



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

SEP 14 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-75
Project # S-1123450

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Covanta Delano, Inc. is proposing a Title V minor permit modification to modify Permit(s) to Operate (PTOs) S-75-1-7 of the facility's current Title V operating permit. Covanta Delano, Inc. has proposed replacing the existing 150 hp hog with a 300 hp unit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO(s) S-75-1-9, 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. Leonard Scandura at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

Enclosures
cc: Kris Rickards, Permit Services

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

SEP 14 2012

Clint Cooper
Covanta Delano, Inc.
PO Box 550
Delano, CA 93216-0550

**Re: Notice of Minor Title V Permit Modification
District Facility # S-75
Project # S-1123450**

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(s) to Operate S-75-1-7 of the current Title V operating permit. Covanta Delano, Inc. has proposed replacing the existing 150 hp hog with a 300 hp unit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO(s) S-75-1-9, application, and previous Title V permit. This project will be finalized after the 45-day EPA comment period.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

Enclosures
cc: Kris Rickards, Permit Services

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1123450

Engineer: Kris Rickards
Date: September 11, 2012

Facility Number: S-75
Facility Name: Covanta Delano, Inc.
Mailing Address: PO Box 550
Delano, CA 93216-0550

Reviewed by AP SURRAGE

Contact Name: Clint Cooper
Phone: 661-792-3067

SEP 13 2012

Responsible Official: Clint Cooper
Title: General Manager

I. PROPOSAL

Covanta Delano, Inc. is proposing a Title V minor permit modification to replace the 150 hp swing-type hammer hog listed on Permit to Operate S-75-1-7 as "HOG-1" with a 300 hp unit.

This modification will not result in any change to the equipment description, permit conditions, emissions profile, or billing schedule.

II. FACILITY LOCATION

The facility is located at 31500 Pond Road in Delano.

III. EQUIPMENT DESCRIPTION

S-75-1-9: FUEL RECEIVING, SCREENING & CONVEYING OPERATION #1 INCLUDING 60 TON CAPACITY TRUCK TIPPER PLATFORM, FUEL RECEIVING HOPPER W/INCLINED DRAG CONVEYOR & SPIKE ROLLER, AND 175 TON/HR FUEL TRANSFER CONVEYOR #1 WITH BELT SCALE WITH FOAM DUST SUPPRESSION SYSTEM (STATION #1 SERVES TRANSFER POINTS BC-1 TO DS-1, BC-9 TO BC-2, HOG-1 TO BC-2; STATION #2 SERVES POINTS BC-3 & BC-5), HIGH PRESSURE WATER SPRAY AT TRUCK UNLOADER #1, AND 3 FABRIC COLLECTORS

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 Delano, Inc. is proposing to replace the 150 hp swing-type hammer hog listed on Permit to Operate S-75-1-7 as "HOG-1" with a 300 hp unit.

This modification will not result in any change to the equipment description, permit conditions, emissions profile, or billing schedule.

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 S-75-1-9
- B. Emissions Increases
- C. Application
- D. Previous Title V Operating Permit S-75-1-7

ATTACHMENT A

Proposed Modified Title V Operating Permit
(S-75-1-9)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-75-1-9

EXPIRATION DATE: 08/31/2016

SECTION: SE25 **TOWNSHIP:** 25S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

FUEL RECEIVING, SCREENING & CONVEYING OPERATION #1 INCLUDING 60 TON CAPACITY TRUCK TIPPER PLATFORM, FUEL RECEIVING HOPPER W/INCLINED DRAG CONVEYOR & SPIKE ROLLER, AND 175 TON/HR FUEL TRANSFER CONVEYOR #1 WITH BELT SCALE WITH FOAM DUST SUPPRESSION SYSTEM (STATION #1 SERVES TRANSFER POINTS BC-1 TO DS-1, BC-9 TO BC-2, HOG-1 TO BC-2; STATION #2 SERVES POINTS BC-3 & BC-5), HIGH PRESSURE WATER SPRAY AT TRUCK UNLOADER #1, AND 3 FABRIC COLLECTORS

PERMIT UNIT REQUIREMENTS

1. Operation shall include ventilation system and fabric collector #2, with a minimum of 5,002 sq.ft. filter area and 100 hp exhaust fan, serving truck tippers, fuel receiving hoppers and inlets to the fuel transfer conveyor #1. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Fabric collector #2 shall include 5 hp blower motor, rotary valve and auger. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Operation shall include belt type magnetic separator and magnetic separator take away conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Operation shall include disk type scalping screen and swing hammer type hog, both with foam dust suppression and both vented to fabric collector #4. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Operation shall include ventilation system and fabric collector #4, with minimum of 3,674 sq. ft. filter area and 60 hp exhaust fan (shared with S-75-5), serving disk type scalping screen, swing hammer type hog, and discharge of fuel transfer conveyor #1. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fabric collector #4 shall include 3 hp blower motor, rotary valve and auger. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Operation shall include 186 ton/hr capacity hog outfeed conveyor #2 with operational foam dust suppression. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Operation shall include 186 ton/hr capacity fixed stacker conveyor #3 with operational foam dust suppression, two position diverter gate, and telescopic spout with dust pick-up shroud. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Operation shall include 186 ton/hr capacity stacker infeed conveyor #4, and 186 ton/hr capacity radial stacker conveyor #5 with telescopic spout with dust pickup. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Operation shall include ventilation system with fabric collector #3 serving equipment associated with the 186 ton/hour hog, fixed stacker and infeed conveyor listed above (fixed stacker conveyor #3, diverter gate, telescopic spout, stacker infeed conveyor #4, radial stacker conveyor #5 and the head of hog outfeed conveyor #2), with a minimum of 3,263 sq.ft. filter area and 125 hp exhaust fan. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Fabric collector #3 shall include 3 hp blower motor, rotary valve and auger. [District NSR Rule] 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. There shall be no visible emissions of 5% opacity or greater from truck tipper receiving hopper ventilation pickup points. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Truck tipper receiving hopper ventilation hood and hog ventilation hoods shall provide minimum indraft velocity of 200 ft/min during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Truck tipper receiving hopper drag chain conveyor transfer point hood shall provide minimum indraft velocity of 150 ft/min during entire truck unloading and fuel transfer to take away belt conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Truck tipper area ventilation system shall be equipped with interlocks and isolation valves which directs all air flow through operating truck tipper and prevents simultaneous operation of truck tippers. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Conveyor belt ventilation hood(s) shall provide minimum indraft velocity of 500 cfm/ft of belt width during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Scalping screen ventilation hood(s) shall provide minimum indraft velocity of 50 ft/min during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Truck tipper fabric collector #2 shall have minimum filter area of 5,002 sq. ft. and maximum air-to-cloth ratio of 8 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Scalping screen/hog area ventilation system shall be equipped with isolation valve which prevents air flow from primary screen and hog when this equipment is not in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Scalping screen/hog area fabric collector #4 shall have minimum filter area of 3,674 sq. ft. and maximum air-to-cloth ratio of 8 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Stacker/reclaimer area fabric collector #3 shall have minimum filter area of 3,263 sq. ft. and maximum air-to-cloth ratio of 8.2 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Each fabric collector shall be equipped with adjustable automatic reverse pulse filter cleaning mechanism and operational differential pressure indicator. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [40 CFR Part 64 and District NSR Rule] Federally Enforceable Through Title V Permit
23. Each fabric collector shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 7 inches water column. [40 CFR Part 64] Federally Enforceable Through Title V Permit
24. Material removed from the fabric collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Particulate matter collected by fabric collectors shall be stored in closed containers when such material is not actively being returned to the boiler via permitted conveying equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Variable height radial stacker, auxiliary stacker and reclaimers shall be ventilated to fabric collector, and discharge from stacker spouts shall be maintained as close as possible to top of storage pile. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Radial and auxiliary stacker conveyors BC3 and BC5 shall be equipped with foam injection nozzles which shall be operated as needed, to ensure dust emissions have visible emissions less than or equal to 20% opacity. [District NSR Rule] Federally Enforceable Through Title V Permit
28. All ventilation system ducts shall be sized for minimum duct transport velocity of 3,200 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

29. Deliveries of fuel shall not exceed 144 truck loads per day. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Drag chain transfer, point hood ventilation system and fabric collector shall operate whenever material is being transferred out of receiving bin. [District NSR Rule] Federally Enforceable Through Title V Permit
31. There shall be no visible emissions of 5% opacity or greater from truck tipper receiving hopper during entire unloading operation. [District NSR Rule] Federally Enforceable Through Title V Permit
32. Truck tipper receiving hopper, ventilation hood system and fabric collector #2 shall be operated whenever material is being transferred into the hopper. [District NSR Rule] Federally Enforceable Through Title V Permit
33. There shall be no visible emissions of 5% opacity or greater from conveyor transfer points, scalping screen, and hog enclosures, including inlet and outlet openings. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Scalping screen/hog area fabric collector #4 shall be operated whenever material is being transferred from fuel receiving operations or storage pile to boiler. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Stacker/reclaimer area fabric collector #3 shall be operated whenever material is being transferred to or from storage piles. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Auxiliary stacker shall not operate when radial stacker is in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
37. Fuel transfer conveyor shall be fully enclosed and covers shall be in place whenever conveyors are operating. [District NSR Rule] Federally Enforceable Through Title V Permit
38. Radial stacker telescoping discharge spout height shall be continuously adjusted to minimize material drop distance to pile. [District NSR Rule] Federally Enforceable Through Title V Permit
39. Material to stacker shall contain no more than 3% by weight of fines capable of passing through 200 mesh screen. [District NSR Rule] Federally Enforceable Through Title V Permit
40. Any stored fuel which is burning shall be immediately segregated and extinguished. [District Rule 4102 and District NSR Rule] Federally Enforceable Through Title V Permit
41. Records of types, amounts and origins (including distance from facility, copies of all purchase contracts, # of trucks, etc.) of offset fuels received shall be maintained and made readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
42. Air flow to fabric collector #2 shall not exceed 40,000 cfm and Particulate (PM-10) emissions from fabric filter #2 shall not exceed 0.0045 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Air flow to fabric collectors 3 and 4 shall not exceed 20,000 and 30,000 cfm respectively, and Particulate (PM-10) emissions from fabric collectors shall not exceed 0.004 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Fugitive particulate (PM-10) emissions from fuel storage piles shall not exceed 1.32 lb PM-10/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
45. Wood waste delivery trucks shall remain covered during entire unloading operation. [District NSR Rule] Federally Enforceable Through Title V Permit
46. Operator shall record the daily number of fuel delivery truck loads. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
47. Operator shall record percentage of fines (passing #200 screen) in the material to the stacker. [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.

48. There shall be no visible emissions of greater than 0% opacity from the fabric collectors. Visible emissions from the fabric collectors shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken within 24 hours to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [District Rules 2520, 9.3.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
49. Visible emissions from truck tipper receiving hopper ventilation pickup points, conveyor transfer points, scalping screens, and hog enclosures (including inlet and outlet openings) shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
50. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
51. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
52. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
53. 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 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
54. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
55. During each day of operation, the permittee shall record the pressure drop of the fabric filters, and compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range 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. [40 CFR Part 64] Federally Enforceable Through Title V Permit
56. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] 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

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-75-1	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT C

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

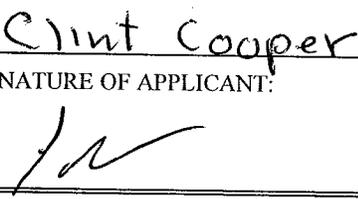
RECEIVED

SEP - 4 2012

SJVAPCD
Southern Region

Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Covanta Delano	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>PO Box 550</u> CITY: <u>Delano</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93216-0550</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>31500 Pond Road</u> CITY: <u>Delano</u> <u> </u> ¼ SECTION <u>25SE</u> TOWNSHIP <u>25S</u> RANGE <u>25E</u>	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Biomass power generation	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) For swing type hammer hog described in permit S-75-1-7. The facility wants to replace the existing 150 HP unit with a 300 HP unit on the fuel receiving system. The intent of this is to more efficiently process incoming fuel and is not for an increase in incoming material processed. Also, there will not be a net increase in emissions, as the emissions will still be exhausted to fabric collector #4, which will still be covered by the emissions limits in condition #49.	
6. TYPE OR PRINT NAME OF APPLICANT: Clint Cooper	TITLE OF APPLICANT: Southern Biomass General Manager
7. SIGNATURE OF APPLICANT: 	DATE: <u>8-28-12</u> PHONE: (661) 792-3067 FAX: (661) 792-3072 EMAIL:

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>S-1123450</u> FACILITY ID: <u>S-75</u>

ATC

San Joaquin Valley
Unified Air Pollution Control District

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Southern Region

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

SIGNIFICANT PERMIT MODIFICATION
 MINOR PERMIT MODIFICATION

ADMINISTRATIVE
AMENDMENT

COMPANY NAME: : COVANTA DELANO, INC.	FACILITY ID: S - 75
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, INC.	
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 source identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the source 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

8-28-12

Date

Clint Cooper

Name of Responsible Official (please print)

General Manager

Title of Responsible Official (please print)

ATTACHMENT D

Previous Title V Operating Permit
(S-75-1-7)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-75-1-7

EXPIRATION DATE: 08/31/2016

SECTION: SE25 **TOWNSHIP:** 25S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

FUEL RECEIVING, SCREENING & CONVEYING OPERATION #1 INCLUDING 60 TON CAPACITY TRUCK TIPPER PLATFORM, FUEL RECEIVING HOPPER W/INCLINED DRAG CONVEYOR & SPIKE ROLLER, AND 175 TON/HR FUEL TRANSFER CONVEYOR #1 WITH BELT SCALE WITH FOAM DUST SUPPRESSION SYSTEM (STATION #1 SERVES TRANSFER POINTS BC-1 TO DS-1, BC-9 TO BC-2, HOG-1 TO BC-2; STATION #2 SERVES POINTS BC-3 & BC-5), HIGH PRESSURE WATER SPRAY AT TRUCK UNLOADER #1, AND 3 FABRIC COLLECTORS

PERMIT UNIT REQUIREMENTS

1. Operation shall include ventilation system and fabric collector #2, with a minimum of 5,002 sq.ft. filter area and 100 hp exhaust fan, serving truck tippers, fuel receiving hoppers and inlets to the fuel transfer conveyor #1. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Fabric collector #2 shall include 5 hp blower motor, rotary valve and auger. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Operation shall include belt type magnetic separator and magnetic separator take away conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Operation shall include disk type scalping screen and swing hammer type hog, both with foam dust suppression and both vented to fabric collector #4. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Operation shall include ventilation system and fabric collector #4, with minimum of 3,674 sq. ft. filter area and 60 hp exhaust fan (shared with S-75-5), serving disk type scalping screen, swing hammer type hog, and discharge of fuel transfer conveyor #1. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fabric collector #4 shall include 3 hp blower motor, rotary valve and auger. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Operation shall include 186 ton/hr capacity hog outfeed conveyor #2 with operational foam dust suppression. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Operation shall include 186 ton/hr capacity fixed stacker conveyor #3 with operational foam dust suppression, two position diverter gate, and telescopic spout with dust pick-up shroud. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Operation shall include 186 ton/hr capacity stacker infeed conveyor #4, and 186 ton/hr capacity radial stacker conveyor #5 with telescopic spout with dust pickup. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Operation shall include ventilation system with fabric collector #3 serving equipment associated with the 186 ton/hour hog, fixed stacker and infeed conveyor listed above (fixed stacker conveyor #3, diverter gate, telescopic spout, stacker infeed conveyor #4, radial stacker conveyor #5 and the head of hog outfeed conveyor #2), with a minimum of 3,263 sq.ft. filter area and 125 hp exhaust fan. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Fabric collector #3 shall include 3 hp blower motor, rotary valve and auger. [District NSR Rule] 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. There shall be no visible emissions of 5% opacity or greater from truck tipper receiving hopper ventilation pickup points. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Truck tipper receiving hopper ventilation hood and hog ventilation hoods shall provide minimum indraft velocity of 200 ft/min during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Truck tipper receiving hopper drag chain conveyor transfer point hood shall provide minimum indraft velocity of 150 ft/min during entire truck unloading and fuel transfer to take away belt conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Truck tipper area ventilation system shall be equipped with interlocks and isolation valves which directs all air flow through operating truck tipper and prevents simultaneous operation of truck tippers. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Conveyor belt ventilation hood(s) shall provide minimum indraft velocity of 500 cfm/ft of belt width during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Scalping screen ventilation hood(s) shall provide minimum indraft velocity of 50 ft/min during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Truck tipper fabric collector #2 shall have minimum filter area of 5,002 sq. ft. and maximum air-to-cloth ratio of 8 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Scalping screen/hog area ventilation system shall be equipped with isolation valve which prevents air flow from primary screen and hog when this equipment is not in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Scalping screen/hog area fabric collector #4 shall have minimum filter area of 3,674 sq. ft. and maximum air-to-cloth ratio of 8 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Stacker/reclaimer area fabric collector #3 shall have minimum filter area of 3,263 sq. ft. and maximum air-to-cloth ratio of 8.2 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Each fabric collector shall be equipped with adjustable automatic reverse pulse filter cleaning mechanism and operational differential pressure indicator. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [40 CFR Part 64 and District NSR Rule] Federally Enforceable Through Title V Permit
23. Each fabric collector shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 7 inches water column. [40 CFR Part 64] Federally Enforceable Through Title V Permit
24. Material removed from the fabric collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Particulate matter collected by fabric collectors shall be stored in closed containers when such material is not actively being returned to the boiler via permitted conveying equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Variable height radial stacker, auxiliary stacker and reclaimers shall be ventilated to fabric collector, and discharge from stacker spouts shall be maintained as close as possible to top of storage pile. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Radial and auxiliary stacker conveyors BC3 and BC5 shall be equipped with foam injection nozzles which shall be operated as needed, to ensure dust emissions have visible emissions less than or equal to 20% opacity. [District NSR Rule] Federally Enforceable Through Title V Permit
28. All ventilation system ducts shall be sized for minimum duct transport velocity of 3,200 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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29. Deliveries of fuel shall not exceed 144 truck loads per day. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Drag chain transfer, point hood ventilation system and fabric collector shall operate whenever material is being transferred out of receiving bin. [District NSR Rule] Federally Enforceable Through Title V Permit
31. There shall be no visible emissions of 5% opacity or greater from truck tipper receiving hopper during entire unloading operation. [District NSR Rule] Federally Enforceable Through Title V Permit
32. Truck tipper receiving hopper, ventilation hood system and fabric collector #2 shall be operated whenever material is being transferred into the hopper. [District NSR Rule] Federally Enforceable Through Title V Permit
33. There shall be no visible emissions of 5% opacity or greater from conveyor transfer points, scalping screen, and hog enclosures, including inlet and outlet openings. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Scalping screen/hog area fabric collector #4 shall be operated whenever material is being transferred from fuel receiving operations or storage pile to boiler. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Stacker/reclaimer area fabric collector #3 shall be operated whenever material is being transferred to or from storage piles. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Auxiliary stacker shall not operate when radial stacker is in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
37. Fuel transfer conveyor shall be fully enclosed and covers shall be in place whenever conveyors are operating. [District NSR Rule] Federally Enforceable Through Title V Permit
38. Radial stacker telescoping discharge spout height shall be continuously adjusted to minimize material drop distance to pile. [District NSR Rule] Federally Enforceable Through Title V Permit
39. Material to stacker shall contain no more than 3% by weight of fines capable of passing through 200 mesh screen. [District NSR Rule] Federally Enforceable Through Title V Permit
40. Any stored fuel which is burning shall be immediately segregated and extinguished. [District Rule 4102 and District NSR Rule] Federally Enforceable Through Title V Permit
41. Records of types, amounts and origins (including distance from facility, copies of all purchase contracts, # of trucks, etc.) of offset fuels received shall be maintained and made readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
42. Air flow to fabric collector #2 shall not exceed 40,000 cfm and Particulate (PM-10) emissions from fabric filter #2 shall not exceed 0.0045 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Air flow to fabric collectors 3 and 4 shall not exceed 20,000 and 30,000 cfm respectively, and Particulate (PM-10) emissions from fabric collectors shall not exceed 0.004 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Fugitive particulate (PM-10) emissions from fuel storage piles shall not exceed 1.32 lb PM-10/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
45. Wood waste delivery trucks shall remain covered during entire unloading operation. [District NSR Rule] Federally Enforceable Through Title V Permit
46. Operator shall record the daily number of fuel delivery truck loads. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
47. Operator shall record percentage of fines (passing #200 screen) in the material to the stacker. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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48. There shall be no visible emissions of greater than 0% opacity from the fabric collectors. Visible emissions from the fabric collectors shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken within 24 hours to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [District Rules 2520, 9.3.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
49. Visible emissions from truck tipper receiving hopper ventilation pickup points, conveyor transfer points, scalping screens, and hog enclosures (including inlet and outlet openings) shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
50. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
51. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
52. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
53. 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 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
54. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
55. During each day of operation, the permittee shall record the pressure drop of the fabric filters, and compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range 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. [40 CFR Part 64] Federally Enforceable Through Title V Permit
56. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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