



DEC 23 2013

Mr. Clint Cooper
Covanta Mendota, L.P.
400 Guillen Pkwy
P O Box 99
Mendota, CA 93640

Re: Notice of Minor Title V Permit Modification
District Facility # C-825
Project # 1131961

Dear Mr. Cooper:

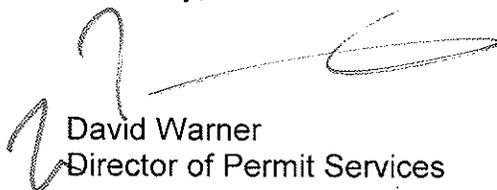
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to modify Permit to Operate (PTO) C-825-5-14 of the facility's current Title V operating permit. This project authorizes the modification of one 317 MMBtu/hr biomass fired boiler to install one stack air flow analyzer and one stack moisture analyzer in the existing Continuous Emission Monitoring System serving this operation.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO C-825-5-16, application, and previous Title V permit. This project will be finalized after the 45-day EPA comment period.

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: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

TITLE V APPLICATION REVIEW

Minor Modification
Project #: 1131961

Engineer: Dustin Brown
Date: December 20, 2013

Facility Number: C-825
Facility Name: Covanta Mendota, LP
Mailing Address: 400 Guillen Parkway
P O Box 99
Mendota, CA 93640

Contact Name: Clint Cooper
Phone: (559) 655-4921

Responsible Official: Clint Cooper
Title: Facility Manager

I. PROPOSAL

Covanta Mendota is proposing a Title V minor permit modification to incorporate additional analyzers to their existing Continuous Emission Monitoring System (CEMS) serving the 317 MMBtu/hr biomass fired boiler in to the requirements of their Title V permit. The facility is requesting to install a stack air flow analyzer and a stack moisture analyzer in to their existing CEMS system. The installation of these new CEM analyzers will allow the facility to more accurately convert all of their ppm emission readings taken from the CEMS over to mass emission rates.

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

Covanta Mendota is located at 400 Guillen Parkway in Mendota, CA.

III. EQUIPMENT DESCRIPTION

Pre-Project Equipment Description:

C-825-5-14: 30 MW POWER PRODUCTION FACILITY WITH A 317 MMBTU/HR BIOMASS AND NATURAL GAS-FIRED GOTAVERKEN CIRCULATING FLUIDIZED BED BOILER CONTROLLED WITH A MODULAR SIX-COMPARTMENT BAGHOUSE AND THERMAL DE-NOX SYSTEM AND WITH A CYCLONE, A SUPERHEATER, A STEAM DRUM, AN ECONOMIZER, AN AIR HEATER, A SAND SILO AND A LIMESTONE SILO EACH CONTROLLED WITH A DCE DALAMATIC MODEL # DLM-V20/10W BIN VENT FILTER, AN ENCLOSED ASH SILO, AND BOTTOM SAND DISCHARGE UNITS

Modification Equipment Description:

C-825-5-16: MODIFICATION OF 30 MW POWER PRODUCTION FACILITY WITH A 317 MMBTU/HR BIOMASS AND NATURAL GAS-FIRED GOTAVERKEN CIRCULATING FLUIDIZED BED BOILER CONTROLLED WITH A MODULAR SIX-COMPARTMENT BAGHOUSE AND THERMAL DE-NOX SYSTEM AND WITH A CYCLONE, A SUPERHEATER, A STEAM DRUM, AN ECONOMIZER, AN AIR HEATER, A SAND SILO AND A LIMESTONE SILO EACH CONTROLLED WITH A DCE DALAMATIC MODEL # DLM-V20/10W BIN VENT FILTER, AN ENCLOSED ASH SILO, AND BOTTOM SAND DISCHARGE UNITS: INSTALL A FLOW 500 AIR FLOW ANALYZER AND A GHG-MAC 155 MOISTURE ANALYZER IN THE EXISTING CONTINUOUS EMISSION MONITORING SYSTEM

Post Project Equipment Description:

C-825-5-16: 30 MW POWER PRODUCTION FACILITY WITH A 317 MMBTU/HR BIOMASS AND NATURAL GAS-FIRED GOTAVERKEN CIRCULATING FLUIDIZED BED BOILER CONTROLLED WITH A MODULAR SIX-COMPARTMENT BAGHOUSE AND THERMAL DE-NOX SYSTEM AND WITH A CYCLONE, A SUPERHEATER, A STEAM DRUM, AN ECONOMIZER, AN AIR HEATER, A SAND SILO AND A LIMESTONE SILO EACH CONTROLLED WITH A DCE DALAMATIC MODEL # DLM-V20/10W BIN VENT FILTER, AN ENCLOSED ASH SILO, AND BOTTOM SAND DISCHARGE UNITS

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

Covanta Mendota is proposing to install a new stack air flow analyzer and a moisture analyzer in to their existing CEMS. Currently, when the facility converts the measure ppm values from the CEMS over to mass by utilizing assumptions of what the stack air flow rate is and what the stack moisture content is based on data obtained during previous source tests. The addition of these new analyzers will allow the facility to no longer need to use "assumed" values in their emission conversion calculations as they will be able to use the real time data taken from the new analyzers. The result will be more accurate mass emission rate calculations and totals for the facility.

The proposed addition of these two analyzers does not result in any emission increases.

Existing PTO Changes:

Existing PTO condition 23 was revised in accordance with the District Rule 4352 and 40 CFR 60, Subpart Db to add that the new flow rate and moisture monitors need to meet the requirements of 40 CFR 60 Appendix B, Performance Specification 6, which established specifications and testing procedures for continuous emission rate monitoring systems. The revised condition has been included as condition 23 of the requirements for this revised permit.

Existing PTO condition 47 was revised in accordance with the latest amendments to District Rule 4352, Section 6.3.1.7, and an additional ASTM test method was included for determining the higher heating value (HHV) of a solid fuel (reference ASTM method D 5865-10). The revised condition has been included as condition 47 of the requirements for this revised permit.

Existing PTO condition 51 was revised as the facility will no longer be performing conversion calculations that require an "F" factor to be determined and/or established for each fuel type. The revised condition has been included as condition 51 of the requirements for this revised permit.

Existing PTO conditions 17, 18, 19, 23, 24, 26, 27, 45, 48 and, 53 were not revised. However, the District Rule 4352 section references at the end of each condition were updated in accordance with the latest approved version of this rule that was amended on December 15, 2011.

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 C-825-5-16
- B. Application
- C. Previous Title V Operating Permit C-825-5-14

ATTACHMENT A

Proposed Modified Title V Operating
Permit C-825-5-16

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-825-5-16

EXPIRATION DATE: 11/30/2016

EQUIPMENT DESCRIPTION:

MODIFICATION OF 30 MW POWER PRODUCTION FACILITY WITH A 317 MMBTU/HR BIOMASS AND NATURAL GAS-FIRED GOTAVERKEN CIRCULATING FLUIDIZED BED BOILER CONTROLLED WITH A MODULAR SIX-COMPARTMENT BAGHOUSE AND THERMAL DE-NOX SYSTEM AND WITH A CYCLONE, A SUPERHEATER, A STEAM DRUM, AN ECONOMIZER, AN AIR HEATER, A SAND SILO AND A LIMESTONE SILO EACH CONTROLLED WITH A DCE DALAMATIC MODEL # DLM-V20/10W BIN VENT FILTER, AN ENCLOSED ASH SILO, AND BOTTOM SAND DISCHARGE UNITS: INSTALL A FLOW 500 AIR FLOW ANALYZER AND A GHG-MAC 155 MOISTURE ANALYZER IN THE EXISTING CONTINUOUS EMISSION MONITORING SYSTEM

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Ammonia slip shall not exceed 25 ppmv at 3% O₂. [District Rule 4102]
3. Boiler fuels shall be limited to the following: saw mill residues (bark, sawdust, chips and shavings); forest residues; orchard and vineyard prunings including chipped whole tree wastes and materials listed in Appendix A to the Title V Permit, "Emission Factors for Open Burning of Agricultural Residues" (August 2000, Gaffney, P., California Air Resources Board Planning and Technical Support Division); clean unpainted urban wood waste; unpainted paper waste; nut shells; stone fruit pits; onion and garlic skins; and natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Natural gas shall be used only for startup and combustion stabilization (fuel not to exceed 25% annual BTU heat input). [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall project and use the proper mix of fuels to ensure that all emissions are offset as required with credits from the use of creditable fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall curtail operation proportionately and notify the District whenever, due to changes in the quantity or quality of wastes supplied, the emissions exceed the offsets. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All stack emissions shall be completely offset with creditable biomass on an annual basis. Emission offsets shall be calculated using the formula $EC = (1/DF) \times \text{Sum}(A(i) \times EF(i))$, where: EC = Emission Credit (lb/yr), DF = Distance Factor, A(i) = Amount from each source (ton/yr), and EF(i) = Emission Factor for each source. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Distance Factor (DF) shall be 1.2 for sources within a 15 mile radius and 2.0 for sources outside the 15 mile radius. [District Rule 2201 and 40 CFR 60.43b(c)] Federally Enforceable Through Title V Permit
9. Open-burning emission factors used to determine the quantity of offsets available from the diversion of biomass from open-burning are listed in Appendix A, "Emission Factors for Open Burning of Agricultural Residues" (August 2000, Gaffney, P., California Air Resources Board Planning and Technical Support Division). A copy of Appendix A shall be retained on site and made available for District inspection upon request. [District Rule 2201 and District Rule 2520, 9.4.2] 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.

10. Particulate matter (PM-10) emissions, except for periods of startup and shutdown as defined in District Rule 4352, shall not exceed any of the following: 0.010 gr/dscf @ 12% CO₂ of filterable particulate, 7.62 lb/hr of filterable particulate, or 14.3 lb/hr of filterable and condensable particulate. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions shall not exceed any of the following limits: 247.2 lb-SO_x/day, 667.2 lb-NO_x/day, 928.8 lb-CO/day, 232.8 lb-VOC/day or 340.1 lb-PM₁₀/day. [District Rule 2201 and District Rules 4301, 5.2 and 4352, 5.1; and 40 CFR 60.44b(i) and (h)] Federally Enforceable Through Title V Permit
12. For pollutants whose emission rates are not monitored by a CEMS (i.e. SO_x, CO, PM₁₀, and VOC), compliance with the hourly and daily emission limits shall be determined by using emission factors derived from the most recent source test. Compliance with the hourly emission rates shall be deemed compliance with the daily emission rates. [District Rule 2520, 9.1] Federally Enforceable Through Title V Permit
13. Start-up operation is defined as the period of time during which a unit is heated to the operating temperature and pressure from a shutdown status. Shutdown operation is defined as the period of time during which a unit is taken from operational to nonoperational status by allowing it to cool down from its operating temperature and pressure to an ambient temperature. [District Rule 4352, 3.15, 3.18, and 5.3] Federally Enforceable Through Title V Permit
14. The duration of each start-up shall not exceed 96 hours. The duration of each shut down shall not exceed twelve (12) hours. [District Rule 4352, 5.3.1 and 5.3.2] Federally Enforceable Through Title V Permit
15. The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shutdown. [District Rule 4352, 5.3.3] Federally Enforceable Through Title V Permit
16. Verification of all emission related data is the responsibility of the Permittee. Such verification shall be provided to the District upon request. [District Rule 2201 and 40 CFR 60.43b(c)] Federally Enforceable Through Title V Permit
17. Permittee shall perform annual source tests for PM₁₀, CO, SO_x as SO₂, VOC, and NO_x as NO₂. The District must be notified 30 days prior to any compliance source testing. A pretest plan outlining source test methods, approved contractor, test date, and operating parameters must be submitted to the District for approval at least 15 days prior to source sampling. [District Rules 1081, 7.1; 2201; and 4352, 6.2] Federally Enforceable Through Title V Permit
18. Source testing for SO_x shall be conducted using EPA Method 5 or 8 or a continuous emissions analyzer in accordance with EPA Method 6C. Source testing for NO_x shall be conducted using EPA Method 7E or CARB Method 100. Source testing for CO shall be conducted using EPA Method 10 or CARB Method 100. Source testing for hydrocarbons shall be conducted using EPA Method 18 or CARB Method 100. Source testing for particulate matter (PM) shall be conducted using EPA Method 5 and EPA Method 202. As an alternative to EPA Method 5, determination of the "front-half" fraction or filterable PM₁₀ may be conducted using EPA Method 201A. Source testing for stack gas velocity shall be conducted using EPA Method 2. Source testing for moisture content shall be conducted using EPA Method 4. [District Rules 2201; 2520, 9.3.2; 4352, 6.3.1; 40 CFR 60.46b(d), and 40 CFR 60.48a] Federally Enforceable Through Title V Permit
19. All emissions measurements during a source test shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No compliance determination shall be established within two hours after a period in which fuel flow to the unit is zero, or is shut off for 30 minutes or longer. [District Rule 4352, 6.2.2, 6.2.3] Federally Enforceable Through Title V Permit
20. Source test reports shall be submitted to the District within 60 days after completion of source testing. [District Rules 1070 and 1081, 7.3] Federally Enforceable Through Title V Permit
21. Emissions during annual source tests shall not exceed any of the following limits: 27.8 lb-NO_x/hr, 38.7 lb-CO/hr, 10.3 lb-SO_x/hr, 9.7 lb-VOC/hr, 7.62 lb-filterable-PM₁₀/hr and 14.3 lb-total-PM₁₀/hr. [District Rules 2201; 4301, 5.2; and 4352, 5.1; and 40 CFR 60.43b(c); and 40 CFR 60.44b(d) and (I)] Federally Enforceable Through Title V Permit
22. Compliance with the daily NO_x emission limit shall be based on a block 24-hour averaging period using CEM system data. [District Rule 4352, 5.2 and 40 CFR 60.44b(i)] 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.

23. Permittee shall operate a Continuous Emissions Monitoring (CEM) system to monitor and record NO_x concentrations and O₂ concentrations, as well as the NO_x emission rate whenever the boiler is operating. The CEM system shall be operated, maintained, and calibrated pursuant to the requirements of 40 CFR 60.7(c), 60.13, and 60.48b. The CEM system must also comply with 40 CFR 60 Appendix B, Performance Specifications 2, 3 and 6, and 40 CFR 60 Appendix F, Quality Assurance Procedures. Per Section 5.1.1 of Appendix F, at least once each calendar year, a Relative Accuracy Test Audit (RATA) must be conducted. Per Sections 5.1.2 and 5.1.3 of Appendix F, a Cylinder Gas Audit (CGA) and a Relative Accuracy Audit (RAA) must be conducted once each calendar quarter, except in the quarter where a RATA is performed. [District Rules 1080 and 4352, 5.4 and 40 CFR 60.7(c), 40 CFR 60.13, and 40 CFR 60.48b] Federally Enforceable Through Title V Permit
24. The continuous monitoring equipment must be linked to a data acquisition system that is accessible via modem. [District Rules 1080 and 4352, 5.4] Federally Enforceable Through Title V Permit
25. Permittee shall operate a Continuous Opacity Monitoring (COM) system to monitor and record opacity whenever the boiler is operating. The COM system shall be operated, maintained, and calibrated pursuant to the requirements of 40 CFR 60.7(c), 60.13, and 60.48b. The COM system must also satisfy Performance Specification 1 of 40 CFR 60 Appendix B. [District Rule 1080 and 40 CFR 60.7(c), 40 CFR 60.13, 40 CFR 60.48b, and 40 CFR 64.3(a) and (d)] Federally Enforceable Through Title V Permit
26. A quarterly CEM and COM report shall be submitted to the District which includes the following: hours of operation, the date and time of each exceedance of emissions limits (including startup, shutdown, malfunctions or any other reason), the quantity of excess emissions, any conversion factors used to calculate excess emissions, the nature and cause of each malfunction, any corrective action taken and any preventive measures adopted, hours of CEM (and COM) down time, and the cause of all CEM (and COM) down time. [District Rules 1080 and 4352, 5.4; 40 CFR 60.49b(h), and 40 CFR 64.3(d)(i)] Federally Enforceable Through Title V Permit
27. Quarterly reports shall be submitted to the District within 30 days after the end of each calendar quarter. [District Rules 1080 and 4352, 5.4] Federally Enforceable Through Title V Permit
28. In cases of CEMS breakdown, malfunction, repairs, calibration checks, and adjustments, emission data shall be obtained as described in paragraph f of 40 CFR 60.48b. [40 CFR 60.48b(f)] Federally Enforceable Through Title V Permit
29. All quarterly NO_x (CEM) and opacity (COM) reports required by this permit may be submitted to the District electronically in lieu of a written submittal. [40 CFR 60.49b(v)] Federally Enforceable Through Title V Permit
30. Baghouse shall be operated whenever the biomass combustor is operating. [District Rule 2201 and 40 CFR 64.3(a)] Federally Enforceable Through Title V Permit
31. 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 Rule 2201 and 40 CFR 64.3(a)] Federally Enforceable Through Title V Permit
32. Visible emissions from the baghouse serving solid fuel-fired boiler shall not equal or exceed 20% opacity for a period or periods aggregating more than three minutes in one hour as determined by the continuous opacity monitor (COM). [District Rule 2201 and District Rule 4101, 40 CFR 60.43b(f), and 40 CFR 64.3(b)] Federally Enforceable Through Title V Permit
33. Pressure drop across the baghouse shall be maintained between 4 and 9 inches water column. [District Rule 2201 and 40 CFR 64.3(b)] Federally Enforceable Through Title V Permit
34. Pressure drop across baghouse shall be observed and recorded at least once per day during operation of this unit. [District Rule 2520, 9.3.2 and 40 CFR 64.3(b)] Federally Enforceable Through Title V Permit
35. Upon detecting any excursion from the acceptable range of baghouse differential pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. If the daily average baghouse differential pressure reading is not within the acceptable established range for two consecutive days, permittee shall notify the APCO of such exceedance within 96 hours. [40 CFR 64.7] 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.

36. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit
37. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR 64.7(d)(2) and 40 CFR 64.8] Federally Enforceable Through Title V Permit
38. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
39. Replacement bags numbering at least 10% of the total number of bags shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
40. The baghouse shall be equipped with multiple compartments having fire detection systems. [District Rule 2201] Federally Enforceable Through Title V Permit
41. The dust collection system shall be thoroughly inspected quarterly for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be repaired as needed. [District Rules 1070; 2201; and 2520, 9.3.2] Federally Enforceable Through Title V Permit
42. Records of dust collector maintenance, inspection, and repair shall be maintained for five years and provided to the District upon request. The record shall include identification of the equipment, date of inspection, corrective action taken and identification of the individual performing the inspection. [District Rule 2520, 9.4.1, 9.4.2] Federally Enforceable Through Title V Permit
43. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
44. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E = 17.31 \times P^{0.16}$ if P is greater than 30 ton per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
45. Permittee shall record the type, mass, and geographic origin of all creditable biomass received on a daily basis. [District Rules 2201; and 4352, 6.1.1] Federally Enforceable Through Title V Permit
46. Permittee shall record on a monthly basis the higher heating value of all fuels used. [District Rule 4352, 6.1.1] Federally Enforceable Through Title V Permit
47. The higher heating value of all solids fuels shall be certified by a third-party supplier or determined by ASTM Methods D 5865-10 or E 711-87, or other test method(s) with prior written approval of the APCO, ARB, and EPA. [District Rule 4352, 6.3] Federally Enforceable Through Title V Permit
48. Daily records for each load of creditable biomass received shall be maintained which include the date, weigh ticket number, supplier name, fuel type, tons received, the offset ratio for the load of biomass, and the amount of offset credit (in pounds of pollutant) attributable to each load of biomass. Records shall include certifications that any creditable biomass for which offset credit is claimed has historically been open burned in the San Joaquin Valley air basin. [District Rules 2201; and 4352, 6.1] Federally Enforceable Through Title V Permit
49. Daily records of creditable biomass received shall be used to determine annual offset compliance. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
50. The permittee shall record and maintain records of the amount of wood and natural gas fuel combusted each day, and calculate the annual capacity factor individually for wood and natural gas on a 12-month rolling average with a capacity factor calculated at the end of each month. [40 CFR 60.49b(d)] 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.

51. The following CEMS records shall be kept for each steam generating unit operating day: (1) Calendar date, (2) Average hourly NOx emission rate, (3) The 24-hour average NOx emission rate (lb-NOx/hr) calculated at the end of each steam generating unit operating day from the measured NOx emissions rate for the preceding 24 hours. (4) Identification of daily NOx limit exceedances including reason for exceedance and the corrective actions taken, (5) Identification of daily CEMS interruptions including reason for interruption and the corrective actions taken, (6) Identification of data exclusions and the reasons for the exclusion, (7) Identification of times that the pollutant concentration exceeded the full span of the CEMS, (8) Description of modifications to the CEMS, and (9) Results of daily CEMS drift tests and other tests required under Appendix F, Procedure 1. A report containing these records shall be submitted to the District upon request. [40 CFR 60.49b(g) and 40 CFR 60.49b(i)] Federally Enforceable Through Title V Permit
52. The permittee shall maintain a record of the opacity readings made by the COM. [40 CFR 60.49b(f)] Federally Enforceable Through Title V Permit
53. All records required by this permit shall be retained on site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 2520, 9.4.2 and 4352, 6.1.2] Federally Enforceable Through Title V Permit
54. Emissions of combustion contaminants from the biomass boiler shall not exceed 10 lb/hr. Combustion contaminants are defined as total PM (filterable plus condensable) minus the ammonium salts (e.g. ammonium chloride, ammonium sulfate, ammonium bisulfate, etc.) present in the condensable PM fraction. Compliance with this emission limit shall be demonstrated annually by source test conducted according to EPA Methods 5 and 202 (or other methods approved by the APCO, ARB, and EPA). Ammonium salts in the condensable PM fraction shall be determined by analysis of the condensable PM fraction by ion chromatography (or other method approved by the APCO, ARB, and EPA). [District Rules 1020, 3.12; 2520, 9.3; 4301, 5.2.3] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

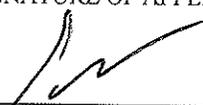
RECEIVED

JUN 07 2013

Permit Application For:

Permits Services
SJVAPCD

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Covanta Mendota L.P.	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>400 Guillen Parkway / PO Box 99</u> CITY: <u>Mendota</u> STATE: <u>California</u> 9-DIGIT ZIP CODE: <u>93640</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>400 Guillen Parkway</u> CITY: _____ <u>SE</u> ¼ SECTION <u>25</u> TOWNSHIP <u>25s</u> RANGE <u>25E</u>	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Electric Power Generation	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) The modification will be the addition of two monitors, a Flow 500 Stack Air Flow Monitor and a GHG-MAC155 Stack moisture analyzer, to convert the facility's existing NOx Continuous Emission Monitoring System (CEMS) to a NOx Continuous Emission Rate Monitoring system (CERMS). The addition of these monitors will allow the facility to more accurately measure and report NOx mass emissions, in lb/hr and lb/day.	
6. TYPE OR PRINT NAME OF APPLICANT: Clint Cooper	TITLE OF APPLICANT: Facility Manager
7. SIGNATURE OF APPLICANT: 	DATE: <u>6/6/2013</u> PHONE: (559) 655-4921 FAX: (559) 655-4525 EMAIL: CCooper@Covantaenergy.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>C431961</u> FACILITY ID: <u>C825</u>
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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: Covanta Mendota, LP	FACILITY ID: C-825
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: Covanta Energy	
3. Agent to the Owner: n/a	

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

6/6/2013

 Date

Clint Cooper

 Name of Responsible Official (please print)

Facility Manager

 Title of Responsible Official (please print)



Covanta Mendota L.P.
400 Guillen Pkwy
PO Box 99
Mendota, CA 93640
Tel 559 655 4921
Fax 559 655 4525

June 6, 2013

San Joaquin Valley Unified APCD
Central Regional Office
1990 E. Gettysburg Ave.
Fresno, CA 93726
Attn: Permit Services

**RE: Covanta Mendota, L.P. (Facility C-825)
Title V Minor Modification**

To SJVUAPCD Permit Services:

Enclosed is a Title V Minor Modification application for the installation of two monitors, a Flow 500 Stack Air Flow Monitor and a GHG-MAC155 Stack moisture analyzer. In accordance with Project Number: C-1131570 letter received on June 4, 2013.

Please call if you have questions or need additional information. I can be reached at (559) 655-4921.

Sincerely,

Alan Minner
Environmental Specialist



ATTACHMENT C

Previous Title V Operating Permit C-825-5-14

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-825-5-14

EXPIRATION DATE: 11/30/2016

EQUIPMENT DESCRIPTION:

30 MW POWER PRODUCTION FACILITY WITH A 317 MMBTU/HR BIOMASS AND NATURAL GAS-FIRED GOTAVERKEN CIRCULATING FLUIDIZED BED BOILER CONTROLLED WITH A MODULAR SIX-COMPARTMENT BAGHOUSE AND THERMAL DE-NOX SYSTEM AND WITH A CYCLONE, A SUPERHEATER, A STEAM DRUM, AN ECONOMIZER, AN AIR HEATER, A SAND SILO AND A LIMESTONE SILO EACH CONTROLLED WITH A DCE DALAMATIC MODEL # DLM-V20/10W BIN VENT FILTER, AN ENCLOSED ASH SILO, AND BOTTOM SAND DISCHARGE UNITS

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Ammonia slip shall not exceed 25 ppmv at 3% O₂. [District Rule 4102]
3. Boiler fuels shall be limited to the following: saw mill residues (bark, sawdust, chips and shavings); forest residues; orchard and vineyard prunings including chipped whole tree wastes and materials listed in Appendix A to the Title V Permit, "Emission Factors for Open Burning of Agricultural Residues" (August 2000, Gaffney, P., California Air Resources Board Planning and Technical Support Division); clean unpainted urban wood waste; unpainted paper waste; nut shells; stone fruit pits; onion and garlic skins; and natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Natural gas shall be used only for startup and combustion stabilization (fuel not to exceed 25% annual BTU heat input). [District NSR Rule] Federally Enforceable Through Title V Permit
5. The permittee shall project and use the proper mix of fuels to ensure that all emissions are offset as required with credits from the use of creditable fuels. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The permittee shall curtail operation proportionately and notify the District whenever, due to changes in the quantity or quality of wastes supplied, the emissions exceed the offsets. [District NSR Rule] Federally Enforceable Through Title V Permit
7. All stack emissions shall be completely offset with creditable biomass on an annual basis. Emission offsets shall be calculated using the formula $EC = (1/DF) \times \text{Sum}(A(i) \times EF(i))$, where: EC = Emission Credit (lb/yr), DF = Distance Factor, A(i) = Amount from each source (ton/yr), and EF(i) = Emission Factor for each source. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Distance Factor (DF) shall be 1.2 for sources within a 15 mile radius and 2.0 for sources outside the 15 mile radius. [District NSR Rule and 40 CFR 60.43b(c)] Federally Enforceable Through Title V Permit
9. Open-burning emission factors used to determine the quantity of offsets available from the diversion of biomass from open-burning are listed in Appendix A, "Emission Factors for Open Burning of Agricultural Residues" (August 2000, Gaffney, P., California Air Resources Board Planning and Technical Support Division). A copy of Appendix A shall be retained on site and made available for District inspection upon request. [District NSR Rule and District Rule 2520, 9.4.2] 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.

10. Particulate matter (PM-10) emissions, except for periods of startup and shutdown as defined in District Rule 4352, shall not exceed any of the following: 0.010 gr/dscf @ 12% CO₂ of filterable particulate, 7.62 lb/hr of filterable particulate, or 14.3 lb/hr of filterable and condensable particulate. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Emissions shall not exceed any of the following limits: 247.2 lb-SO_x/day, 667.2 lb-NO_x/day, 928.8 lb-CO/day, 232.8 lb-VOC/day or 340.1 lb-PM₁₀/day. [District NSR Rule and District Rules 4301, 5.2 and 4352, 5.1; and 40 CFR 60.44b(i) and (h)] Federally Enforceable Through Title V Permit
12. For pollutants whose emission rates are not monitored by a CEMS (i.e. SO_x, CO, PM₁₀, and VOC), compliance with the hourly and daily emission limits shall be determined by using emission factors derived from the most recent source test. Compliance with the hourly emission rates shall be deemed compliance with the daily emission rates. [District Rule 2520, 9.1] Federally Enforceable Through Title V Permit
13. Start-up operation is defined as the period of time during which a unit is heated to the operating temperature and pressure from a shutdown status. Shutdown operation is defined as the period of time during which a unit is taken from operational to nonoperational status by allowing it to cool down from its operating temperature and pressure to an ambient temperature. [District Rule 4352, 3.15, 3.18, and 5.3] Federally Enforceable Through Title V Permit
14. The duration of each start-up shall not exceed 96 hours. The duration of each shut down shall not exceed twelve (12) hours. [District Rule 4352, 5.3.1 and 5.3.2] Federally Enforceable Through Title V Permit
15. The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shutdown. [District Rule 4352, 5.3.3] Federally Enforceable Through Title V Permit
16. Verification of all emission related data is the responsibility of the Permittee. Such verification shall be provided to the District upon request. [District NSR Rule and 40 CFR 60.43b(c)] Federally Enforceable Through Title V Permit
17. Permittee shall perform annual source tests for PM₁₀, CO, SO_x as SO₂, VOC, and NO_x as NO₂. The District must be notified 30 days prior to any compliance source testing. A pretest plan outlining source test methods, approved contractor, test date, and operating parameters must be submitted to the District for approval at least 15 days prior to source sampling. [District NSR Rule and District Rules 1081, 7.1; 4352, 6.3] Federally Enforceable Through Title V Permit
18. Source testing for SO_x shall be conducted using EPA Method 5 or 8 or a continuous emissions analyzer in accordance with EPA Method 6C. Source testing for NO_x shall be conducted using EPA Method 7E or CARB Method 100. Source testing for CO shall be conducted using EPA Method 10 or CARB Method 100. Source testing for hydrocarbons shall be conducted using EPA Method 18 or CARB Method 100. Source testing for particulate matter (PM) shall be conducted using EPA Method 5 and EPA Method 202. As an alternative to EPA Method 5, determination of the "front-half" fraction or filterable PM₁₀ may be conducted using EPA Method 201A. Source testing for stack gas velocity shall be conducted using EPA Method 2. Source testing for moisture content shall be conducted using EPA Method 4. [District NSR Rule and District Rules 2520, 9.3.2; 4352, 6.4.1; 40 CFR 60.46b(d), and 40 CFR 60.48a] Federally Enforceable Through Title V Permit
19. All emissions measurements during a source test shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No compliance determination shall be established within two hours after a period in which fuel flow to the unit is zero, or is shut off for 30 minutes or longer. [District Rule 4352, 6.3.2, 6.3.3] Federally Enforceable Through Title V Permit
20. Source test reports shall be submitted to the District within 60 days after completion of source testing. [District Rules 1070 and 1081, 7.3] Federally Enforceable Through Title V Permit
21. Emissions during annual source tests shall not exceed any of the following limits: 27.8 lb-NO_x/hr, 38.7 lb-CO/hr, 10.3 lb-SO_x/hr, 9.7 lb-VOC/hr, 7.62 lb-filterable-PM₁₀/hr and 14.3 lb-total-PM₁₀/hr. [District NSR Rule and District Rules 4301, 5.2; and 4352, 5.1; and 40 CFR 60.43b(c); and 40 CFR 60.44b(d) and (l)] Federally Enforceable Through Title V Permit
22. Compliance with the daily NO_x emission limit shall be based on a block 24-hour averaging period using CEM system data. [District Rule 4352, 5.2 and 40 CFR 60.44b(i)] 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.

23. Permittee shall operate a Continuous Emissions Monitoring (CEM) system to monitor and record NO_x concentrations and O₂ concentrations, as well as the NO_x emission rate whenever the boiler is operating. The CEM system shall be operated, maintained, and calibrated pursuant to the requirements of 40 CFR 60.7(c), 60.13, and 60.48b. The CEM system must also comply with 40 CFR 60 Appendix B, Performance Specifications 2 and 3, and 40 CFR 60 Appendix F, Quality Assurance Procedures. Per Section 5.1.1 of Appendix F, at least once each calendar year, a Relative Accuracy Test Audit (RATA) must be conducted. Per Sections 5.1.2 and 5.1.3 of Appendix F, a Cylinder Gas Audit (CGA) and a Relative Accuracy Audit (RAA) must be conducted once each calendar quarter, except in the quarter where a RATA is performed. [District Rules 1080 and 4352, 5.5 and 40 CFR 60.7(c), 40 CFR 60.13, and 40 CFR 60.48b] Federally Enforceable Through Title V Permit
24. The continuous monitoring equipment must be linked to a data acquisition system that is accessible via modem. [District Rules 1080 and 4352, 5.5] Federally Enforceable Through Title V Permit
25. Permittee shall operate a Continuous Opacity Monitoring (COM) system to monitor and record opacity whenever the boiler is operating. The COM system shall be operated, maintained, and calibrated pursuant to the requirements of 40 CFR 60.7(c), 60.13, and 60.48b. The COM system must also satisfy Performance Specification 1 of 40 CFR 60 Appendix B. [District Rule 1080 and 40 CFR 60.7(c), 40 CFR 60.13, 40 CFR 60.48b, and 40 CFR 64.3(a) and (d)] Federally Enforceable Through Title V Permit
26. A quarterly CEM and COM report shall be submitted to the District which includes the following: hours of operation, the date and time of each exceedance of emissions limits (including startup, shutdown, malfunctions or any other reason), the quantity of excess emissions, any conversion factors used to calculate excess emissions, the nature and cause of each malfunction, any corrective action taken and any preventive measures adopted, hours of CEM (and COM) down time, and the cause of all CEM (and COM) down time. [District Rules 1080 and 4352, 5.5; 40 CFR 60.49b(h), and 40 CFR 64.3(d)(i)] Federally Enforceable Through Title V Permit
27. Quarterly reports shall be submitted to the District within 30 days after the end of each calendar quarter. [District Rules 1080 and 4352, 5.5] Federally Enforceable Through Title V Permit
28. In cases of CEMS breakdown, malfunction, repairs, calibration checks, and adjustments, emission data shall be obtained as described in paragraph f of 40 CFR 60.48b. [40 CFR 60.48b(f)] Federally Enforceable Through Title V Permit
29. All quarterly NO_x (CEM) and opacity (COM) reports required by this permit may be submitted to the District electronically in lieu of a written submittal. [40 CFR 60.49b(v)] Federally Enforceable Through Title V Permit
30. Baghouse shall be operated whenever the biomass combustor is operating. [District NSR Rule and 40 CFR 64.3(a)] Federally Enforceable Through Title V Permit
31. 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 and 40 CFR 64.3(a)] Federally Enforceable Through Title V Permit
32. Visible emissions from the baghouse serving solid fuel-fired boiler shall not equal or exceed 20% opacity for a period or periods aggregating more than three minutes in one hour as determined by the continuous opacity monitor (COM). [District NSR Rule and District Rule 4101, 40 CFR 60.43b(f), and 40 CFR 64.3(b)] Federally Enforceable Through Title V Permit
33. Pressure drop across the baghouse shall be maintained between 4 and 9 inches water column. [District NSR Rule and 40 CFR 64.3(b)] Federally Enforceable Through Title V Permit
34. Pressure drop across baghouse shall be observed and recorded at least once per day during operation of this unit. [District Rule 2520, 9.3.2 and 40 CFR 64.3(b)] Federally Enforceable Through Title V Permit
35. Upon detecting any excursion from the acceptable range of baghouse differential pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. If the daily average baghouse differential pressure reading is not within the acceptable established range for two consecutive days, permittee shall notify the APCO of such exceedance within 96 hours. [40 CFR 64.7] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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36. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit
37. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR 64.7(d)(2) and 40 CFR 64.8] Federally Enforceable Through Title V Permit
38. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
39. Replacement bags numbering at least 10% of the total number of bags shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
40. The baghouse shall be equipped with multiple compartments having fire detection systems. [District NSR Rule] Federally Enforceable Through Title V Permit
41. The dust collection system shall be thoroughly inspected quarterly for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be repaired as needed. [District NSR Rule and District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
42. Records of dust collector maintenance, inspection, and repair shall be maintained for five years and provided to the District upon request. The record shall include identification of the equipment, date of inspection, corrective action taken and identification of the individual performing the inspection. [District Rule 2520, 9.4.1, 9.4.2] Federally Enforceable Through Title V Permit
43. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E = 17.31 \times P^{0.16}$ if P is greater than 30 ton per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
45. Permittee shall record the type, mass, and geographic origin of all creditable biomass received on a daily basis. [District NSR Rule and District Rule 4352, 6.2.1] Federally Enforceable Through Title V Permit
46. Permittee shall record on a monthly basis the higher heating value of all fuels used. [District Rule 4352, 6.2.1] Federally Enforceable Through Title V Permit
47. The higher heating value of all solids fuels shall be certified by a third-party supplier or determined by ASTM Method E711 or other test method(s) with prior written approval of the APCO, ARB, and EPA. [District Rule 4352, 6.4] Federally Enforceable Through Title V Permit
48. Daily records for each load of creditable biomass received shall be maintained which include the date, weigh ticket number, supplier name, fuel type, tons received, the offset ratio for the load of biomass, and the amount of offset credit (in pounds of pollutant) attributable to each load of biomass. Records shall include certifications that any creditable biomass for which offset credit is claimed has historically been open burned in the San Joaquin Valley air basin. [District NSR Rule and District Rule 4352, 6.2] Federally Enforceable Through Title V Permit
49. Daily records of creditable biomass received shall be used to determine annual offset compliance. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
50. The permittee shall record and maintain records of the amount of wood and natural gas fuel combusted each day, and calculate the annual capacity factor individually for wood and natural gas on a 12-month rolling average with a capacity factor calculated at the end of each month. [40 CFR 60.49b(d)] 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.

51. The following CEMS records shall be kept for each steam generating unit operating day: (1) Calendar date, (2) Average hourly NOx emission rate, (3) The 24-hour average NOx emission rate (lb-NOx/hr) calculated at the end of each steam generating unit operating day from the measured NOx emissions rate for the preceding 24 hours. (4) Identification of daily NOx limit exceedances including reason for exceedance and the corrective actions taken, (5) Identification of daily CEMS interruptions including reason for interruption and the corrective actions taken, (6) Identification of data exclusions and the reasons for the exclusion, (7) Identification of "F" factor used for calculations, method of determination, and type of fuel combusted, (8) Identification of times that the pollutant concentration exceeded the full span of the CEMS, (9) Description of modifications to the CEMS, (10) Results of daily CEMS drift tests and other tests required under Appendix F, Procedure 1. A report containing these records shall be submitted to the District upon request. [40 CFR 60.49b(g) and 40 CFR 60.49b(i)] Federally Enforceable Through Title V Permit
52. The permittee shall maintain a record of the opacity readings made by the COM. [40 CFR 60.49b(f)] Federally Enforceable Through Title V Permit
53. All records required by this permit shall be retained on site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 2520, 9.4.2 and 4352, 6.2.2] Federally Enforceable Through Title V Permit
54. Emissions of combustion contaminants from the biomass boiler shall not exceed 10 lb/hr. Combustion contaminants are defined as total PM (filterable plus condensable) minus the ammonium salts (e.g. ammonium chloride, ammonium sulfate, ammonium bisulfate, etc.) present in the condensable PM fraction. Compliance with this emission limit shall be demonstrated annually by source test conducted according to EPA Methods 5 and 202 (or other methods approved by the APCO, ARB, and EPA). Ammonium salts in the condensable PM fraction shall be determined by analysis of the condensable PM fraction by ion chromatography (or other method approved by the APCO, ARB, and EPA). [District Rules 1020, 3.12; 2520, 9.3; 4301, 5.2.3] Federally Enforceable Through Title V Permit

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