



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-799
Project # C-1103025

Dear Mr. Rios:

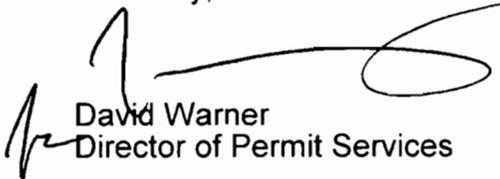
Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for Madera Power LLC, located at 11427 Firebaugh Blvd in Firebaugh, CA, which has been issued a Title V permit. Madera Power LLC is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The applicant proposes to add a second truck tipper to its existing fuel receiving, sorting, and handling line.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authority to Construct # C-799-1-8 with Certificate of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. 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
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Dave Baldwin
Madera Power LLC
PO Box 305
Firebaugh, CA 93622

**Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)
District Facility # C-799
Project # C-1103025**

Dear Mr. Baldwin:

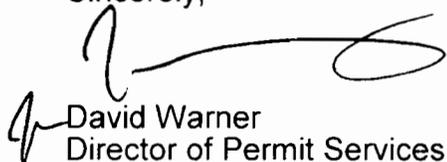
Enclosed for your review is the District's analysis of your application for Authority to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The applicant proposes to add a second truck tipper to its existing fuel receiving, sorting, and handling line.

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

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**San Joaquin Valley Air Pollution Control District
Authority to Construct
Application Review
Biomass Fuel Handling System**

Facility Name:	Madera Power LLC	Date:	October 29, 2010
Mailing Address:	P O Box 305 Firebaugh, CA 93622	Engineer:	Jesse A. Garcia
Contact Person:	David Baldwin	Lead Engineer:	Joven Refuerzo
Telephone:	(661) 303-6207		
Fax:	(661) 845-9700		
E-Mail:	dbaldwin@communityrecycling.net		
Application #:	C-799-1-8		
Project #:	C-1103025		
Deemed Complete:	September 23, 2010		

I. Proposal

Madera Power LLC is requesting an Authority to Construct (ATC) permit to install a second truck tipper on its existing fuel receiving, sorting, and handling line (permit C-799-1). The truck tipper will empty truck trailers into a stockpile controlled with water sprays and from which the fuel will be loaded with a tractor onto the reclaim conveyors.

The proposed throughput of the truck tipper is 100 tons/hr (proposed by applicant to be consistent with throughputs of other equipment in the unit); however, there is no increase in emissions as this unit is included in an existing specific limiting condition (SLC). The PM₁₀ emission limit is 83,520 lb/year for permits C-799-1, -3, -6, -7, -8 to avoid triggering offsets. PM₁₀ is the only pollutant of concern in this project.

In addition, Madera Power LLC maintains a valid ATC, C-799-1-7, to install a fuel hog grinding system on its existing fuel receiving, sorting, and handling line. ATC C-799-1-7 will be implemented prior to or concurrently with the ATC in this project. Therefore, the following condition will be placed on this project's ATC C-799-1-8:

- Authority to Construct (ATC) C-799-1-7 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]

Madera Power received their Title V Permit on December 31, 2002. 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. Madera Power must apply to administratively amend their Title V Operating Permit to include the requirements of the ATC(s) issued with this project.

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (12/18/08)
Rule 2520 Federally Mandated Operating Permits (6/21/01)
Rule 4001 New Source Performance Standards (4/14/99)
Rule 4002 National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101 Visible Emissions (2/17/05)
Rule 4102 Nuisance (12/17/92)
Rule 4201 Particulate Matter Concentration (12/17/92)
Rule 4202 Particulate Matter Emission Rate (12/17/92)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The facility is located at 11427 Firebaugh Blvd. near Firebaugh, CA. The District has verified that this facility is not located within 1,000 feet of the outer boundary of any K-12 school therefore the School Noticing requirements of CH&SC 42301.6 do not apply.

IV. Process Description

Madera Power is a biomass facility that incinerates wood and agricultural waste to produce electricity. The fuel receiving operation that is being modified in this project receives fuel material via truck. The fuel is sorted and sized prior to introduction into the main boiler.

As briefly discussed in Section I, the applicant is proposing to install a second truck tipper to empty truck trailers transporting fuel to the facility into a stockpile. From the stockpile, the fuel will be loaded with a tractor onto the existing reclaim conveyors.

The addition of this second truck tipper will not cause a debottlenecking of the material processing operation which would potentially result in an increase of emissions from potential increased fuel into the boiler down stream. The limiting component of the entire operation is the unchanged maximum capacity of the reclaim conveyors of which both of the truck tippers will be utilizing; therefore, this project will not result in an increase in actual potential facility-wide emissions.

V. Equipment Listing

Pre-Project Equipment Description:

C-799-1-7

FUEL STORAGE AND FEED SYSTEM CONSISTING OF: TRUCK WEIGH SCALE, FUEL STORAGE BLDG., TRUCK TIPPER, 2 RECLAIM CONVEYORS (RC1A, RC2A), FUEL RECLAIM, COLLECTION, TRANSFER CONVEYORS WITH A DUST COLLECTION SYSTEM INCLUDING FOUR PICKUP POINTS SERVED BY A BAGHOUSE, AND FUEL HOG GRINDING SYSTEM

Proposed Modification:

C-799-1-8

Install a truck tipper controlled by water sprays.

MODIFICATION OF FUEL STORAGE AND FEED SYSTEM CONSISTING OF: TRUCK WEIGH SCALE, FUEL STORAGE BLDG., TRUCK TIPPER, 2 RECLAIM CONVEYORS (RC1A, RC2A), FUEL RECLAIM, COLLECTION, TRANSFER CONVEYORS WITH A DUST COLLECTION SYSTEM INCLUDING FOUR PICKUP POINTS SERVED BY A BAGHOUSE, AND FUEL HOG GRINDING SYSTEM: INSTALL A SECOND TRUCK TIPPER CONTROLLED BY WATER SPRAYS

Post Project Equipment Description:

C-799-1-8

FUEL STORAGE AND FEED SYSTEM CONSISTING OF: TRUCK WEIGH SCALE, FUEL STORAGE BLDG., 2 TRUCK TIPPERS, 2 RECLAIM CONVEYORS (RC1A, RC2A), FUEL RECLAIM, COLLECTION, TRANSFER CONVEYORS WITH A DUST COLLECTION SYSTEM INCLUDING FOUR PICKUP POINTS SERVED BY A SCIENTIFIC BAGHOUSE MODEL SPJ-64, AND FUEL HOG GRINDING SYSTEM

VI. Emission Control Technology Evaluation

The truck tipper will be controlled by water sprays as necessary to limit the visible emissions. Properly maintained and operated, the wet suppression system is expected to achieve a PM10 control efficiency of 70%¹.

All other existing controls will remain.

VII. General Calculations

A. Assumptions

- PM₁₀ is the only pollutant of concern in this project
- Facility may operate 24 hours per day, 365 days per year (worst-case)
- Maximum amount of fuel transferred by the truck tipper is 100 tons per hour (per applicant)

B. Emission Factors

The emission factor for the new truck tipper will be the same as the existing truck tipper, 0.024 lb PM/ton which was taken from a previous edition of AP-42, Table 10.3-1. There will be no increase in emissions from the transfer of fuel from the stockpile to the existing reclaim conveyors as there will not be an increase in throughput through the reclaim conveyors and the emissions for fuel being transferred to the reclaim conveyors is already accounted for.

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Per project C-1101083,

¹ Approximate control efficiency for wet suppression system from AP-42 and the Cooperative EPA-NSA Emission Factor Test Program (1995)

Emissions Point	EF	Throughput (ton/hr)	PM10 fraction	lb PM10/day (based on 24 hours)
truck dump (north reclaimer)	0.024 lb-PM/ton	100	0.5	28.8
truck dump (south reclaimer)	0.024 lb-PM/ton	100	0.5	28.8
Reclaimer to weigh belt	-	-	-	6.0
Weigh belt to transfer conveyor (oversizers)	-	-	-	6.0
Transfer conveyor to return conveyor	0.01 lb-PM/ton	100	0.5	12.0
Weigh belt to disk screen	-	-	-	6.0
Disk screen to inclined conveyor	-	-	-	6.0
Inclined conveyor to red conveyor (reject material)	0.01 lb-PM/ton	100	0.5	12.0
Baghouse				2.1
Disc Screen Overs Conveyor	4.6E-5 lb-PM10/ton	100	-	0.1
Fuel Hog Grinder	1.2E-3 lb-PM10/ton	100	-	2.9
Hog Transfer Conveyor	4.6E-5 lb-PM10/ton	100	-	0.1
			Totals	110.8

Annual emissions from the entire fuel receiving operation are:

Annual PE1 = 110.8 lb PM10/day x 365 days/year = 40,442 lb PM10/year

Specific Limiting Condition

Permit units C-799-1, '3, '6, '7, and '8 have a specific limiting condition of 83,520 lb-PM₁₀/year.

2. Post Project Potential to Emit (PE2)

Existing fuel handling operation (see PE1)

Daily PE2 = 110.8 lb-PM₁₀/day
Annual PE2 = 40,442 lb-PM₁₀/year

Truck Tipper (new)

Daily PE2 = (Throughput) x (EF) x (PM10 Fraction) x (Control Efficiency) x (Hours/Day)
Daily PE2 = 100 ton/hr x 0.024 lb-PM10/ton x 0.5 PM10/PM x (1-0.70) x 24 hr/day

Annual PE2 = 8.6 lb-PM10/day x 365 days/year = 3,139 lb-PM10/year

Total

Daily PE2 = 110.8 + 8.6 lb-PM10/day= 119.4 lb-PM10/day

Annual PE2 = 40,442 + 3,139 lb-PM10/year = 43,581 lb-PM10/year

Specific Limiting Condition

The applicant proposes maintain the specific limiting condition of 83,520 lb-PM10/year for permit units C-799-1, '3, '6, '7, and '8.

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Pre-Project Stationary Source Potential to Emit [SSPE1] (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
C-799-2-3	0	0	130	0	0
C-799-1-7	417,600	54,000	83,520	501,120	200,448
C-799-3-16					
C-799-6-3					
C-799-7-2					
C-799-8-2	0	0	0	0	0
C-799-4-2					
Pre-Project SSPE (SSPE1)	417,600	54,000	83,650	501,120	200,448

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Post-Project Stationary Source Potential to Emit [SSPE2] (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
C-799-2-3	0	0	130	0	0
C-799-1-8	417,600	54,000	83,520	501,120	200,448
C-799-3-16					
C-799-6-3					
C-799-7-2					
C-799-8-2	0	0	0	0	0
C-799-4-2					
Post-Project SSPE (SSPE2)	417,600	54,000	83,650	501,120	200,448

5. Major Source Determination

Pursuant to Section 3.24 of District Rule 2201, a Major Source is a stationary source with post-project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values. However, Section 3.24.2 states, "for the purposes of determining major source status, the SSPE2 shall not include the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site."

Major Source Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
Post Project SSPE (SSPE2)	417,600	54,000	83,650	501,120	200,448
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	Yes	No	No	Yes	Yes

6. Baseline Emissions (BE)

The BE calculation (in lbs/year) is performed pollutant-by-pollutant for each unit within the project, to calculate the QNEC and if applicable, to determine the amount of offsets required.

Pursuant to Section 3.7 of District Rule 2201, BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22 of District Rule 2201.

Therefore Baseline Emissions (BE) are equal to the Pre-Project Potential to Emit (PE1).

BE = 40,442 lb PM10/year

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "*any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.*"

As discussed in Section VII.C.5 above, the facility is not a Major Source for PM10; therefore, the project does not constitute a SB 288 Major Modification for PM10.

As discussed in Section VII.C.5 above, the facility is an existing Major Source for NO_x and VOC; however, the project by itself would need to be a significant increase in order to trigger a SB 288 Major Modification. The emissions unit within this project does not have a total potential to emit which is greater than SB 288 Major Modification thresholds (see table below). Therefore, the project cannot be a significant increase and the project does not constitute a SB 288 Major Modification.

SB 288 Major Modification Thresholds (Existing Major Source)			
Pollutant	Project PE (lb/year)	Threshold (lb/year)	SB 288 Major Modification?
NO _x	0	50,000	No
VOC	0	50,000	No

8. Federal Major Modification

District Rule 2201, Section 3.17 states that Federal Major Modifications are the same as "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA. SB 288 Major Modifications are not federal major modifications if they meet the criteria of the "Less-Than-Significant Emissions Increase" exclusion.

A Less-Than-Significant Emissions Increase exclusion is for an emissions increase for the project, or a Net Emissions Increase for the project (as defined in 40 CFR 51.165 (a)(2)(ii)(B) through (D), and (F)), that is not significant for a given regulated NSR pollutant, and therefore is not a federal major modification for that pollutant.

- To determine the post-project projected actual emissions from existing units, the provisions of 40 CFR 51.165 (a)(1)(xxviii) shall be used.
- To determine the pre-project baseline actual emissions, the provisions of 40 CFR 51.165 (a)(1)(xxxv)(A) through (D) shall be used.
- If the project is determined not to be a federal major modification pursuant to the provisions of 40 CFR 51.165 (a)(2)(ii)(B), but there is a reasonable possibility that the project may result in a significant emissions increase, the owner or operator shall comply with all of the provisions of 40 CFR 51.165 (a)(6) and (a)(7).

- Emissions increases calculated pursuant to this section are significant if they exceed the significance thresholds specified in the table below.

Significant Threshold (lb/year)	
Pollutant	Threshold (lb/year)
NO _x	0
VOC	0

This facility is a major source for NO_x and VOC. As calculated previously, none of the thresholds presented above will be surpassed as a result of this project. Therefore, the project is excluded as a Less-Than-Significant Emissions Increase” and is not a Federal Major Modification.

9. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District’s PAS emissions profile screen.

$$QPE1 = \text{Annual PE1} \div 4 \text{ quarters/year} = 83,520 \text{ lbs PM10} \div 4 = 20,880 \text{ lbs PM10}$$

$$QPE2 = \text{Annual PE2} \div 4 \text{ quarters/year} = 83,520 \text{ lbs PM10} \div 4 = 20,880 \text{ lbs PM10}$$

$$QNEC = QPE2 - QPE1 = 20,880 \text{ lbs PM10} - 20,880 \text{ lbs PM10} = 0 \text{ lbs PM10}$$

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

- Any new emissions unit with a potential to emit exceeding two pounds per day,
- The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

As seen in Section VII.C.2 of this evaluation, the applicant is proposing to install a truck tipper with a PE greater than 2 lb/day for PM₁₀. BACT is triggered for PM₁₀ since the PE is greater than 2 lbs/day.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

As discussed in Section I above, there are no modified emissions units associated with this project; therefore BACT is not triggered.

d. Major Modification

As discussed in Section VII.C.7 above, this project does not constitute a Major Modification; therefore BACT is not triggered.

2. BACT Guideline

BACT Guideline 6.4.5, applies to the biomass fuel receiving, handling, and storage in this project. [Biomass – Fuel Receiving, Handling, and Storage] (See Appendix B)

3. Top-Down BACT Analysis

Per Permit Services Policies and Procedures for BACT, a Top-Down BACT analysis shall be performed as a part of the application review for each application subject to the BACT requirements pursuant to the District's NSR Rule.

Pursuant to the attached Top-Down BACT Analysis (see Appendix B), BACT has been satisfied with the following:

PM₁₀: Use of a wet suppression system on all emission units, transfer points, and raw material stockpiles to maintain an adequate moisture to prevent visible emissions in excess of 20%

B. Offsets

1. Offset Applicability

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the Post Project Stationary Source Potential to Emit (SSPE2) equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The following table compares the post-project facility-wide annual emissions in order to determine if offsets will be required for this project.

Offset Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
Post Project SSPE (SSPE2)	417,600	54,000	83,650	501,120	200,448
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	Yes	No	Yes	Yes	Yes

2. Quantity of Offsets Required

As seen above, the SSPE2 is greater than the offset thresholds for NO_x, PM₁₀, CO, and VOC. However, this emissions unit in this project only emits PM₁₀; therefore offset calculations will be required for PM₁₀ only.

Per Sections 4.7.1 and 4.7.3, the quantity of offsets in pounds per year for PM₁₀ is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = $(\Sigma[PE2 - BE] + ICCE) \times DOR$, for all new or modified emissions units in the project,

Where,

PE2 = Post Project Potential to Emit, (lb/year)

BE = Baseline Emissions, (lb/year)

ICCE = Increase in Cargo Carrier Emissions, (lb/year)

DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE)

There are no increases in cargo carrier emissions; therefore offsets can be determined as follows:

Offsets Required (lb/year) = $([PE2 - BE] + ICCE) \times DOR$

PE2_{SLC} (PM10) = 83,520 lb/year

BE_{SLC} (PM10) = 83,520 lb/year

ICCE = 0 lb/year

Offsets Required (lb/year) = $([83,520 - 83,520] + 0) \times DOR$
= 0 lb PM10/year

As demonstrated in the calculation above, the amount of offsets is zero; therefore, offsets will not be required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:

- a. Any new Major Source, which is a new facility that is also a Major Source,
- b. Major Modifications,
- c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- d. Any project which results in the offset thresholds being surpassed, and/or
- e. Any project with an SSPE of greater than 20,000 lb/year for any pollutant.

a. New Major Source

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

b. Major Modification

As demonstrated in VII.C.7, this project does not constitute a Major Modification; therefore, public noticing for Major Modification purposes is not required.

c. PE > 100 lb/day

Applications which include a new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. As seen in Section VII.C.2 above, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant, therefore public noticing for PE > 100 lb/day purposes is not required.

d. Offset Threshold

The following table compares the SSPE1 with the SSPE2 in order to determine if any offset thresholds have been surpassed with this project.

Offset Threshold				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO _x	417,600	417,600	20,000 lb/year	No
SO _x	54,000	54,000	54,750 lb/year	No
PM ₁₀	83,650	83,650	29,200 lb/year	No
CO	501,120	501,120	200,000 lb/year	No
VOC	200,448	200,448	20,000 lb/year	No

As indicated in the table above, the SSPE1 for NO_x, PM₁₀, CO and VOC has been reached or exceeded prior to this project. Therefore, public noticing is not required for offset threshold exceedance purposes.

e. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project Stationary Source Potential to Emit (SSPE1), i.e. SSIPE = SSPE2 – SSPE1. The values for SSPE2 and SSPE1 are calculated according to Rule 2201, Sections 4.9 and 4.10, respectively. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table:

Stationary Source Increase in Permitted Emissions [SSIPE] – Public Notice					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	417,600	417,600	0	20,000 lb/year	No
SO _x	54,000	54,000	0	20,000 lb/year	No
PM ₁₀	83,650	83,650	0	20,000 lb/year	No
CO	501,120	501,120	0	20,000 lb/year	No
VOC	200,448	200,448	0	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

2. Public Notice Action

As discussed above, this project will not result in emissions, for any pollutant, which would subject the project to any of the noticing requirements listed above. Therefore, public notice will not be required for this project.

D. Daily Emission Limits (DELs)

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2,

the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

- Emissions of PM10 shall not exceed 119.4 lb PM10/day from the entire operation. [District NSR Rule]
- Emissions of PM10 shall not exceed 2.1 lb PM10/day from the baghouse exhaust. [District NSR Rule]
- Throughput of fuel shall not exceed 100 tons per hour nor 2,400 tons per day for each of the following emissions points: each truck tipper, north reclaimer, south reclaimer, reclaimer to weigh belt transfer point, weigh belt to transfer conveyor (oversizers) transfer point, weigh belt to disk screen transfer point, disk screen to inclined conveyor transfer point, transfer conveyor to return conveyor transfer point, inclined conveyor to red conveyor transfer point, disc screen overs conveyor to fuel hog, fuel hog grinder, and fuel hog to hog transfer conveyor. [District NSR Rule]
- Emissions shall not exceed 0.012 lb PM10/ton for each of the north and south reclaimers. [District NSR Rule]
- Emissions shall not exceed 0.005 lb PM10/ton for each of the following emissions points: transfer conveyor to return conveyor transfer point and inclined conveyor to red conveyor transfer point. [District NSR Rule]
- Controlled emissions shall not exceed 0.001 lb PM10/ton for each of the following emissions points: reclaimer to weigh belt transfer point, weigh belt to transfer conveyor (oversizers) transfer point, weigh belt to disk screen transfer point, and disk screen to inclined conveyor transfer point. [District NSR Rule]
- Emissions shall not exceed 0.000046 lb PM10/ton for each of the following emissions points: disc screen overs to fuel hog and fuel hog to hog transfer conveyor. [District Rule 2201]
- Emission shall not exceed 0.0012 lb PM10/ton for the fuel hog grinder. [District Rule 2201]
- Emission shall not exceed 0.024 lb PM10/ton for each of the truck tippers. [District Rule 2201]

E. Compliance Assurance

1. Source Testing

Per District Policy APR-1710, source testing of the baghouse exhaust will not be required since emissions from this point source is not expected to be greater than 30 lb/day.

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following condition will appear on the permit to operate:

- Permittee shall keep daily and annual records of fuel throughput in tons. [District NSR Rule]

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit pursuant to Section 3.20 of this rule:

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.

As discussed above, the facility has applied for a Certificate of Conformity (COC); therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment application.

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 biomass fuel receiving operations.

Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to biomass fuel receiving operations.

Rule 4101 Visible Emissions

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). Installation of the baghouse to control dust emissions will serve to further reduce emissions.

In order to ensure that the baghouse is maintained and operated correctly, District Policy SSP-1005 prescribes limiting opacity to less than 5% from the baghouse exhaust. Therefore the following conditions will be placed on the ATC to ensure compliance with this rule:

- Except as otherwise required in this permit, 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]
- Visible emissions from baghouse serving the fuel receiving operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]

Therefore compliance with this rule is expected.

Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – Risk Management Policy for Permitting New and Modified Sources 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.

As demonstrated above, there are no increases in emissions associated with this project and because the previous health risk assessment (HRA) performed was done under the classification of an area source, this new equipment will not affect the existing HRA; therefore, a health risk assessment is not necessary and no further risk analysis is required.

Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation that can be manifolded and exhausted through a stack in excess of 0.1 grain per dry standard cubic foot.

$$\text{PM Conc. (gr/scf)} = \frac{(\text{PM emission rate}) \times (7,000 \text{ gr/lb})}{(\text{Air flow rate}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})}$$

PM₁₀ emission rate = 2.1 lb/day (note these emissions are from the baghouse only)
Exhaust Gas Flow = 6,000 scfm

$$\text{PM Conc. (gr/scf)} = [(2.1 \text{ lb/day}) \times (7,000 \text{ gr/lb})] \div [(6,000 \text{ ft}^3/\text{min}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})]$$

PM Conc. = 0.0017 gr/scf

Compliance with this rule is expected.

Rule 4202 Particulate Matter Emission Rate

This rule prohibits the discharge of particulate matter in excess of the emission limit found by the following equation:

$$E_{\text{Max.}} = 17.31 P^{0.16}$$

where: E = Emissions in lb/hr
P = Process weight in ton/hr (P > 30 tons/hr)

$$E_{\text{Max.}} = 3.59 P^{0.62}$$

where: E = Emissions in lb/hr
P = Process weight in ton/hr (P ≤ 30 tons/hr)

$$E = 17.31 (100)^{0.16} = 36.2 \text{ lb PM/hr}$$

This calculated limit is then compared to the expected emissions of 119.4 lb PM₁₀/day, which is equivalent to 221.6 lb PM/day (assuming 50% of PM is PM₁₀). Hourly emissions of PM are thusly 9.23 lb PM based on 24 hours of operation. Since 9.23 lb PM/hr is less than 36.2 lb PM/hr, compliance with this rule is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.

- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas (GHG) Significance Determination

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

The District’s engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions as the unit being modified does not generate any greenhouse gases at all. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. 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. Issue Authority to Construct C-799-1-8 subject to the permit conditions on the attached draft Authority to Construct in Appendix D.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
C-799-1-8	999-99	No fee applicable	N/A

Appendices

- A: Current Operating Permit C-799-1-7
- B: BACT Guideline 6.4.5 and Top Down BACT Analysis
- C: Draft Authority to Construct

APPENDIX A
Current Operating Permit C-799-1-7

AUTHORITY TO CONSTRUCT

PERMIT NO: C-799-1-7

ISSUANCE DATE: 05/26/2010

LEGAL OWNER OR OPERATOR: MADERA POWER, LLC

MAILING ADDRESS: PO BOX 305
FIREBAUGH, CA 93622

LOCATION: 11427 FIREBAUGH BLVD
P O BOX 305
FIREBAUGH, CA 93622

EQUIPMENT DESCRIPTION:

MODIFICATION OF FUEL STORAGE AND FEED SYSTEM CONSISTING OF: TRUCK WEIGH SCALE, FUEL STORAGE BLDG., TRUCK TIPPER, 2 RECLAIM CONVEYORS (RC1A, RC2A), FUEL RECLAIM, COLLECTION, AND TRANSFER CONVEYORS WITH A DUST COLLECTION SYSTEM INCLUDING FOUR PICKUP POINTS SERVED BY A BAGHOUSE: INSTALL A FUEL HOG GRINDING SYSTEM CONSISTING OF ENCLOSED DISC SCREEN OVERS CONVEYOR, FUEL HOG GRINDER, ENCLOSED HOG TRANSFER CONVEYOR, AND TWO MAGNETS, ADD PERMIT C-799-1 TO PM10 SPECIFIC LIMITING CONDITION WITH PERMITS C-799-3, 6, 7, 8

CONDITIONS

1. 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
2. Authority to Construct (ATC) C-799-1-6 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Specific Limiting Condition (SLC) limiting the annual emissions from the fuel handling listed under permit C-799-1, boiler/generator listed under permit C-799-3, the screening operation listed under permit C-799-6, the grinding operation listed under permit C-799-7 and the transportable IC engine listed under permit C-799-8 calculated on a twelve consecutive month rolling basis, shall not exceed any of the following: 417,600 lb-NOx/year, 54,000 lb-SOx/year, 83,520 lb-PM10/year, 501,120 lb-CO/year, or 200,448 lb-VOC/year. [District NSR Rule]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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

6. Except as otherwise required in this permit, 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] Federally Enforceable Through Title V Permit
7. Visible emissions from baghouse serving the fuel receiving 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] Federally Enforceable Through Title V Permit
8. Fugitive dust emissions shall be controlled by water sprays, dust suppressants, enclosures, fencing, or other wind barriers. [District Rule 4102]
9. Mobile equipment, except their propulsion motors, shall be subject to all applicable conditions of this permit. [District Rule 4102]
10. 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
11. 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
12. Records of visible emission checks, emission control 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, 9.3.2] Federally Enforceable Through Title V Permit
13. The baghouse shall be maintained and operated according to manufacturer's specifications. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
18. A spare set of bags shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
19. 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
20. The differential pressure gauge reading range shall be established per manufacturer's recommendation at time of start up inspection. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Throughput of fuel shall not exceed 100 tons per hour nor 2,400 tons per day for each of the following emissions points: north reclaimer, south reclaimer, reclaimer to weigh belt transfer point, weigh belt to transfer conveyor (oversizers) transfer point, weigh belt to disk screen transfer point, disk screen to inclined conveyor transfer point, transfer conveyor to return conveyor transfer point, inclined conveyor to red conveyor transfer point, disc screen overs conveyor to fuel hog, fuel hog grinder, and fuel hog to hog transfer conveyor. [District NSR Rule]
23. Emissions shall not exceed 0.012 lb PM10/ton for each of the north and south reclaimers. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Emissions shall not exceed 0.005 lb PM10/ton for each of the following emissions points: transfer conveyor to return conveyor transfer point and inclined conveyor to red conveyor transfer point. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

25. Controlled emissions shall not exceed 0.001 lb PM10/ton for each of the following emissions points: reclaimer to weigh belt transfer point, weigh belt to transfer conveyor (oversizers) transfer point, weigh belt to disk screen transfer point, and disk screen to inclined conveyor transfer point. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Emissions shall not exceed 0.000046 lb PM10/ton for each of the following emissions points: disc screen overs to fuel hog and fuel hog to hog transfer conveyor. [District Rule 2201]
27. Emission shall not exceed 0.0012 lb PM10/ton for the fuel hog grinder. [District Rule 2201]
28. Emissions of PM10 shall not exceed 110.8 lb PM10/day from the entire operation. [District NSR Rule] Federally Enforceable Through Title V Permit
29. Emissions of PM10 shall not exceed 2.1 lb PM10/day from the baghouse exhaust. [District NSR Rule] Federally Enforceable Through Title V Permit
30. For each unit subject to the Specific Limiting Condition (SLC), the permittee shall maintain all necessary records in order to show compliance with the annual SLC limits. [District NSR Rule]
31. Permittee shall keep daily and annual records of fuel throughput in tons. [District NSR Rule] Federally Enforceable Through Title V Permit
32. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made readily available for District inspection upon request. [District NSR Rule and Rule 1070] Federally Enforceable Through Title V Permit

APPENDIX B
BACT Guideline 6.4.5 and Top Down BACT Analysis

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 6.4.5*

Last Update: 9/7/1998

Biomass - Fuel Receiving, Handling, and Storage

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
PM10	Use of a wet suppression system on all emission units, transfer points, and raw material stockpiles to maintain an adequate moisture to prevent visible emissions in excess of 20%.		

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

***This is a Summary Page for this Class of Source - Permit Specific BACT Determinations on Next Page(s)**

TOP DOWN BACT ANALYSIS

I. BACT Analysis for C-799-1-8:

a. Step 1 - Identify All Possible Control Technologies

BACT guideline 6.4.5 identifies the following control technologies:

Pollutant	Achieved in Practice or contained in SIP	Technologically Feasible	Alternate Basic Equipment
PM10	Use of a wet suppression system on all emission units, transfer points, and raw material stockpiles to maintain an adequate moisture to prevent visible emissions in excess of 20%		

b. Step 2 - Eliminate Technologically Infeasible Options

There are no infeasible options.

c. Step 3 - Rank Remaining Control Technologies by Control Effectiveness

There are no remaining control technologies.

d. Step 4 - Cost Effectiveness Analysis

The applicant is proposing the most effective control technology; therefore, a cost effectiveness analysis is not required.

e. Step 5 - Select BACT

Use of a wet suppression system on all emission units, transfer points, and raw material stockpiles to maintain an adequate moisture to prevent visible emissions in excess of 20% is selected as BACT.

The truck tipper will be equipped with water sprays to maintain adequate moisture to prevent visible emissions in excess of 20%.

APPENDIX C
Draft Authority to Construct

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: C-799-1-8

LEGAL OWNER OR OPERATOR: MADERA POWER, LLC
MAILING ADDRESS: PO BOX 305
FIREBAUGH, CA 93622

LOCATION: 11427 FIREBAUGH BLVD
P O BOX 305
FIREBAUGH, CA 93622

EQUIPMENT DESCRIPTION:

MODIFICATION OF FUEL STORAGE AND FEED SYSTEM CONSISTING OF: TRUCK WEIGH SCALE, FUEL STORAGE BLDG., TRUCK TIPPER, 2 RECLAIM CONVEYORS (RC1A, RC2A), FUEL RECLAIM, COLLECTION, TRANSFER CONVEYORS WITH A DUST COLLECTION SYSTEM INCLUDING FOUR PICKUP POINTS SERVED BY A BAGHOUSE, AND FUEL HOG GRINDING SYSTEM: INSTALL A SECOND TRUCK TIPPER CONTROLLED BY WATER SPRAYS

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. Authority to Construct (ATC) C-799-1-7 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Specific Limiting Condition (SLC) limiting the annual emissions from the fuel handling listed under permit C-799-1, boiler/generator listed under permit C-799-3, the screening operation listed under permit C-799-6, the grinding operation listed under permit C-799-7 and the transportable IC engine listed under permit C-799-8 calculated on a twelve consecutive month rolling basis, shall not exceed any of the following: 417,600 lb-NOx/year, 54,000 lb-SOx/year, 83,520 lb-PM10/year, 501,120 lb-CO/year, or 200,448 lb-VOC/year. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director YAPCO

DAVID WARNER, Director of Permit Services

C-799-1-8 : Nov 2 2010 2:26PM - GARCIAJ : Joint Inspection Required with GARCIAJ

5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
7. Except as otherwise required in this permit, 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] Federally Enforceable Through Title V Permit
8. Visible emissions from baghouse serving the fuel receiving 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] Federally Enforceable Through Title V Permit
9. Fugitive dust emissions shall be controlled by water sprays, dust suppressants, enclosures, fencing, or other wind barriers. [District Rule 4102] Federally Enforceable Through Title V Permit
10. Mobile equipment, except their propulsion motors, shall be subject to all applicable conditions of this permit. [District Rule 4102] Federally Enforceable Through Title V Permit
11. 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
12. 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
13. Records of visible emission checks, emission control 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, 9.3.2] Federally Enforceable Through Title V Permit
14. The baghouse shall be maintained and operated according to manufacturer's specifications. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
19. A spare set of bags shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
20. 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
21. The baghouse shall operate at all times with a minimum differential pressure of 0.5 inches water column and a maximum differential pressure of 6.0 inches water column. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Throughput of fuel shall not exceed 100 tons per hour nor 2,400 tons per day for each of the following emissions points: each truck tipper, north reclaimer, south reclaimer, reclaimer to weigh belt transfer point, weigh belt to transfer conveyor (oversizers) transfer point, weigh belt to disk screen transfer point, disk screen to inclined conveyor transfer point, transfer conveyor to return conveyor transfer point, inclined conveyor to red conveyor transfer point, disc screen overs conveyor to fuel hog, fuel hog grinder, and fuel hog to hog transfer conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

24. Emissions shall not exceed 0.012 lb PM10/ton for each of the north and south reclaimers. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Emissions shall not exceed 0.005 lb PM10/ton for each of the following emissions points: transfer conveyor to return conveyor transfer point and inclined conveyor to red conveyor transfer point. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Controlled emissions shall not exceed 0.001 lb PM10/ton for each of the following emissions points: reclaimer to weigh belt transfer point, weigh belt to transfer conveyor (oversizers) transfer point, weigh belt to disk screen transfer point, and disk screen to inclined conveyor transfer point. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Emissions shall not exceed 0.000046 lb PM10/ton for each of the following emissions points: disc screen overs to fuel hog and fuel hog to hog transfer conveyor. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Emission shall not exceed 0.0012 lb PM10/ton for the fuel hog grinder. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Emission shall not exceed 0.024 lb PM10/ton for each of the truck tippers. [District Rule 2201] Federally Enforceable Through Title V Permit
30. Emissions of PM10 shall not exceed 119.4 lb PM10/day from the entire operation. [District NSR Rule] Federally Enforceable Through Title V Permit
31. Emissions of PM10 shall not exceed 2.1 lb PM10/day from the baghouse exhaust. [District NSR Rule] Federally Enforceable Through Title V Permit
32. For each unit subject to the Specific Limiting Condition (SLC), the permittee shall maintain all necessary records in order to show compliance with the annual SLC limits. [District NSR Rule] Federally Enforceable Through Title V Permit
33. Permittee shall keep daily and annual records of fuel throughput in tons. [District NSR Rule] Federally Enforceable Through Title V Permit
34. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made readily available for District inspection upon request. [District NSR Rule and Rule 1070] Federally Enforceable Through Title V Permit

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