



STATEMENT OF BASIS
ADMINISTRATIVE AMENDMENT OF
TITLE V FEDERAL OPERATING PERMIT

TITLE V PERMIT NO.:	TV2007-12-01A
DATE:	January 11, 2012
REVIEWING ENGR:	Jeff Weiss

A. FACILITY INFORMATION:

FACILITY NAME	Sacramento Cogeneration Authority
LOCATION	5000 83rd Street Sacramento, CA 95826
MAILING ADDRESS	P.O. Box 15830, Mail Stop B355 Sacramento, CA 95852-1830
RESPONSIBLE OFFICIAL	Paul Lau SCA Representative (916) 732-6252
CONTACT PERSON	Jeff White Plant Manger (916) 379-2041

B. PURPOSE OF THIS STATEMENT OF BASIS

The Title V Federal Operating Permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes that make the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose of this Statement of Basis is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this Statement of Basis, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

In addition to this Statement of Basis, the information contained in the Statement of Basis for the June 5, 2008 Title V permit renewal, TV2007-12-01, is applicable to the facility.

C. PERMIT ACTIONS

Previous Permit Actions

The following permit actions have occurred since the initial Federal Operating Permit No. TV1997-12-01 was issued:

<u>Permit Action</u>	<u>Date Issued</u>	<u>Permit No.</u>
Initial Title V Federal Operating Permit	06-05-2003	TV1997-12-01
1st Significant Modification	05-08-2008	TV1997-12-02
1st Permit Renewal	06-05-2008	TV2007-12-01

Current Permit Action

This 1st Administrative Amendment to the 1st Permit Renewal will be assigned the following permit number: TV2007-12-01A.

The specific changes to the Title V Permit are described in Section E below.

D. FACILITY DESCRIPTION:

The Sacramento Cogeneration Authority facility generates electricity for the Sacramento Municipal Utility District (SMUD) and produces process steam for use in the operations of the Procter & Gamble Manufacturing Company. The project is located on a 10-acre site adjacent to the Procter & Gamble manufacturing facility at 5000 83rd Street, Sacramento.

The cogeneration facility consists of two major power systems and support equipment.

Combined Cycle Power System:

1. (2) General Electric LM6000 gas turbines, 500 MMBTU/hour each, natural gas fuel, with a nominal rating of 50 MW each.
2. (2) duct burners, 83.2 MMBTU/hour each, natural gas fuel.
3. (2) Heat recovery steam generators.
4. (1) 45 MW nominal capacity steam turbine generator.
5. (2) Selective catalytic reduction (SCR) NOx air pollution control systems.
6. (2) Oxidation catalyst CO and ROC air pollution control systems.

Simple Cycle Power System:

7. (1) General Electric LM6000 gas turbine, 500 MMBTU/hour, natural gas fuel, with a nominal rating of 50 MW.
8. (1) Selective catalytic reduction (SCR) NOx air pollution control system.
9. (1) Oxidation catalyst CO and ROC air pollution control system.

Support Equipment:

10. Auxiliary boiler, 108.7 MMBTU/hour, natural gas fuel.
11. Cooling tower.

Nitrogen oxide emissions from the gas turbines are controlled with water injection and SCR systems to comply with the NOx concentration limit of 2.5 ppmvd at 15% O2. Oxidation catalyst systems have also been installed for the three gas turbines to reduce ROC and CO emissions. Low NOx duct burners are used for NOx control for the HRSGs. Control of NOx in the auxiliary boiler is achieved by low NOx burners and flue gas recirculation.

Fuel used for the gas turbines, duct burners and auxiliary boiler is natural gas with no emergency use fuel. The use of natural gas will reduce sulfur dioxide and PM10 emissions.

E. DESCRIPTION OF TITLE V ADMINISTRATIVE AMENDMENT

Change of Responsible Official

In the permit application dated December 22 2011, the Sacramento Cogeneration Authority requested that the responsible official listed in Title V Permit No. TV2007-12-01 be changed:

From - James Shetler
SCA Representative

To - Paul Lau
SCA Representative

This administrative permit amendment is made pursuant to SMAQMD Rule 207 Section 409.

Public Notice

SMAQMD Rule 207 Section 409 states that no public notice is required for a Title V administrative permit amendment.

Permit Distribution

The revised Title V Permit No. TV2007-12-01A will be provided to the permittee and to U.S. EPA Region 9.

Revised Permit Numbering

The new Title V permit number for the amended permit will be Title V Permit No. TV2007-12-01A.

Category of Title V Permit Modification (See categories in Attachment 'B')

This request qualifies as an administrative permit amendment because a name change of a person identified in the Title V permit is listed as one of the qualifying actions in the definition of "Administrative Title V Permit Amendment" in SMAQMD Rule 207 Section 202.2.

F. RECOMMENDATION

1. Revise the Title V Federal Operating Permit as described in this Statement of Basis.
2. Send the final Statement of Basis and final Title V permit, TV2007-12-01A, to U.S. EPA Region 9.
3. Send the final Title V permit, TV2007-12-01A, to the Sacramento Cogeneration Authority

APPROVED BY: _____ **DATE:** _____