



MAR 15 2011

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

Re: **Notice of Minor Title V Permit Modification**  
**District Facility # N-645**  
**Project # N-1101828**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. DTE Stockton, LLC is proposing a Title V minor permit modification to incorporate the recently issued N-645-14-11 and '-16-11 into the Title V operating permit. This modification is to designate the two coal-fired boilers as dormant emission units.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-645-14-11 and '-16-11, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

Enclosures

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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**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



MAR 15 2011

Rob Sanch  
DTE Stockton, LLC  
2526 W. Washington St.  
Stockton, CA 95203

**Re: Notice of Minor Title V Permit Modification  
District Facility # N-645  
Project # N-1101828**

Dear Mr. Sanch:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued N-645-14-11 and '-16-11 into the Title V operating permit. This modification is to designate the two coal-fired boilers as dormant emission units.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-645-14-11 and '-16-11, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

Enclosures

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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# **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: N-1101828

Engineer: Frank DeMaris  
Date: March 7, 2011

Facility Number: N-645  
Facility Name: DTE Stockton, LLC  
Mailing Address: 2526 W Washington St.  
Stockton, CA 95203

Contact Name: Rob Sanch  
Phone: (734) 302-5383

Responsible Official: Stephen Sorrentino  
Title: Vice President for Renewable Resources

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## **I. PROPOSAL**

DTE Stockton, LLC ("DTE") is proposing a Title V minor permit modification to incorporate the recently issued N-645-14-11 and '-16-11 into the Title V operating permit. These ATCs designate these two coal-fired boilers as dormant emissions units, allowing DTE to maintain the permits without being required to conduct periodic compliance testing and monitoring until such time as they resume operation of the boilers.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

## **II. FACILITY LOCATION**

2526 W. Washington St.  
Stockton, CA 95203

### III. EQUIPMENT DESCRIPTION

N-645-14-13: 280 MMBTU/HR CIRCULATING FLUIDIZED BED BOILER #A UTILIZING LIMESTONE INJECTION, A THERMAL DENOX SYSTEM, AND A BAGHOUSE, DESIGNATED AS A DORMANT EMISSIONS UNIT. NOTE: THIS BOILER SERVES AN ELECTRIC GENERATOR

N-645-16-13: 280 MMBTU/HR CIRCULATING FLUIDIZED BED BOILER #B UTILIZING LIMESTONE INJECTION, A THERMAL DENOX SYSTEM, AND A BAGHOUSE, DESIGNATED AS A DORMANT EMISSIONS UNIT. NOTE: THIS BOILER SERVES AN ELECTRIC GENERATOR

### IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

### V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

### VI. DESCRIPTION OF PROPOSED MODIFICATIONS

DTE proposes to render each of these two identical boilers non-operational by disconnecting the fuel line to the natural gas-fired startup burner. With the startup burner non-operational, the coal-fired boiler cannot be started up. DTE has made this modification in order to ensure that the boilers cannot be operated, thereby allowing the permits to be maintained without having to conduct monitoring and periodic performance testing as would normally be required under District Rule 4352 (Solid Fuel Fired Boilers, Steam Generators, and Process Heaters).

Each of the permits is identical, as are the existing and proposed Permits to Operate, so all changes described below apply to both boilers.

N-645-14-13, '-16-13:

Permit conditions 7, 34, 43, 45, 47, 55, 60, and 61 on the current Permit to Operate were replaced by permit conditions 7, 34, 43, 45, 47, 55, 60, and 61 on the proposed Permit to Operate. The new conditions include the phrase "Upon recommencing operation ..." in accordance with the District's policy on dormant

emission units, suspending enforcement of monitoring and performance testing requirements while the boilers are in a dormant status.

Permit condition 63 was added to the proposed Permit to Operate to enforce the modification that ensures the boilers cannot be operated while in a dormant emission unit status.

Permit condition 64 was added to the proposed Permit to Operate to require the permittee to conduct a new performance test within 60 days of recommencing operation of the dormant boilers.

Permit condition 65 was added to the proposed Permit to Operate to require the permittee to provide the District seven days notice before recommencing operation. This condition provides a mechanism for bringing the boilers out of dormant emission unit status and amending the Permit to Operate to reflect the commencement of operation.

## **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. 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;
4. 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 terms and conditions include:
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit No. N-645-14-13, '-16-13
- B. Authorities to Construct No. N-645-14-11, '-16-11
- C. Previous Title V Operating Permit No. N-645-14-10, '-16-10
- D. Emissions Increases
- E. Application

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
(N-645-14-13, '-16-13)

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-645-14-13

EXPIRATION DATE: 11/30/2010

## EQUIPMENT DESCRIPTION:

MODIFICATION OF 280 MMBTU/HR CIRCULATING FLUIDIZED BED BOILER #A UTILIZING LIMESTONE INJECTION, A THERMAL DENOX SYSTEM, AND A BAGHOUSE NOTE: THIS BOILER SERVES AN ELECTRIC GENERATOR:

## PERMIT UNIT REQUIREMENTS

1. The total net electrical output of the Cogeneration Facility shall not exceed 50 MW and the total gross electrical output, including the parasitic use, shall not exceed 54 MW. [District NSR Rule and the California Health and Safety Code, Section 42314] Federally Enforceable Through Title V Permit
2. The operator shall install, continuously operate, and maintain limestone injection for control of SOx emissions. A Selective Non-Catalytic Reduction system utilizing ammonia injection shall be incorporated within the boiler at a point where a temperature range of 1500-1700 °Fahrenheit is provided during normal operations. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
3. The boiler shall be equipped with automatic air/fuel ratio control system. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The flue gas from the combustor shall be vented through the fabric filter at all times (including the soot blowing periods). [District NSR Rule] Federally Enforceable Through Title V Permit
5. The flue gas temperature entering the fabric filter shall be maintained at 50 °Fahrenheit or above the wet bulb temperature whenever the boiler is in operation, including the boiler start-up and shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The fabric filter shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule and 40 CFR 64.3] Federally Enforceable Through Title V Permit
7. Upon recommencing operation, the differential pressure across the fabric filter bags shall be maintained between 2" and 8" water column. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Replacement bags numbering at least 10% of the total number of bags in the largest fabric filter using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The fabric filter shall have a maximum effective air to cloth ratio of 4.2:1 and shall be equipped with an automatic pulse jet cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The fabric filter filtering media shall be P84 Felt type or an equivalent approved by the Air Pollution Control Officer (APCO) in writing. Written approval from the APCO shall be maintained on-site. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The fabric filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Material removed from the fabric filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. The bottom ash from the bed and the fly ash from the economizer shall be transferred to their pertinent silo via a totally air tight pneumatic transfer system. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The boiler may be fired on Western United States Coal, Canadian Coal, Petroleum Coke, or tire derived fuel. The boiler may also fire on fuel oil #2, or natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The fuel switch over period is defined as the time the boiler is switched from solid fuel to fuel oil #2 for a period not to exceed 3 consecutive hours per occurrence. At the end of the three hour time limit, if the boiler continues to fire on fuel oil, then the fuel oil #2 emission limits for NO<sub>x</sub>, and CO will be enforced. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The amount of tire derived fuel used in the boiler shall not exceed 11% by weight of the total solid fuels used at any one time. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Natural gas or fuel oil #2 shall be used during start-up to heat the boiler to solid fuel ignition temperature throughout the combustor before feeding any solid fuel. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
18. The maximum rate at which fuel oil #2 may be consumed in the boiler shall be limited to 170,000,000 Btu/hr. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
19. The average sulfur content of the fuel oil #2 shall not exceed 0.2 percent by weight on a monthly basis. The sulfur content of the fuel oil #2 shall not exceed 0.25 percent by weight at any time. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
20. The 3-hour averaging NSR emission limits of this permit shall not apply during startup and shutdown periods as defined in District Rule 4352 - "Solid Fuel Fired Boilers, Steam Generators, and Process Heaters." [District NSR Rule and District Rule 4352] Federally Enforceable Through Title V Permit
21. No gases which exhibit greater than 20% opacity (6 minute average), except for one 6 minute period per hour of not more than 27% opacity shall be discharged into the atmosphere from this boiler. [40 CFR 60.42a(b)] Federally Enforceable Through Title V Permit
22. The VOC emissions from the entire stationary source shall not exceed 150 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Emissions of VOC from this boiler shall not exceed 2.5 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Emissions of Particulate Matter (PM) from this boiler shall not exceed 5 pounds per hour. [District NSR Rule & District Rules 4201 & 4301] Federally Enforceable Through Title V Permit
25. Emissions of PM<sub>10</sub> from this boiler shall not exceed 5 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Emissions of SO<sub>x</sub> from this boiler shall not exceed 13.04 pounds per hour, based on a 24-hour rolling average. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Emissions of SO<sub>x</sub> shall not exceed 0.29 lb/MMBtu (24-hour average) from each boiler and 26.0 lb/hr (24-hour average) or 50.0 lb/hr (3-hour average) from the stack common to both boilers. [PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
28. When firing on solid fuels or fuel oil #2 during fuel switch over periods, emissions of NO<sub>x</sub> from this boiler shall be the more restrictive of all of following: 12.29 lb/hr, 0.04 lb/MMBtu (24-hour average) from each boiler and 42.0 lb/hr, 0.075 lb/MMBtu (3-hour average) from stack common to both boilers. [District NSR Rule, District Rule 4352, 5.1, and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
29. When firing on fuel oil #2, emissions of NO<sub>x</sub> from this boiler shall not exceed 3.13 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
30. Emissions of NO<sub>x</sub> from startup duct burners shall not exceed 0.15 lb/MMBtu (3 hour average) when firing on natural gas. [PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

31. When firing on solid fuels or fuel oil #2 during fuel switch over periods, emissions of CO from this boiler shall not exceed 39.58 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
32. When firing on fuel oil #2, emissions of CO from this boiler shall not exceed 14.4 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
33. If solid fuel or liquid fuel is used for a period of less than 24 hours (except for fuel switch over periods), the hourly emission limitations for NO<sub>x</sub>, CO, and SO<sub>x</sub> shall be determined by averaging the recording points from the continuous emission monitoring system taken during that time period. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Upon recommencing operation, performance testing for the NO<sub>x</sub>, CO, VOC, SO<sub>x</sub>, and PM<sub>10</sub> shall be conducted on an annual basis for combustion of solid fuels. [District NSR Rule & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
35. Performance testing for NO<sub>x</sub>, SO<sub>x</sub>, VOC, CO, and PM<sub>10</sub> shall also be performed for combustion of fuel oil in any year that the fuel oil consumption rate exceeds 242,900 gallons. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Performance testing shall be conducted using following test methods; for NO<sub>x</sub> EPA Methods 1-4 and 7E or ARB Method 100; for SO<sub>x</sub> EPA Methods 1-4 and 6 or 6C or 8 or ARB Method 100; for CO EPA Method 1-4 and 10 or ARB Method 100; for PM<sub>10</sub> EPA Method 201A in combination with EPA Method 202 or ARB Method 501 in combination with ARB Method 5 and EPA Method 5 (Front half only) or CARB Method 5 (excluding ammonia sulfate compounds) for PM; and for VOC EPA Method 25 or 25A or ARB Method 100. [District Rule 4352, 6.4; District Rule 2520, 9.3.2; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
37. For performance testing, stack gas velocity and volumetric flow rate shall be measured using EPA method 2 or CARB method 2, stack gas oxygen shall be measured using EPA methods 3 or 3A or CARB method 100, and stack gas moisture content shall be measured using EPA method 4 or CARB method 4. [District NSR Rule] Federally Enforceable Through Title V Permit
38. The main exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples using approved test methods. [District Rule 1081, 3.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
39. The District and EPA 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 & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
40. Performance testing shall be witnessed or authorized District personnel and EPA. Test results must be submitted to the District within 60 day of performance testing. [District Rule 1081, 7.2, 7.3 & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
41. Performance testing for hourly emission rates for NO<sub>x</sub>, CO, VOC, SO<sub>x</sub>, and PM<sub>10</sub> shall be conducted using the arithmetic mean of the test runs as outlined in District Rule 1081-"Source Sampling" section 6.0. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
42. In lieu of performing a source test for PM<sub>10</sub>, the results of the total particulate test may be used for compliance with the PM<sub>10</sub> emissions limit. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Upon recommencing operation, operator shall operate and maintain in calibration a system which continuously measures and records control system operating parameters; elapsed time of operation; exhaust gas Opacity, NO<sub>x</sub>, SO<sub>2</sub>, CO, and O<sub>2</sub> concentrations. For NO<sub>x</sub>, SO<sub>2</sub>, CO, and O<sub>2</sub> concentrations sampling, analyzing, and data recording cycle shall be completed every successive 15 minute period. For exhaust gas Opacity sampling and analyzing cycle shall be completed every successive 10 second period and data recording cycle shall be completed every successive 6 minute period. [District NSR Rule; District Rule 1080. 4.0; 40 CFR 64.3; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

44. The continuous emissions monitoring system shall meet the performance specification requirements in 40 CFR 60, Appendix B; 40 CFR 60, Appendix F; and 40 CFR 51, Appendix P, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. For purposes of annual Relative Accuracy Audit Testing, the applicable standards are 0.29 lb/MMBtu for SOx and 0.6 lb/MMBtu for NOx. [District Rule 1080, 6.5; 40 CFR 64.3; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
45. Upon recommencing operation, operator shall operate and maintain in calibration a system which continuously measures and records stack gas volumetric flow rates meeting the performance specifications of 40 CFR Part 52, Appendix E. [40 CFR 64.3 and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
46. Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080, 7.2 and 40 CFR 64.9] Federally Enforceable Through Title V Permit
47. Upon recommencing operation, records of continuous emissions monitoring system shall be maintained and shall contain: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance of any CEMs that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080, 7.3, 40 CFR 64.9 and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
48. Permittee shall submit a CEMs written report for each calendar quarter to the District and to EPA. The report is due on the 30th day following the end of the calendar quarter. [District Rule 1080, 8.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
49. Quarterly report shall include: time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; 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; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 2520, 9.5.1; District Rule 1080, 8.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
50. Any violation of emission standards, as indicated by the CEM, shall be reported by the operator to the APCO within 96 hours. Excess emissions shall be defined as any three-hour period during which emissions of SOx or NOx as measured by CEM system exceeds the SOx and NOx maximum emission limits set forth for each the pollutants in this permit except for the SOx and NOx 3-hour emission limits during normal startup or shutdown or during fuel switching. [District Rule 1080, 9.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
51. Operator shall notify the District no later than eight hours after the detection of a breakdown of the CEM. The operator shall inform the District of the intent to shut down the CEM at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
52. Upon detecting any excursion from the acceptable range of differential pressure readings, the Permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR 64.7] Federally Enforceable Through Title V Permit
53. The permittee shall maintain daily average records of the differential pressure across the baghouse filter. [40 CFR 64.9] Federally Enforceable Through Title V Permit
54. If the daily average baghouse differential pressure is not within the acceptable established range for two consecutive days, permittee shall notify the APCO of such exceedance within 96 hours. [40 CFR 64.3] Federally Enforceable Through Title V Permit
55. Upon recommencing operation, the permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit
56. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

57. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR 64.8] Federally Enforceable Through Title V Permit
58. The operator shall record hours of operation of circulating fluidized bed boiler and daily amounts of each solid fuel and fuel oil fired. Such records shall be kept on the premises for District inspection. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
59. An ultimate analysis for each stock of fuel received (both solid fuels and fuel oil) shall be maintained on the premises at all times and shall be made available for District inspection upon request. The analysis shall include sulfur content of the fuel received. [District NSR Rule and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
60. Upon recommencing operation, baghouse shall be completely inspected for evidence of particulate matter leaks at least annually and whenever COM system indicates increased opacity, and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
61. Upon recommencing operation, bags shall be completely inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
62. Records of baghouse maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
63. The fuel supply line shall be physically disconnected from the startup burner serving this unit. [District Rule 4352] Federally Enforceable Through Title V Permit
64. A source test to demonstrate compliance with the indicated emission limits shall be performed within 60 days of recommencing operation of this unit. [District Rule 4352] Federally Enforceable Through Title V Permit
65. Operator shall notify the District at least seven calendar days prior to recommencing operation of this dormant emissions unit, at which time this permit will be administratively modified to remove DEU references. [District Rule 4352] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-645-16-13

**EXPIRATION DATE:** 11/30/2010

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 280 MMBTU/HR CIRCULATING FLUIDIZED BED BOILER #B UTILIZING LIMESTONE INJECTION, A THERMAL DENOX SYSTEM, AND A BAGHOUSE NOTE: THIS BOILER SERVES AN ELECTRIC GENERATOR:

## PERMIT UNIT REQUIREMENTS

1. The total net electrical output of the Cogeneration Facility shall not exceed 50 MW and the total gross electrical output, including the parasitic use, shall not exceed 54 MW. [District NSR Rule and the California Health and Safety Code, Section 42314] Federally Enforceable Through Title V Permit
2. The operator shall install, continuously operate, and maintain limestone injection for control of SO<sub>x</sub> emissions. A Selective Non-Catalytic Reduction system utilizing ammonia injection shall be incorporated within the boiler at a point where a temperature range of 1500-1700 °Fahrenheit is provided during normal operations. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
3. The boiler shall be equipped with automatic air/fuel ratio control system. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The flue gas from the combustor shall be vented through the fabric filter at all times (including the soot blowing periods). [District NSR Rule] Federally Enforceable Through Title V Permit
5. The flue gas temperature entering the fabric filter shall be maintained at 50 °Fahrenheit or above the wet bulb temperature whenever the boiler is in operation, including the boiler start-up and shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The fabric filter shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule and 40 CFR 64.3] Federally Enforceable Through Title V Permit
7. Upon recommencing operation, the differential pressure across the fabric filter bags shall be maintained between 2" and 8" water column. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Replacement bags numbering at least 10% of the total number of bags in the largest fabric filter using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The fabric filter shall have a maximum effective air to cloth ratio of 4.2:1 and shall be equipped with an automatic pulse jet cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The fabric filter filtering media shall be P84 Felt type or an equivalent approved by the Air Pollution Control Officer (APCO) in writing. Written approval from the APCO shall be maintained on-site. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The fabric filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Material removed from the fabric filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

13. The bottom ash from the bed and the fly ash from the economizer shall be transferred to their pertinent silo via a totally air tight pneumatic transfer system. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The boiler may be fired on Western United States Coal, Canadian Coal, Petroleum Coke, or tire derived fuel. The boiler may also fire on fuel oil #2, or natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The fuel switch over period is defined as the time the boiler is switched from solid fuel to fuel oil #2 for a period not to exceed 3 consecutive hours per occurrence. At the end of the three hour time limit, if the boiler continues to fire on fuel oil, then the fuel oil #2 emission limits for NO<sub>x</sub>, and CO will be enforced. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The amount of tire derived fuel used in the boiler shall not exceed 11% by weight of the total solid fuels used at any one time. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Natural gas or fuel oil #2 shall be used during start-up to heat the boiler to solid fuel ignition temperature throughout the combustor before feeding any solid fuel. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
18. The maximum rate at which fuel oil #2 may be consumed in the boiler shall be limited to 170,000,000 Btu/hr. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
19. The average sulfur content of the fuel oil #2 shall not exceed 0.2 percent by weight on a monthly basis. The sulfur content of the fuel oil #2 shall not exceed 0.25 percent by weight at any time. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
20. The 3-hour averaging NSR emission limits of this permit shall not apply during startup and shutdown periods as defined in District Rule 4352 - "Solid Fuel Fired Boilers, Steam Generators, and Process Heaters." [District NSR Rule and District Rule 4352] Federally Enforceable Through Title V Permit
21. No gases which exhibit greater than 20% opacity (6 minute average), except for one 6 minute period per hour of not more than 27% opacity shall be discharged into the atmosphere from this boiler. [40 CFR 60.42a(b)] Federally Enforceable Through Title V Permit
22. The VOC emissions from the entire stationary source shall not exceed 150 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Emissions of VOC from this boiler shall not exceed 2.5 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Emissions of Particulate Matter (PM) from this boiler shall not exceed 5 pounds per hour. [District NSR Rule & District Rules 4201 & 4301] Federally Enforceable Through Title V Permit
25. Emissions of PM<sub>10</sub> from this boiler shall not exceed 5 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Emissions of SO<sub>x</sub> from this boiler shall not exceed 13.04 pounds per hour, based on a 24-hour rolling average. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Emissions of SO<sub>x</sub> shall not exceed 0.29 lb/MMBtu (24-hour average) from each boiler and 26.0 lb/hr (24-hour average) or 50.0 lb/hr (3-hour average) from the stack common to both boilers. [PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
28. When firing on solid fuels or fuel oil #2 during fuel switch over periods, emissions of NO<sub>x</sub> from this boiler shall be the more restrictive of all of following: 12.29 lb/hr, 0.04 lb/MMBtu (24-hour average) from each boiler and 42.0 lb/hr, 0.075 lb/MMBtu (3-hour average) from stack common to both boilers. [District NSR Rule, District Rule 4352, 5.1, and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
29. When firing on fuel oil #2, emissions of NO<sub>x</sub> from this boiler shall not exceed 3.13 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
30. Emissions of NO<sub>x</sub> from startup duct burners shall not exceed 0.15 lb/MMBtu (3 hour average) when firing on natural gas. [PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

31. When firing on solid fuels or fuel oil #2 during fuel switch over periods, emissions of CO from this boiler shall not exceed 39.58 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
32. When firing on fuel oil #2, emissions of CO from this boiler shall not exceed 14.4 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
33. If solid fuel or liquid fuel is used for a period of less than 24 hours (except for fuel switch over periods), the hourly emission limitations for NO<sub>x</sub>, CO, and SO<sub>x</sub> shall be determined by averaging the recording points from the continuous emission monitoring system taken during that time period. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Upon recommencing operation, performance testing for the NO<sub>x</sub>, CO, VOC, SO<sub>x</sub>, and PM<sub>10</sub> shall be conducted on an annual basis for combustion of solid fuels. [District NSR Rule & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
35. Performance testing for NO<sub>x</sub>, SO<sub>x</sub>, VOC, CO, and PM<sub>10</sub> shall also be performed for combustion of fuel oil in any year that the fuel oil consumption rate exceeds 242,900 gallons. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Performance testing shall be conducted using following test methods; for NO<sub>x</sub> EPA Methods 1-4 and 7E or ARB Method 100; for SO<sub>x</sub> EPA Methods 1-4 and 6 or 6C or 8 or ARB Method 100; for CO EPA Method 1-4 and 10 or ARB Method 100; for PM<sub>10</sub> EPA Method 201A in combination with EPA Method 202 or ARB Method 501 in combination with ARB Method 5 and EPA Method 5 (Front half only) or CARB Method 5 (excluding ammonia sulfate compounds) for PM; and for VOC EPA Method 25 or 25A or ARB Method 100. [District Rule 4352, 6.4; District Rule 2520, 9.3.2; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
37. For performance testing, stack gas velocity and volumetric flow rate shall be measured using EPA method 2 or CARB method 2, stack gas oxygen shall be measured using EPA methods 3 or 3A or CARB method 100, and stack gas moisture content shall be measured using EPA method 4 or CARB method 4. [District NSR Rule] Federally Enforceable Through Title V Permit
38. The main exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples using approved test methods. [District Rule 1081, 3.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
39. The District and EPA 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 & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
40. Performance testing shall be witnessed or authorized District personnel and EPA. Test results must be submitted to the District within 60 day of performance testing. [District Rule 1081, 7.2, 7.3 & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
41. Performance testing for hourly emission rates for NO<sub>x</sub>, CO, VOC, SO<sub>x</sub>, and PM<sub>10</sub> shall be conducted using the arithmetic mean of the test runs as outlined in District Rule 1081-"Source Sampling" section 6.0. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
42. In lieu of performing a source test for PM<sub>10</sub>, the results of the total particulate test may be used for compliance with the PM<sub>10</sub> emissions limit. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Upon recommencing operation, operator shall operate and maintain in calibration a system which continuously measures and records control system operating parameters; elapsed time of operation; exhaust gas Opacity, NO<sub>x</sub>, SO<sub>2</sub>, CO, and O<sub>2</sub> concentrations. For NO<sub>x</sub>, SO<sub>2</sub>, CO, and O<sub>2</sub> concentrations sampling, analyzing, and data recording cycle shall be completed every successive 15 minute period. For exhaust gas Opacity sampling and analyzing cycle shall be completed every successive 10 second period and data recording cycle shall be completed every successive 6 minute period. [District NSR Rule; District Rule 1080, 4.0; 40 CFR 64.3; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

44. The continuous emissions monitoring system shall meet the performance specification requirements in 40 CFR 60, Appendix B; 40 CFR 60, Appendix F; and 40 CFR 51, Appendix P, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. For purposes of annual Relative Accuracy Audit Testing, the applicable standards are 0.29 lb/MMBtu for SO<sub>x</sub> and 0.6 lb/MMBtu for NO<sub>x</sub>. [District Rule 1080, 6.5; 40 CFR 64.3; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
45. Upon recommencing operation, operator shall operate and maintain in calibration a system which continuously measures and records stack gas volumetric flow rates meeting the performance specifications of 40 CFR Part 52, Appendix E. [40 CFR 64.3 and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
46. Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080, 7.2 and 40 CFR 64.9] Federally Enforceable Through Title V Permit
47. Upon recommencing operation, records of continuous emissions monitoring system shall be maintained and shall contain: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance of any CEMs that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080, 7.3, 40 CFR 64.9 and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
48. Permittee shall submit a CEMs written report for each calendar quarter to the District and to EPA. The report is due on the 30th day following the end of the calendar quarter. [District Rule 1080, 8.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
49. Quarterly report shall include: time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; 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; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 2520, 9.5.1; District Rule 1080, 8.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
50. Any violation of emission standards, as indicated by the CEM, shall be reported by the operator to the APCO within 96 hours. Excess emissions shall be defined as any three-hour period during which emissions of SO<sub>x</sub> or NO<sub>x</sub> as measured by CEM system exceeds the SO<sub>x</sub> and NO<sub>x</sub> maximum emission limits set forth for each the pollutants in this permit except for the SO<sub>x</sub> and NO<sub>x</sub> 3-hour emission limits during normal startup or shutdown or during fuel switching. [District Rule 1080, 9.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
51. Operator shall notify the District no later than eight hours after the detection of a breakdown of the CEM. The operator shall inform the District of the intent to shut down the CEM at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
52. Upon detecting any excursion from the acceptable range of differential pressure readings, the Permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR 64.7] Federally Enforceable Through Title V Permit
53. The permittee shall maintain daily average records of the differential pressure across the baghouse filter. [40 CFR 64.9] Federally Enforceable Through Title V Permit
54. If the daily average baghouse differential pressure is not within the acceptable established range for two consecutive days, permittee shall notify the APCO of such exceedance within 96 hours. [40 CFR 64.3] Federally Enforceable Through Title V Permit
55. Upon recommencing operation, the permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit
56. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

57. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR 64.8] Federally Enforceable Through Title V Permit
58. The operator shall record hours of operation of circulating fluidized bed boiler and daily amounts of each solid fuel and fuel oil fired. Such records shall be kept on the premises for District inspection. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
59. An ultimate analysis for each stock of fuel received (both solid fuels and fuel oil) shall be maintained on the premises at all times and shall be made available for District inspection upon request. The analysis shall include sulfur content of the fuel received. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
60. Upon recommencing operation, baghouse shall be completely inspected for evidence of particulate matter leaks at least annually and whenever COM system indicates increased opacity, and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
61. Upon recommencing operation, bags shall be completely inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
62. Records of baghouse maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
63. The fuel supply line shall be physically disconnected from the startup burner serving this unit. [District Rule 4352] Federally Enforceable Through Title V Permit
64. A source test to demonstrate compliance with the indicated emission limits shall be performed within 60 days of recommencing operation of this unit. [District Rule 4352] Federally Enforceable Through Title V Permit
65. Operator shall notify the District at least seven calendar days prior to recommencing operation of this dormant emissions unit, at which time this permit will be administratively modified to remove DEU references. [District Rule 4352] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# ATTACHMENT B

Authorities to Construct No.  
(N-645-14-11, '-16-11)



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-645-14-11

**ISSUANCE DATE:** 12/01/2009

**LEGAL OWNER OR OPERATOR:** POSDEF POWER COMPANY, L.P.  
**MAILING ADDRESS:** 2526 W. WASHINGTON STREET  
STOCKTON, CA 95203

**LOCATION:** 2526 W. WASHINGTON STREET  
STOCKTON, CA 95203

**EQUIPMENT DESCRIPTION:**

MODIFICATION TO DESIGNATE UNIT AS A DORMANT EMISSION UNIT. POST-PROJECT EQUIPMENT DESCRIPTION IS: 280 MMBTU/HR CIRCULATING FLUIDIZED BED BOILER #A UTILIZING LIMESTONE INJECTION, A THERMAL DENOX SYSTEM, AND A BAGHOUSE, DESIGNATED AS A DORMANT EMISSIONS UNIT. NOTE: THIS BOILER SERVES AN ELECTRIC GENERATOR

### CONDITIONS

1. The total net electrical output of the Cogeneration Facility shall not exceed 50 MW and the total gross electrical output, including the parasitic use, shall not exceed 54 MW. [District NSR Rule and the California Health and Safety Code, Section 42314] Federally Enforceable Through Title V Permit
2. The operator shall install, continuously operate, and maintain limestone injection for control of SOx emissions. A Selective Non-Catalytic Reduction system utilizing ammonia injection shall be incorporated within the boiler at a point where a temperature range of 1500-1700 °Fahrenheit is provided during normal operations. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
3. The boiler shall be equipped with automatic air/fuel ratio control system. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The flue gas from the combustor shall be vented through the fabric filter at all times (including the soot blowing periods). [District NSR Rule] Federally Enforceable Through Title V Permit
5. The flue gas temperature entering the fabric filter shall be maintained at 50 °Fahrenheit or above the wet bulb temperature whenever the boiler is in operation, including the boiler start-up and shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit

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

DAVID WARNER, Director of Permit Services

N-645-14-11 : Dec 1 2009 8:40AM - DEMARISF : Joint Inspection NOT Required

6. The fabric filter shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule and 40 CFR 64.3] Federally Enforceable Through Title V Permit
7. Upon recommencing operation, the differential pressure across the fabric filter bags shall be maintained between 2" and 8" water column. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Replacement bags numbering at least 10% of the total number of bags in the largest fabric filter using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The fabric filter shall have a maximum effective air to cloth ratio of 4.2:1 and shall be equipped with an automatic pulse jet cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The fabric filter filtering media shall be P84 Felt type or an equivalent approved by the Air Pollution Control Officer (APCO) in writing. Written approval from the APCO shall be maintained on-site. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The fabric filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Material removed from the fabric filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The bottom ash from the bed and the fly ash from the economizer shall be transferred to their pertinent silo via a totally air tight pneumatic transfer system. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The boiler may be fired on Western United States Coal, Canadian Coal, Petroleum Coke, or tire derived fuel. The boiler may also fire on fuel oil #2, or natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The fuel switch over period is defined as the time the boiler is switched from solid fuel to fuel oil #2 for a period not to exceed 3 consecutive hours per occurrence. At the end of the three hour time limit, if the boiler continues to fire on fuel oil, then the fuel oil #2 emission limits for NOx, and CO will be enforced. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The amount of tire derived fuel used in the boiler shall not exceed 11% by weight of the total solid fuels used at any one time. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Natural gas or fuel oil #2 shall be used during start-up to heat the boiler to solid fuel ignition temperature throughout the combustor before feeding any solid fuel. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
18. The maximum rate at which fuel oil #2 may be consumed in the boiler shall be limited to 170,000,000 Btu/hr. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
19. The average sulfur content of the fuel oil #2 shall not exceed 0.2 percent by weight on a monthly basis. The sulfur content of the fuel oil #2 shall not exceed 0.25 percent by weight at any time. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
20. The 3-hour averaging NSR emission limits of this permit shall not apply during startup and shutdown periods as defined in District Rule 4352 - "Solid Fuel Fired Boilers, Steam Generators, and Process Heaters." [District NSR Rule and District Rule 4352] Federally Enforceable Through Title V Permit
21. No gases which exhibit greater than 20% opacity (6 minute average), except for one 6 minute period per hour of not more than 27% opacity shall be discharged into the atmosphere from this boiler. [40 CFR 60.42a(b)] Federally Enforceable Through Title V Permit
22. The VOC emissions from the entire stationary source shall not exceed 150 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Emissions of VOC from this boiler shall not exceed 2.5 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Emissions of Particulate Matter (PM) from this boiler shall not exceed 5 pounds per hour. [District NSR Rule & District Rules 4201 & 4301] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

25. Emissions of PM10 from this boiler shall not exceed 5 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Emissions of SOx from this boiler shall not exceed 13.04 pounds per hour, based on a 24-hour rolling average. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Emissions of SOx shall not exceed 0.29 lb/MMBtu (24-hour average) from each boiler and 26.0 lb/hr (24-hour average) or 50.0 lb/hr (3-hour average) from the stack common to both boilers. [PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
28. When firing on solid fuels or fuel oil #2 during fuel switch over periods, emissions of NOx from this boiler shall be the more restrictive of all of following: 12.29 lb/hr, 0.04 lb/MMBtu (24-hour average) from each boiler and 42.0 lb/hr, 0.075 lb/MMBtu (3-hour average) from stack common to both boilers. [District NSR Rule, District Rule 4352, 5.1, and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
29. When firing on fuel oil #2, emissions of NOx from this boiler shall not exceed 3.13 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
30. Emissions of NOx from startup duct burners shall not exceed 0.15 lb/MMBtu (3 hour average) when firing on natural gas. [PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
31. When firing on solid fuels or fuel oil #2 during fuel switch over periods, emissions of CO from this boiler shall not exceed 39.58 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
32. When firing on fuel oil #2, emissions of CO from this boiler shall not exceed 14.4 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
33. If solid fuel or liquid fuel is used for a period of less than 24 hours (except for fuel switch over periods), the hourly emission limitations for NOx, CO, and SOx shall be determined by averaging the recording points from the continuous emission monitoring system taken during that time period. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Upon recommencing operation, performance testing for the NOx, CO, VOC, SOx, and PM10 shall be conducted on an annual basis for combustion of solid fuels. [District NSR Rule & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
35. Performance testing for NOx, SOx, VOC, CO, and PM10 shall also be performed for combustion of fuel oil in any year that the fuel oil consumption rate exceeds 242,900 gallons. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Performance testing shall be conducted using following test methods; for NOx EPA Methods 1-4 and 7E or ARB Method 100; for SOx EPA Methods 1-4 and 6 or 6C or 8 or ARB Method 100; for CO EPA Method 1-4 and 10 or ARB Method 100; for PM10 EPA Method 201A in combination with EPA Method 202 or ARB Method 501 in combination with ARB Method 5 and EPA Method 5 (Front half only) or CARB Method 5 (excluding ammonia sulfate compounds) for PM; and for VOC EPA Method 25 or 25A or ARB Method 100. [District Rule 4352, 6.4; District Rule 2520, 9.3.2; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
37. For performance testing, stack gas velocity and volumetric flow rate shall be measured using EPA method 2 or CARB method 2, stack gas oxygen shall be measured using EPA methods 3 or 3A or CARB method 100, and stack gas moisture content shall be measured using EPA method 4 or CARB method 4. [District NSR Rule] Federally Enforceable Through Title V Permit
38. The main exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples using approved test methods. [District Rule 1081, 3.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
39. The District and EPA 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 & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

40. Performance testing shall be witnessed or authorized District personnel and EPA. Test results must be submitted to the District within 60 day of performance testing. [District Rule 1081, 7.2, 7.3 & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
41. Performance testing for hourly emission rates for NOx, CO, VOC, SOx, and PM10 shall be conducted using the arithmetic mean of the test runs as outlined in District Rule 1081-"Source Sampling" section 6.0. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
42. In lieu of performing a source test for PM10, the results of the total particulate test may be used for compliance with the PM10 emissions limit. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Upon recommencing operation, operator shall operate and maintain in calibration a system which continuously measures and records control system operating parameters; elapsed time of operation; exhaust gas Opacity, NOx, SO2, CO, and O2 concentrations. For NOx, SO2, CO, and O2 concentrations sampling, analyzing, and data recording cycle shall be completed every successive 15 minute period. For exhaust gas Opacity sampling and analyzing cycle shall be completed every successive 10 second period and data recording cycle shall be completed every successive 6 minute period. [District NSR Rule; District Rule 1080, 4.0; 40 CFR 64.3; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
44. The continuous emissions monitoring system shall meet the performance specification requirements in 40 CFR 60, Appendix B; 40 CFR 60, Appendix F; and 40 CFR 51, Appendix P, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. For purposes of annual Relative Accuracy Audit Testing, the applicable standards are 0.29 lb/MMBtu for SOx and 0.6 lb/MMBtu for NOx. [District Rule 1080, 6.5; 40 CFR 64.3; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
45. Upon recommencing operation, operator shall operate and maintain in calibration a system which continuously measures and records stack gas volumetric flow rates meeting the performance specifications of 40 CFR Part 52, Appendix E. [40 CFR 64.3 and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
46. Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080, 7.2 and 40 CFR 64.9] Federally Enforceable Through Title V Permit
47. Upon recommencing operation, records of continuous emissions monitoring system shall be maintained and shall contain: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance of any CEMs that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080, 7.3, 40 CFR 64.9 and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
48. Permittee shall submit a CEMs written report for each calendar quarter to the District and to EPA. The report is due on the 30th day following the end of the calendar quarter. [District Rule 1080, 8.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
49. Quarterly report shall include: time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; 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; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 2520, 9.5.1; District Rule 1080, 8.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
50. Any violation of emission standards, as indicated by the CEM, shall be reported by the operator to the APCO within 96 hours. Excess emissions shall be defined as any three-hour period during which emissions of SOx or NOx as measured by CEM system exceeds the SOx and NOx maximum emission limits set forth for each the pollutants in this permit except for the SOx and NOx 3-hour emission limits during normal startup or shutdown or during fuel switching. [District Rule 1080, 9.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
51. Operator shall notify the District no later than eight hours after the detection of a breakdown of the CEM. The operator shall inform the District of the intent to shut down the CEM at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

52. Upon detecting any excursion from the acceptable range of differential pressure readings, the Permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR 64.7] Federally Enforceable Through Title V Permit
53. The permittee shall maintain daily average records of the differential pressure across the baghouse filter. [40 CFR 64.9] Federally Enforceable Through Title V Permit
54. If the daily average baghouse differential pressure is not within the acceptable established range for two consecutive days, permittee shall notify the APCO of such exceedance within 96 hours. [40 CFR 64.3] Federally Enforceable Through Title V Permit
55. Upon recommencing operation, the permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit
56. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
57. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR 64.8] Federally Enforceable Through Title V Permit
58. The operator shall record hours of operation of circulating fluidized bed boiler and daily amounts of each solid fuel and fuel oil fired. Such records shall be kept on the premises for District inspection. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
59. An ultimate analysis for each stock of fuel received (both solid fuels and fuel oil) shall be maintained on the premises at all times and shall be made available for District inspection upon request. The analysis shall include sulfur content of the fuel received. [District NSR Rule and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
60. Upon recommencing operation, baghouse shall be completely inspected for evidence of particulate matter leaks at least annually and whenever COM system indicates increased opacity, and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
61. Upon recommencing operation, bags shall be completely inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
62. Records of baghouse maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
63. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
64. The fuel supply line shall be physically disconnected from the startup burner serving this unit. [District Rule 4352]
65. A source test to demonstrate compliance with the indicated emission limits shall be performed within 60 days of recommencing operation of this unit. [District Rule 4352]
66. Operator shall notify the District at least seven calendar days prior to recommencing operation of this dormant emissions unit, at which time this permit will be administratively modified to remove DEU references. [District Rule 4352]



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-645-16-11

**ISSUANCE DATE:** 12/01/2009

**LEGAL OWNER OR OPERATOR:** POSDEF POWER COMPANY, L.P.  
**MAILING ADDRESS:** 2526 W. WASHINGTON STREET  
STOCKTON, CA 95203

**LOCATION:** 2526 W. WASHINGTON STREET  
STOCKTON, CA 95203

**EQUIPMENT DESCRIPTION:**  
MODIFICATION TO DESIGNATE UNIT AS A DORMANT EMISSION UNIT. POST-PROJECT EQUIPMENT DESCRIPTION IS: 280 MMBTU/HR CIRCULATING FLUIDIZED BED BOILER #B UTILIZING LIMESTONE INJECTION, A THERMAL DENOX SYSTEM, AND A BAGHOUSE, DESIGNATED AS A DORMANT EMISSIONS UNIT. NOTE: THIS BOILER SERVES AN ELECTRIC GENERATOR

### CONDITIONS

1. The total net electrical output of the Cogeneration Facility shall not exceed 50 MW and the total gross electrical output, including the parasitic use, shall not exceed 54 MW. [District NSR Rule and the California Health and Safety Code, Section 42314] Federally Enforceable Through Title V Permit
2. The operator shall install, continuously operate, and maintain limestone injection for control of SOx emissions. A Selective Non-Catalytic Reduction system utilizing ammonia injection shall be incorporated within the boiler at a point where a temperature range of 1500-1700 °Fahrenheit is provided during normal operations. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
3. The boiler shall be equipped with automatic air/fuel ratio control system. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The flue gas from the combustor shall be vented through the fabric filter at all times (including the soot blowing periods). [District NSR Rule] Federally Enforceable Through Title V Permit
5. The flue gas temperature entering the fabric filter shall be maintained at 50 °Fahrenheit or above the wet bulb temperature whenever the boiler is in operation, including the boiler start-up and shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit

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 Sadleir, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-045-10-11 Dec 1 2009 8:21AM - DEMARISF : Joint Inspection NOT Required

6. The fabric filter shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule and 40 CFR 64.3] Federally Enforceable Through Title V Permit
7. Upon recommencing operation, the differential pressure across the fabric filter bags shall be maintained between 2" and 8" water column. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Replacement bags numbering at least 10% of the total number of bags in the largest fabric filter using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The fabric filter shall have a maximum effective air to cloth ratio of 4.2:1 and shall be equipped with an automatic pulse jet cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The fabric filter filtering media shall be P84 Felt type or an equivalent approved by the Air Pollution Control Officer (APCO) in writing. Written approval from the APCO shall be maintained on-site. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The fabric filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Material removed from the fabric filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The bottom ash from the bed and the fly ash from the economizer shall be transferred to their pertinent silo via a totally air tight pneumatic transfer system. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The boiler may be fired on Western United States Coal, Canadian Coal, Petroleum Coke, or tire derived fuel. The boiler may also fire on fuel oil #2, or natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The fuel switch over period is defined as the time the boiler is switched from solid fuel to fuel oil #2 for a period not to exceed 3 consecutive hours per occurrence. At the end of the three hour time limit, if the boiler continues to fire on fuel oil, then the fuel oil #2 emission limits for NOx, and CO will be enforced. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The amount of tire derived fuel used in the boiler shall not exceed 11% by weight of the total solid fuels used at any one time. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Natural gas or fuel oil #2 shall be used during start-up to heat the boiler to solid fuel ignition temperature throughout the combustor before feeding any solid fuel. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
18. The maximum rate at which fuel oil #2 may be consumed in the boiler shall be limited to 170,000,000 Btu/hr. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
19. The average sulfur content of the fuel oil #2 shall not exceed 0.2 percent by weight on a monthly basis. The sulfur content of the fuel oil #2 shall not exceed 0.25 percent by weight at any time. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
20. The 3-hour averaging NSR emission limits of this permit shall not apply during startup and shutdown periods as defined in District Rule 4352 - "Solid Fuel Fired Boilers, Steam Generators, and Process Heaters." [District NSR Rule and District Rule 4352] Federally Enforceable Through Title V Permit
21. No gases which exhibit greater than 20% opacity (6 minute average), except for one 6 minute period per hour of not more than 27% opacity shall be discharged into the atmosphere from this boiler. [40 CFR 60.42a(b)] Federally Enforceable Through Title V Permit
22. The VOC emissions from the entire stationary source shall not exceed 150 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Emissions of VOC from this boiler shall not exceed 2.5 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Emissions of Particulate Matter (PM) from this boiler shall not exceed 5 pounds per hour. [District NSR Rule & District Rules 4201 & 4301] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

25. Emissions of PM10 from this boiler shall not exceed 5 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Emissions of SOx from this boiler shall not exceed 13.04 pounds per hour, based on a 24-hour rolling average. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Emissions of SOx shall not exceed 0.29 lb/MMBtu (24-hour average) from each boiler and 26.0 lb/hr (24-hour average) or 50.0 lb/hr (3-hour average) from the stack common to both boilers. [PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
28. When firing on solid fuels or fuel oil #2 during fuel switch over periods, emissions of NOx from this boiler shall be the more restrictive of all of following: 12.29 lb/hr, 0.04 lb/MMBtu (24-hour average) from each boiler and 42.0 lb/hr, 0.075 lb/MMBtu (3-hour average) from stack common to both boilers. [District NSR Rule, District Rule 4352, 5.1, and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
29. When firing on fuel oil #2, emissions of NOx from this boiler shall not exceed 3.13 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
30. Emissions of NOx from startup duct burners shall not exceed 0.15 lb/MMBtu (3 hour average) when firing on natural gas. [PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
31. When firing on solid fuels or fuel oil #2 during fuel switch over periods, emissions of CO from this boiler shall not exceed 39.58 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
32. When firing on fuel oil #2, emissions of CO from this boiler shall not exceed 14.4 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
33. If solid fuel or liquid fuel is used for a period of less than 24 hours (except for fuel switch over periods), the hourly emission limitations for NOx, CO, and SOx shall be determined by averaging the recording points from the continuous emission monitoring system taken during that time period. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Upon recommencing operation, performance testing for the NOx, CO, VOC, SOx, and PM10 shall be conducted on an annual basis for combustion of solid fuels. [District NSR Rule & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
35. Performance testing for NOx, SOx, VOC, CO, and PM10 shall also be performed for combustion of fuel oil in any year that the fuel oil consumption rate exceeds 242,900 gallons. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Performance testing shall be conducted using following test methods; for NOx EPA Methods 1-4 and 7E or ARB Method 100; for SOx EPA Methods 1-4 and 6 or 6C or 8 or ARB Method 100; for CO EPA Method 1-4 and 10 or ARB Method 100; for PM10 EPA Method 201A in combination with EPA Method 202 or ARB Method 501 in combination with ARB Method 5 and EPA Method 5 (Front half only) or CARB Method 5 (excluding ammonia sulfate compounds) for PM; and for VOC EPA Method 25 or 25A or ARB Method 100. [District Rule 4352, 6.4; District Rule 2520, 9.3.2; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
37. For performance testing, stack gas velocity and volumetric flow rate shall be measured using EPA method 2 or CARB method 2, stack gas oxygen shall be measured using EPA methods 3 or 3A or CARB method 100, and stack gas moisture content shall be measured using EPA method 4 or CARB method 4. [District NSR Rule] Federally Enforceable Through Title V Permit
38. The main exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples using approved test methods. [District Rule 1081, 3.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
39. The District and EPA 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 & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

40. Performance testing shall be witnessed or authorized District personnel and EPA. Test results must be submitted to the District within 60 day of performance testing. [District Rule 1081, 7.2, 7.3 & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
41. Performance testing for hourly emission rates for NO<sub>x</sub>, CO, VOC, SO<sub>x</sub>, and PM<sub>10</sub> shall be conducted using the arithmetic mean of the test runs as outlined in District Rule 1081-"Source Sampling" section 6.0. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
42. In lieu of performing a source test for PM<sub>10</sub>, the results of the total particulate test may be used for compliance with the PM<sub>10</sub> emissions limit. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Upon recommencing operation, operator shall operate and maintain in calibration a system which continuously measures and records control system operating parameters; elapsed time of operation; exhaust gas Opacity, NO<sub>x</sub>, SO<sub>2</sub>, CO, and O<sub>2</sub> concentrations. For NO<sub>x</sub>, SO<sub>2</sub>, CO, and O<sub>2</sub> concentrations sampling, analyzing, and data recording cycle shall be completed every successive 15 minute period. For exhaust gas Opacity sampling and analyzing cycle shall be completed every successive 10 second period and data recording cycle shall be completed every successive 6 minute period. [District NSR Rule; District Rule 1080, 4.0; 40 CFR 64.3; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
44. The continuous emissions monitoring system shall meet the performance specification requirements in 40 CFR 60, Appendix B; 40 CFR 60, Appendix F; and 40 CFR 51, Appendix P, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. For purposes of annual Relative Accuracy Audit Testing, the applicable standards are 0.29 lb/MMBtu for SO<sub>x</sub> and 0.6 lb/MMBtu for NO<sub>x</sub>. [District Rule 1080, 6.5; 40 CFR 64.3; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
45. Upon recommencing operation, operator shall operate and maintain in calibration a system which continuously measures and records stack gas volumetric flow rates meeting the performance specifications of 40 CFR Part 52, Appendix E. [40 CFR 64.3 and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
46. Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080, 7.2 and 40 CFR 64.9] Federally Enforceable Through Title V Permit
47. Upon recommencing operation, records of continuous emissions monitoring system shall be maintained and shall contain: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance of any CEMs that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080, 7.3, 40 CFR 64.9 and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
48. Permittee shall submit a CEMs written report for each calendar quarter to the District and to EPA. The report is due on the 30th day following the end of the calendar quarter. [District Rule 1080, 8.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
49. Quarterly report shall include: time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; 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; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 2520, 9.5.1; District Rule 1080, 8.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
50. Any violation of emission standards, as indicated by the CEM, shall be reported by the operator to the APCO within 96 hours. Excess emissions shall be defined as any three-hour period during which emissions of SO<sub>x</sub> or NO<sub>x</sub> as measured by CEM system exceeds the SO<sub>x</sub> and NO<sub>x</sub> maximum emission limits set forth for each the pollutants in this permit except for the SO<sub>x</sub> and NO<sub>x</sub> 3-hour emission limits during normal startup or shutdown or during fuel switching. [District Rule 1080, 9.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
51. Operator shall notify the District no later than eight hours after the detection of a breakdown of the CEM. The operator shall inform the District of the intent to shut down the CEM at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

52. Upon detecting any excursion from the acceptable range of differential pressure readings, the Permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR 64.7] Federally Enforceable Through Title V Permit
53. The permittee shall maintain daily average records of the differential pressure across the baghouse filter. [40 CFR 64.9] Federally Enforceable Through Title V Permit
54. If the daily average baghouse differential pressure is not within the acceptable established range for two consecutive days, permittee shall notify the APCO of such exceedance within 96 hours. [40 CFR 64.3] Federally Enforceable Through Title V Permit
55. Upon recommencing operation, the permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit
56. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
57. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR 64.8] Federally Enforceable Through Title V Permit
58. The operator shall record hours of operation of circulating fluidized bed boiler and daily amounts of each solid fuel and fuel oil fired. Such records shall be kept on the premises for District inspection. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
59. An ultimate analysis for each stock of fuel received (both solid fuels and fuel oil) shall be maintained on the premises at all times and shall be made available for District inspection upon request. The analysis shall include sulfur content of the fuel received. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
60. Upon recommencing operation, baghouse shall be completely inspected for evidence of particulate matter leaks at least annually and whenever COM system indicates increased opacity, and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
61. Upon recommencing operation, bags shall be completely inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
62. Records of baghouse maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
63. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
64. The fuel supply line shall be physically disconnected from the startup burner serving this unit. [District Rule 4352]
65. A source test to demonstrate compliance with the indicated emission limits shall be performed within 60 days of recommencing operation of this unit. [District Rule 4352]
66. Operator shall notify the District at least seven calendar days prior to recommencing operation of this dormant emissions unit, at which time this permit will be administratively modified to remove DEU references. [District Rule 4352]

# ATTACHMENT C

Previous Title V Operating Permit No.  
(N-645-14-10, '16-10)

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-645-14-10

**EXPIRATION DATE:** 11/30/2010

**EQUIPMENT DESCRIPTION:**

280 MMBTU/HR CIRCULATING FLUIDIZED BED BOILER #A UTILIZING LIMESTONE INJECTION, A THERMAL DENOX SYSTEM, AND A BAGHOUSE NOTE: THIS BOILER SERVES AN ELECTRIC GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. The total net electrical output of the Cogeneration Facility shall not exceed 50 MW and the total gross electrical output, including the parasitic use, shall not exceed 54 MW. [District NSR Rule and the California Health and Safety Code, Section 42314] Federally Enforceable Through Title V Permit
2. The operator shall install, continuously operate, and maintain limestone injection for control of SOx emissions. A Selective Non-Catalytic Reduction system utilizing ammonia injection shall be incorporated within the boiler at a point where a temperature range of 1500-1700 °Fahrenheit is provided during normal operations. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
3. The boiler shall be equipped with automatic air/fuel ratio control system. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The flue gas from the combustor shall be vented through the fabric filter at all times (including the soot blowing periods). [District NSR Rule] Federally Enforceable Through Title V Permit
5. The flue gas temperature entering the fabric filter shall be maintained at 50 °Fahrenheit or above the wet bulb temperature whenever the boiler is in operation, including the boiler start-up and shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The fabric filter shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule and 40 CFR 64.3] Federally Enforceable Through Title V Permit
7. The differential pressure across the fabric filter bags shall be maintained between 2" and 8" water column. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Replacement bags numbering at least 10% of the total number of bags in the largest fabric filter using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The fabric filter shall have a maximum effective air to cloth ratio of 4.2:1 and shall be equipped with an automatic pulse jet cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The fabric filter filtering media shall be P84 Felt type or an equivalent approved by the Air Pollution Control Officer (APCO) in writing. Written approval from the APCO shall be maintained on-site. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The fabric filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Material removed from the fabric filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. The bottom ash from the bed and the fly ash from the economizer shall be transferred to their pertinent silo via a totally air tight pneumatic transfer system. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The boiler may be fired on Western United States Coal, Canadian Coal, Petroleum Coke, or tire derived fuel. The boiler may also fire on fuel oil #2, or natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The fuel switch over period is defined as the time the boiler is switched from solid fuel to fuel oil #2 for a period not to exceed 3 consecutive hours per occurrence. At the end of the three hour time limit, if the boiler continues to fire on fuel oil, then the fuel oil #2 emission limits for NO<sub>x</sub>, and CO will be enforced. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The amount of tire derived fuel used in the boiler shall not exceed 11% by weight of the total solid fuels used at any one time. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Natural gas or fuel oil #2 shall be used during start-up to heat the boiler to solid fuel ignition temperature throughout the combustor before feeding any solid fuel. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
18. The maximum rate at which fuel oil #2 may be consumed in the boiler shall be limited to 170,000,000 Btu/hr. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
19. The average sulfur content of the fuel oil #2 shall not exceed 0.2 percent by weight on a monthly basis. The sulfur content of the fuel oil #2 shall not exceed 0.25 percent by weight at any time. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
20. The 3-hour averaging NSR emission limits of this permit shall not apply during startup and shutdown periods as defined in District Rule 4352 - "Solid Fuel Fired Boilers, Steam Generators, and Process Heaters." [District NSR Rule and District Rule 4352] Federally Enforceable Through Title V Permit
21. No gases which exhibit greater than 20% opacity (6 minute average), except for one 6 minute period per hour of not more than 27% opacity shall be discharged into the atmosphere from this boiler. [40 CFR 60.42a(b)] Federally Enforceable Through Title V Permit
22. The VOC emissions from the entire stationary source shall not exceed 150 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Emissions of VOC from this boiler shall not exceed 2.5 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Emissions of Particulate Matter (PM) from this boiler shall not exceed 5 pounds per hour. [District NSR Rule & District Rules 4201 & 4301] Federally Enforceable Through Title V Permit
25. Emissions of PM<sub>10</sub> from this boiler shall not exceed 5 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Emissions of SO<sub>x</sub> from this boiler shall not exceed 13.04 pounds per hour, based on a 24-hour rolling average. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Emissions of SO<sub>x</sub> shall not exceed 0.29 lb/MMBtu (24-hour average) from each boiler and 26.0 lb/hr (24-hour average) or 50.0 lb/hr (3-hour average) from the stack common to both boilers. [PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
28. When firing on solid fuels or fuel oil #2 during fuel switch over periods, emissions of NO<sub>x</sub> from this boiler shall be the more restrictive of all of following: 12.29 lb/hr, 0.04 lb/MMBtu (24-hour average) from each boiler and 42.0 lb/hr, 0.075 lb/MMBtu (3-hour average) from stack common to both boilers. [District NSR Rule, District Rule 4352, 5.1, and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
29. When firing on fuel oil #2, emissions of NO<sub>x</sub> from this boiler shall not exceed 3.13 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
30. Emissions of NO<sub>x</sub> from startup duct burners shall not exceed 0.15 lb/MMBtu (3 hour average) when firing on natural gas. [PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

31. When firing on solid fuels or fuel oil #2 during fuel switch over periods, emissions of CO from this boiler shall not exceed 39.58 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
32. When firing on fuel oil #2, emissions of CO from this boiler shall not exceed 14.4 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
33. If solid fuel or liquid fuel is used for a period of less than 24 hours (except for fuel switch over periods), the hourly emission limitations for NO<sub>x</sub>, CO, and SO<sub>x</sub> shall be determined by averaging the recording points from the continuous emission monitoring system taken during that time period. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Performance testing for the NO<sub>x</sub>, CO, VOC, SO<sub>x</sub>, and PM<sub>10</sub> shall be conducted on an annual basis for combustion of solid fuels. [District NSR Rule & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
35. Performance testing for NO<sub>x</sub>, SO<sub>x</sub>, VOC, CO, and PM<sub>10</sub> shall also be performed for combustion of fuel oil in any year that the fuel oil consumption rate exceeds 242,900 gallons. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Performance testing shall be conducted using following test methods; for NO<sub>x</sub> EPA Methods 1-4 and 7E or ARB Method 100; for SO<sub>x</sub> EPA Methods 1-4 and 6 or 6C or 8 or ARB Method 100; for CO EPA Method 1-4 and 10 or ARB Method 100; for PM<sub>10</sub> EPA Method 201A in combination with EPA Method 202 or ARB Method 501 in combination with ARB Method 5 and EPA Method 5 (Front half only) or CARB Method 5 (excluding ammonia sulfate compounds) for PM; and for VOC EPA Method 25 or 25A or ARB Method 100. [District Rule 4352, 6.4; District Rule 2520, 9.3.2; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
37. For performance testing, stack gas velocity and volumetric flow rate shall be measured using EPA method 2 or CARB method 2, stack gas oxygen shall be measured using EPA methods 3 or 3A or CARB method 100, and stack gas moisture content shall be measured using EPA method 4 or CARB method 4. [District NSR Rule] Federally Enforceable Through Title V Permit
38. The main exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples using approved test methods. [District Rule 1081, 3.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
39. The District and EPA 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 & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
40. Performance testing shall be witnessed or authorized District personnel and EPA. Test results must be submitted to the District within 60 day of performance testing. [District Rule 1081, 7.2, 7.3 & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
41. Performance testing for hourly emission rates for NO<sub>x</sub>, CO, VOC, SO<sub>x</sub>, and PM<sub>10</sub> shall be conducted using the arithmetic mean of the test runs as outlined in District Rule 1081-"Source Sampling" section 6.0. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
42. In lieu of performing a source test for PM<sub>10</sub>, the results of the total particulate test may be used for compliance with the PM<sub>10</sub> emissions limit. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Operator shall operate and maintain in calibration a system which continuously measures and records control system operating parameters; elapsed time of operation; exhaust gas Opacity, NO<sub>x</sub>, SO<sub>2</sub>, CO, and O<sub>2</sub> concentrations. For NO<sub>x</sub>, SO<sub>2</sub>, CO, and O<sub>2</sub> concentrations sampling, analyzing, and data recording cycle shall be completed every successive 15 minute period. For exhaust gas Opacity sampling and analyzing cycle shall be completed every successive 10 second period and data recording cycle shall be completed every successive 6 minute period. [District NSR Rule; District Rule 1080, 4.0; 40 CFR 64.3; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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44. The continuous emissions monitoring system shall meet the performance specification requirements in 40 CFR 60, Appendix B; 40 CFR 60, Appendix F; and 40 CFR 51, Appendix P, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. For purposes of annual Relative Accuracy Audit Testing, the applicable standards are 0.29 lb/MMBtu for SO<sub>x</sub> and 0.6 lb/MMBtu for NO<sub>x</sub>. [District Rule 1080, 6.5; 40 CFR 64.3; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
45. Operator shall operate and maintain in calibration a system which continuously measures and records stack gas volumetric flow rates meeting the performance specifications of 40 CFR Part 52, Appendix E. [40 CFR 64.3 and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
46. Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080, 7.2 and 40 CFR 64.9] Federally Enforceable Through Title V Permit
47. Records of continuous emissions monitoring system shall be maintained and shall contain: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance of any CEMs that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080, 7.3, 40 CFR 64.9 and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
48. Permittee shall submit a CEMs written report for each calendar quarter to the District and to EPA. The report is due on the 30th day following the end of the calendar quarter. [District Rule 1080, 8.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
49. Quarterly report shall include: time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; 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; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 2520, 9.5.1; District Rule 1080, 8.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
50. Any violation of emission standards, as indicated by the CEM, shall be reported by the operator to the APCO within 96 hours. Excess emissions shall be defined as any three-hour period during which emissions of SO<sub>x</sub> or NO<sub>x</sub> as measured by CEM system exceeds the SO<sub>x</sub> and NO<sub>x</sub> maximum emission limits set forth for each the pollutants in this permit except for the SO<sub>x</sub> and NO<sub>x</sub> 3-hour emission limits during normal startup or shutdown or during fuel switching. [District Rule 1080, 9.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
51. Operator shall notify the District no later than eight hours after the detection of a breakdown of the CEM. The operator shall inform the District of the intent to shut down the CEM at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
52. Upon detecting any excursion from the acceptable range of differential pressure readings, the Permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR 64.7] Federally Enforceable Through Title V Permit
53. The permittee shall maintain daily average records of the differential pressure across the baghouse filter. [40 CFR 64.9] Federally Enforceable Through Title V Permit
54. If the daily average baghouse differential pressure is not within the acceptable established range for two consecutive days, permittee shall notify the APCO of such exceedance within 96 hours. [40 CFR 64.3] Federally Enforceable Through Title V Permit
55. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit
56. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

57. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR 64.8] Federally Enforceable Through Title V Permit
58. The operator shall record hours of operation of circulating fluidized bed boiler and daily amounts of each solid fuel and fuel oil fired. Such records shall be kept on the premises for District inspection. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
59. An ultimate analysis for each stock of fuel received (both solid fuels and fuel oil) shall be maintained on the premises at all times and shall be made available for District inspection upon request. The analysis shall include sulfur content of the fuel received. [District NSR Rule and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
60. Baghouse shall be completely inspected for evidence of particulate matter leaks at least annually and whenever COM system indicates increased opacity, and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
61. Bags shall be completely inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
62. Records of baghouse maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-645-16-10

**EXPIRATION DATE:** 11/30/2010

**EQUIPMENT DESCRIPTION:**

280 MMBTU/HR CIRCULATING FLUIDIZED BED BOILER #B UTILIZING LIMESTONE INJECTION, A THERMAL DENOX SYSTEM, AND A BAGHOUSE NOTE: THIS BOILER SERVES AN ELECTRIC GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. The total net electrical output of the Cogeneration Facility shall not exceed 50 MW and the total gross electrical output, including the parasitic use, shall not exceed 54 MW. [District NSR Rule and the California Health and Safety Code, Section 42314] Federally Enforceable Through Title V Permit
2. The operator shall install, continuously operate, and maintain limestone injection for control of SOx emissions. A Selective Non-Catalytic Reduction system utilizing ammonia injection shall be incorporated within the boiler at a point where a temperature range of 1500-1700 °Fahrenheit is provided during normal operations. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
3. The boiler shall be equipped with automatic air/fuel ratio control system. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The flue gas from the combustor shall be vented through the fabric filter at all times (including the soot blowing periods). [District NSR Rule] Federally Enforceable Through Title V Permit
5. The flue gas temperature entering the fabric filter shall be maintained at 50 °Fahrenheit or above the wet bulb temperature whenever the boiler is in operation, including the boiler start-up and shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The fabric filter shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule and 40 CFR 64.3] Federally Enforceable Through Title V Permit
7. The differential pressure across the fabric filter bags shall be maintained between 2" and 8" water column. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Replacement bags numbering at least 10% of the total number of bags in the largest fabric filter using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The fabric filter shall have a maximum effective air to cloth ratio of 4.2:1 and shall be equipped with an automatic pulse jet cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The fabric filter filtering media shall be P84 Felt type or an equivalent approved by the Air Pollution Control Officer (APCO) in writing. Written approval from the APCO shall be maintained on-site. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The fabric filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Material removed from the fabric filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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13. The bottom ash from the bed and the fly ash from the economizer shall be transferred to their pertinent silo via a totally air tight pneumatic transfer system. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The boiler may be fired on Western United States Coal, Canadian Coal, Petroleum Coke, or tire derived fuel. The boiler may also fire on fuel oil #2, or natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The fuel switch over period is defined as the time the boiler is switched from solid fuel to fuel oil #2 for a period not to exceed 3 consecutive hours per occurrence. At the end of the three hour time limit, if the boiler continues to fire on fuel oil, then the fuel oil #2 emission limits for NOx, and CO will be enforced. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The amount of tire derived fuel used in the boiler shall not exceed 11% by weight of the total solid fuels used at any one time. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Natural gas or fuel oil #2 shall be used during start-up to heat the boiler to solid fuel ignition temperature throughout the combustor before feeding any solid fuel. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
18. The maximum rate at which fuel oil #2 may be consumed in the boiler shall be limited to 170,000,000 Btu/hr. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
19. The average sulfur content of the fuel oil #2 shall not exceed 0.2 percent by weight on a monthly basis. The sulfur content of the fuel oil #2 shall not exceed 0.25 percent by weight at any time. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
20. The 3-hour averaging NSR emission limits of this permit shall not apply during startup and shutdown periods as defined in District Rule 4352 - "Solid Fuel Fired Boilers, Steam Generators, and Process Heaters." [District NSR Rule and District Rule 4352] Federally Enforceable Through Title V Permit
21. No gases which exhibit greater than 20% opacity (6 minute average), except for one 6 minute period per hour of not more than 27% opacity shall be discharged into the atmosphere from this boiler. [40 CFR 60.42a(b)] Federally Enforceable Through Title V Permit
22. The VOC emissions from the entire stationary source shall not exceed 150 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Emissions of VOC from this boiler shall not exceed 2.5 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Emissions of Particulate Matter (PM) from this boiler shall not exceed 5 pounds per hour. [District NSR Rule & District Rules 4201 & 4301] Federally Enforceable Through Title V Permit
25. Emissions of PM10 from this boiler shall not exceed 5 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Emissions of SOx from this boiler shall not exceed 13.04 pounds per hour, based on a 24-hour rolling average. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Emissions of SOx shall not exceed 0.29 lb/MMBtu (24-hour average) from each boiler and 26.0 lb/hr (24-hour average) or 50.0 lb/hr (3-hour average) from the stack common to both boilers. [PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
28. When firing on solid fuels or fuel oil #2 during fuel switch over periods, emissions of NOx from this boiler shall be the more restrictive of all of following: 12.29 lb/hr, 0.04 lb/MMBtu (24-hour average) from each boiler and 42.0 lb/hr, 0.075 lb/MMBtu (3-hour average) from stack common to both boilers. [District NSR Rule, District Rule 4352, 5.1, and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
29. When firing on fuel oil #2, emissions of NOx from this boiler shall not exceed 3.13 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
30. Emissions of NOx from startup duct burners shall not exceed 0.15 lb/MMBtu (3 hour average) when firing on natural gas. [PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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31. When firing on solid fuels or fuel oil #2 during fuel switch over periods, emissions of CO from this boiler shall not exceed 39.58 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
32. When firing on fuel oil #2, emissions of CO from this boiler shall not exceed 14.4 pounds per hour using a 24 hour rolling average. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
33. If solid fuel or liquid fuel is used for a period of less than 24 hours (except for fuel switch over periods), the hourly emission limitations for NO<sub>x</sub>, CO, and SO<sub>x</sub> shall be determined by averaging the recording points from the continuous emission monitoring system taken during that time period. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Performance testing for the NO<sub>x</sub>, CO, VOC, SO<sub>x</sub>, and PM<sub>10</sub> shall be conducted on an annual basis for combustion of solid fuels. [District NSR Rule & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
35. Performance testing for NO<sub>x</sub>, SO<sub>x</sub>, VOC, CO, and PM<sub>10</sub> shall also be performed for combustion of fuel oil in any year that the fuel oil consumption rate exceeds 242,900 gallons. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Performance testing shall be conducted using following test methods; for NO<sub>x</sub> EPA Methods 1-4 and 7E or ARB Method 100; for SO<sub>x</sub> EPA Methods 1-4 and 6 or 6C or 8 or ARB Method 100; for CO EPA Method 1-4 and 10 or ARB Method 100; for PM<sub>10</sub> EPA Method 201A in combination with EPA Method 202 or ARB Method 501 in combination with ARB Method 5 and EPA Method 5 (Front half only) or CARB Method 5 (excluding ammonia sulfate compounds) for PM; and for VOC EPA Method 25 or 25A or ARB Method 100. [District Rule 4352, 6.4; District Rule 2520, 9.3.2; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
37. For performance testing, stack gas velocity and volumetric flow rate shall be measured using EPA method 2 or CARB method 2, stack gas oxygen shall be measured using EPA methods 3 or 3A or CARB method 100, and stack gas moisture content shall be measured using EPA method 4 or CARB method 4. [District NSR Rule] Federally Enforceable Through Title V Permit
38. The main exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples using approved test methods. [District Rule 1081, 3.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
39. The District and EPA 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 & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
40. Performance testing shall be witnessed or authorized District personnel and EPA. Test results must be submitted to the District within 60 day of performance testing. [District Rule 1081, 7.2, 7.3 & PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
41. Performance testing for hourly emission rates for NO<sub>x</sub>, CO, VOC, SO<sub>x</sub>, and PM<sub>10</sub> shall be conducted using the arithmetic mean of the test runs as outlined in District Rule 1081-"Source Sampling" section 6.0. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
42. In lieu of performing a source test for PM<sub>10</sub>, the results of the total particulate test may be used for compliance with the PM<sub>10</sub> emissions limit. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Operator shall operate and maintain in calibration a system which continuously measures and records control system operating parameters; elapsed time of operation; exhaust gas Opacity, NO<sub>x</sub>, SO<sub>2</sub>, CO, and O<sub>2</sub> concentrations. For NO<sub>x</sub>, SO<sub>2</sub>, CO, and O<sub>2</sub> concentrations sampling, analyzing, and data recording cycle shall be completed every successive 15 minute period. For exhaust gas Opacity sampling and analyzing cycle shall be completed every successive 10 second period and data recording cycle shall be completed every successive 6 minute period. [District NSR Rule; District Rule 1080, 4.0; 40 CFR 64.3; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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44. The continuous emissions monitoring system shall meet the performance specification requirements in 40 CFR 60, Appendix B; 40 CFR 60, Appendix F; and 40 CFR 51, Appendix P, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. For purposes of annual Relative Accuracy Audit Testing, the applicable standards are 0.29 lb/MMBtu for SO<sub>x</sub> and 0.6 lb/MMBtu for NO<sub>x</sub>. [District Rule 1080, 6.5; 40 CFR 64.3; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
45. Operator shall operate and maintain in calibration a system which continuously measures and records stack gas volumetric flow rates meeting the performance specifications of 40 CFR Part 52, Appendix E. [40 CFR 64.3 and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
46. Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080, 7.2 and 40 CFR 64.9] Federally Enforceable Through Title V Permit
47. Records of continuous emissions monitoring system shall be maintained and shall contain: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance of any CEMs that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080, 7.3, 40 CFR 64.9 and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
48. Permittee shall submit a CEMs written report for each calendar quarter to the District and to EPA. The report is due on the 30th day following the end of the calendar quarter. [District Rule 1080, 8.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
49. Quarterly report shall include: time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; 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; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 2520, 9.5.1; District Rule 1080, 8.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
50. Any violation of emission standards, as indicated by the CEM, shall be reported by the operator to the APCO within 96 hours. Excess emissions shall be defined as any three-hour period during which emissions of SO<sub>x</sub> or NO<sub>x</sub> as measured by CEM system exceeds the SO<sub>x</sub> and NO<sub>x</sub> maximum emission limits set forth for each the pollutants in this permit except for the SO<sub>x</sub> and NO<sub>x</sub> 3-hour emission limits during normal startup or shutdown or during fuel switching. [District Rule 1080, 9.0; and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
51. Operator shall notify the District no later than eight hours after the detection of a breakdown of the CEM. The operator shall inform the District of the intent to shut down the CEM at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
52. Upon detecting any excursion from the acceptable range of differential pressure readings, the Permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR 64.7] Federally Enforceable Through Title V Permit
53. The permittee shall maintain daily average records of the differential pressure across the baghouse filter. [40 CFR 64.9] Federally Enforceable Through Title V Permit
54. If the daily average baghouse differential pressure is not within the acceptable established range for two consecutive days, permittee shall notify the APCO of such exceedance within 96 hours. [40 CFR 64.3] Federally Enforceable Through Title V Permit
55. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit
56. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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57. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR 64.8] Federally Enforceable Through Title V Permit
58. The operator shall record hours of operation of circulating fluidized bed boiler and daily amounts of each solid fuel and fuel oil fired. Such records shall be kept on the premises for District inspection. [District NSR Rule and PSD ATC SJ 85-05] Federally Enforceable Through Title V Permit
59. An ultimate analysis for each stock of fuel received (both solid fuels and fuel oil) shall be maintained on the premises at all times and shall be made available for District inspection upon request. The analysis shall include sulfur content of the fuel received. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
60. Baghouse shall be completely inspected for evidence of particulate matter leaks at least annually and whenever COM system indicates increased opacity, and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
61. Bags shall be completely inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
62. Records of baghouse maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# ATTACHMENT D

## Emissions Increases

In accordance with the District's policy on dormant emission units, the application modify the permit to assume dormant emission unit status is an administrative amendment not subject to new source review under District Rule 2201. Therefore, the increase in emissions is zero for each pollutant.

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
N-645-14-11	0	0	0	0	0
N-645-16-11	0	0	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

# ATTACHMENT E

Application



# San Joaquin Valley Air Pollution Control District

## TITLE V COMPLIANCE CERTIFICATION FORM

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

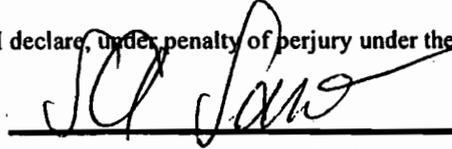
INITIAL TITLE V PERMIT                       PERMIT RENEWAL <sup>Minor Modification</sup>                       NEW TITLE V PERMIT

COMPANY NAME: <u>POSDEN Power Company, L.P.</u>	FACILITY ID: <u>N - 645</u>
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input checked="" type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <u>DTE Energy Services</u>	
3. Agent to the Owner: <u>Robert Sanchez</u>	
4. Compliance Certifications will be submitted on: <u>No change to the existing reporting period, April 14th with the report submitted within 30 days after the</u> year 1: ___/___/___   year 2: ___/___/___   year 3: ___/___/___   year 4: ___/___/___   year 5: ___/___/___ <u>reporting period ends</u>	
Other dates if required by regulations or compliance schedule: _____	

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial each circle for confirmation):**

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) which the source is in compliance as identified in the Compliance Plan.
- Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term as identified in the Compliance Plan, on a timely basis.
- Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance at the time of permit issuance with the applicable federal requirement(s), as identified in the Compliance Plan, and I have attached a compliance schedule.
- 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

8/25/10  
 Date

Stephen A. Sorrentino  
 Name of Responsible Official (please print)

V.P.  
 Title of Responsible Official (please print)