



JUN 01 2011

Mark Kehoe
Hanford L P
4300 Railroad Ave
Pittsburg, CA 94565

**Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # C-603
Project # C-1103157**

Dear Mr. Kehoe:

The Air Pollution Control Officer has modified the Title V permit for Hanford L P by incorporating Authorities to Construct C-603-1-10 and '-15-0. The modifications were to install a sodium bicarbonate/sorbent injection system and sodium bicarbonate storage silo with loading system respectively.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on March 9, 2011. No comments were received following the District's preliminary decision on this project.

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

Sincerely,

David Warner
Director of Permit Services

DW:tb

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
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Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Notice of Final Action - Minor Title V Permit Modification
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Project # C-1103157**

Dear Mr. Rios:

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-603-1-11

EXPIRATION DATE: 04/30/2008

EQUIPMENT DESCRIPTION:

30 MW FLUIDIZED BED COMBUSTOR FUELED BY PETROLEUM COKE, NATURAL GAS, AND NO. 2 FUEL OIL UP TO 320 MMBTU/HR

PERMIT UNIT REQUIREMENTS

1. Fuel consumption in the fluidized bed combustor shall not exceed 320 MMBTU/hr of petroleum coke, natural gas, and No. 2 fuel oil. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Natural gas utilization in the fluidized bed combustor shall not exceed 48 MMBTU/hr. Fuel oil may only be used during warm-up or as necessary to establish or maintain bed temperature at 1,560 degree F at a rate not to exceed 170 MMBTU/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Natural gas consumption in the low pressure evaporator shall not exceed 2 million scf in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The NOx emissions (measured as NO2) from the combined exhaust of the low pressure evaporator and fluidized bed combustor shall not exceed 245 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The NOx concentration (as NO2 corrected to 3% O2) in the combined exhaust of the fluidized bed combustor and low pressure evaporator shall not exceed 28 ppmvd averaged over any 3 hour period when the freeboard temperature is at least 1,560 degree F. [District Rules 2201, District Rule 4301 and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
6. The carbon monoxide emissions from the combined exhaust of the fluidized bed combustor and low pressure evaporator shall not exceed 544 pounds in any one day. [District Rule 2201 and District Rule 4352, 5.3] Federally Enforceable Through Title V Permit
7. Annual carbon monoxide emissions from the combined exhaust of the fluidized bed combustor and low pressure evaporator shall not exceed 156,000 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The VOC emissions from the combined exhaust of the fluidized bed combustor and low pressure evaporator shall not exceed 60 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The PM10 emissions from the combined exhaust of the fluidized bed combustor and low pressure evaporator shall not exceed 80 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The concentration of particulate matter in the exhaust from the main baghouse shall not exceed 0.005 gr/dscf corrected to 12% CO2. [District Rule 2201, District Rule 4301, and 40 CFR 60.43b(c)] Federally Enforceable Through Title V Permit
11. SOx emissions (calculated as SO2) from the combined exhaust of the combustor and the low pressure evaporator shall not exceed 469 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Sorbent shall be injected into the fluidized bed combustor at a rate sufficient to meet the SOx concentration and emissions limits in these conditions. [District Rule 2201] 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 SO_x concentration (as SO₂ corrected to 3% O₂) in the combined exhaust of the fluidized bed combustor and low pressure evaporator shall not exceed 35 ppmvd averaged over any three hour period when the bed temperature was at least 1,500 degree F. [District Rule 2201, District Rule 4301 and District Rule 4801] Federally Enforceable Through Title V Permit
14. A start-up event commences when the petroleum coke feed to the CFBC is initiated and/or the freeboard temperature is 1,560 degree F. The start-up event is complete when the NO_x concentration and SO_x concentration are in compliance with the concentration limits. A shutdown event commences when the petroleum coke feed to the CFBC is terminated and is complete when the combustion air flow to the CFBC is terminated. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The start-up/shutdown event shall not exceed any of the following limits: 2 hours, 1 per day, 50 per year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emissions from the circulating fluidized bed combustor shall not exceed either of the following limits during a start-up or shutdown event: 140 lb NO_x/hr or 200 lb SO₂/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
17. In no event shall SO₂ emissions from the combined exhaust of the combustor and the low pressure evaporator exceed 76.1 ton/yr. [District Rule 2201 and 40 CFR 52.21] Federally Enforceable Through Title V Permit
18. Ammonia shall be injected into the fluidized bed combustor as necessary to meet the limits in these conditions and whenever the freeboard temperature is at least 1,560 degree F. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The concentration of ammonia in the combined exhaust of the fluidized bed combustor and low pressure evaporator shall not exceed 30 ppmvd. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Source testing to demonstrate compliance with permit conditions and all rules and regulations shall be conducted on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit
21. Performance testing shall be conducted annually for NO_x, CO, SO_x, and PM(10) at normal operating capacity using following test methods; for NO_x, EPA Method 7E or ARB Method 1-100; for CO, EPA Method 10 or ARB Method 100; for SO_x, EPA Method 6 or 6C ; and for PM(10), EPA Method 201A, and SCAQMD Method 5.3 and 6.1. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
22. Filterable PM(10) shall be quantified using EPA Method 201A. Condensable PM10 from the back-half of the test apparatus shall be quantified using SCAQMD methods 5.3 and 6.1. Total PM10 is the sum of the results of these two tests. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
23. 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
24. 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
25. The pressure drop across the filter fabric in the combustion exhaust baghouse shall be monitored daily. Immediate corrective action must be taken if the pressure drop in any section is greater than 10 inches H₂O or less than 0.5 inches H₂O. [District Rule 2201] Federally Enforceable Through Title V Permit
26. A Continuous Emissions Monitoring System shall be in place and operating whenever the facility is operating. NO_x (as NO₂ corrected to 3% O₂), SO_x as SO₂, CO, opacity and O₂ concentrations must be recorded continuously. [District Rule 1080] Federally Enforceable Through Title V Permit
27. Results of continuous emissions monitoring shall 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] Federally Enforceable Through Title V Permit
28. The continuous monitoring equipment must be linked to a data logger which is compatible with the District's data acquisition system. [District Rule 1080 and District Rule 4352] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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29. The owner/operator shall perform a relative accuracy test audit (RATA) as specified by 40 CFR Part 60, Appendix F, 5.11, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
30. Operator shall notify the APCO no later than eight hours after the detection of a breakdown of the CEMS. Operator shall inform the APCO of the intent to shut down the CEMS at least 24 hours prior to the event. [District Rule 1080; Fresno County Rule 108] Federally Enforceable Through Title V Permit
31. The permittee shall submit a written report to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective 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 1080, 40 CFR 60.49b(f) and 40 CFR 60.49b(h)] Federally Enforceable Through Title V Permit
32. An ultimate analysis for each lot of liquid or solid fuel received shall be maintained on site and made available to the District upon request. The analyses shall include heating value, sulfur content, and nitrogen content. [District Rule 1070] Federally Enforceable Through Title V Permit
33. Records of all daily fuel consumption shall be maintained on site and submitted to the District with quarterly reports and upon request. [District Rule 1070, District rule 1080, District Rule 4352 and 40 CFR 60.49b(d)] Federally Enforceable Through Title V Permit
34. A violation of NOx emission standards indicated by the NOx CEM shall be reported by the operator to the APCO within 96 hours. [Rule 108 (Kings, Fresno, Merced San Joaquin, Tulare, Kern, and Stanislaus) and Rule 109 (Madera) and District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
35. If the unit is fired on diesel fuel that is not supplier-certified 0.0015% sulfur content or less, the sulfur content of each fuel source shall be tested weekly, except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
36. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
37. Records of system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
38. Operator shall maintain all records for at least five years and conform to the recordkeeping requirements described in District Rule 2520. [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: C-603-15-1

EXPIRATION DATE: 04/30/2008

EQUIPMENT DESCRIPTION:

10,473 GALLON (1,400 CUBIC FEET) INERT MATERIAL (SODIUM BICARBONATE/SORBENT) STORAGE SILO, LOADING SYSTEM SERVED BY A DSS MODEL WAM SILO TOP PULSE JET CLEANING BAGHOUSE, AND A SEALED SCREW CONVEYER

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the baghouses serving the sodium bicarbonate handling and storage operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule and District Rule 4101] Federally Enforceable Through Title V Permit
2. Visible emissions shall be inspected annually under material and environmental conditions, such as dry and windy, where high emissions are expected. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Dust collector filters shall be inspected at least once every two weeks while not in operation for any tears, holes, abrasions, and scuffs which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. The baghouse 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] Federally Enforceable Through Title V Permit
8. The baghouse shall operate at all times with a minimum differential pressure of 0.1 inches water column and a maximum differential pressure of 3.5 inches water column. [District NSR Rule]
9. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule]
10. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Emissions from the sodium bicarbonate silo shall not exceed 0.0016 lb PM10 per ton of sodium bicarbonate. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The maximum throughput for the sodium bicarbonate storage operation shall exceed either of the following limits: 42 tons per day or 660 tons per year. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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14. Records of dust collector inspection, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and initials of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. Records of the amount of material loaded on a daily basis shall be maintained, retained on the premises at least five years, and shall be made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. Records of daily sodium bicarbonate throughput shall be maintained, retained on-site for a period of at least five years and made available for District inspection upon request. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit

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