



**JAN 23 2013**

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

**Re: Notice of Minor Title V Permit Modification  
District Facility # N-238  
Project # N-1110085**

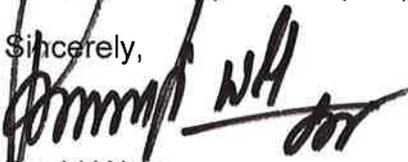
Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Ingredion Inc. is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct N-238-18-5 into the Title V operating permit. This project is for the modification of a gas turbine system to add a selective catalytic reduction system and to reduce the NOx emissions to 9 ppmvd for District Rule 4703 compliance.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-238-18-5, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rapi Gill at (209) 557-6400.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

**Sayed 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

JAN 28 2013

Eric Chutorash  
Ingredion Inc.  
PO Box 6129  
Stockton, CA 95206

**Re: Notice of Minor Title V Permit Modification  
District Facility # N-238  
Project # N-1110085**

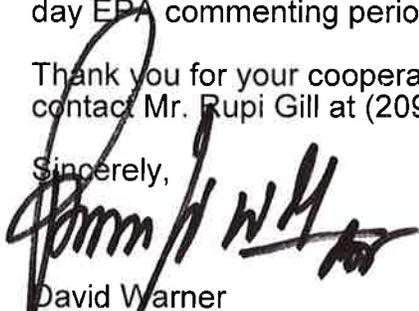
Dear Mr. Chutorash:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct N-238-18-5 into the Title V operating permit. This project is for the modification of a gas turbine system to add a selective catalytic reduction system and to reduce the NOx emissions to 9 ppmvd for District Rule 4703 compliance.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-238-18-5, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,



David Warner  
Director of Permit Services

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Tel: 661-392-5500 FAX: 661-392-5585

# **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: N-1110085

Engineer: James Harader  
Date: October 1, 2012

Facility Number: N-238  
Facility Name: Ingredion Inc.  
Mailing Address: PO Box 6129  
Stockton, CA 95206

Contact Name: Eric Chutorash  
Phone: (209) 547-8222

Responsible Official: Eric Chutorash  
Title: Stockton Plant Manager

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## **I. PROPOSAL**

Ingredion Inc. is proposing a Title V minor permit modification to incorporate Authority to Construct N-238-18-5 into the existing Title V operating permit. Authority to Construct N-238-18-5 authorizes the modification of a turbine to add a selective catalytic reduction system and to reduce the NO<sub>x</sub> emission limit to 9 ppmvd @ 15% O<sub>2</sub> for District Rule 4703 compliance. This proposal did not result in an increase in NO<sub>x</sub>, CO, VOC, PM<sub>10</sub>, or SO<sub>x</sub> emissions.

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

## **II. FACILITY LOCATION**

This facility is located at 1021 Industrial Drive in Stockton, CA.

### III. EQUIPMENT DESCRIPTION

**N-238-18-6:** SOLAR TURBINE INCORPORATED CENTAUR 2800 KW (ISO) CONTINUOUS DUTY INDUSTRIAL GAS TURBINE GENERATOR AND A DELTA WASTE HEAT BOILER, MODEL 3L-227, SERVED BY A SELECTIVE CATALYTIC REDUCTION SYSTEM

### IV. SCOPE OF EPA AND PUBLIC REVIEW

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

### V. APPLICABLE REQUIREMENTS

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

### VI. DESCRIPTION OF PROPOSED MODIFICATIONS

N-238-18-6

The following tables summarize the proposed modifications to the turbine permit.

Modified Conditions			
Previous TV PTO Condition #	ATC Condition #	New TV PTO Condition #	Proposed Changes to Conditions
3	8	5	The grains/100 dscf sulfur content of PUC-Quality natural gas has been added to the condition requiring the use of natural gas fuel.
4 and 5	5	2	Conditions #4 and #5 of the existing permit require that the operator maintain a minimum water to fuel ratio of 0.57 when operating at full load and during startup and shutdown. This condition has been replaced with a condition that requires the 0.57 water to fuel ratio be maintained during all operation of the turbine.
8	11	8	Condition 8 of the existing permit limited the turbine to 35 ppm NOx @ 15% O <sub>2</sub> . This condition has been replaced with a condition that requires the turbine to meet an emission limit of 9 ppmvd @ 15% O <sub>2</sub> , except during startup and shutdown.

**Modified Conditions - Continued**

Previous TV PTO Condition #	ATC Condition #	New TV PTO Condition #	Proposed Changes to Conditions
9	9	6	The existing condition limits CO emissions. This condition has been revised to include permit limits for PM <sub>10</sub> , VOC, and SO <sub>x</sub> emissions.
10	17	14	The source testing condition has been modified to specify that the 3-run tests must be performed at four evenly spaced load points in the normal operating range of the gas turbine, as required by 40 CFR 60 Subpart GG. Additionally, the ATC condition requires initial testing within 60 days of startup. The initial testing requirement will be satisfied prior to issuing the permit to operate; therefore, the initial testing requirement is not included in the new TV PTO condition.
12	19	16	The NO <sub>x</sub> test method requirement has been modified to require the results to be corrected to ISO standard conditions, as required by 40 CFR 60 Subpart GG Section 60.335.
21	25	22	The fuel sulfur monitoring condition, when firing on non-PUC regulate natural gas, currently allows for quarterly testing if eight consecutive weeks of compliance is demonstrated. This requirement has been modified to require monthly testing if eight consecutive weeks of compliance is demonstrated.
26 and 27	15	12	Existing conditions #26 and #27 defined the terms "startup" and "shutdown". These conditions have been combined into a single condition.
30, 31 and 34	34 and 35	31 and 32	NO <sub>x</sub> excess emissions were redefined to include periods where the ammonia injection rate falls below the minimum ammonia injection rate, and conditions for NO <sub>x</sub> excess emissions were combined.
40	36	33	The existing condition requires the operator to keep a record of the duration of all startup and shutdown periods. The condition has been revised to also require the operator to keep a record of the cumulative daily duration of all startups and shutdowns.

**Removed Conditons**

<b>Previous TV PTO Condition #</b>	<b>Proposed Changes to Conditions</b>
1	This condition required the permittee to comply fully with the requirements of District Rule 4001 (New Source Performance Standards, 40 CFR Part 60 Subpart GG). All of the specific requirements of 40 CFR Part 60 Subpart GG are included on the permit; therefore, this general requirement is not necessary and has been removed from the permit.
2	This condition required the permittee to comply fully with the requirements of District Rule 4703. All of the specific requirements of District Rule 4703 are included on the permit; therefore, this general requirement is not necessary and has been removed from the permit.
19	This condition requires sulfur compound emissions to not exceed 0.015% by volume, 150 ppmv, on a dry basis averaged over 15 minutes. Compliance with this requirement is guaranteed by complying with the natural gas fuel sulfur content limit of the permit; therefore, this overlapping requirement has been removed from the permit.
20	This condition requires the unit to be fired exclusively on PUC-Quality natural gas with a sulfur content of less than 0.017% by weight. Compliance with this requirement is guaranteed by complying with the natural gas grains/dscf fuel sulfur content limit of the permit; therefore, this overlapping requirement has been removed from the permit.
24	This condition defines the term "transitional operating period". District Rule 4703 has been revised, and this definition is no longer applicable. Therefore, this condition has been removed from the permit.
25	This condition defines the term "reduced load period". District Rule 4703 has been revised, and this definition is no longer applicable. Therefore, this condition has been removed from the permit.
32	This condition requires the operator to provide source test information annually and lists the required test methods. This condition is redundant and has been removed from the permit.
35	This condition limits CO emissions to 200 ppmvd @ 15% O <sub>2</sub> , except during transitional operational periods. The permit already includes a condition that limits CO emissions to 120 ppmvd during all operational periods. Therefore, this condition is redundant and has been removed from the permit.
38	This condition granted a permit shield from 40 CFR 60.332 and 60.333 requirements. These requirements have been modified since the permit shield was granted. Therefore, the permit shield has been removed from the permit.

<b>Added Conditions</b>		
<b>ATC Condition #</b>	<b>New TV PTO Condition #</b>	<b>Proposed Changes to Conditions</b>
10	7	A condition that limits ammonia slip has been added to the permit.
12 and 14	9 and 11	Conditions that limit the cumulative daily startup/shutdown duration and NOx emissions during startup/shutdown have been added to the permit.
22	19	A condition that specifies the required test method to determine ammonia emissions has been added to the permit.
28	25	A condition has been added that requires ammonia to be injected whenever the catalytic reduction system temperature exceeds the minimum ammonia injection temperature recommended by the manufacturer.
29	26	A condition has been added that requires the permittee to determine the ammonia injection rate(s) required to demonstrate compliance with the NOx emission limit. The ammonia injection rate will be determined during the initial performance test and this condition will be modified to enforce the minimum ammonia injection rates once the test data is available.
30	27	A condition has been added to state the required course of action if the measured ammonia injection rate is less than the minimum ammonia injection rate(s) listed on the permit.
31	28	A condition has been added that requires the permittee to monitor the NOx, CO, and O2 emissions weekly using a portable emissions monitor.
32	29	A condition has been added to state the required course of action if the measured NOx or CO emissions exceed the permitted emission limits.
33	30	A condition has been added that requires lists the ammonia emission monitoring requirements.

<b>ATC Conditions that were not Added</b>	
<b>ATC Condition #</b>	<b>Proposed Changes to Conditions</b>
1	This condition requires the facility to submit an application to modify the TV permit in accordance with the timeframes and procedures of District Rule 2520. This requirement has not been included on the new permit.
3 and 4	These conditions already appear on the facility-wide permit. Therefore, they have not been included on the new permit.

## **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or Conditions;

3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
  4. Do not seek to establish or change a permit term or Condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and Conditions include;
    - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
    - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
  5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
  6. Do not seek to consolidate overlapping applicable requirements.
- In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;
1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
  2. The source's suggested draft permit; and
  3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit N-238-18-6
- B. Authority to Construct N-238-18-5
- C. Title V Compliance Certification Form
- D. Previous Title V Operating Permit N-238-18-4

# ATTACHMENT A

Proposed Modified Title V Operating Permit  
N-238-18-6

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-238-18-6

**EXPIRATION DATE:** 03/31/2014

**EQUIPMENT DESCRIPTION:**

SOLAR TURBINE INCORPORATED CENTAUR 2800 KW (ISO) CONTINUOUS DUTY INDUSTRIAL GAS TURBINE GENERATOR AND A DELTA WASTE HEAT BOILER, MODEL 3L-227, SERVED BY A SELECTIVE CATALYTIC REDUCTION SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. {2256} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
2. The water to fuel injection ratio shall be maintained at a minimum of 0.57 by weight. [District NSR Rule and District Rule 4703] Federally Enforceable Through Title V Permit
3. The permittee shall maintain and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. [District Rule 4001 and District Rule 4703] Federally Enforceable Through Title V Permit
4. A flowmeter shall be operated at the water injection system's water inlet to the turbine. The flow meter shall be equipped with flow totalizer. [District NSR Rule and District Rule 4703] Federally Enforceable Through Title V Permit
5. The turbine shall only be fired on natural gas with a sulfur content not exceeding 1.0 grains of sulfur compounds (as S) per 100 dry standard cubic feet of natural gas fuel. [District Rule 2201, 40 CFR 60.333(a), and San Joaquin County Rule 407] Federally Enforceable Through Title V Permit
6. Emissions from the gas turbine shall not exceed any of the following limits: 120 ppmvd CO @15% O<sub>2</sub>; 0.0070 lb-PM<sub>10</sub>/MMBtu; 0.0021 lb-VOC/MMBtu (referenced as methane); and 0.00285 lb-SO<sub>x</sub>/MMBtu (referenced as SO<sub>2</sub>). The CO emission limit is based on a 3-hour average. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
7. Ammonia slip (NH<sub>3</sub>) emissions shall not exceed 5 ppmvd @ 15% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Except during startup and shutdown periods, emissions from the gas turbine system shall not exceed 9 ppmvd NO<sub>x</sub> @ 15% O<sub>2</sub>. [District Rules 2201 and 4703, and 40 CFR 60.332(c)] Federally Enforceable Through Title V Permit
9. During startup and shutdown periods, emissions from the gas turbine system shall not exceed 35 ppmvd NO<sub>x</sub> @ 15% O<sub>2</sub> once the turbine generator has reached operating speed. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
10. The duration of each startup and each shutdown shall not exceed 2 hours per event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
11. The total combined duration of startups and shutdowns shall not exceed 8 hours in any one day. [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.

12. Startup shall be defined as the period of time during which a unit is brought from a shutdown status to its SCR operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown shall be defined as the period of time during which a unit is taken from an operational to non-operational status as the fuel supply to the unit is completely turned off. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
13. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown periods. [District Rule 4703] Federally Enforceable Through Title V Permit
14. Source testing to demonstrate compliance with the NO<sub>x</sub>, CO, and NH<sub>3</sub> emission limits of the gas turbine system shall be conducted at least once every 12 months. The 3-run tests shall be performed at four evenly spaced load points in the normal operating range of the gas turbine. [40 CFR 60.335(a), (b)(2) and District Rules 1081 and 4703] Federally Enforceable Through Title V Permit
15. 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
16. NO<sub>x</sub> emissions (referenced as NO<sub>2</sub>) shall be determined using EPA Method 7E or EPA Method 20. [District Rules 1081 and 4703, 40 CFR 60.335(b)(1)] Federally Enforceable Through Title V Permit
17. CO emissions shall be determined using EPA Method 10 or EPA Method 10B. [District Rules 1081 and 4703] Federally Enforceable Through Title V Permit
18. Oxygen content of the exhaust gas shall be determined using EPA Method 3, EPA Method 3A, or EPA Method 20. [District Rules 1081 and 4703] Federally Enforceable Through Title V Permit
19. Ammonia (NH<sub>3</sub>) emissions shall be determined using BAAQMD Method ST-1B. [District Rules 1081, 2201, and 4102] Federally Enforceable Through Title V Permit
20. {2270} All continuous monitoring systems and monitoring devices shall be installed and operational prior to conducting performance tests. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the device. [40 CFR 60.13(b)] Federally Enforceable Through Title V Permit
21. 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
22. If this unit is not fired on PUC-regulated natural gas, the sulfur content of each natural gas fuel source shall be tested weekly to determine compliance with the fuel sulfur content limit. Upon the completion of eight consecutive weekly tests that demonstrate compliance with the fuel sulfur content limit, the sulfur content testing may be conducted on a monthly schedule. If any test shows non-compliance with the fuel sulfur content limit while on a monthly testing schedule, the testing schedule shall return to weekly testing until eight consecutive weeks demonstrate compliance with the fuel sulfur content limit. [District Rule 2201 and 40 CFR 60.334(h)(3)] Federally Enforceable Through Title V Permit
23. {2261} If this unit is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM method D 1072, D 4084 or D 3246. [40 CFR 60.335(d)] Federally Enforceable Through Title V Permit
24. If this unit is fired on PUC-regulated natural gas, then the owner or operator shall maintain copies of the natural gas bills on file. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. Ammonia shall be injected whenever the selective catalytic reduction system catalyst temperature exceeds the minimum ammonia injection temperature recommended by the manufacturer. [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.

26. During initial performance testing, the ammonia injection rate shall be monitored concurrently with each testing run to establish acceptable values and ranges that provide a reasonable assurance of ongoing compliance with the emissions limitations stated in this permit. The minimum ammonia injection rate(s) demonstrated during the initial NO<sub>x</sub> source test to result in compliance with the NO<sub>x</sub> emission limits shall be imposed as a condition in the Permit to Operate. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
27. If the ammonia injection rate is less than the minimum ammonia injection rate demonstrated during the initial compliance test, the permittee shall return the ammonia injection rate above the minimum ammonia injection rate established during compliance testing as soon as possible, but no longer than eight hours after detection. If the ammonia injection rate is not returned above the minimum ammonia injection rate established during compliance testing within eight hours, the permittee shall notify the District within the following one hour and conduct a source test within 60 days of the first exceedance to demonstrate compliance with the applicable emission limits at the reduced ammonia injection rate. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
28. The permittee shall monitor and record the stack concentration of NO<sub>x</sub> (as NO<sub>2</sub>), CO, and O<sub>2</sub> weekly using a portable emissions monitor that meets District specifications. If compliance with the NO<sub>x</sub> and CO emissions is demonstrated for eight consecutive weeks, then the monitoring frequency will be reduced to monthly. If deviations are observed in two consecutive months, monitoring shall revert to weekly until eight consecutive weeks show no deviations. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within one day of restarting the unit unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the week if on a weekly monitoring schedule. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
29. If the NO<sub>x</sub> and/or CO concentrations, as measured by the permittee with a portable emissions monitor, exceed the permitted emission limits, the permittee shall notify the District and return the NO<sub>x</sub> and CO concentrations to the permitted emission limits as soon as possible but no longer than eight hours after detection. If the permittee's portable emission monitor readings continue to exceed the permitted emissions limits after eight hours, the permittee shall notify the District within the following one hour, and conduct a certified source test within 60 days to demonstrate compliance with the permitted emissions limits. In lieu of conducting a source test, the permittee may stipulate that a violation has occurred, subject to enforcement action. The permittee must correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
30. Permittee shall determine and record the ammonia slip monthly using a draeger tube, or equivalent ammonia detection device. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
31. The owner or operator shall submit a report of NO<sub>x</sub> excess emissions and periods of monitor downtime to the APCO semi-annually, and this report shall be postmarked by the 30th day following the end of each 6-month period. [40 CFR 60.334(j)(5)] Federally Enforceable Through Title V Permit
32. NO<sub>x</sub> excess emissions shall be defined as any unit operating hour for which the average water to fuel injection rate, as measured by the continuous monitoring system, falls below the water to fuel ratio specified in this permit, including during startup and shutdown. NO<sub>x</sub> excess emissions shall also be defined as any 4-hour rolling unit operating hour in which the average ammonia injection rate falls below the minimum ammonia injection rate(s) specified in this permit, not including startup or shutdown. NO<sub>x</sub> monitor downtime shall be defined as any operating hour during which the water to fuel ratio or ammonia injection rate is either not recorded or is invalid. [40 CFR 60.334(j)(1)] Federally Enforceable Through Title V Permit
33. Permittee shall maintain daily records of the occurrence and duration of each startup or shutdown and the total cumulative duration of all startups and shutdowns. [District Rule 4703] 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.

34. The owner or operator shall maintain a stationary gas turbine operating log that includes, on a daily basis, the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation, type and quantity of fuel used. [District Rule 4703 and 40 CFR 60.332(a) and (b)] Federally Enforceable Through Title V Permit
35. The owner or operator of the stationary gas turbine system shall maintain records of the following: (1) Water to fuel injection continuous monitoring system measurements, (2) Ammonia injection rate monitoring system measurements, and (3) Periodic NOx, CO, and O2 portable emissions monitor measurements. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
36. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2520 and 4703] Federally Enforceable Through Title V Permit
37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: San Joaquin County Rule 108.1 as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
38. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: San Joaquin Country Rule 407 as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b); District Rule 1081 (as amended 12/16/93) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

DRAFT

# ATTACHMENT B

Authority to Construct  
N-238-18-5

INSPECTION  
ISSUANCE DATE: 04/05/2011

**LEGAL OWNER OR OPERATOR:** CORN PRODUCTS INTERNATIONAL  
**MAILING ADDRESS:** P O BOX 6129  
 STOCKTON, CA 95206-0129

**LOCATION:** 1021 INDUSTRIAL DR  
 STOCKTON, CA 95206

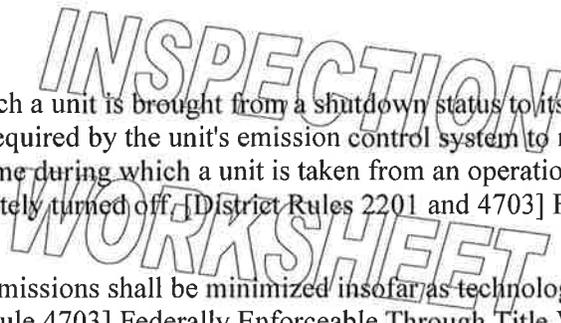
**INSPECT PROGRAM PARTICIPANT:** NO

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF ONE SOLAR TURBINE INCORPORATED CENTAUR 2800 KW (ISO) CONTINUOUS DUTY INDUSTRIAL GAS TURBINE GENERATOR AND A DELTA WASTE HEAT BOILER, MODEL 3L-227 TO INSTALL A SELECTIVE CATALYTIC REDUCTION SYSTEM AND TO LOWER THE NOX EMISSION LIMIT TO 9 PPMVD @ 15% O2 FOR DISTRICT RULE 4703 COMPLIANCE

## CONDITIONS

1. {1829} 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. {2256} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
3. {15} 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]
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The water to fuel injection ratio shall be maintained at a minimum of 0.57 by weight. [District NSR Rule and District Rule 4703] Federally Enforceable Through Title V Permit
6. The permittee shall maintain and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. [District Rule 4001 and District Rule 4703] Federally Enforceable Through Title V Permit
7. A flowmeter shall be operated at the water injection system's water inlet to the turbine. The flow meter shall be equipped with flow totalizer. [District NSR Rule and District Rule 4703] Federally Enforceable Through Title V Permit
8. The turbine shall only be fired on natural gas with a sulfur content not exceeding 1.0 grains of sulfur compounds (as S) per 100 dry standard cubic feet of natural gas fuel. [District Rule 2201, 40 CFR 60.333(a), and San Joaquin County Rule 407] Federally Enforceable Through Title V Permit
9. Emissions from the gas turbine shall not exceed any of the following limits: 120 ppmvd CO @15% O2; 0.0070 lb-PM10/MMbtu; 0.0021 lb-VOC/MMBtu (referenced as methane); and 0.00285 lb-SOx/MMBtu (referenced as SO2). The CO emission limit is based on a 3-hour average. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
10. Ammonia slip (NH3) emissions shall not exceed 5 ppmvd @ 15% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Except during startup and shutdown periods, emissions from the gas turbine system shall not exceed 9 ppmvd NOx @ 15% O2. [District Rules 2201 and 4703, and 40 CFR 60.332(c)] Federally Enforceable Through Title V Permit
12. During startup and shutdown periods, emissions from the gas turbine system shall not exceed 35 ppmvd NOx @ 15% O2. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
13. The duration of each startup and each shutdown shall not exceed 2 hours per event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
14. The total combined duration of startups and shutdowns shall not exceed 8 hours in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit



15. Startup shall be defined as the period of time during which a unit is brought from a shutdown status to its SCR operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown shall be defined as the period of time during which a unit is taken from an operational to non-operational status as the fuel supply to the unit is completely turned off. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
16. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown periods. [District Rule 4703] Federally Enforceable Through Title V Permit
17. Source testing to demonstrate compliance with the NO<sub>x</sub>, CO, and NH<sub>3</sub> emission limits of the gas turbine system shall be conducted within 60 days of initial startup, and at least once every 12 months thereafter. The 3-run tests shall be performed at four evenly spaced load points in the normal operating range of the gas turbine. [40 CFR 60.335(a), (b)(2) and District Rules 1081 and 4703] Federally Enforceable Through Title V Permit
18. 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
19. NO<sub>x</sub> emissions (referenced as NO<sub>2</sub>) shall be determined using EPA Method 7E or EPA Method 20. The test results shall be corrected to ISO standard conditions as defined in 40 CFR Part 60 Subpart GG Section 60.335. [District Rules 1081 and 4703, 40 CFR 60.335(b)(1)] Federally Enforceable Through Title V Permit
20. CO emissions shall be determined using EPA Method 10 or EPA Method 10B. [District Rules 1081 and 4703] Federally Enforceable Through Title V Permit
21. Oxygen content of the exhaust gas shall be determined using EPA Method 3, EPA Method 3A, or EPA Method 20. [District Rules 1081 and 4703] Federally Enforceable Through Title V Permit
22. Ammonia (NH<sub>3</sub>) emissions shall be determined using BAAQMD Method ST-1B. [District Rules 1081, 2201, and 4102]
23. {2270} All continuous monitoring systems and monitoring devices shall be installed and operational prior to conducting performance tests. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the device. [40 CFR 60.13(b)] 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. If this unit is not fired on PUC-regulated natural gas, the sulfur content of each natural gas fuel source shall be tested weekly to determine compliance with the fuel sulfur content limit. Upon the completion of eight consecutive weekly tests that demonstrate compliance with the fuel sulfur content limit, the sulfur content testing may be conducted on a monthly schedule. If any test shows non-compliance with the fuel sulfur content limit while on a monthly testing schedule, the testing schedule shall return to weekly testing until eight consecutive weeks demonstrate compliance with the fuel sulfur content limit. [District Rule 2201 and 40 CFR 60.334(h)(3)] Federally Enforceable Through Title V Permit
26. {2261} If this unit is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM method D 1072, D 4084 or D 3246. [40 CFR 60.335(d)] Federally Enforceable Through Title V Permit
27. If this unit is fired on PUC-regulated natural gas, then the owner or operator shall maintain copies of the natural gas bills on file. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. Ammonia shall be injected whenever the selective catalytic reduction system catalyst temperature exceeds the minimum ammonia injection temperature recommended by the manufacturer. [District Rule 2201] Federally Enforceable Through Title V Permit
29. During initial performance testing, the ammonia injection rate shall be monitored concurrently with each testing run to establish acceptable values and ranges that provide a reasonable assurance of ongoing compliance with the emissions limitations stated in this permit. The minimum ammonia injection rate(s) demonstrated during the initial NO<sub>x</sub> source test to result in compliance with the NO<sub>x</sub> emission limits shall be imposed as a condition in the Permit to Operate. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

- INSPECTION WORKSHEET
30. If the ammonia injection rate is less than the minimum ammonia injection rate demonstrated during the initial compliance test, the permittee shall return the ammonia injection rate above the minimum ammonia injection rate established during compliance testing as soon as possible, but no longer than eight hours after detection. If the ammonia injection rate is not returned above the minimum ammonia injection rate established during compliance testing within eight hours, the permittee shall notify the District within the following one hour and conduct a source test within 60 days of the first exceedance to demonstrate compliance with the applicable emission limits at the reduced ammonia injection rate. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
  31. The permittee shall monitor and record the stack concentration of NO<sub>x</sub> (as NO<sub>2</sub>), CO, and O<sub>2</sub> weekly using a portable emissions monitor that meets District specifications. If compliance with the NO<sub>x</sub> and CO emissions is demonstrated for eight consecutive weeks, then the monitoring frequency will be reduced to monthly. If deviations are observed in two consecutive months, monitoring shall revert to weekly until eight consecutive weeks show no deviations. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within one day of restarting the unit unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the week if on a weekly monitoring schedule. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
  32. If the NO<sub>x</sub> and/or CO concentrations, as measured by the permittee with a portable emissions monitor, exceed the permitted emission limits, the permittee shall notify the District and return the NO<sub>x</sub> and CO concentrations to the permitted emission limits as soon as possible but no longer than eight hours after detection. If the permittee's portable emission monitor readings continue to exceed the permitted emissions limits after eight hours, the permittee shall notify the District within the following one hour, and conduct a certified source test within 60 days to demonstrate compliance with the permitted emissions limits. In lieu of conducting a source test, the permittee may stipulate that a violation has occurred, subject to enforcement action. The permittee must correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
  33. Compliance with ammonia emission limit shall be demonstrated utilizing one of the following procedures: 1) The permittee may utilize a continuous in-stack ammonia monitor to verify compliance with the ammonia emissions limit. 2) The permittee may utilize a District-approved calculation method using measured surrogate parameters to determine the daily ammonia emissions in ppmvd @ 15% O<sub>2</sub>. The permittee shall submit a detailed calculation protocol or monitoring plan for District Approval prior to operation of the turbine with the SCR system. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
  34. The owner or operator shall submit a report of NO<sub>x</sub> excess emissions and periods of monitor downtime to the APCO semi-annually, and this report shall be postmarked by the 30th day following the end of each 6-month period. [40 CFR 60.334(j)(5)] Federally Enforceable Through Title V Permit
  35. NO<sub>x</sub> excess emissions shall be defined as any unit operating hour for which the average water to fuel injection rate, as measured by the continuous monitoring system, falls below the water to fuel ratio specified in this permit, including during startup and shutdown. NO<sub>x</sub> excess emissions shall also be defined as any 4-hour rolling unit operating hour in which the average ammonia injection rate falls below the minimum ammonia injection rate(s) specified in this permit, not including startup or shutdown. NO<sub>x</sub> monitor downtime shall be defined as any operating hour during which the water to fuel ratio or ammonia injection rate is either not recorded or is invalid. [40 CFR 60.334(j)(1)] Federally Enforceable Through Title V Permit
  36. Permittee shall maintain daily records of the occurrence and duration of each startup or shutdown and the total cumulative duration of all startups and shutdowns. [District Rule 4703] Federally Enforceable Through Title V Permit
  37. The owner or operator shall maintain a stationary gas turbine operating log that includes, on a daily basis, the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation, type and quantity of fuel used. [District Rule 4703 and 40 CFR 60.332(a) and (b)] Federally Enforceable Through Title V Permit

INSPECTION  
WORKSHEET

38. The owner or operator of the stationary gas turbine system shall maintain records of the following: (1) Water to fuel injection continuous monitoring system measurements, (2) Ammonia injection rate monitoring system measurements, and (3) Periodic NOx, CO, and O2 portable emissions monitor measurements. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
39. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2520 and 4703] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: San Joaquin County Rule 108.1 as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: San Joaquin Country Rule 407 as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: District Rule 1081 (as amended 12/16/93) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

# ATTACHMENT C

Title V Compliance Certification Form

**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

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

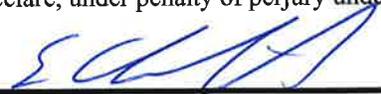
- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: Corn Product International	FACILITY ID: N-238
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner:	

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

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
\_\_\_\_\_

Signature of Responsible Official

1/10/11  
\_\_\_\_\_

Date

ERIC CHUTORASH

\_\_\_\_\_  
Name of Responsible Official (please print)

STOCKTON PLANT MANAGER

\_\_\_\_\_  
Title of Responsible Official (please print)

# ATTACHMENT D

Previous Title V Operating Permit  
N-238-18-4

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-238-18-4

**EXPIRATION DATE:** 03/31/2014

**EQUIPMENT DESCRIPTION:**

ONE (1) SOLAR TURBINE INCORPORATED CENTAUR 2800 KW (ISO) CONTINUOUS DUTY INDUSTRIAL GAS TURBINE GENERATOR AND A DELTA WASTE HEAT BOILER, MODEL 3L-227

## PERMIT UNIT REQUIREMENTS

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1. Permittee shall comply in full with all applicable monitoring, recordkeeping, and reporting requirements of Rule 4001 (New Source Performance Standards, 40 CFR Part 60, Subpart GG). [District Rule 4001] Federally Enforceable Through Title V Permit
2. Permittee shall comply with all applicable requirements of Rule 4703. [District Rule 4703] Federally Enforceable Through Title V Permit
3. The turbine shall be fired on natural gas only. [District NSR Rule] Federally Enforceable Through Title V Permit
4. A minimum water to fuel ratio of 0.57 by weight shall be injected directly into the combustion chamber when operating at full load. [District NSR Rule and District Rule 4703] Federally Enforceable Through Title V Permit
5. During start-up and shut down the water to fuel injection ratio shall be maintained at a minimum of 0.57 by weight. [District NSR Rule and District Rule 4703] Federally Enforceable Through Title V Permit
6. The permittee shall maintain and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. [District Rule 4001 and District Rule 4703] Federally Enforceable Through Title V Permit
7. A flowmeter shall be installed at water injection system's water inlet to the turbine. The flow meter shall be equipped with flow totalizer. [District NSR Rule and District Rule 4703] Federally Enforceable Through Title V Permit
8. NO<sub>x</sub> emissions shall not exceed 35 ppmv at 15% O<sub>2</sub>. [District Rule 4703] Federally Enforceable Through Title V Permit
9. CO emissions shall not exceed 120 ppmv at 15% O<sub>2</sub>. [District Rule 4703] Federally Enforceable Through Title V Permit
10. Source testing to demonstrate compliance with NO<sub>x</sub> and CO emission limits shall be conducted not less than once every 12 months or as required by the District. [District NSR Rule, District Rule 1081 and District Rule 4703] Federally Enforceable Through Title V Permit
11. 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
12. NO<sub>x</sub> concentrations shall be determined using EPA Method 7E or 20 [District Rule 4703] Federally Enforceable Through Title V Permit
13. CO concentrations shall be determined using EPA Method 10 or 10B. [District Rule 4703] Federally Enforceable Through Title V Permit
14. O<sub>2</sub> concentrations shall be determined using EPA Methods 3, 3A, or 20. [District Rule 4703] 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.

15. 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
16. The owner or operator shall install, operate and maintain in calibration a system which continuously measures and records: control system operating parameters, elapsed time of operation of the turbine, and the fuel consumption and the ratio of water to fuel being fired in the turbine. [40 CFR 60.334(a)] Federally Enforceable Through Title V Permit
17. The owner or operator shall be required to conform to the compliance testing and sampling procedures described in District Rule 1081 (as amended 12/16/93). [District Rule 1081] Federally Enforceable Through Title V Permit
18. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
19. Sulfur compound emissions shall not exceed 0.015% by volume, 150 ppmv, on a dry basis averaged over 15 consecutive minutes. [40 CFR 60.333(a)] Federally Enforceable Through Title V Permit
20. This unit shall be fired exclusively on PUC-quality natural gas which has a sulfur content of less than or equal to 0.017% by weight. [40 CFR 60.333(b); County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus County)] Federally Enforceable Through Title V Permit
21. If this unit is not fired on PUC-regulated natural gas, 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [40 CFR 60.334(h)(1)] Federally Enforceable Through Title V Permit
22. If this unit is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM method D 1072, D 4084 or D 3246. [40 CFR 60.335(d)] Federally Enforceable Through Title V Permit
23. If this unit is fired on PUC-regulated natural gas, then maintain on file copies of natural gas bills. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. Transitional Operation Period shall be defined as any of the following periods: bypass transition period, primary re-ignition period, reduced load period, start-up or shutdown. [District Rule 4703, 3.33] Federally Enforceable Through Title V Permit
25. Reduced Load Period shall be defined as the time during which a gas turbine is operated at less than rated capacity in order to change the exhaust gas diverter gate not exceeding one hour. [District Rule 4703, 3.23] Federally Enforceable Through Title V Permit
26. Start-up shall be defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. [District Rule 4703] Federally Enforceable Through Title V Permit
27. Shutdown shall be defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4703] Federally Enforceable Through Title V Permit
28. The duration of each startup or shutdown shall not exceed two hours. [District Rule 4703] Federally Enforceable Through Title V Permit
29. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during each transitional operation period. [District Rule 4703] Federally Enforceable Through Title V Permit
30. The owner or operator shall report periods of excess emissions that are defined as follows: any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with the NOx emission limit. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, and gas turbine load. [40 CFR 60.334(j)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

31. The continuous monitor of fuel, water, and water-to-fuel ratio system shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with the NO<sub>x</sub> emission limits at 30, 50, 75, and 100% of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer. [40 CFR 60.335(b)] Federally Enforceable Through Title V Permit
32. The owner or operator shall provide source test information annually regarding the exhaust gas NO<sub>x</sub> and CO concentration corrected to 15% O<sub>2</sub> (dry). EPA Methods 7E or 20 shall be used for NO<sub>x</sub> emissions. EPA Methods 10 or 10B shall be used for CO emissions. EPA Methods 3, 3A, or 20 shall be used for Oxygen content of the exhaust gas. [40 CFR 60.8(a) and District Rule 4703, 5.1, 6.3.1, 6.4.1, 6.4.2, and 6.4.3] Federally Enforceable Through Title V Permit
33. All continuous monitoring systems and monitoring devices shall be installed and operational prior to conducting performance tests. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the device. [40 CFR 60.13(b)] Federally Enforceable Through Title V Permit
34. Results of continuous monitoring system shall be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with either EPA Method 7E or EPA Method 20 for NO<sub>x</sub>, EPA Test Methods 10 or 10B for CO, or EPA Methods 3, 3A, or 20 for O<sub>2</sub>. [40 CFR 60.335(c)(3) and 60.13 and District Rule 4703, 5.1, 6.4] Federally Enforceable Through Title V Permit
35. The owner or operator shall not operate the gas turbine under load conditions, excluding the transitional operation period, which results in the measured CO emissions concentration exceeding 200 ppmv @ 15% O<sub>2</sub>. [District Rule 4703, 5.2] Federally Enforceable Through Title V Permit
36. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 108.1 (Fresno, Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
38. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332(a), (a)(1), (a)(2), (b), and (f), 60.333 (a) and (b). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b); District Rule 1081 (as amended 12/16/93) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Permittee shall maintain records of the occurrence and duration of any start-up or shutdown. [District Rule 4703] Federally Enforceable Through Title V Permit
41. The owner or operator shall maintain a stationary gas turbine operating log that includes, on a daily basis, the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation, type and quantity of fuel used. [40 CFR 60.332(a) and (b) and District Rule 4703, 6.2.6] Federally Enforceable Through Title V Permit
42. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
43. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4703] Federally Enforceable Through Title V Permit

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