



**FEB 12 2014**

Lewis Nelson  
City of Tulare  
Tulare, CA 93274

**Re: Notice of Minor Title V Permit Modification**  
**District Facility # S-548**  
**Project # S-1133516**

Dear Mr. Nelson:

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 S-548-3-5 and '-3-6 into the Title V operating permit. The permits authorized modification of 670 HP biogas-fired lean burn IC engine by designating the engine as compliant dormant and lowering the VOC emission factor.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-548-3-7 and '-3-8, 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.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager. at (661) 392-5500.

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

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**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  
[www.valleyair.org](http://www.valleyair.org)

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

[www.healthyairliving.com](http://www.healthyairliving.com)

# TITLE V APPLICATION REVIEW

Minor Modification  
Project #'s: S-1133516

Engineer: Robert Rinaldi  
Date: February 10, 2014

Facility Number: S-548  
Facility Name: *Tulare City Wastewater Pl.* *Reviewed by ASURCAQE*  
Mailing Address: 411 E. Kern Ave.  
Tulare, CA 93274

FEB 11 2014

Contact Name: Lewis R. Nelson  
Phone: (661) 684-4318

Responsible Official: Don Doorman  
Title: City Manager

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## I. PROPOSAL

City of Tulare is proposing a Title V minor permit modification to incorporate the recently issued ATC's S-548-3-5 and '-3-6 into the Title V operating permit.

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

The facility is located at 1875 S. West St., Tulare, CA.

## III. EQUIPMENT DESCRIPTION

**ATC S-548-3-5:**  
MODIFICATION OF 670 HP WAUKESHA MODEL L5108GL BIOGAS-FIRED LEAN BURN IC ENGINE WITH H<sub>2</sub>S SCUBBER, POWERING AN ELECTRIC GENERATOR: LOWER VOC EMISSIONS FACTOR

**ATC S-548-3-6:**

MODIFICATION OF 670 BHP WAUKESHA MODEL L5108GL BIOGAS-FIRED LEAN BURN IC ENGINE WITH H2S SCRUBBER POWERING AN ELECTRIC GENERATOR: DESIGNATE AS DORMANT

**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**

The following condition will be modified in the S-548-3-7 Title V permit.

15. Emissions from this IC engine shall not exceed any of the following limits: 65 ppmvd NOx @ 15% O2 (equivalent to 0.933 g-NOx/hp-hr), 0.197 g-SOx/hp-hr, 0.011 g-PM10/hp-hr, 2,000 ppmvd CO @ 15% O2 (equivalent to 17.468 g-CO/hp-hr), or ~~750~~ 250 ppmvd VOC @ 15% O2 (equivalent to ~~3.743~~ 1.213 g-VOC/hp-hr). [District NSR Rule, District Rules 4701, 5.1 and 4702, 5.1] Y

The following conditions will be added to the S-548-3-8 Title V permit.

1. While dormant, the fuel line shall be physically disconnected from the unit. (Adjust as necessary) [District Rule 2080] Federally Enforceable Through Title V Permit
2. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit

4. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]

## 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 Title V Operating Permit
- B. Existing Title V Permit
- C. Authority to Construct
- D. Emissions Increases
- E. Application
- F. Compliance Certification Form

# ATTACHMENT A

Proposed Modified Title V Operating Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-548-3-8

**EXPIRATION DATE:** 11/30/2016

**SECTION:** SW16 **TOWNSHIP:** 20S **RANGE:** 24E

**EQUIPMENT DESCRIPTION:**

670 BHP WAUKESHA MODEL L5108GL BIOGAS-FIRED LEAN BURN IC ENGINE WITH H2S SCRUBBER POWERING AN ELECTRIC GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
6. {4565} Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
8. 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, 5.0] Federally Enforceable Through Title V Permit
9. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. In lieu of installing a nonresettable fuel meter, the owner or operator may use a non-resettable elapsed operating time meter in conjunction with the engine manufacturer's maximum rated fuel consumption to determine annual fuel usage. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
10. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5.5] Federally Enforceable Through Title V Permit
11. This engine shall be operated within the ranges that the source testing has shown result in pollution concentrations within the emissions limits as specified on this permit. [District Rule 4702, 6.5.1] 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. Emissions from this IC engine shall not exceed any of the following limits: 65 ppmvd NO<sub>x</sub> @ 15% O<sub>2</sub> (equivalent to 0.933 g-NO<sub>x</sub>/hp-hr), 0.197 g-SO<sub>x</sub>/hp-hr, 0.011 g-PM<sub>10</sub>/hp-hr, 2,000 ppmvd CO @ 15% O<sub>2</sub> (equivalent to 17.468 g-CO/hp-hr), or 250 ppmvd VOC @ 15% O<sub>2</sub> (equivalent to 1.213 g-VOC/hp-hr). [District NSR Rule, District Rules 4701, 5.1 and 4702, 5.1] Federally Enforceable Through Title V Permit
13. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701, 5.4.3 and 4702, 6.5.2] Federally Enforceable Through Title V Permit
14. The acceptable exhaust gas O<sub>2</sub> range shall be established from manufacturer's information, or by source testing this unit. [District Rules 4701, 6.3 and 4702, 5.6.1] Federally Enforceable Through Title V Permit
15. If either the NO<sub>x</sub> or CO concentrations corrected to 15% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then 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 4701, 6.3 and 4702, 6.5.4] Federally Enforceable Through Title V Permit
16. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4701, 5.4.3 and 4702, 5.6.9] Federally Enforceable Through Title V Permit
17. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 15% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4701, 6.2 and 4702, 6.5.7] Federally Enforceable Through Title V Permit
18. Source testing to measure biogas-combustion NO<sub>x</sub>, CO, and VOC emissions from this unit shall be measured not less than once every 24 months. [District Rules 4701, 6.3.1 and 4702, 6.3] Federally Enforceable Through Title V Permit
19. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4701, 6.3.2 and 4702, 6.3] Federally Enforceable Through Title V Permit
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NO<sub>x</sub>, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4701, 6.3.2 and 4702, 6.3] Federally Enforceable Through Title V Permit
21. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081, 5.0; 4701, 6.4 and 4702, 6.4] 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.

22. 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, 7.1] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
24. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 4701, 6.2.1 and 4702, 6.2] Federally Enforceable Through Title V Permit
25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.8] Federally Enforceable Through Title V Permit
26. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4701, 6.2.3 and 4702, 6.2.2] Federally Enforceable Through Title V Permit

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

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# ATTACHMENT B

## Existing Title V Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-548-3-4

**EXPIRATION DATE:** 11/30/2016

**SECTION:** SW16 **TOWNSHIP:** 20S **RANGE:** 24E

**EQUIPMENT DESCRIPTION:**

670 BHP WAUKESHA MODEL L5108GL BIOGAS-FIRED LEAN BURN IC ENGINE WITH H<sub>2</sub>S SCRUBBER POWERING AN ELECTRIC GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. In lieu of installing a nonresettable fuel meter, the owner or operator may use a non-resettable elapsed operating time meter in conjunction with the engine manufacturer's maximum rated fuel consumption to determine annual fuel usage. [District Rule 4702 and 40 CFR 63, Subpart ZZZZ] Federally Enforceable Through Title V Permit
3. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
4. This engine shall be operated within the ranges that the source testing has shown result in pollution concentrations within the emissions limits as specified on this permit. [District Rule 4702] Federally Enforceable Through Title V Permit
5. Emissions from this IC engine shall not exceed any of the following limits: 65 ppmvd NO<sub>x</sub> @ 15% O<sub>2</sub> (equivalent to 0.933 g-NO<sub>x</sub>/hp-hr), 0.197 g-SO<sub>x</sub>/hp-hr, 0.011 g-PM<sub>10</sub>/hp-hr, 2,000 ppmvd CO @ 15% O<sub>2</sub> (equivalent to 17.468 g-CO/hp-hr), or 750 ppmvd VOC @ 15% O<sub>2</sub> (equivalent to 3.743 g-VOC/hp-hr). [District Rule 2201, District Rules 4701, and 4702] Federally Enforceable Through Title V Permit
6. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
7. The acceptable exhaust gas O<sub>2</sub> range shall be established from manufacturer's information, or by source testing this unit. [District Rules 4701 and 4702] 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.

8. If either the NO<sub>x</sub> or CO concentrations corrected to 15% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then 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 4701 and 4702] Federally Enforceable Through Title V Permit
9. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
10. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 15% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
11. Source testing to measure biogas-combustion NO<sub>x</sub>, CO, and VOC emissions from this unit shall be measured not less than once every 24 months. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
12. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
13. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NO<sub>x</sub>, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
14. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081, 4701, and 4702] 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. 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
17. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 4701 and 4702] 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.

18. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
19. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4701, 4702, and 40 CFR 63, Subpart ZZZZ] Federally Enforceable Through Title V Permit
20. On and after October 19, 2013, the engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63, Subpart ZZZZ] Federally Enforceable Through Title V Permit
21. On and after October 19, 2013, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63, Subpart ZZZZ] Federally Enforceable Through Title V Permit
22. On and after October 19, 2013, the engine's oil and filter shall be changed every 1,440 hours of operation or every 12 months, whichever comes first. [40 CFR 63, Subpart ZZZZ] Federally Enforceable Through Title V Permit
23. On and after October 19, 2013, the engine's spark plugs shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63, Subpart ZZZZ] Federally Enforceable Through Title V Permit
24. On and after October 19, 2013, the engine's hoses and belts shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63, Subpart ZZZZ] Federally Enforceable Through Title V Permit
25. On and after October 19, 2013, the permittee shall maintain monthly records that include any information necessary to demonstrate compliance with 40 CFR 63, ZZZZ. [District Rule 1070 and 40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
26. The permittee shall maintain monthly records of all performance tests, opacity and visible emissions observations and required maintenance performed on the air pollution control and monitoring equipment. [District Rule 1070 and 40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
27. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of the operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of the action(s) taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning operation and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
28. The permittee shall maintain daily records of the fuel usage monitors. [District Rule 1070 and 40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit

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

# ATTACHMENT C

Authorities to Construct



COPY

## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-548-3-5

**ISSUANCE DATE:** 04/05/2012

**LEGAL OWNER OR OPERATOR:** TULARE CITY WASTEWATER PLANT

**MAILING ADDRESS:** 1875 S WEST ST  
TULARE, CA 93274

**LOCATION:** 1875 S WEST ST  
TULARE, CA 93274

**SECTION:** SW16 **TOWNSHIP:** 20S **RANGE:** 24E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 670 HP WAUKESHA MODEL L5108GL BIOGAS-FIRED LEAN BURN IC ENGINE WITH H2S SCUBBER, POWERING AN ELECTRIC GENERATOR: LOWER VOC EMISSIONS FACTOR

### CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
3. 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, 5.0] Federally Enforceable Through Title V Permit
4. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. In lieu of installing a nonresettable fuel meter, the owner or operator may use a non-resettable elapsed operating time meter in conjunction with the engine manufacturer's maximum rated fuel consumption to determine annual fuel usage. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
5. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5.5] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

6. This engine shall be operated within the ranges that the source testing has shown result in pollution concentrations within the emissions limits as specified on this permit. [District Rule 4702, 6.5.1] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed any of the following limits: 65 ppmvd NO<sub>x</sub> @ 15% O<sub>2</sub> (equivalent to 0.933 g-NO<sub>x</sub>/hp-hr), 0.197 g-SO<sub>x</sub>/hp-hr, 0.011 g-PM<sub>10</sub>/hp-hr, 2,000 ppmvd CO @ 15% O<sub>2</sub> (equivalent to 17.468 g-CO/hp-hr), or 250 ppmvd VOC @ 15% O<sub>2</sub> (equivalent to 1.213 g-VOC/hp-hr). [District NSR Rule, District Rules 4701, 5.1 and 4702, 5.1] Federally Enforceable Through Title V Permit
8. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701, 5.4.3 and 4702, 6.5.2] Federally Enforceable Through Title V Permit
9. The acceptable exhaust gas O<sub>2</sub> range shall be established from manufacturer's information, or by source testing this unit. [District Rules 4701, 6.3 and 4702, 5.6.1] Federally Enforceable Through Title V Permit
10. If either the NO<sub>x</sub> or CO concentrations corrected to 15% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then 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 4701, 6.3 and 4702, 6.5.4] Federally Enforceable Through Title V Permit
11. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4701, 5.4.3 and 4702, 5.6.9] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 15% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4701, 6.2 and 4702, 6.5.7] Federally Enforceable Through Title V Permit
13. Source testing to measure biogas-combustion NO<sub>x</sub>, CO, and VOC emissions from this unit shall be measured not less than once every 24 months. [District Rules 4701, 6.3.1 and 4702, 6.3] Federally Enforceable Through Title V Permit
14. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4701, 6.3.2 and 4702, 6.3] Federally Enforceable Through Title V Permit
15. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NO<sub>x</sub>, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4701, 6.3.2 and 4702, 6.3] Federally Enforceable Through Title V Permit
16. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081, 5.0; 4701, 6.4 and 4702, 6.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

17. 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, 7.1] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
19. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 4701, 6.2.1 and 4702, 6.2] Federally Enforceable Through Title V Permit
20. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.8] Federally Enforceable Through Title V Permit
21. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4701, 6.2.3 and 4702, 6.2.2] Federally Enforceable Through Title V Permit



# AUTHORITY TO CONSTRUCT

COPY

**PERMIT NO:** S-548-3-6

**ISSUANCE DATE:** 01/07/2013

**LEGAL OWNER OR OPERATOR:** TULARE CITY WASTEWATER PLANT

**MAILING ADDRESS:** 1875 S WEST ST  
TULARE, CA 93274

**LOCATION:** 1875 S WEST ST  
TULARE, CA 93274

**SECTION:** SW16 **TOWNSHIP:** 20S **RANGE:** 24E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 670 BHP WAUKESHA MODEL L5108GL BIOGAS-FIRED LEAN BURN IC ENGINE WITH H2S SCRUBBER POWERING AN ELECTRIC GENERATOR: DESIGNATE AS DORMANT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
5. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

7. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
8. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
9. 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
10. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
11. 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, 5.0] Federally Enforceable Through Title V Permit
12. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. In lieu of installing a nonresettable fuel meter, the owner or operator may use a non-resettable elapsed operating time meter in conjunction with the engine manufacturer's maximum rated fuel consumption to determine annual fuel usage. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
13. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5.5] Federally Enforceable Through Title V Permit
14. This engine shall be operated within the ranges that the source testing has shown result in pollution concentrations within the emissions limits as specified on this permit. [District Rule 4702, 6.5.1] Federally Enforceable Through Title V Permit
15. Emissions from this IC engine shall not exceed any of the following limits: 65 ppmvd NO<sub>x</sub> @ 15% O<sub>2</sub> (equivalent to 0.933 g-NO<sub>x</sub>/hp-hr), 0.197 g-SO<sub>x</sub>/hp-hr, 0.011 g-PM<sub>10</sub>/hp-hr, 2,000 ppmvd CO @ 15% O<sub>2</sub> (equivalent to 17.468 g-CO/hp-hr), or 250 ppmvd VOC @ 15% O<sub>2</sub> (equivalent to 1.213 g-VOC/hp-hr). [District NSR Rule, District Rules 4701, 5.1 and 4702, 5.1] Federally Enforceable Through Title V Permit
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18. If either the NO<sub>x</sub> or CO concentrations corrected to 15% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then 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 4701, 6.3 and 4702, 6.5.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4701, 5.4.3 and 4702, 5.6.9] Federally Enforceable Through Title V Permit
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21. Source testing to measure biogas-combustion NO<sub>x</sub>, CO, and VOC emissions from this unit shall be measured not less than once every 24 months. [District Rules 4701, 6.3.1 and 4702, 6.3] Federally Enforceable Through Title V Permit
22. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4701, 6.3.2 and 4702, 6.3] Federally Enforceable Through Title V Permit
23. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NO<sub>x</sub>, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4701, 6.3.2 and 4702, 6.3] Federally Enforceable Through Title V Permit
24. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081, 5.0; 4701, 6.4 and 4702, 6.4] Federally Enforceable Through Title V Permit
25. 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, 7.1] Federally Enforceable Through Title V Permit
26. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
27. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 4701, 6.2.1 and 4702, 6.2] Federally Enforceable Through Title V Permit
28. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.8] Federally Enforceable Through Title V Permit
29. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4701, 6.2.3 and 4702, 6.2.2] Federally Enforceable Through Title V Permit

# ATTACHMENT D

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
ATC S-548-3-5	0	0	0	0	0
ATC S-548-3-6	0	0	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

# ATTACHMENT E

Application

Facility S-548

Com SUBMITTAL S-548-3-7# 13-8

RECEIVED

San Joaquin Valley Air Pollution Control District

AUG 21 2013

www.valleyair.org

SJVAPCD Southern Region

Permit Application For:

ADMINISTRATIVE AMENDMENT  MINOR MODIFICATION  SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>CITY OF TULARE</u>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>411 E. KERN AVE.</u> CITY: <u>TULARE</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93274</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>1875 S. WEST ST.</u> CITY: <u>TULARE</u> <u>SW16</u> 1/4 SECTION <u>20S</u> TOWNSHIP <u>24E</u> RANGE _____	INSTALLATION DATE: <u>12-1991</u>
4. GENERAL NATURE OF BUSINESS: <u>WASTEWATER TREATMENT</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  <u>MODIFICATION OF S-548-3-4 TO LOWER EMISSIONS AND MAKE DORMANT S-548 3-5 AND S-548-3-6</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>LEWIS R. NELSON</u>	TITLE OF APPLICANT: <u>PUBLIC WORKS DIRECTOR</u>
7. SIGNATURE OF APPLICANT: 	DATE: <u>8-20-2013</u> PHONE: <u>(559) 684-4318</u> FAX: <u>(559) 685-2378</u> EMAIL: <u>lnelson@ci.tulare.ca.us</u>

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#:
	DATE PAID: _____
	PROJECT NO: <u>S-1133516</u> FACILITY ID: <u>S-548</u>

# ATTACHMENT F

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 AMENDMENT  
 MINOR PERMIT MODIFICATION

COMPANY NAME: <u>City of Tulare</u>	FACILITY ID: <u>-</u>
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input checked="" type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <u>City of Tulare</u>	
3. Agent to the Owner: <u>Don Dorman, City Manager</u>	

**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:

City of Tulare  
By Don Dorman  
 \_\_\_\_\_  
 Signature of Responsible Official

2/6/2014  
 \_\_\_\_\_  
 Date

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

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