



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

NOV -8 2012

Jason Thompson
CRE5 Inc dba Dinuba Energy
6929 Ave 430
Reedley, CA 93654

**Re: Notice of Minor Title V Permit Modification
District Facility # S-285
Project # S-1123377**

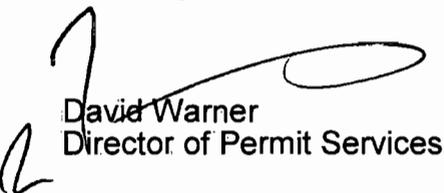
Dear Mr. Thompson:

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-285-11-0 into the Title V operating permit. The facility is installing a third cell to its 16,000 gpm induced draft two cell cooling tower.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-285-11-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Sincerely,



David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

NOV -8 2012

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

Re: **Notice of Minor Title V Permit Modification**
District Facility # S-285
Project # S-1123377

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. CRES Inc dba Dinuba Energy is proposing a Title V minor permit modification to incorporate the recently issued S-285-11-0 into the Title V operating permit. The facility is installing a third cell to its 16,000 gpm induced draft two cell cooling tower.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-285-11-0, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,

David Warner
Director of Permit Services

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1123377

Engineer: Juscelino Siongco
Date: November 7, 2012

Facility Number: S-285
Facility Name: CRES Inc dba Dinuba Energy
Mailing Address: 6929 Ave 430
Reedley, CA 93654

Contact Name: Jason Thompson
Phone: (559) 591-8060

Responsible Official: Jason Thompson
Title: Plant Manager

I. PROPOSAL

Dinuba Energy is proposing a Title V minor permit modification to incorporate the recently issued S-285-11-0 into the Title V operating permit. The facility is installing a third cell to its 16,000 gpm induced draft two cell cooling tower.

This existing cooling tower was installed when the facility was first built in 1985 and was permit exempt. The cooling tower lost its permit exemption in the September 19, 1991 under Tulare County APCD version of Rule 202, but was never permitted. Authority to Construct S-285-11-0 permits the existing cooling tower and add the third cell.

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 6929 Ave 30 in Reedley, CA.

III. EQUIPMENT DESCRIPTION

S-285-11-2: 16,000 GPM INDUCED DRAFT THREE CELL COOLING TOWER

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

Dinuba Energy is proposing to permit a 16,000 gpm induced draft cooling tower that lost its permit exempt status and add a third cell to the cooling tower.

S-285-11-2:

Condition 1 on the current ATC was removed since it is already included as condition 40 on the facility-wide requirements permit S-285-1-0.

Conditions 2 through 8 on the current ATC were included as conditions 1 through 7 in the requirements for the proposed permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;

- a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
 6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. S-285-11-2
- B. Authorities to Construct No. S-285-11-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit No.

S-285-11-2

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-285-11-2

EXPIRATION DATE: 05/31/2017

EQUIPMENT DESCRIPTION:

16,000 GPM INDUCED DRAFT THREE CELL COOLING TOWER

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. No hexavalent chromium containing compounds shall be added to cooling tower circulating water. [District Rule 7012] Federally Enforceable Through Title V Permit
3. Cooling tower drift percentage shall not exceed 0.025%. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Total dissolved solids (TDS) in cooling tower water shall not exceed 2.0 grams per liter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The correlation between the TDS in cooling tower water and the cooling tower water specific conductance shall be determined by cooling water sample analysis by independent laboratory annually, and whenever there is a change of the cooling tower water solution that may alter the correlation (e.g. change of make-up water source or change of type and/or source of chemical additives). [District Rule 1081] Federally Enforceable Through Title V Permit
6. Permittee shall measure the cooling tower water specific conductance and calculate the TDS in cooling tower water using the correlation between the TDS in cooling tower water and the cooling tower water specific conductance on a weekly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain records of the calculated TDS in cooling tower water. All records will be retained for a period of five years and made readily available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Authorities to Construct No.
(S-285-11-0)



San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-285-11-0

ISSUANCE DATE: 04/21/2004

LEGAL OWNER OR OPERATOR: CRES INC DBA DINUBA ENERGY

MAILING ADDRESS: 6929 AVE 430
REEDLEY, CA 93654

LOCATION: 6929 AVE 430
REEDLEY, CA 93654

EQUIPMENT DESCRIPTION:

MODIFICATION OF 16,000 GPM INDUCED DRAFT TWO CELL COOLING TOWER: INSTALL A THIRD CELL

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. No hexavalent chromium containing compounds shall be added to cooling tower circulating water. [District Rule 7012]
4. Cooling tower drift percentage shall not exceed 0.025%. [District Rule 2201]
5. Total dissolved solids (TDS) in cooling tower water shall not exceed 2.0 grams per liter. [District Rule 2201]
6. The correlation between the TDS in cooling tower water and the cooling tower water specific conductance shall be determined by cooling water sample analysis by independent laboratory within 60 days of startup, annually thereafter, and whenever there is a change of the cooling tower water solution that may alter the correlation (e.g. change of make-up water source or change of type and/or source of chemical additives). [District Rule 1081]
7. Permittee shall measure the cooling tower water specific conductance and calculate the TDS in cooling tower water using the correlation between the TDS in cooling tower water and the cooling tower water specific conductance on a weekly basis. [District Rule 2201]
8. Permittee shall maintain records of the calculated TDS in cooling tower water. All records will be retained for a period of five years and made readily available for District inspection upon request. [District Rules 1070 and 2201]

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 326-6900 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.

DAVID L. CROW, Executive Director / APCO

DAVID WARNER, Director of Permit Services
S-285 11-0 - Apr 21 2004 7:56AM - LUDWICKI Joint Inspection NOT Required

ATTACHMENT C

Emissions Increases

| | SSIPE (lb/yr) | | | | |
|--------------|---------------|----------|----------|----------|----------|
| | NOx | VOC | CO | SOx | PM10 |
| S-285-11-1 | 0 | 0 | 0 | 0 | 0 |
| TOTAL | 0 | 0 | 0 | 0 | 0 |

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED

AUG 27 2012

**Permits Services
SJVAPCD**

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

| | |
|--|---|
| 1. PERMIT TO BE ISSUED TO: <u>Community Renewable energy services dba Dinuba Energy</u> | |
| 2. MAILING ADDRESS: | |
| STREET/P.O. BOX: <u>6929 ave 430</u> | |
| CITY: <u>Reedley</u> | STATE: <u>California</u> 9-DIGIT ZIP CODE: <u>93654</u> |
| 3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: | |
| STREET: <u>Ave 430</u> CITY: <u>Reedley</u> | INSTALLATION DATE: <u>7-31-2007</u> |
| _____% SECTION TOWNSHIP RANGE | |
| 4. GENERAL NATURE OF BUSINESS: <u>Biomass Power Plant</u> | |
| 5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>ATC# S-285-11-0 Addition of 16,000 GPM 3rd cell cooling tower to existing 2 cell cooling tower.</u> | |
| 6. TYPE OR PRINT NAME OF APPLICANT: <u>Jason D Thompson</u> | TITLE OF APPLICANT: <u>Manager</u> |
| 7. SIGNATURE OF APPLICANT:  | DATE: <u>8/23/2012</u> |
| | PHONE: <u>(559) 591-8060</u> FAX: <u>(559) 591.8815</u> EMAIL: <u>Thompson@dinubaenergy.com</u> |

For APCD Use Only:

| | |
|--|--|
| <p>DATE STAMP RECEIVED AUG 28 2012 FINANCE SJVAPCD</p> | <p>FILING FEE RECEIVED: \$ <u>19.00</u> CHECK#: <u>cash</u></p> <p>DATE PAID: <u>8/27/12</u> SV</p> <p>PROJECT NO: <u>S-1123377</u> FACILITY ID: <u>S-285</u></p> |
|--|--|

**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: <u>DENUBA ENERGY</u> | FACILITY ID: <u>S-285</u> |
| 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: <u>COMMUNITY RENEWABLE ENERGY SERVICES INC</u> | |
| 3. Agent to the Owner: <u>LARRY OSBORNE</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:


Signature of Responsible Official

11/7/2012
Date

JASON D. THOMPSON
Name of Responsible Official (please print)

PLANT MANAGER
Title of Responsible Official (please print)