

DOCKETED

Docket Number:	08-AFC-10C
Project Title:	Lodi Energy Center Project
TN #:	202238
Document Title:	Northern California Power Agency's Submittal of Application for Title V Permit Amendment
Description:	Application to SJVAPCD for administrative amendment to Title V permit: amend startup time limit
Filer:	Nancy Matthews
Organization:	Sierra Research
Submitter Role:	Applicant Consultant
Submission Date:	4/25/2014 9:52:54 AM
Docketed Date:	4/25/2014



April 25, 2014

Ms. Christine Stora
Compliance Project Manager
Siting, Transmission and Environmental Protection (STEP) Division
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814

PO Box 1478
12745 N. Thornton Road
Lodi, CA 95241
(209) 333-6370
www.ncpa.com

Subject: Lodi Energy Center (08-AFC-10)
Condition AQ-SC6, Submittal of Application to the SJVAPCD for
Amendment to Title V Operating Permit

Dear Ms. Stora:

As required by Condition AQ-SC6 of the Northern California Power Agency (NCPA) Lodi Energy Center (LEC) conditions of certification, NCPA is submitting to the California Energy Commission (CEC) Compliance Project Manager (CPM) the attached copy of the Title V Operating Permit application forms that were recently submitted to the SJVAPCD. These Title V permit application forms were submitted to amend LEC's Title V operating permit to reflect the new startup time limits proposed in the startup analysis required under Conditions #9 and AQ-19 of the SJVAPCD Title V permit and the CEC license, respectively. A copy of the startup analysis was provided to the CEC on March 10, 2014.

The District is in the process of renewing the Title V operating permit for NCPA's LEC facility. That process is expected to require approximately 60 days. Following issuance of the renewed Title V permit, the District will administratively amend the permit to incorporate the new startup time limits, pursuant to Conditions #11 and AQ-21 of the SJVAPCD Title V permit and the CEC license, respectively. Once we receive a draft of the proposed permit condition changes from the District staff, we will submit a request to make conforming changes to the air quality conditions of certification. Meanwhile, if you have any questions about the attached material, or any other aspect of the LEC, please do not hesitate to call Vinnie Venethongkham of my staff at (209) 210-5009 or Nancy Matthews of Sierra Research at (916) 273-5124.

Sincerely,


Michael DeBortoli
Plant Manager

Attachment

cc: Nancy Matthews, Sierra Research



March 6, 2014

Via Certified Mail – Return Receipt Requested

Mr. Rupi Gill
San Joaquin Valley APCD
Northern Regional Office
4800 Enterprise Way
Modesto, CA 95356-8718

PO Box 1478
12745 N. Thornton Road
Lodi, CA 95241
(209) 333-6370
www.ncpa.com

Subject: Title V Minor Modification Request for Northern California Power Agency

Dear Mr. Gill:

Pursuant to your request, please find enclosed an application for Minor Modification to the Northern California Power Agency (NCPA) Lodi Energy Center (LEC) Title V Permit. This Minor Modification application is required by the SJVAPCD as a result of the startup analysis required under Condition #9 of Title V Operating Permit #N-2697-5-1. This startup analysis was previously provided to the SJVAPCD by NCPA and has resulted in a requirement to change to the allowable startup time in Condition #6 of the LEC Title V permit.

We have included a check for \$19 to cover the filing fee for the Title V permit amendment.

Please contact me at 209-210-5009 if you have any questions regarding this matter.

Sincerely,

Vinnie Venethongkham
Compliance Manager

Enclosures

cc: Gerardo Rios, EPA Region IX
Andrea Grenier, Grenier and Associates
Nancy Matthews, Sierra Research

**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: Northern California Power Agency	FACILITY ID: - 2697
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input checked="" type="checkbox"/> Utility	
2. Owner's Name: Northern California Power Agency	
3. Agent to the Owner: Michael DeBortoli	

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 foregoing is correct and true:

Michael DeBortoli
Signature of Responsible Official

3/10/14
Date

Michael DeBortoli
Name of Responsible Official (please print)

Plant Manager, Lodi Energy Center
Title of Responsible Official (please print)

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM
INSTRUCTIONS (TVFORM-009)

Page 1 of 1

Complete a Title V Modification - Compliance Certification Form (TVFORM-009) for each Responsible Official (RO) and identify the areas of responsibility for each (indicate by permit number the emissions units under the responsibility of each RO).

I. Type of Permit Action

Mark the appropriate box to indicate whether the application is for: a significant or minor Title V permit modification, or an application for an administrative amendment to a Title V permit.

Line 1. Indicate the organizational structure of the facility.

Line 2. Print the name of the facility owner.

Line 3. Print the name of the agent to the owner, if any, who may conduct business on behalf of the owner.

II. Compliance Certification

A compliance certification is a certification by the Responsible Official that each of the statements initialed in this section are true, accurate, and complete. The Responsible Official must initial the statements that are true, sign and date, and print his/her name and title.

For a corporation, the responsible official shall be a president, secretary, treasurer, or vice president in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation. The responsible official may be a duly authorized representative rather than any of the above if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit; and

1. the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million in 1980 dollars; or
2. the District has approved a petition from the original responsible person to delegate authority.

For a public agency the responsible official shall be either the principal executive officer or the ranking elected official. The principal executive officer, in the case of a federal agency, may be the executive officer having responsibility for a geographical unit.

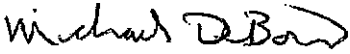
For a partnership or sole proprietorship, the responsible official is a general partner or the proprietor, respectively.

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Northern California Power Agency</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>P. O. Box 1478</u> CITY: <u>Lodi</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95241-1478</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>12745 North Thornton Road</u> CITY: <u>Lodi</u> SW <u>1/4</u> SECTION <u>24</u> TOWNSHIP <u>T3N</u> RANGE <u>R5E</u>	INSTALLATION DATE: n/a
4. GENERAL NATURE OF BUSINESS: <p style="text-align: center;">Electrical Power Production</p>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Permit Unit N-2697-5-1: 294 MW (nominal) combined cycle electrical generation plant consistent of a Siemens "Flex Plant 30" STG6-5000F natural gas-fired turbine with unfired HRSG: <p style="text-align: center;">Amend Condition #6 of existing PTO to reduce startup time limit from 3.0 hours to 100 minutes, as required by Condition #9.</p>	
6. TYPE OR PRINT NAME OF APPLICANT: Michael DeBortoli	TITLE OF APPLICANT: Plant Manager, NCPA Lodi Energy Center
7. SIGNATURE OF APPLICANT: 	DATE: <u>3/10/14</u> PHONE: (916) 781-4528 FAX: EMAIL: Michael.DeBortoli@ncpa.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: _____ FACILITY ID: _____

APPLICATION FOR TITLE V MODIFICATION

- Instructions -

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On the application form, mark the box to indicate what type of Title V modification this is. Only one application form is needed for each facility.

- Line 1.** Indicate the name of the business exactly as it appears on the Permit to Operate.
- Line 2.** List the mailing address where correspondence regarding the application and the Permit to Operate may be sent. Please include your nine-digit zip code.
- Line 3.** List the physical location where the emissions unit(s) will be operated. If a street address is not applicable, provide the United States Geological Survey (USGS) quarter-section, township, and range or the Universal Transverse Mercator (UTM) coordinates. Indicate the installation date of any equipment changes from this modification.
- Line 4.** Indicate the general nature of the business performed by the facility.
- Line 5.** Describe each emissions unit. You may reference existing valid District Permits to Operate for each permitted emissions unit. A summary listing of all emissions units with valid District operating permits can be obtained from the District and may be attached and referenced. Reference and attach a copy of the Authority to Construct (ATC) issued by the District for this modification, if one is available.
- Line 6.** Type or print the name of the applicant followed by the title of the applicant.
- Line 7.** Sign and date the application in ink. Also include the daytime telephone number, FAX number, and e-mail address of the applicant.

OTHER REQUIRED INFORMATION

Please attach a Title V Modification – Compliance Certification Form (TVFORM-009). If needed to complete the processing of your Title V permit application, the District may request additional information.

APPLICATION FOR TITLE V MODIFICATION

- Instructions -

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FEES

A nonrefundable filing fee of \$19 per emissions unit, up to a maximum of \$1,400 per stationary source, is required. The applicant may submit the necessary filing fees along with this application, or the District will issue a bill for the appropriate fee. Checks or money orders shall be made payable to the SJVUAPCD. All filing fees paid will be credited toward the hourly evaluation fee.

Every applicant for a Title V permit modification, administrative amendment, or certificate of conformity, shall also pay an evaluation fee for the issuance of the Title V permit. The fee shall be calculated using the staff hours expended and a weighted labor rate. All filing fees paid will be credited towards the evaluation fee.

The fee requirements are specified in District Rule 3010 (Permit Fee).

APPLICATION SUBMITTAL

Title V sources are encouraged to schedule a meeting with District personnel prior to submitting Title V applications. Applications, including all supporting documents, must be submitted in duplicate since EPA requires that a copy of each application be forwarded to them. It is recommended that applications be submitted to the Central Regional Office. However, applications may be submitted either by mail or in person at the following locations:

Northern Region Office
(Serving San Joaquin, Stanislaus, and
Merced Counties):

4800 Enterprise Way
Modesto, CA 95356-8718
(209) 557-6400
FAX: (209) 557-6475
SBA Hotline: (209) 557-6446

Central Region Office
(Serving Madera, Fresno, and Kings
Counties):

1990 E. Gettysburg Avenue
Fresno, California 93726-0244
(559) 230-5900
FAX: (559) 230-6061
SBA Hotline: (559) 230-5888

Southern Region Office
(Serving Tulare and Kern Counties):

34946 Flyover Court
Bakersfield, California 93308
(661) 392-5500
FAX: (661) 392-5585
SBA Hotline: (661) 392-5665