370-1612

Address: 944 S Stockton Ave
Ripon, CA

I declare that based on information and belief formed after reasonable inquiry, the statements and information provided in the document are true, accurate, and complete.


Signature of Responsible Official

June 30, 2009

Date

Paulette Heuer

Name of Responsible Official (please print)

Vice President, Operations

Title of Responsible Official (please print)

Appendix C
Current PTO

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-770-7-6

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

94.0 MMBTU/HR HOLMAN MODEL WT9609-1004 GP BOILER WITH A NATCOM ULTRA LOW NOX HYPER-MIX BURNER AND A FLUE GAS RECIRCULATION SYSTEM (LOAD-FOLLOWING UNIT).

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions from any combustion source shall not exceed 0.1 grains/dscf (calculated to 12% CO₂). [District Rules 4201, 3.0; and 4301, 5.1] Federally Enforceable Through Title V Permit
4. The boiler shall be fired only on natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The NO_x emissions concentration shall not exceed 15 ppmv, dry, corrected to 3% oxygen (O₂) or 0.018 pounds per MMBtu. [District NSR Rule, District Rule 4305, 5.1.1, and 4306, 5.1.1] Federally Enforceable Through Title V Permit
6. The CO emissions concentration shall not exceed 280 ppmv, dry, corrected to 3% oxygen (O₂). [District NSR Rule, District Rule 4305, 5.1.1, and 4306, 5.1.1] Federally Enforceable Through Title V Permit
7. The VOC emissions rate shall not exceed 0.0055 lb/MMBtu. [District Rules 2201] Federally Enforceable Through Title V Permit
8. The PM₁₀ emissions rate shall not exceed 0.0076 lb/MMBtu. [District Rules 2201] Federally Enforceable Through Title V Permit
9. The SO_x emissions rate shall not exceed 0.00285 lb/MMBtu. [District Rules 2201] Federally Enforceable Through Title V Permit
10. Performance testing for NO_x and CO emissions shall be conducted annually using the following test methods: EPA Method 7E (or ARB Method 100) for NO_x (ppmv), EPA Method 10 (or ARB Method 100) for CO, EPA Method 3 or 3A (or ARB Method 100) for stack gas oxygen, EPA Method 2 for stack gas velocity, and EPA Method 4 for stack gas moisture content. [District Rules 4305, 6.2 & 6.3; 4306, 6.2 & 6.3; and 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. The unit may be tested once every 36 months, if the performance testing shows compliance for 2 consecutive years. If a performance test shows noncompliance with any of the requirements, the source shall return to annual performance testing until compliance is again shown for two consecutive years. [District Rules 4305, 6.3; 4306, 6.3; and 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. The stack height shall be adequate for stack sampling pursuant to EPA reference methods for performance testing and shall meet all the requirements of District Rule 1081. [District Rule 1081, 3.2] Federally Enforceable Through Title V Permit
13. The District must be notified 30 days prior to any performance testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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14. Performance testing shall be witnessed or authorized by District personnel. Test results must be submitted to the District within 60 day of performance testing. [District Rules 1081, 7.2, 7.3] Federally Enforceable Through Title V Permit
15. If the boiler is fired on PUC-regulated natural gas, then the operator shall maintain copies of natural gas bills. [District Rule 2520, 9.4.2 and 40 CFR 60.40c - 48c] Federally Enforceable Through Title V Permit
16. If the boiler is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the boiler shall be calculated using ASTM method D 1072, D 3031, D 4084 or D 3246. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. If the boiler is not fired on PUC-regulated natural gas, then the sulfur content of each fuel source shall be less than 0.0062% by weight, tested weekly except that if the fuel sulfur content requirement has been met for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a quarterly test does not meet the sulfur content requirement, the source must return to weekly testing until eight consecutive weekly tests meet the sulfur content requirement. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. The stack concentration of NO_x (as NO₂), CO, and O₂ shall be measured and recorded at least on a monthly basis using an ECOM Model AC portable emission analyzer, or other District approved portable emission analyzer. [District Rules 4305; 4306, 5.4; and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
19. The permittee shall maintain records of the date and time of NO_x, CO, and O₂ measurements, the measured NO₂ and CO concentrations corrected to 3% O₂, and the O₂ concentration. The records must also include a description of any corrective action taken to maintain the emissions within the acceptable range. These records shall be retained at the facility for a period of no less than 5 years and shall be made available for District inspection upon request. [District Rules 4305; 4306, 5.4; and 2520, 9.5.2] Federally Enforceable Through Title V Permit
20. If the NO_x or CO concentrations, as measured by the ECOM Model AC, or other District approved portable emissions analyzer, exceed the allowable emissions rate, the permittee shall notify the District and take corrective action within one (1) hour after detection. If the portable analyzer readings continue to exceed the allowable emissions rate, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emissions limits. [District Rules 4305; 4306, 5.4; and 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. The portable emissions analyzer shall be calibrated as recommended by the manufacturer. All instrument calibration data shall be kept on file including the date of calibration. The calibration date shall not exceed 6 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305; 4306, 5.4; and 2520, 9.4.2] Federally Enforceable Through Title V Permit
22. Concentration measurements shall not be taken until the sample acquisition probe has been exposed to the stack gas for at least 150% of the response time. Measurements shall be taken in triplicate. [District Rules 4305, 2520, 9.4.2, and 4306, 5.4] Federally Enforceable Through Title V Permit
23. If water vapor is not removed prior to measurement, the absolute humidity in the gas stream must be determined so that the gas concentrations may be reported on a dry basis. [District Rules 4305 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. If water vapor creates an interference with the measurement of any component, then the water vapor must be removed from the gas stream prior to concentration measurements. [District Rules 4305 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
25. The source test plan shall identify which basis (ppmvd or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5] Federally Enforceable Through Title V Permit
26. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2; and 4306, 5.5.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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27. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.5.4; and 4306, 5.5.4] Federally Enforceable Through Title V Permit
28. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5; and 4306, 5.5.5] Federally Enforceable Through Title V Permit
29. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1; and 4306, 6.1] Federally Enforceable Through Title V Permit
30. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: SJVUAPCD Rules 4201, 4301, & 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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