



NOV 09 2009

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

Re: **Proposed Authority to Construct / Certificate of Conformity (Minor Mod)**
District Facility # C-3843
Project # C-1093599

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for Wellhead Power Gates, LLC, located at 39950 S. Butte Avenue in Huron, CA, which has been issued a Title V permit. Wellhead Power Gates, LLC is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. This ATC authorizes the modification of one 329 bhp natural gas-fired IC engine to designate it as a compliant dormant emissions unit (DEU).

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authority to Construct # C-3843-4-2 with Certificate of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures
cc: Jesse A. Garcia, Permit Services

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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



NOV 09 2009

Rachel Garza
Wellhead Power Gates, LLC
650 Bercut Drive, Suite C
Sacramento, CA 95814

**Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)
District Facility # C-3843
Project # C-1093599**

Dear Ms. Garza:

Enclosed for your review is the District's analysis of your application for Authority to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. This ATC authorizes the modification of one 329 bhp natural gas-fired IC engine to designate it as a compliant dormant emissions unit (DEU).

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

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures
cc: Jesse A. Garcia, Permit Services

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San Joaquin Valley Air Pollution Control District
Authority to Construct
Application Review

Designate IC Engine as a Dormant Emissions Unit

Facility Name: Wellhead Power Gates, LLC
Mailing Address: 650 Bercut Drive, Suite C
Sacramento, CA 95814

Date: October 2, 2009
Engineer: Jesse A. Garcia
Lead Engineer: Joven Refuerzo

Contact Person: Rachel Garza
Telephone: (559) 693-2494
Application #(s): C-3843-4-3
Project #: C-1093599

Deemed Complete: September 8, 2009

I. Proposal

Wellhead Power Gates, LLC proposes to designate the permit listed above (see Attachment A for current permit requirements) as a dormant emission unit (DEU). The IC engine is currently in compliance with all District rules and regulations and is expected to remain in compliance should the applicant wish to recommence operation in the future. In accordance with District Policy SSP 1705, Additional Permit Conditions for Dormant Emission Units, the applicant proposes to physically disconnect the fuel line to ensure that the unit does not operate.

Permit conditions will also be updated to eliminate Rule 4701 conditions and include additional Rule 4702 conditions.

Wellhead Power Gates, LLC received their Title V Permit on January 31, 2004. This modification can be classified as a Title V minor modification pursuant to Rule 2520, Section 3.20, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Wellhead Power Gates, LLC must apply to administratively amend their Title V Operating Permit to include the requirements of the ATCs issued with this project.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (9/21/06)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)

Rule 4701 Stationary Internal Combustion Engines – Phase 1 (8/21/03)
Rule 4702 Stationary Internal Combustion Engines – Phase 2 (1/18/07)
Rule 4801 Sulfur Compounds (12/17/92)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
California Environmental Quality Act (CEQA)

III. Project Location

The facility is located at 39950 S. Butte Avenue in Huron, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Wellhead Power Gates, LLC operates a 45.4 MW power plant located near Huron, CA adjacent to an existing Pacific Gas and Electric substation. Wellhead Power Gates has at this site one natural gas-fired turbine engine and a 329 bhp natural gas-fired IC engine. The 329 bhp natural gas-fired genset is used to produce electricity. The genset is used in place of the gas turbines during periods when electricity demand is much lower than the gas turbines' outputs.

V. Equipment Listing

Existing Equipment Description:

C-3843-4-0: 329 BHP CAT MODEL #G379 NATURAL GAS-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR

ATC Equipment Description:

C-3843-4-2: MODIFICATION OF A 329 BHP CAT MODEL #G379 NATURAL GAS-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR: DESIGNATE AS COMPLIANT DORMANT EMISSIONS UNIT

Post Project Equipment Description:

C-3843-4-2: DORMANT 329 BHP CAT MODEL #G379 NATURAL GAS-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR

VI. Emission Control Technology Evaluation

There are no proposed changes to the IC engine; therefore, there is no need to evaluate the emission controls at this time and no further discussion is required.

VII. General Calculations

This project does not meet the criteria for a Rule 2201 Modification, as defined in Section 3.26, and is therefore not subject to the requirements of Rule 2201. Therefore, formal calculations for Rule 2201 are not required and only the Potential to Emit (PE) will be calculated for reference purposes.

A. Assumptions

Daily operating schedule:	24 hours/day
Annual operating schedule:	8,760 hours/year
EPA F-factor (adjusted to 60 °F):	8,578 dscf/MMBtu (40 CFR 60 Appendix B)
Fuel heating value:	1,000 Btu/dscf (District Policy APR-1720, dated 12/20/01)
BHP to Btu/hr conversion:	2,542.5 Btu/bhp-hr
Sulfur concentration:	1 gr-S/100 scf.
Thermal efficiency of engine:	commonly ≈ 35%

B. Emission Factors

Natural Gas-Fired Engine Emissions Factors		
Pollutant	g/hp · hr	Source
NO _x	0.072	Current Permit
SO _x	0.0104	Current Permit
PM ₁₀	0.071	Current Permit
CO	5.69	Current Permit
VOC	0.125	Current Permit

C. Potential to Emit (PE)

Emissions from this IC engine will be calculated using the maximum horsepower rating listed above, the g/bhp-hr emission factors listed on the current permit and a worse case operating scenario of 24 hours/day and 365 days/year. An example calculation for NO_x is listed below:

$$\text{Daily PE} = (0.072 \text{ g-NO}_x/\text{hp-hr}) \cdot (329 \text{ bhp}) / (453.6 \text{ gram/lb}) \cdot (24 \text{ hr/day}) = 1.3 \text{ lb NO}_x/\text{day}$$

$$\text{Annual PE} = \text{Daily PE} \times 365 \text{ days/year}$$

	NO _x	SO _x	PM ₁₀	CO	VOC
Daily (lb/day)	1.3	0.2	1.2	99.0	2.2
Annual (lb/yr)	475	73	438	36,135	803

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

This project does not meet the following criteria for a Modification, as defined in Section 3.26, and is therefore not subject to this rule.

- Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- Addition of any new emissions unit which is subject to District permitting requirements.
- A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Compliance with this rule is expected.

Rule 2520 Federally Mandated Operating Permits

Pursuant to their current operating permit, this facility is an existing major source. An application to comply with Rule 2520 - *Federally Mandated Operating Permits* has already been submitted to the District. Since the facility has specifically requested that this project be processed with a COC, the following conditions will be placed on the permit.

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

Rule 4001 New Source Performance Standards (NSPS)

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to reciprocating natural gas-fired IC engines and no further discussion is required.

Rule 4101 Visible Emissions

Rule 4101 states that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. Therefore, the following condition will be listed on the ATC to ensure compliance:

- No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]

Rule 4102 Nuisance

Rule 4102 states that no air contaminant shall be released into the atmosphere which causes a public nuisance. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, the following condition will be listed on the ATC to ensure compliance:

- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

California Health & Safety Code 41700 (Health Risk Assessment)

District policy APR 1905 specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite. There are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

Rule 4201 Particulate Matter Concentration

Particulate matter emissions from the engines will be less than or equal to the rule limit of 0.1 grain per cubic foot of gas at dry standard conditions as shown by the following:

$$0.072 \frac{g - PM_{10}}{bhp - hr} \times \frac{1g - PM}{0.96g - PM_{10}} \times \frac{1bhp - hr}{2,542.5 Btu} \times \frac{10^6 Btu}{8,578 dscf} \times \frac{0.35 Btu_{out}}{1 Btu_{in}} \times \frac{15.43 grain}{g} = 0.0186 \frac{grain - PM}{dscf}$$

Since 0.0186 grain-PM/dscf is \leq to 0.1 grain per dscf, compliance with Rule 4201 is expected. The following condition will be added to assure compliance with this rule.

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

Rule 4701 Internal Combustion Engines – Phase 1

Pursuant to Section 7.6.3.3.2 of District Rule 4702, as of June 1, 2007 District Rule 4701 is no longer applicable to Non-Ag natural gas-fired IC engines. Therefore, this natural gas-fired IC engine will comply with the requirements of District Rule 4702 and no further discussion is required.

Rule 4702 Internal Combustion Engines – Phase 2

The purpose of this rule is to limit the emissions of nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines.

The emission limits, monitoring provisions, and testing requirements of this rule will be satisfied upon recommencing operation of this IC engine. The following conditions will be incorporated into the permit to enforce the dormant emission unit status pursuant to District Policy SSP 1705. The conditions below will be placed ahead of the existing permit conditions:

- No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rule 2010]
- The fuel supply line shall be physically disconnected from this unit. [District Rule 4702]
- 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 4702]
- Operators shall notify the District at least seven (7) calendar days prior to commencing operation of this dormant emissions unit, at which time this permit will be administratively modified to remove DEU references. [District Rule 4702]

In addition, the term "*Upon recommencing operation.*" will be included on all pre-existing monitoring and operating conditions. This will keep the conditions on the permit, but will allow the permittee to avoid these requirements as long as the unit is not in operation and in dormant status.

Rule 4801 Sulfur Compounds

Rule 4801 requires that sulfur compound emissions (as SO₂) shall not exceed 0.2% by volume. Using the ideal gas equation, the sulfur compound emissions are calculated as follows:

$$\text{Volume SO}_2 = (n \times R \times T) \div P$$

n = moles SO₂

T (standard temperature) = 60 °F or 520 °R

$$R \text{ (universal gas constant)} = \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}}$$

$$\text{SO}_x \text{ EF (lb/MMscf)} = 0.00285 \text{ lb-SO}_x/\text{MMBtu} * 1,000 \text{ Btu/scf} = 2.85 \text{ lb/MMscf}$$

$$2.85 \frac{\text{lb-S}}{\text{MMscf-gas}} \times \frac{1 \text{ scf-gas}}{1,000 \text{ Btu}} \times \frac{1 \text{ MMBtu}}{8,578 \text{ scf}} \times \frac{1 \text{ lb-mol}}{64 \text{ lb-S}} \times \frac{10.73 \text{ psi-ft}^3}{\text{lb-mol-}^\circ\text{R}} \times \frac{520^\circ\text{R}}{14.7 \text{ psi}} \times 1,000,000 = 1.97 \text{ ppmv}$$

Since 1.97 ppmv is ≤ 2,000 ppmv, this engine is expected to comply with Rule 4801.

California Health & Safety Code 42301.6 (School Notice)

This facility is not located within 1,000 feet of a school. Regardless, there is no increase in emissions of any hazardous air pollutants with this project; therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

California Environmental Quality Act (CEQA)

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful Title V COC noticing period, issue ATC subject to the permit conditions on the attached draft ATC. Conditions have been added to enforce the dormant status of the unit(s) pursuant to District Policy SSP 1705.

X. Billing Information

Application filing fees have been received. No change in annual fees will result with this project.

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
C-3843-4-2	3020-10-C	329 bhp	\$240

Attachments

- A: Current Permit Requirements
- C: Draft ATC

Attachment A
Current Permit Requirements

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-3843-4-0

EXPIRATION DATE: 12/31/2008

EQUIPMENT DESCRIPTION:

329 BHP CAT MODEL #G379 NATURAL GAS-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. This engine shall be equipped with an operational nonresettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
2. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
3. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
4. This engine shall be operated within the ranges that the source testing has shown result in pollution concentrations within the emissions limits as specified on this permit. [District Rule 4702] Federally Enforceable Through Title V Permit
5. Combined annual emissions from units C-3843-1 and -4 shall not exceed any of the following limits: 19,958 lb-NOx/year, 4,409 lb-SOx/year, 10,211 lb-PM10/year, 20,731 lb-CO/year, and 4,022 lb-VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Emissions from this IC engine shall not exceed any of the following limits: 5 ppmvd NOx @ 15% O2 (equivalent to 0.072 g-NOx/hp-hr), 0.0104 g-SOx/hp-hr, 0.071 g-PM10/hp-hr, 670 ppmvd CO @ 15% O2 (equivalent to 5.69 g-CO/hp-hr), or 25 ppmvd VOC @ 15% O2 (equivalent to 0.125 g-VOC/hp-hr). [District Rules 2201, 4701, and 4702] Federally Enforceable Through Title V Permit
7. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
8. Source testing to measure natural gas-combustion NOx, CO, and VOC emissions from this unit shall be measured not less than once every 24 months. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
9. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
10. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NOx, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4701 and 4702] 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.

11. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 18, 25A or 25B, or ARB Method 100. [District Rules 1081, 4701, and 4702] Federally Enforceable Through Title V Permit
12. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
15. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
16. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

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

Attachment B
Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: C-3843-4-2

LEGAL OWNER OR OPERATOR: WELLHEAD POWER GATES, LLC.

MAILING ADDRESS: 650 BERCUT DRIVE STE C
SACRAMENTO, CA 95814

LOCATION: S-29,T-20S,R-17E
HURON, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF A 329 BHP CAT MODEL #G379 NATURAL GAS-FIRED IC ENGINE SERVED BY A NON SELECTIVE CATALYTIC REDUCTION (NSCR) SYSTEM POWERING AN ELECTRICAL GENERATOR: DESIGNATE AS COMPLIANT DORMANT EMISSIONS UNIT

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rule 2010]
4. The fuel supply line shall be physically disconnected from this unit. [District Rule 4702]
5. 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 4702]
6. Operators shall notify the District at least seven (7) calendar days prior to commencing operation of this dormant emissions unit, at which time this permit will be administratively modified to remove DEU references. [District Rule 4702]
7. This engine shall be equipped with an operational nonresettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

C-3843-4-2 : Nov 5 2009 8:39AM - GARCIAJ : Joint Inspection NOT Required

8. The engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
9. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
10. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
11. This engine shall be operated within the ranges that the source testing has shown result in pollution concentrations within the emissions limits as specified on this permit. [District Rule 4702] Federally Enforceable Through Title V Permit
12. Combined annual emissions from units C-3843-1 and -4 shall not exceed any of the following limits: 19,958 lb-NOx/year, 4,409 lb-SOx/year, 10,211 lb-PM10/year, 20,731 lb-CO/year, and 4,022 lb-VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Emissions from this IC engine shall not exceed any of the following limits: 5 ppmvd NOx @ 15% O2 (equivalent to 0.072 g-NOx/hp-hr), 0.0104 g-SOx/hp-hr, 0.071 g-PM10/hp-hr, 670 ppmvd CO @ 15% O2 (equivalent to 5.69 g-CO/hp-hr), or 25 ppmvd VOC @ 15% O2 (equivalent to 0.125 g-VOC/hp-hr). [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
14. Upon recommencing operation, the permittee shall monitor operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (e.g. oil pressure, exhaust gas temperature, etc.). [District Rule 4702]
15. Upon recommencing operation, the permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4702] Federally Enforceable Through Title V Permit
16. Upon recommencing operation, the permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702]
17. Upon recommencing operation, Source testing to measure natural gas-combustion NOx, CO, and VOC emissions from this unit shall be measured not less than once every 24 months. [District Rules 4702] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4702] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NOx, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4702] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 18, 25A or 25B, or ARB Method 100. [District Rules 1081 and 4702] Federally Enforceable Through Title V Permit
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
23. Upon recommencing operation, the permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 4702] Federally Enforceable Through Title V Permit
24. Upon recommencing operation, the permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
25. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4702] Federally Enforceable Through Title V Permit

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