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Description:	2018 Annual Compliance Report for the Lodi Energy Center.
Filer:	Mary Dyas
Organization:	NCPA
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January 24, 2019

Ms. Mary Dyas
Compliance Project Manager
California Energy Commission
1516 Ninth Street, MS 2000
Sacramento, CA 95814

Subject: Lodi Energy Center Annual Compliance Report
Docket 08-AFC-10C

Dear Ms. Dyas:

In compliance with Condition of Certification COM-7 as set forth in the California Energy Commission's Final Decision for the Lodi Energy Center, enclosed is the Annual Compliance Report, which documents the Lodi Energy Center's compliance activities related to its operations during the period January 1, 2018 through December 31, 2018. Also, I have included five site plans, which were recently reviewed and updated: LEC O&M Health and Safety Plan, Operational Waste Management Plan, Temporary/Permanent Closure/Onsite Contingency Plan, Emergency Response Plan, and Facility Security Plan.

If you have any questions regarding this report, please contact me at (209) 210-5009.

Sincerely,

Michael DeBortoli
Plant Manager

cc: Brooklyn Saylor, Compliance Manager

Lodi Energy Center



Annual Compliance Report

Reporting Period
January 1, 2018 through December 31, 2018



Lodi Energy Center Annual Compliance Report

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SECTION ONE | INTRODUCTION

On April 21, 2010, the California Energy Commission (CEC) issued a license to the Northern California Power Agency (NCPA) for the construction and operation of the Lodi Energy Center Project. The CEC Compliance Project Manager (CPM) issued an Authority to Construct letter to NCPA on July 14, 2010, allowing the start of construction activities for all power plant and related linear facilities. Construction was completed and the Lodi Energy Center began commercial operation on November 27, 2012.

This Annual Compliance Report has been prepared pursuant to Condition of Certification COMPLIANCE-7, which requires NCPA to prepare and submit a report that documents compliance activities related to the operation of the Lodi Energy Center. This report covers a reporting period from January 1, 2018 through December 31, 2018.

This report addresses the specific compliance information requirements as set forth in Condition of Certification COMPLIANCE-7. It also provides information related to other Conditions of Certification within the Final Decision that have annual reporting requirements. These conditions are: BIO-2, HAZ-1, HAZ-6, SOIL & WATER-8, VIS-3, VIS-5, TLSN-2, TLSN-4, AND WASTE-6.

SECTION TWO | COMPLIANCE-7 REPORTING REQUIREMENTS

A summary of the items required by COMPLIANCE-7 to be addressed in the Annual Compliance Report is provided below.

1. An updated compliance matrix showing the status of all Conditions of Certification (fully satisfied Conditions do not need to be included in the matrix after they have been reported as completed)
2. A summary of the current project operating status and an explanation of any significant changes to facility operations during the year
3. Documents required by specific Conditions to be submitted along with the Annual Compliance Report. Each of these items must be identified in the transmittal letter, with the condition it satisfies, and submitted as attachments
4. A cumulative listing of all post-certification changes approved by the Energy Commission or cleared by the CPM
5. An explanation for any submittal deadlines that were missed, accompanied by an estimate of when the information will be provided
6. A listing of filings submitted to, or permits issued by, other governmental agencies during the year
7. A projection of project compliance activities scheduled during the next year
8. A listing of the year's additions to the on-site compliance file
9. An evaluation of the on-site contingency plan for unplanned facility closure, including any suggestions necessary for bringing the plan up to date
10. A listing of complaints, notices of violation, official warnings, and citations received during the year, a description of the resolution of any resolved matters, and the status of any unresolved matters
11. The status of the insurance coverage and major equipment warranties must be updated in the annual compliance reports

Information for each of these requirements and accompanying documentation is contained in Section Three of this report and in the appendices provided with this report.

SECTION THREE | ANNUAL COMPLIANCE REQUIREMENTS

This section provides the required annual compliance reporting information for the Lodi Energy Center. The reporting period covered by this report is January 1, 2018 through December 31, 2018.

3.1 Compliance Matrix

Condition COMPLIANCE-7, Item 1, requires that an updated compliance matrix be included in the Annual Compliance Report. An updated compliance matrix for the reporting period is provided in Appendix A.

3.2 Summary of Operating Status

A summary of the LEC operations along with an explanation of any significant changes to facility operations during the reporting period is provided in Table 3.2-1. The summary includes the total number of hours the combustion turbine and the steam turbine operated each month of the reporting period. It also includes the total megawatt hours (MWH) produced each month by each unit. There were no significant changes to facility operations during this reporting period.

Table 3-2.1
Plant Operations Summary
January 1, 2017 through December 31, 2017

GAS TURBINE			STEAM TURBINE		
MONTH/YEAR	OPERATING HOURS	GENERATOR GROSS OUTPUT (MWH)	MONTH/YEAR	OPERATING HOURS	GENERATOR GROSS OUTPUT (MWH)
Jan-18	553.2	94,333.84	Jan-18	523.7	51,022.25
Feb-18	439.2	74,551.24	Feb-18	422.6	39,645.00
Mar-18	580.3	91,810.82	Mar-18	568.5	51,077.05
Apr-18	78	9,835.01	Apr-18	69.7	5,456.15
May-18	51.6	6,077.80	May-18	41.6	3,110.00
Jun-18	164.2	24,059.81	Jun-18	143.9	12,582.18
Jul-18	662.8	114,492	Jul-18	658.3	61,934.02
Aug-18	678.6	117,666.90	Aug-18	674.0	65,711.53
Sep-18	316.6	51,657.50	Sep-18	304.9	28,407.44
Oct-18	728.3	133,089	Oct-18	726.8	72,730.50
Nov-18	584.5	106,540.50	Nov-18	576.0	56,598.43
Dec-18	624.8	115,225.90	Dec-18	614.3	60,150.48
Totals	5,462	939,340	Totals	5,324	508,425

3.3 Annual Compliance Reporting Required by Specific Conditions

Several conditions set forth in the CEC Final Decision for the Lodi Energy Center require that information be included in the Annual Compliance Report. These conditions are BIO-2, HAZ-1, HAZ-6, SOIL & WATER-8, VIS-3, VIS-5, TLSN-2, TLSN-4, AND WASTE-6. Compliance with each of these conditions is discussed below:

3.3.1 BIO-2

Condition of Certification BIO-2 requires the Designated Biologist to prepare and submit record summaries in the Annual Compliance Report documenting biological resource activities which occurred during the reporting period. This information, compiled by Designated Biologist Rick Crowe, is provided in Appendix B.

3.3.2 HAZ-1

Condition of Certification HAZ-1 requires the Project Owner to provide in the Annual Compliance Report a list of hazardous materials contained at the Lodi Energy Center. An updated list is provided in Table 3.3.2-1.

**Table 3.3.2-1
Hazardous Materials for Use at the LEC**

Material	CASE No.	Application	Hazardous Characteristics	Maximum Quantity on Site	CERCLA SARA RQ
Amines NALCO 352	110-91-8	Corrosion Inhibitor	Health: severe skin burns and eye damage. May cause respiratory irritation. Physical: corrosive.	105 gallons	NA
Anhydrous Ammonia (99% NH3)	7664-41-7	Control oxides of nitrogen (NOx) emissions via selective catalytic reduction	Health: corrosive, irritation to permanent damage from inhalation, ingestion, and skin contact. Physical: combustible, but difficult to burn.	10,200 gallons	100 pounds
Aqueous ammonia (19%)	1336-21-6 7664-41-7	Boiler feedwater pH control	Health: fatal if swallowed, skin and eye burns, toxic and irritating vapor. Physical: corrosive liquid, limited flammability.	875 gallons	1,000 pounds
Biocide NALCO PC-56	10377-60-3 26172-55-4 2682-20-4	RO Cleaner	Health: causes severe skin burns and eye damage. May cause an allergic skin reaction. Harmful if inhaled. Physical: corrosive	275 gallons	NA
Biocide NALCO STABREX ST70	7647-15-6 7681-52-9 7647-14-5 1310-73-2	Injection well biological control	Health: harmful if swallowed or if inhaled Causes severe skin burns and eye damage. Physical: corrosive.	55 gallons	1,572 pounds

Material	CASE No.	Application	Hazardous Characteristics	Maximum Quantity on Site	CERCLA SARA RQ
PermaClean PC-11	25322-68-3 10222-01-2 7647-15-6 3252-43-5	Biocide	Health: eye damage, skin reaction, skin irritation, toxic if inhaled. Physical: toxic to aquatic life	220 gallons	NA
Diesel No. 2c	68476-34-6 8008-20-6	Small equipment refueling / Fire Pump	Health: harmful if inhaled. Skin and eye irritation. Suspected of causing cancer. May be fatal if swallowed and enters airways. May cause damage to organs through prolonged or repeated exposure. (central nervous system (CNS)) Physical: flammable.	300 gallons	42 gallons
EPA Protocol Gases	7727-37-9 10102-43-9	Calibration gases	Health: skin irritant. May displace oxygen and cause suffocation. Physical: gas under pressure may explode if heated.	5,922 cubic feet	10 pounds
Nitrogen Liquid	7727-37-9	Pressure Gas	Health: skin irritant. May displace oxygen and cause suffocation. Physical: gas under pressure may explode if heated.	30632 cubic feet	10 pounds
Glutaraldehyde NALCO H-550	111-30-8	Cooling Water System Cleaner	Health: toxic, irritant, Toxic if swallowed. Harmful in contact with skin or if inhaled. Causes severe skin burns and eye damage. May cause an allergic skin reaction. . May cause allergy or asthma symptoms or breathing difficulties if inhaled. May cause respiratory irritation. Physical: corrosive.	300 gallons	NA
Hydrated Lime	1305-62-0 1309-48-4 14808-60-7	Cold lime softener hardness removal	Health: serious eye damage. Skin and respiratory irritation. Causes damage to lungs through prolonged or repeated exposure when inhaled. May cause cancer through inhalation. Physical: corrosive.	124,950 Pounds	NA
Hydraulic Oil	None	High-pressure combustion turbine starting system, turbine	Health: hazardous if ingested. Physical: combustible.	500 gallons	42 gallons

Material	CASE No.	Application	Hazardous Characteristics	Maximum Quantity on Site	CERCLA SARA RQ
		control valve actuators			
NALCLEAR 7763	64742-47-8	Polymer Water Softener	Health: irritant, causes eye irritation. Physical: none.	400 gallons	NA
Lead Acid Battery	7439-92-1 7440-36-0 7440-38-2 7664-93-9 7440-70-2 7440-31-5	Storage Battery System	Health: toxic, potential to cause eye damage, fertility damage, cancer, and central nervous system damage. Physical: explosive, corrosive, marine pollutant.	13,500 pounds	1,000 pounds
Lubrication Oil	70514-12-4 64742-25-2	Lubricate rotating equipment (e.g., gas turbine and steam turbine bearings)	Health: toxic, hazardous if ingested. Physical: flammable.	1,500 gallons	42 gallons
Magnesium Sulfate (Aqueous)	7487-18-5 7732-18-5	Cold lime softener silica removal	Health: causes mild eye irritation. Causes nausea, vomiting, abdominal cramps, and diarrhea. Physical: none.	6,000 gallons	NA
Magnesium Oxide	1309-48-4	Cold lime softener silica removal	Health: slowly absorbed, ingestion may cause rapid bowel evacuation, inhalation can cause a flu like illness (metal fume fever), this 24 to 48-hour illness is characterized by chills, fever, aching muscles, dryness in the mouth, and throat and headache. Physical: none.	176,800 Pounds	NA
Mineral Oil	8012-95-1	Transformers/ switchyard	Health: minor health hazard. Physical: may be combustible, depending on manufacturer.	193,721 gallons	42 gallons
NALCO 71D5 Plus	64741-44-2 64742-47-8 25322-69-4 57-11-4 111-87-5 8002-74-2	Antifoam	Health: may be fatal if swallowed or inhaled. Physical: combustible.	25 gallons	NA
Oxygen	7782-44-7	Welding gas cycle water treatment	Health: therapeutic overdoses can cause convulsions, liquid oxygen is an irritant to skin. Physical: oxidizing agent, actively supports combustion.	1,392 cubic feet	NA

Material	CASE No.	Application	Hazardous Characteristics	Maximum Quantity on Site	CERCLA SARA RQ
NALCO 1720	7631-90-5 7773-03-7 10124-43-3	Oxygen scavenger	Health: irritant may cause asthma like attack if ingested, can cause mild irritation, causes asthmatic signs and symptoms in hyper-reactive individuals. Physical: none.	75 gallons	NA
NALCO ELIMIN-OX	7631-90-5 7773-03-7 10124-43-3	Oxygen scavenger for boiler water conditioning	Health: irritant may cause asthma like attack if ingested, can cause mild irritation, causes asthmatic signs and symptoms in hyper-reactive individuals. Physical: none.	75 gallons	NA
NALCO 3DT457		Scale Inhibitor	Health: None Physical: None	55 gallons	
NALCO PC-77		Reverse Osmosis Cleaner	Health: may cause eye irritation. Physical:	110 gallons	
Permatreat PC -191T		Reverse Osmosis Antiscalant	Health: None Physical: None	200 gallons	
Phosphoric Acid NALCO 3DT487	7664-38-2	Cooling Water Treatment	Health: may cause skin burns. Physical: corrosive.	400 gallons	NA
Propane	74-98-6	Torch gas	Health: asphyxiant gas causes frostbite to area of contact. Physical: flammable.	200 cubic feet	NA
Sodium Bisulfite (NaHSO ₃) NALCO PC-7408	7631-90-5	Reduce oxidizers in reverse osmosis feed to protect the RO membranes	Health: irritant to eyes, skin, and lungs, may be harmful if digested. Physical: none.	30 gallons	100 pounds

Material	CASE No.	Application	Hazardous Characteristics	Maximum Quantity on Site	CERCLA SARA RQ
Sodium Hydroxide NALCO BT3400	1310-73-2	Internal Boiler Treatment	Health: severe skin burns and eye damage. Physical: corrosive.	105 gallons	35,371 pounds
Sodium Hydroxide NALCO 1742	1310-73-2	Boiler Treatment	Health: causes severe skin burns and eye damage. Physical: corrosive	105 gallons	34,904 pounds
Sodium Hydroxide NALCO 8735	1310-73-2 1310-58-3	PH Stabilizer	Health: causes severe skin burns and eye damage. Physical: corrosive.	50 gallons	2,999 pounds
Sodium Hydroxide NALCO TRAC107	1310-73-2 1330-43-4	Corrosion Inhibitor	Health: causes severe skin burns and eye damage. Causes serious eye damage. May damage fertility or the unborn child if swallowed. Physical: corrosive.	55 gallons	24,700 pounds
Sodium Hydroxide 15% (Caustic)	1310-73-2	Reverse Osmosis pH control and cleaning	Health: causes burns to eyes and skin. Physical: corrosive, may react violently with acids and water.	1,000 gallons	1,000 pounds
Sodium Nitrite NALCO TRAC108	7632-00-0 77775-19-1	Corrosion Inhibitor	Health: harmful if swallowed. Causes eye irritation. Causes damage to organs (Blood) if swallowed. Physical: none.	55 gallons	407 pounds
Sodium Hypochlorite	7681-52-9 1310-73-2 7732-18-5	Cooling tower biological control	Health: harmful by ingestion, inhalation, and through skin contact. Physical: corrosive, toxic to marine life.	12,000 gallons	100 pounds
Sulfur Hexafluoride	2551-62-4	230-KV breaker insulation medium	Health: hazardous if inhaled Physical: none.	1,200 pounds	NA
Sulfuric Acid (93%)	7664-93-9	Cooling tower pH control	Health: causes severe skin burns, causes severe eye burns, causes burns of the mouth throat, and stomach. Physical: corrosive.	92,100 gallons	1,000 pounds
Tetrasodium EDTA Solution 1%	64-02-8	Reverse Osmosis Cleaner	Health: causes severe skin burns and eye damage. Physical: corrosive	110 gallons	NA

Material	CASE No.	Application	Hazardous Characteristics	Maximum Quantity on Site	CERCLA SARA RQ
ZOK 27	9043-30-5 5131-66-8 110-25-8 80584-88-9	Corrosion Inhibitor	Health: may cause eye irritation. Physical: none.	55 gallons	NA

Source: Ex. 300.

a. Reportable quantities are based on the pure chemical by CAS # per the Comprehensive Environmental Response, Compensation, and Liability Act.

3.3.3 HAZ-6

Condition of Certification HAZ-6 requires that LEC prepare an Operations Security Plan. As part of this plan, LEC provided statements certifying that background investigations had been conducted on all current LEC project personnel. A statement was received by LEC certifying that the contractor has conducted appropriate vendor background investigations on contractors who regularly visit the project site. Lastly, the plan includes statements received by LEC that hazardous materials transport vendors regarding compliance with 49 CFR 172.802 and that they have conducted employee background investigations in accordance with 49 CFR Part 1572, subparts A and B.

As required by Condition HAZ-6, LEC has reviewed the LEC Operations Security Plan. As a result of that review, LEC confirms that all current LEC project employee background investigations have been performed and updated certification statements have been appended to the Operations Security Plan. LEC further confirms that all appropriate vendors have represented to LEC that employee background investigations have been performed and updated certification statements have been appended to the Operations Security Plan. In addition, appropriate hazardous materials transport vendor certifications for security plans and vendor employee background investigations received by LEC have been included in the plan. LEC believes and is also informed that all of these background checks and investigations have been conducted consistent with applicable federal, state, and local laws, ordinances, regulations, and standards, including, but not limited to, applicable employment and privacy laws and regulations. This information is provided in Appendix H.

3.3.4 S&W-8

Condition of Certification S&W-8 requires the Project Owner provide a report on the servicing, testing, and calibration of the metering devices in the Annual Compliance Report.

Maintenance service was required on the PH IP Feedwater (BOP)/HP Feedwater (HRSG) analyzer. In January, some of the buttons on the PH analyzer stopped working. The analyzer was sent to the manufacturer and the meter was replaced.

The condition also requires preparation and submittal of summary information on the use of potable and recycled water in terms of calculated monthly range, monthly average, and annual use by the project in both gallons per minute and acre-feet. Table 3.3.4-1 has been prepared to address these

reporting requirements and includes usage information for the cooling tower makeup, potable water usage, and recycled water data.

**Table 3.3.4-1
Annual Summary of Water Use at the LEC (gallons)**

Month/Year	Cooling Tower Makeup	Cooling Tower Makeup Monthly Avg	Potable Water	Potable Water Monthly Avg	Recycled Water	Recycled Water Monthly Avg
Jan-18	0	0.00	1193	38.48	33069568	1066760.26
Feb-18	0	0.00	1195	42.68	28680192	1024292.57
Mar-18	331756	10701.81	1145	36.94	37507584	1209922.06
Apr-18	658	21.93	803	26.77	5713920	190464.00
May-18	1566	50.52	3399	109.65	2273280	73331.61
Jun-18	0	0.00	4704	156.80	4180640	139354.67
Jul-18	0	0.00	2611	84.23	56453632	1821084.90
Aug-18	44	1.42	9982	322.00	56255924	1814707.23
Sep-18	673	22.43	12273	409.10	27184716	906157.20
Oct-18	27933	28.00	7854	253.35	56993792	1838509.42
Nov-18	156090	5203.00	6511	217.03	41081856	1369395.20
Dec-18	530543	17114.29	32015	1032.74	40074752	1292733.94
TOTAL (gallons)	1,049,263		83,685		389,469,856	
TOTAL (acre-feet)	3.220		0.257		1,195.238	

3.3.5 TLSN-2

Condition of Certification TLSN-2 requires the Lodi Energy Center to summarize all project-related transmission line complaints in the Annual Compliance Report during the first five years of plant operation. No transmission line complaints were received during the reporting period.

3.3.6 TLSN-4

Condition of Certification TLSN-4 requires the Lodi Energy Center to provide a summary of inspection results and any fire prevention activities carried out along the right-of-way and provide such summaries in the ACR during the first five years of plant operation. The transmission line right of way for the Lodi Energy Center is located entirely within the project boundaries of the operating facility. Inspections of the transmission line facilities were conducted regularly as part of routine on-site walks by LEC personnel. The inspections did not identify any area along the right of way requiring modification or repair. No additional fire prevention activities were required beyond those incorporated into the facility's design and operations.

3.3.7 VIS-3

Condition of Certification VIS-3 requires the Project Owner to provide the CPM written documentation in the Annual Compliance Report demonstrating that the cooling tower has consistently been operated to meet the specified fogging frequency curve (except as necessary to prevent damage to the cooling tower). The written certification required by this condition is provided in Appendix C.

3.3.8 VIS-5

Condition of Certification VIS-5 requires the Project Owner to provide a status report regarding surface treatment maintenance in the Annual Compliance Report. The report shall specify (a): the condition of the surfaces of all structures and buildings at the end of the reporting year; (b) maintenance activities that occurred during the reporting year; and (c) the schedule of maintenance activities for the next year.

Between January 2018 and December 2018 the LEC stack was painted, all other structures and building surfaces were in good condition.

There are no planned surface treatment activities for 2019.

3.3.9 WASTE-6

Condition of Certification Waste-6 requires that each Annual Compliance Report document the actual volume of wastes generated and the waste management methods used during the year; provide a comparison of the actual waste generation and management methods used to those proposed in the original Operation Waste Management Plan; and update the Operation Waste Management Plan as necessary to address current waste generation and management practices. Table 3.3.9-1 shows the volume of wastes generated during the reporting period.

Table 3.3.9-1
Volume of Wastes Generated at LEC During Reporting Period

Stream	Volume	Units
Non-RCRA Hazardous Waste, Liquids (Use Oil)	933	gallons
Non-RCRA Hazardous Waste, Solid (Oily Debris, Absorbent) (Used Oil Filters)	1183	pounds
UN3260, Corrosive Solid, Acidic, Inorganic, N.O.S. (Sulfuric Acid, Aluminum Oxide) 8, II	125	pounds
Non-RCRA Hazardous Waste, Liquids (Glycol Ether and Water)	500	gallons
Non-RCRA Hazardous Waste, Liquids (Limestone, Benzyl Alcohol)	10	pounds
UN3264, Waste Corrosive, Acidic, Inorganic, N.O.S. (Sulfuric Acid, Hydrochloric Acid) 8, II	40	gallons

UN3082, Environmental Hazardous Substance, Liquid, N.O.S. (Contains Bisphenol-A-Epichlorohydrin Resin) 9, PG III Non-Hazardous Waste Solid / Filter Cake	25	pounds
	3913	yards
Non-Hazardous Waste Liquid (Cooling Water Tower Liquid) (ChemGuard Expansion Foam)	7121	gallons
Non-Hazardous Waste Solid (Piping w/ Chemical Residue & Empty Transformer Bushing)	500	pounds

All waste management methods used during the reporting period were consistent with the methods specified in the approved Operations Waste Management Plan. There were no changes to warrant updates to the Operation Waste Management Plan for the reporting period. A Copy of the Operations Waste Management Plan is attached in appendix D

3.4 Cumulative Listing of Post-Certification Changes

Condition of Certification COMPLIANCE-7 requires that the Annual Compliance Report include a cumulative list of post-certification changes approved by the Energy Commission or cleared by the Compliance Project Manager (CPM). See Appendix G for more information. The following items are post-certification changes approved by the CPM during the reporting period.

1. Condition of Certification SOIL & WATER 7 permit clarification on 14 day limit and use of Mosquito Vector Control Agricultural Well.
 - a. The 14 day limit for back-up supply was interpreted to equal 336 operating hours
 - b. Use of Mosquito Vector Control District's Agricultural Well was approved for emergency use.

3.5 Submittal Deadlines Missed

No submittal deadlines were missed during the reporting period.

3.6 Filings Made To or Permits Issued by Other Government Agencies

Table 3.6-1 contains filings made to or Permits issued by other government agencies. Copies of issued permits are included in Appendix E.

Table 3.6-1
List of Filings Made to Other Government Agencies During Reporting Period

Agency	Type	Item/Action
San Joaquin Valley Air Pollution Control District	Title V Renewal Application	Application submitted to SJVAPCD. Pending approval.
City of Lodi White Slough Water Pollution Control Facility	Permit: Unit 548	CITY OF LODI ZERO WASTE WATER DISCHARGE PERMIT
San Joaquin Environmental Health Department	Submittal: Hazardous Material Business Plans (HMBP) - CERSID: 10183585	Reported via the California Environmental Reporting System
California Energy Commission	Request for permit clarification SOIL & WATER 7 – Cleared by CPM	See listing under Section 3.4

3.7 Scheduled Compliance Activities

A list of compliance activities anticipated to occur in 2019 are provided in Table 3.7-1.

Table 3.7-1
Projected Compliance Activities in 2019

Type	Item/Action	Submitted to
Report	Q4 2018 CEMS Report (January)	SJVAPCD, EPA
	Q4 2018 Quarterly Operations Report (January)	CEC
	Q4 2018 Class I Nonhazardous UIC Quarterly Operations Report (January)	EPA
	Q4 2018 Quarterly Emissions Data Reporting (January)	SJVAPCD, EPA
	2 nd 2018 Report of Required Monitoring (January)	SJVAPCD, EPA
	2018 Annual Compliance Certification (January)	SJVAPCD, EPA
	Annual City of Lodi Zero Discharge Compliance Certification (January)	City of Lodi
	Q1 2019 CEMS Report (April)	SJVAPCD, EPA
	Q1 2019 Quarterly Operations Report (April)	CEC
	Q1 2019 Class I Nonhazardous UIC Quarterly Operations Report (April)	EPA
	Q1 2019 Quarterly Emissions Data Reporting (April)	EPA
	2018 California Greenhouse Gas Report (April)	CARB
	2018 EPA Greenhouse Gas Report (April)	EPA
	Annual Class I Nonhazardous UIC Mechanical Integrity Test (May)	EPA
	Q2 2019 CEMS Report (July)	SJVAPCD, EPA
	Q2 2019 Quarterly Operations Report (July)	CEC
	Q2 2019 Class I Nonhazardous UIC Quarterly Operations Report (July)	EPA
	1 st 2019 Report of Required Monitoring (July)	SJVAPCD, EPA
	Q2 2019 Quarterly Emissions Data Reporting (July)	EPA
	Annual Source Test/RATA Testing Protocol (October)	SJVAPCD, EPA
	Annual Source Test/RATA (November)	SJVAPCD, EPA
	Annual Source Test/RATA Report (December)	SJVAPCD, EPA
	Q3 2019 CEMS Report (October)	SJVAPCD, EPA
	Q3 2019 Quarterly Operations Report (October)	CEC
	Q3 2019 Class I Nonhazardous UIC Quarterly Operations Report (October)	EPA
	Q3 2019 Quarterly Emissions Data Reporting (October)	EPA

3.8 Additions to the On-Site Compliance File

All compliance submittals made during the reporting period have been added to the on-site compliance files. The Compliance Matrix in Appendix A identifies the submittals added to the compliance files during the reporting period.

3.9 On-Site Contingency Plan

Condition of Certification COM-12 required that the LEC On-Site Contingency Plan be reviewed annually and updated if necessary. The LEC On-Site Contingency Plan was reviewed on January 22, 2019 by Brooklyn Saylor, LEC Compliance Manager. No updates to the plan were needed. A copy of this plan has been provided as a separate electronic file submitted with the 2018 Annual Compliance Report.

3.10 Listing of Complaints, Notices of Violation, Official Warnings, and Citations

Condition of Certification COMPLIANCE-7 requires that the Annual Compliance Report include information related to any complaints, notices of violation, official warnings, and citations receiving during the reporting period. In addition, a description of any resolved complaints and the status of any unresolved complaints must be addressed in the Annual Compliance Report.

NCPA received one notices of violation for this reporting period and one official warnings/citations from a previous reporting period. NCPA also received two equipment breakdown reliefs by the San Joaquin Valley Air Pollution Control District (SJVAPCD) during this reporting period. Table 3.10-1 provides a summary list of these violations and breakdowns. Copies of the NOV, citation, correspondence and breakdowns relief letters are included in Appendix F.

Table 3.10-1
Notices of Violation Received During Reporting Period

Issued By	Type	Description
San Joaquin Valley Air Pollution Control District (SJVAPCD)	Equipment Breakdown	On 12/21/2018 at 12: 15A.M it was discovered that the data acquisition and handling system (DAHS) for Lodi Energy Center Unit CT1 (N-2697-5-3) was not adequately displaying CEMS data. Upon further investigation it was determined that the CEMS PLC Communication/Network card failed. Data was lost for the time period of the breakdown. Missing data substitution procedures will be followed. In follow-up to this issue, the NCPA technician is in process of procuring a new communication card for the CEMS PLC. 1/8/2019: SJVAPCD granted a breakdown relief for this incident.

San Joaquin Valley Air Pollution Control District (SJVAPCD)	Equipment Breakdown	On 12/3/2018 at 22:40 it was discovered that the data acquisition and handling system (DAHS) for Lodi Energy Center Unit CT1 (N-2697-5-3) was not adequately displaying CEMS data. Review of the system and analyzers showed that the emission monitors were still functioning. Further investigation revealed that the primary hard drive, followed by the secondary hard drive for the DAHS failed. At the time it was not thought to be a breakdown because the PLC/Analyzers continued to function. As the problem was diagnosed, at 12/4/18 at 09:30 AM it was discovered that a breakdown had occurred. During this time all CEMS data was still collected and stored on the PLC and fed to the emissions control equipment. The district indicated that their polling system was able to collect the data. On 12/6/2018 at 12:00PM Teledyne Monitor Labs was able to fully restore one of the hard drives enabling data collection and viewing on the DAHS. All missing data will be reconciled with data substitution procedures from the CFR. 1/8/2019: SJVAPCD granted a breakdown relief for this incident.
San Joaquin Valley Air Pollution Control District (SJVAPCD)	Permit Deviation-Exceedance	On 1/27/2018 at 03:00am the operator at Lodi Energy Center received an alarm indicating the CO ppmvd 3-hour rolling average was 2.2 ppmvd (0.2 ppmvd over the limit). Due to the operating schedule put out by Cal-ISO that day the unit was consistently changing loads which causes higher than normal CO levels. During this time Cal-ISO has external automatic generation control of the unit; the plant is not in control of the unit's load movements. The unit was able to regain compliance within the next operating hour. 2/27/2017: SJVAPCD did not grant a breakdown relief for this exceedance. CASE# N-18-0229 and NOV #5019524 were issued and paid in full.
San Joaquin County Environmental Health Department	Warning/Citation	10/7/2018: Received notice of citation for an outstanding violation from a 2016 inspection. Notice required for the facility address to be updated and new EPA ID to be issued by DTSC. 12/18/2018: Return to Compliance form was submitted.

Lodi Energy Center Annual Compliance Report

APPENDICES

Lodi Energy Center Annual Compliance Report

APPENDIX A: COM-7 COMPLIANCE MATRIX

LODI ENERGY CENTER OPERATIONS COMPLIANCE MATRIX
ANNUAL COMPLIANCE REPORT
January 1, 2018 - December 31, 2018

Cond. #	Sort Code	Description of Project Owner's Responsibilities	Verification/Action/Submittal Required by Project Owner	Timeframe	Date Due to CEC CPM	Date sent to CEC, CBO or agency
AQ-004	OPS	Notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR (AQ SC8).	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-005	OPS	The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-006	OPS	No air contaminant shall be released into the atmosphere which causes a public nuisance.	Make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	As required	As required	
AQ-016	OPS	The duration of startup or shutdown period shall not exceed 3.0 hours per event for any type of startup event (hot, warm, or cold).	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-017	OPS	The combined startup and shutdown duration for all events shall not exceed 6.0 hours during any one day.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-018	OPS	Maintain records of the date, start-up time, downtime for gas turbine and the steam turbine prior to startup, startup type, minute-by-minute turbine load (MW), and NO _x and CO concentrations (ppmvd @ 15% O ₂) measurement using CEMS, for each startup event in the first 12 months of operation following the end of the commissioning period.	Make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	As required	As required	
AQ-019	OPS	Submit proposed new time limits for each type of startup that reflect the effect of "Flex Plant 30" fast start-up technology. The proposed time limits shall be based on the required data collected in the first 12 months of operation following the end of the commissioning period. The submittal must include all CEMS data.	Submit info to the District, the CARB and the EPA.	Within 15 months of end of commissioning period	2/27/2014	Sent to SJVAPCD on 2/10/2014, Sent to CEC on 3/10/2014

AQ-020	OPS	A margin of compliance of 60 minutes (or less) may be added to the longest startup to establish a startup limit for each type of startup event (hot, warm, or cold). Established startup limit shall not exceed 3.0 hours.	Submit info to the District, the CARB and the EPA.	Within 15 months of end of commissioning period	2/27/2014	Sent to SJVAPCD on 2/10/2014, Sent to CEC on 3/10/2015
AQ-021	OPS	The District shall administratively establish appropriate startup times for each startup mode (hot, warm, or cold), and associated recordkeeping requirements.	Submit info to the District, the CARB and the EPA.	Within 15 months of end of commissioning period	2/27/2014	Sent to SJVAPCD on 2/10/2014, Sent to CEC on 3/10/2017
AQ-025	OPS	During start-up and shutdown periods, the emissions shall not exceed any of the following limits: NOx (as NO2) - 160.00 lb/hr; CO - 900.00 lb/hr; VOC (as methane) - 16.00 lb/hr; PM10 - 9.00 lb/hr; SOx (as SO2) - 6.10 lb/hr; or Ammonia (NH3) - 28.76 lb/hr.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-028	OPS	The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown.	Submit to the District and CPM the startup and shutdown event duration data demonstrating compliance with this condition as part of the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-029	OPS	Except during startup and shutdown periods, emissions from the gas turbine system shall not exceed any of the following limits: NOx (as NO2) - 15.54 lb/hr and 2.0 ppmvd @ 15% O2; CO - 9.46 lb/hr and 2.0 ppmvd @ 15% O2; VOC (as methane) - 3.79 lb/hr and 1.4 ppmvd @ 15% O2; PM10 - 9.0 lb/hr; or SOx (as SO2) - 6.10 lb/hr. NOx (as NO2) emission limits are based on 1-hour rolling average period. All other emission limits are based on 3-hour rolling average period.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
Cond. #	Sort Code	Description of Project Owner's Responsibilities	Verification/Action/Submittal Required by Project Owner	Timeframe	Date Due to CEC CPM	Date sent to CEC, CBO or agency
AQ-030	OPS	NH3 emissions shall not exceed any of the following limits: 10.0 ppmvd @ 15% O2 over a 24-hour rolling average period, and 28.76 lb/hr while gas turbine system operates.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018

AQ-032	OPS	Emissions from the gas turbine system, on days when a startup and/or shutdown occurs, shall not exceed the following limits: NOx (as NO2) - 879.7 lb/day; CO - 5,570.3 lb/day; VOC - 164.2 lb/day; PM10 - 216.0 lb/day; SOx (as SO2) - 146.4 lb/day, or NH3 - 690.3 lb/day. Daily emissions shall be compiled for a twenty-four hour period starting and ending at twelve-midnight.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-033	OPS	Emissions from the gas turbine system, on days when a startup and/or shutdown does not occur, shall not exceed the following: NOx (as NO2) - 373.0 lb/day; CO - 227.0 lb/day; VOC - 91.0 lb/day; PM10 - 216.0 lb/day; SOx (as SO2) - 146.4 lb/day, or NH3 - 690.3 lb/day. Daily emissions will be compiled for a twenty-four hour period starting and ending at twelve-midnight.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-034	OPS	Gas turbine system shall be fired on PUC-regulated natural gas with a sulfur content of no greater than 1.0 grain of sulfur compounds per 100 dscf of natural gas.	The result of the natural gas fuel sulfur monitoring data and other fuel sulfur content source data shall be submitted to the District and CPM in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-035	OPS	NOx (as NO2) emissions from the gas turbine system shall not exceed any of the following: 1Q: 38,038 lb; 2Q: 38,411 lb; 3Q: 37,126 lb; 4Q: 37,840 lb.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-036	OPS	CO emissions from the gas turbine system shall not exceed any of the following: 1Q: 142,312 lb; 2Q: 142,539 lb; 3Q: 86,374 lb; 4Q: 113,660 lb.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-037	OPS	VOC emissions from the gas turbine system shall not exceed any of the following: 1Q: 8,086 lb; 2Q: 8,177 lb; 3Q: 8,417 lb; 4Q: 8,323 lb.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-038	OPS	NH3 emissions from the SCR system shall not exceed any of the following: 1Q: 62,122 lb; 2Q: 62,812 lb; 3Q: 63,502 lb; 4Q: 63,502 lb.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-039	OPS	PM10 emissions from the gas turbine system shall not exceed any of the following: 1Q: 19,440 lb; 2Q: 19,656 lb; 3Q: 19,872 lb; 4Q: 19,872 lb.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-040	OPS	SOx (as SO2) emissions from the gas turbine system shall not exceed any of the following: 1Q: 13,176 lb; 2Q: 13,322 lb; 3Q: 13,469 lb; 4Q: 13,469 lb.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018

AQ-041	OPS	The total CO emissions from the gas turbine system (N-2697-5) and the auxiliary boiler (N-2697-7) shall not exceed 198,000 pounds in any 12-consecutive month rolling period.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR as required by AQSC-08.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-044c	OPS	Source testing shall be conducted using the methods and procedures approved by the District.	Submit source test results to the CEC CPM and District.	No later than 60 days following the source test	Unit N-2697-5-3 was tested on 9/26/18. All measured emissions were in compliance with the PTO. Due to CPM 11/25/18.	11/21/2018
Cond. #	Sort Code	Description of Project Owner's Responsibilities	Verification/Action/Submittal Required by Project Owner	Timeframe	Date Due to CEC CPM	Date sent to CEC, CBO or agency
AQ-046a	OPS	Source testing to measure start-up emission rates of NO _x , CO and VOC shall be conducted before the end of commissioning period and at least once every seven years thereafter. CEM relative accuracy for NO _x and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEM data is not certifiable to determine compliance with NO _x and CO startup emission limits, then startup and shutdown NO _x and CO testing shall be conducted every 12 months.	Submit results and field data collected during source tests to the District and CPM.	Within 60 days of testing	11/6/2012 Initial testing, next testing due during the 2019 RATA source testing.	
AQ-046b	OPS	Testing for startup and shutdown emissions shall be conducted upon initial operation.	Submit source test results to the CEC CPM and District.	Upon initial operation and at least once every 7 years	11/6/2012 Initial testing, next testing due during the 2019 RATA source testing.	
AQ-046c	OPS	Testing for startup and shutdown emissions shall be conducted at least once every seven years.	Submit source test results to the CEC CPM and District.	At least once every 7 years	11/6/2012 Initial testing, next testing due during the 2019 RATA source testing.	

AQ-047a	OPS	Source testing to determine compliance with the NO _x , CO, VOC, and NH ₃ emission rates (lb/hr and ppmvd @ 15% O ₂) and PM ₁₀ emission rate (lb/hr) shall be conducted before the end of commissioning period and at least once every 12 months thereafter.	Submit results and field data collected during source tests to the District and CPM according to a pre-approved protocol (AQ-44). Testing for steady-state emissions shall be conducted upon initial operation and at least once every 12 months.	Within 60 days of testing	Unit N-2697-5-3 was tested on 9/26/18. All measured emissions were in compliance with the PTO. Due to CPM 11/25/18.	11/21/2018
AQ-047b	OPS	Testing for steady state emissions shall be conducted upon initial operation.	Submit source test results to the CEC CPM and District.	Upon initial operation	11/6/2012 Initial testing, next testing due during the 2019 RATA source testing.	
AQ-047c	OPS	Testing for steady state emissions shall be conducted upon initial operation and at least once every seven years.	Submit source test results to the CEC CPM and District.	At least once every 7 years	11/6/2012 Initial testing, next testing due during the 2019 RATA source testing.	
AQ-050	OPS	Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D6228, D6667 or Gas Processors Association Standard 2377.	Results of the natural gas fuel sulfur monitoring data and other fuel sulfur content source data shall be submitted to the District and CPM in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018. A sample for analysis is also grabbed during the annual rata/source test by the testing company, and included in the Source Test Report. Gas sample was taken on 11/26/18 by Montrose and included the RATA/Source Test Report.
AQ-051	OPS	The results of each source test shall be submitted to the District within 60 days thereafter.	Submit the source test report of results to both the CEC and District.	Within 60 days of testing	Unit N-2697-5-3 was tested on 9/26/18. All measured emissions were in compliance with the PTO. Due to CPM 11/25/18.	11/21/2018

AQ-054	OPS	The NOx and O2 CEMS shall be installed and certified in accordance with the requirements of 40 CFR Part 75. The CO CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specification 4A (PS 4A), or shall meet equivalent specifications established by mutual agreement of the District, the CARB, and the EPA.	Submit to the CPM and APCO CEMS audits demonstrating compliance with this condition as part of the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-055	OPS	The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA.	Submit to the CPM and APCO CEMS audits demonstrating compliance with this condition as part of the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-056	OPS	The CEMS data shall be reduced to hourly averages as specified in §60.13(h) and in accordance with §60.4350, or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA.	Submit to the CPM and APCO the CEMS data reduced in compliance with this condition as part of the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-057	OPS	In accordance with 40 CFR Part 60, Appendix F, 5.1, each CO CEMS must be audited at least once each calendar quarter by conducting cylinder gas audits or relative accuracy audits. CGA or RAA may be conducted three of four calendar quarters, but no more than three calendar quarters in succession.	Submit the CEMS audits demonstrating compliance with this condition as part of the QOR to the CPM and APCO.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-058	OPS	The owner or operator shall perform RATA for NOx, CO and O2 as specified by 40 CFR Part 60, Appendix F, 5.1.1, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F.	Submit the CEMS audits demonstrating compliance with this condition as part of the QOR to the CPM and APCO.	Include info in QOR	30 days after end of quarter. Unit N-2697-5-3 was tested on 09/26/2018 RATA were in compliance with the PTO. Due to CPM 11/25/2018 Sent to District and CPM on 11/21/2018.	January 2018, April 2018, July 2018, October 2018

AQ-059	OPS	The NOx and O2 CEMS shall be audited in accordance with the applicable requirements of 40 CFR Part 75. Linearity reports shall be submitted along with QORs to the District.	Submit the CEMS audits demonstrating compliance with this condition as part of the QOR to the CPM and APCO.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
Cond. #	Sort Code	Description of Project Owner's Responsibilities	Verification/Action/Submittal Required by Project Owner	Timeframe	Date Due to CEC CPM	Date sent to CEC, CBO or agency
AQ-062	OPS	The owner or operator shall maintain the following records: the date, time and duration of any malfunction of the continuous monitoring equipment; dates of performance testing; dates of evaluations, calibrations, checks, and adjustments of the continuous monitoring equipment; date and time period which a continuous monitoring system or monitoring device was inoperative.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-064	OPS	Monitor Downtime is defined as any unit operating hour in which the data for NOx, CO2 or O2 concentrations is either missing or invalid.	No verification necessary.	None		
AQ-065	OPS	The owner or operator shall maintain records of the following items: 1) hourly and daily emissions, in pounds, for each pollutant listed in this permit on the days startup and or shutdown of the gas turbine system occurs, 2) hourly and daily emissions, in pounds, for each pollutant in this permit on the days startup and or shutdown of the gas turbine system does not occur, 3) quarterly emissions, in pounds, for each pollutant listed in this permit, and and 4) the combined CO emissions (12 consecutive month rolling total) in pounds, for permit unit N-2697-5 and N-2697-7.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-066	OPS	The owner or operator shall maintain a stationary gas turbine system operating log that includes, on a daily basis, the actual local startup and stop time, total hours of operation, the type and quantity of fuel used, mode of start-up (cold, warm, or hot), duration of each start-up, and duration of each shutdown.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-068	OPS	Submit a written report of CEM operations for each calendar quarter to the District. (See condition for list of specific items that need to be included in the report.)	Submit to the District and CPM the report of CEM operations, emission data, and monitor downtime data in the quarterly operation report (AQ-SC8) that follows the definitions of this condition.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018

AQ-069	OPS	Submit to the District information correlating the NOx control system operating parameters to the associated measured NOx output. The information must be sufficient to allow the District to determine compliance with the NOx emission limits of this permit when the CEMS is not operating properly.	Submit to the District and CPM the report of CEM operations, emission data, and monitor downtime data in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-089	OPS	Records and other supporting documentation shall be maintained as required to demonstrate compliance with the requirements of the rules under Regulation VIII only for those days that a control measure was implemented. Such records shall include the type of control measure(s) used, the location and extent of coverage, and the date, amount, and frequency of application of dust suppressant, manufacturer's dust suppressant product information sheet that identifies the name of the dust suppressant and application instructions. Records shall be kept for one year following project completion that results in the termination of all dust generating activities.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-091	OPS	The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR Part 75.	Make the site available for inspection by representatives of the District, ARB, and the CEC upon request.	As required	As required	
AQ-092	OPS	The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain program.	Make the site available for inspection by representatives of the District, ARB, and the CEC upon request.	As required	As required	
AQ-093	OPS	The owners and operators of each source and each affected unit at the source shall: (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.	Make the site available for inspection by representatives of the District, ARB, and the CEC upon request.	As required	As required	
AQ-094	OPS	Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.	No verification necessary.	None	None	

AQ-095	OPS	Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.	Make the site available for inspection by representatives of the District, ARB, and the CEC upon request.	As required	As required	
AQ-096	OPS	An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the calendar year for which the allowance was allocated.	Make the site available for inspection by representatives of the District, ARB, and the CEC upon request.	As required	As required	
Cond. #	Sort Code	Description of Project Owner's Responsibilities	Verification/Action/Submittal Required by Project Owner	Timeframe	Date Due to CEC CPM	Date sent to CEC, CBO or agency
AQ-097	OPS	An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.	No verification necessary.	None	None	
AQ-098	OPS	An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.	No verification necessary.	None	None	
AQ-099	OPS	The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR Part 77.	Submit to both the District and CPM the proposed offset plan as required by the federal rule.	As required	As required	
AQ-100	OPS	The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) Pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.	Make the site available for inspection by representatives of the District, ARB, and the CEC upon request.	As required	As required	

AQ-101	OPS	The owners and operators of the each affected unit at the source shall keep on site the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority: (i) The certificate of representation for the designated representative for the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site beyond such five-year period until such documents are superceded because of the submission of a new certificate of representation changing the designated representative.	Make the site available for inspection by representatives of the District, ARB, and the CEC upon request.	As required	As required	
AQ-102	OPS	The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority; (ii) All emissions monitoring information, in accordance with 40 CFR part 75; (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program.	Make the site available for inspection by representatives of the District, ARB, and the CEC upon request.	As required	Complete	3/30/12
AQ-103	OPS	The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 Subpart I.	Submit the Acid Rain Program Application to both the District and CPM.	Prior to first fire	11/9/12	5/6/09
AQ-108	OPS	Notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018

AQ-109	OPS	Notify the District in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-111	OPS	Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration.	The results of water recirculation rate and total dissolved solids concentration analysis data shall be included in the quarterly operation report (AQ-SC8).	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-113	OPS	The drift rate shall not exceed 0.0005%.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
Cond. #	Sort Code	Description of Project Owner's Responsibilities	Verification/Action/Submittal Required by Project Owner	Timeframe	Date Due to CEC CPM	Date sent to CEC, CBO or agency
AQ-114	OPS	PM10 emissions shall not exceed 22.4 pounds per day.	The results of water recirculation rate and total dissolved solids concentration analysis data shall be included in the quarterly operation report (AQ-SC8).	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-115	OPS	Compliance with the PM10 emission limit (lb/day) shall be demonstrated by using the following equation: Water Recirculation Rate (gal/day) x 8.34 lb/gal x Total Dissolved Solids Concentration in the blowdown water (ppm x 10E-06) x Design Drift Rate (%).	The results of water recirculation rate and total dissolved solids concentration analysis data shall be included in the quarterly operation report (AQ-SC8).	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-116	OPS	Compliance with PM10 emission limit shall be determined by blowdown water sample analysis by independent laboratory within 60 days after the end of commissioning period of the gas turbine system and at least once quarterly thereafter.	Use the results of water recirculation rate and total dissolved solids concentration analysis data to determine emissions (lb/day and grains/dscf) and the results shall be included in the quarterly operation report (AQ-SC8).	60 days after end of commissioning	1/28/13	10/30/12
AQ-123	OPS	Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration.	Submit the results of fuel sulfur content analysis to both the District and CPM in accordance with AQ-48.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-124	OPS	The unit shall only be fired on PUC-regulated natural gas.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-127	OPS	The owner or operator shall keep records of the natural gas fuel combusted in the boiler on daily basis.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018

AQ-128	OPS	The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-129	OPS	The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-130	OPS	NO _x (as NO ₂) emissions shall not exceed 7.0 ppmvd @ 3% O ₂ .	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-131	OPS	CO emissions shall not exceed 50 ppmvd @ 3% O ₂ .	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-132	OPS	VOC (as CH ₄) emissions shall not exceed 10.0 ppmvd @ 3% O ₂ .	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-133	OPS	PM ₁₀ emissions shall not exceed 0.0076 lb/MMBtu.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
Cond. #	Sort Code	Description of Project Owner's Responsibilities	Verification/Action/Submittal Required by Project Owner	Timeframe	Date Due to CEC CPM	Date sent to CEC, CBO or agency
AQ-134	OPS	SO _x emissions shall not exceed 0.00285 lb/MMBtu.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-135	OPS	NO _x (as NO ₂) emissions from this unit shall not exceed any of the following: 1Q: 310 lb; 2Q: 310 lb; 3Q: 310 lb; 4Q: 310 lb.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-136	OPS	CO emissions from this unit shall not exceed any of the following: 1Q: 1,348 lb; 2Q: 1,348 lb; 3Q: 1,348 lb; 4Q: 1,348 lb.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018

AQ-137	OPS	VOC emissions from this unit shall not exceed any of the following: 1Q: 154 lb; 2Q: 154 lb; 3Q: 154 lb; 4Q: 154 lb.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-138	OPS	PM10 emissions from this unit shall not exceed any of the following: 1Q: 277 lb; 2Q: 277 lb; 3Q: 277 lb; 4Q: 277 lb.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-139	OPS	SOx (as SO2) emissions from this unit shall not exceed any of the following: 1Q: 104 lb; 2Q: 104 lb; 3Q: 104 lb; 4Q: 104 lb.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-140	OPS	The total CO emissions from the gas turbine system (N-2697-5) and the auxiliary boiler (N-2697-7) shall not exceed 198,000 pounds in any 12-consecutive month rolling period.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-143c	OPS	Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months.	Testing for steady-state emissions shall be conducted at least once every 12 months or every 36 months as specified by this condition.	Within 30 days of testing	Unit N-2697-5-3 was tested on 9/26/18 . All measured emissions were in compliance with the PTO. Due to CPM 11/25/18.	11/21/2018
AQ-151	OPS	Submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel's sulfur content.	Results of the natural gas fuel sulfur monitoring data and other fuel sulfur content source data shall be submitted to the District and CPM in the QOR (AQ-SC8).	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018. A sample for analysis is grabbed during the annual rata/source test by the testing company, and included in the Source Test Report.
AQ-152	OPS	Fuel sulfur content shall be determined using EPA Method 11 or EPA Method 15 or District, CARB and EPA approved alternative methods.	The result of the natural gas fuel sulfur monitoring data and other fuel sulfur content source data shall be submitted to the District and CPM in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018. A sample for analysis is grabbed during the annual rata/source test by the testing company, and included in the Source Test Report.

AQ-153	OPS	The permittee shall monitor and record the stack concentration of NO _x , CO, and O ₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications given in District Policy SSP-1105. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within five days of restarting the unit unless monitoring has been performed within the last month.	The results of the boiler stack emission monitoring data shall be summarized and submitted to the District and CPM in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
Cond. #	Sort Code	Description of Project Owner's Responsibilities	Verification/Action/Submittal Required by Project Owner	Timeframe	Date Due to CEC CPM	Date sent to CEC, CBO or agency
AQ-154	OPS	If either the NO _x or CO concentrations corrected to 3% O ₂ , as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than one hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after one hour of operation after detection, the permittee shall notify the District within the following one 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.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR. The results of the boiler stack emission monitoring data shall also be summarized and submitted to the District and CPM in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018

AQ-155	OPS	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.	Provide a protocol for any alternate monitoring parameters at least 60 days prior to implementing alternate monitoring procedures. The results of the boiler stack emission monitoring data shall be summarized and submitted to the District and CPM in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-156	OPS	The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (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.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-157	OPS	The permittee shall maintain daily records of the type and quantity of fuel combusted by the boiler.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-158	OPS	The permittee shall maintain records of: (1) the date, (2) heat input rate, MMBtu/day, (3) daily emissions (lb/day) for each pollutant listed in this permit, and (4) quarterly emissions (lb) for each pollutant listed in this permit and the combined CO emissions (12 consecutive month rolling total) in pounds, for permit unit N-2697-5 and N-2697-7.	A summary of significant operation and maintenance events and monitoring records required shall be included in the QOR.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
AQ-SC08	OPS	Submit Quarterly Operation Reports (QOR) that include operational and emissions information as necessary to demonstrate compliance with the conditions of certification. The QOR shall specifically note or highlight incidences of noncompliance.	Submit QOR to the CPM and APCO. This information shall be maintained on site for a minimum of five years and shall be provided to the CPM and District personnel upon request.	Include info in QOR	30 days after end of quarter	January 2018, April 2018, July 2018, October 2018
BIO-05d	OPS	Keep signed WEAP statements in project files.	During project operation, signed statements for active project operational personnel shall be kept on file for six months following the termination of an individual's employment.	As required	As required	

COM-07	OPS	Submit an Annual Compliance Report which is due for each year of commercial operation and is due to the CPM each year at a date agreed to by the CPM. Annual Compliance Reports shall be submitted over the life of the project unless otherwise specified by the CPM. Each Annual Compliance Report shall include the AFC number, identify the reporting period and shall contain the items listed in the condition.	Submit to CPM on an annual basis	Annually	As required	Jan-18
COM-10	OPS	Report and provide copies to the CPM of all complaint forms, including noise and lighting complaints, notices of violation, notices of fines, official warnings, and citations. Complaints shall be logged and numbered. Noise complaints shall be recorded on the form provided in the NOISE Conditions of Certification. All other complaints shall be recorded on the complaint form (Attachment A).	Provide documentation to the CPM as required.	Annually	As required	Jan-18
Cond. #	Sort Code	Description of Project Owner's Responsibilities	Verification/Action/Submittal Required by Project Owner	Timeframe	Date Due to CEC CPM	Date sent to CEC, CBO or agency
COM-11	OPS	Submit a proposed facility closure plan to the CEC for review and approval prior to commencement of closure activities. The plan shall discuss the items specified in the condition.	File 120 copies (or other number of copies agreed upon by the CPM) of a proposed facility closure plan with the CEC.	at least 12 months prior to start of closure activities	As required	
COM-12b	OPS	In the event of an unplanned temporary closure, the project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan. The project owner shall keep the CPM informed of the circumstances and expected duration of the closure.	Notify the CPM and other agencies as required.	Within 24 hours of unplanned temporary closure	As required	
COM-12c	OPS	If the CPM determines that an unplanned temporary closure is likely to be permanent, or for a duration of more than 12 months, a closure plan consistent with the requirements for a planned closure shall be developed and submitted to the CPM.	Develop and submit the closure plan to the CPM.	Within 90 days of CPM's determination	As required	
COM-12c	OPS	As part of the ACR, review the on-site contingency plan, and recommend changes to bring the plan up to date. Any changes to the plan must be approved by the CPM.	Include any recommended changes to the contingency plan as part of the ACR.	Annually	Include in ACR	January 2018

COM-13a	OPS	The on-site contingency plan required for unplanned temporary closure shall also cover unplanned permanent facility closure. All of the requirements specified for unplanned temporary closure shall also apply to unplanned permanent closure. In addition, the on-site contingency plan shall address how the project owner will ensure that all required closure steps will be successfully undertaken in the event of abandonment.	In the event of an unplanned permanent closure, the project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail and shall take all necessary steps to implement the on-site contingency plan. The project owner shall keep the CPM informed of the status of all closure activities.	Within 24 hours of unplanned permanent closure	As required	
COM-13b	OPS	Prepare a closure plan, consistent with the requirements for a planned closure.	Submit the closure plan to the CPM.	Within 90 days of permanent closure	As required	
COM-14	OPS	Post-Certification Changes to the Decision--see Condition for detailed information on what constitutes and how to prepare a post-licensing change to the CEC Final Decision.	As required	As required	As required	2/21/2018: Received permit clarification letter from CEC interpreting 14 days as 336 operating hours.
GEN-01c	OPS	Once the certificate of occupancy has been issued, the project owner shall inform the CPM at least 30 days prior to any construction, addition, alteration, moving, demolition, repair, or maintenance being performed on any portion(s) of the completed facility that requires CBO approval for compliance with the above codes. The CPM shall then determine if the CBO needs to approve the work.	The CPM shall then determine if the CBO needs to approve the work.	At least 30 days prior to such work	As required	
HAZ-01	OPS	The project owner shall not use any hazardous materials not listed in ATTACHMENT A on page 183 of the condition, or in greater quantities or strengths than those identified by chemical name in ATTACHMENT A, unless approved in advance by the CPM.	Provide to the CPM, in the Annual Compliance Report, a list of hazardous materials contained at the facility.	Annually	Include in ACR	January 2018
HAZ-06b	OPS	Include a statement that all current project employee and appropriate contractor background investigations have been performed, and that updated certification statements have been appended to the operations security plan. Also include a statement that the operations security plan includes all current hazardous materials transport vendor certifications for security plans and employee background investigations.	Provide information for inclusion in the ACR.	Annually	Include in ACR	January 2018

NOISE-02	OPS	Throughout the construction and operation of the project, document, investigate, evaluate, and attempt to resolve all project-related noise complaints. Noise Complaint Resolution process will be used.	File a Noise Complaint Resolution Form with the City and the CPM documenting resolution of the complaint. If mitigation is required to resolve a complaint, and the complaint is not resolved within a three-day period, the project owner shall submit an updated Noise Complaint Resolution Form when the mitigation is implemented.	Within 5 days of receiving a noise complaint	As required	
NOISE-04b	OPS	Submit a summary report of the survey to the CPM. Included in the survey report shall be a description of any additional mitigation measures necessary to achieve compliance with the above listed noise limit, and a schedule, subject to CPM approval, for implementing these measures. When these measures are in place, the project owner shall repeat the noise survey.	Submit required info to the CPM.	Within 15 days after completing noise survey	3/14/13	3/13/13
NOISE-05	OPS	Conduct an occupational noise survey to identify the noise hazardous areas in the facility when plant reaches 85% of rated capacity or greater	Prepare a report of the survey results and, if necessary, identify proposed mitigation measures that will be employed to comply with the applicable California and federal regulations.	Within 30 days after completing survey	2/27/13	4/29/13
PAL-06	OPS	Through the designated PRS, ensure that all components of the PRMMP are adequately performed (see list of activities included in Condition).	Maintain in compliance file copies of signed contracts or agreements with the designated PRS and other qualified research specialists. Maintain these files for a period of three years after completion and approval of the CPM-approved PRR required by PAL-07.	As required	Annually	No activities conducted in 2018 requiring PRS activity
Cond. #	Sort Code	Description of Project Owner's Responsibilities	Verification/Action/Submittal Required by Project Owner	Timeframe	Date Due to CEC CPM	Date sent to CEC, CBO or agency
SOIL & WATER-04	OPS	Comply with the requirements of the General National Pollutant Discharge Elimination System (NPDES) Permit for Discharges of Storm Water Associated with Industrial Activity (WQO 97-03-DWQ).	Develop and submit an Industrial SWPPP for the operation of the LEC. submit copies to the CPM of all correspondence between the project owner and the Central Valley Regional Water Quality Control Board regarding the industrial SWPPP within 10 days of its receipt or submittal.	Prior to commercial ops	Complete	RWQCB granted NCPA application for Exemption on 7/3/12
SOIL & WATER-07f	OPS	Ensure compliance with all county water well standards and requirements for the life of the existing pumping well and any new pumping wells	Provide CPM with 2 copies of all monitoring or other reports required for compliance with the SJCEHD's water well standards and operation requirements, as well as any changes made to the operation of the well.	As required	As required	

SOIL & WATER-07g	OPS	The project owner shall not use potable water as an emergency backup supply for more than 14 calendar days of plant operation without CPM approval.	If potable water is needed as an emergency backup supply for more than 14 days, obtain CEC approval in advance.	As required	As required	
SOIL & WATER-08b	OPS	Metering devices shall be operation for life of project.	Submit a water use summary report to the CPM in the annual compliance report for the life of the project. Also provide a report on the servicing, testing, and calibration of the metering devices.	Annually	Include in ACR	January 2018
SOIL & WATER-9b	OPS	Provide the annual monitoring report summary required by the UIC Class I Permit and shall fully explain violations, exceedance, enforcement actions, or corrective actions related to permit compliance. Notify the CPM in writing of changes to the UIC Class I Permit that are instituted by either the project owner or USEPA Region IX including permit renewals.	Submit the required info to the CPM.	Annually	Include in ACR	January 2018
TLSN-02	OPS	Every reasonable effort will be made to identify and correct, on a case- specific basis, any complaints of interference with radio or TV signals from operation of the proposed line and associated switchyard.	Reports of line-related complaints shall be summarized for the project-related line and included during the first five years of plant operation in the Annual Compliance Report.	Annually	Include in ACR	January 2018
TLSN-04	OPS	Ensure that the rights-of-way of the proposed transmission line are kept free of combustible material, as required under the provisions of Section 4292 of the Public Resources Code and Section 1250 of Title 14 of the California Code of Regulations.	During the first five years of operation, the project owner shall provide a summary of inspection results and any fire prevention activities carried out along the right-of-way and provide such summaries in the Annual Compliance Report.	Annually	Include in ACR	January 2018
VIS-03b	OPS	Demonstrate that the cooling tower has consistently been operated to meet above-specified fogging frequency curve (except as necessary to prevent damage to the cooling tower). If determined that the cooling tower has not operated within the specified design parameters, the project owner shall provide proposed remedial actions for CPM review and approval.	Provide the CPM written documentation in the project's ACR and at anytime as requested by the CPM. If requested by the CPM, the project owner shall provide the requested cooling tower operating data to the CPM at a date determined by the CPM.	Annually	Include in ACR	January 2018
VIS-04d	OPS	Notify the CPM of any complaints re: lighting.	Submit a complaint resolution form to the CPM record each lighting complaint and document resolution of that complaint.	Within 48 hours after receiving a complaint	As required	

VIS-05c	OPS	Provide a status report regarding surface treatment maintenance in the Annual Compliance Report. The report shall specify (a): the condition of the surfaces of all structures and buildings at the end of the reporting year; (b) maintenance activities that occurred during the reporting year; and (c) the schedule of maintenance activities for the next year.	Include the required documentation in the ACR.	Annually	Include in ACR	January 2018
WASTE-06b	OPS	Document in each ACR the actual volume of wastes generated and the waste management methods used during the year; provide a comparison of the actual waste generation and management methods used to those proposed in the original Operation Waste Management Plan; and update the Operation Waste Management Plan as necessary to address current waste generation and management practices.	Submit the required documentation as part of the ACR.	Annually	Include in ACR	January 2018
WASTE-07	OPS	Ensure that the cooling tower sludge is tested pursuant to Title 22, California Code of Regulations, Division 4.5, section 66262.10.	Report findings in a report to the CPM. If two consecutive tests show that the sludge is non-hazardous, the project owner may apply to the CPM to discontinue testing.	No less than 60 days after start of project operations	5/1/13	1/6/13

Lodi Energy Center Annual Compliance Report

APPENDIX B: BIO-2 DESIGNATED BIOLOGIST REPORT

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Subject **Biology Section, 2018**

Project Name California Energy Commission Annual Compliance Report

Attention NCPA LEC Compliance Manager
 Brooklyn Saylor

From Rick Crowe/Jacobs
 Lodi Energy Center CEC Designated Biologist

Date January 22, 2019

Copies to Karen Parker/Jacobs Project Manager

1. Introduction

This Northern California Power Agency (NCPA) Lodi Energy Center (LEC) Biological Annual Compliance Report for 2018 fulfills the California Energy Commission (CEC) requirement in the Verification for Condition of Certification (COC) BIO-2, Sub-section 8. The Designated Biologist's duties as described in BIO-2, Sub-section 8 include maintaining written records of the tasks specified in the other subsections of BIO-2, as well as records of those requirements included in the Biological Resources Mitigation Implementation and Monitoring Plan (BRMIMP). Summaries of the records are required by the CEC to be submitted in the annual compliance report.

The LEC project was designed to avoid biological resources to the greatest extent feasible through development of mitigation and protection measures using informal consultation with the resources agencies (U.S. Fish and Wildlife Service, California Department of Fish and Wildlife), discussions with and participation in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJCMSHCOSP) and through coordination and communication with the CEC's staff.

The main construction phase of LEC occurred from August 2010 through February 2013. Restoration of the temporary laydown areas began in December 2012 and was completed in February 2013.

A Biological Resources Post-construction Compliance Monitoring Report (BIO-6, 7 and 8) was submitted to the CEC in April 2013. The report indicated that all construction-impacted areas had been restored to their natural condition.

2. Project Location

The LEC project site is on 4.4 acres of land owned and incorporated by the City of Lodi, 6 miles west of the Lodi City Center. The site is located adjacent to Interstate-5 approximately 1.7 miles south of State Route 12 (Figure 1). On the east side of the site is the City of Lodi's White Slough Water Pollution Control Facility (WPCF). The WPCF's treatment and holding ponds are located to the north. To the west is the 49-megawatt NCPA Combustion Turbine Project (STIG Plant), and further to the west is the Pacific Gas and Electric Company overhead 230 kilovolt electrical transmission line. The San Joaquin County Mosquito and Vector Control facility is located south of the project site.

3. Monitored Activities and Wildlife Interaction

Since completion of the LEC project, NCPA has followed the CEC COCs and had the Designated Biologist perform pre-disturbance surveys when necessary. In addition, NCPA has contacted the Designated Biologist to identify or capture and relocate wildlife discovered in harm's way or wildlife that could harm facility employees. All new employees and contract workers received Worker Environmental Awareness Program (WEAP) Training via video and lecture. The Designated Biologist (DB) remained on-call throughout the year.

The on-call monitoring and compliance efforts for the year 2018 are documented in chronological order below and in Appendix A, Site Photos.

March 1st, the DB received an e-mail from Brooklyn Saylor, the NCPA/LEC Compliance Manager regarding two dead bird observations that were made in February. The e-mail included photos of a dead barn owl (*Tyto alba*) that was observed outside the maintenance building lying on the ground on February 14th, Photo 1. The second observation took place on February 28th and was of a European starling (*Sturnus vulgaris*) that was observed on the ground near the LP Rotor Air Cooler, Photo 2. Both bird carcasses were disposed of. Also included in the e-mail was notification that Ms. Saylor would be on leave beginning March 9th returning in mid-May. In the interim Scott Sexton and Rafael Santana, LEC Operations and Maintenance Managers (OMM), would be reporting biological issues to the DB and assisting in arranging site visits.

March 20th, the DB received a call from Rafael Santana concerning a planned upcoming outage. The outage required the use of the contractor overflow parking area located directly south of the LEC main gate. This area has been used for contractor overflow parking during previous outages. The overflow parking area is an area where killdeer (*Charadrius vociferus*) typically nest in the spring. The outage was planned to begin on April 2nd and end on April 25th. The DB arranged to be on site on March 27th to conduct a pre-disturbance survey of the overflow parking area.

March 27th, the DB was on site to conduct a pre-disturbance nesting bird survey of the contractor overflow parking area and to survey the LEC plant site for active wildlife. The DB spent several hours observing the LEC contractor overflow parking area for nesting bird activities, Photos 3 and 4. Several killdeer were observed in the area but no nests were observed. An aquatic turtle was observed in the irrigation ditch that is south of the overflow parking area, Photo 5. The turtle slipped under the water before a positive identification could be made. The DB also walked through the LEC site looking for nesting birds or other wildlife, none were observed. Based on the large amount of killdeer activity observed in the overflow parking area, the DB informed Mr. Santana that he would be back on site on April 2nd.

April 2nd, the DB was on site to conduct a follow-up pre-disturbance survey of the contractor overflow parking area. The DB again spent several hours observing the parking lot and numerous killdeer were observed in the area mating and defending areas, but no nest sites were observed, Photo 6. Many other common species of birds were also observed in the parking area, but no nests were observed. The DB checked in with Mr. Santana and informed him that the contractor overflow parking area currently did not contain any nesting birds and that it could be used for contractor overflow parking.

April 4th, the DB was on site to conduct a follow-up nesting bird survey on the LEC contractor overflow parking area, Photo 7. The DB again spent several hours observing the parking lot and numerous killdeer were observed in the area mating and defending areas, but no nest sites were observed. Many other common species of birds were again observed in the parking area, but no nests were observed.

April 9th, the DB was on site to continue monitoring the LEC contractor overflow parking area. The DB observed a pair of killdeer mating in the southeast corner of the parking area, Photo 8. The DB investigated the area where the killdeer were mating and observed a small cupped nest on the ground containing 4-eggs, Photo 9. The DB informed LEC management of the nesting situation and then erected a cone barricade in the southeast corner of the overflow parking area, Photo 10. The barricaded

exclusion area was approximately 100-feet southeast of where contractors were parking. This 100-foot buffer was sufficient to protect the nest and adults attending to it.

April 16th, the DB was on site to follow up on the nesting killdeer and to survey for more nests. The DB observed a single adult killdeer on the nest within the exclusion zone, Photo 11. The DB surveyed the remainder of the parking area and no other nests were observed.

May 17th, the DB was contacted by Ms. Saylor, the LEC Compliance Manager, that she had returned from leave and she would be contacting the DB in the future for wildlife interactions.

May 22nd, the DB was on site to conduct a spring/summer site visit. The DB and LEC Compliance Manager walked around the LEC facility, the DB also alerted the Compliance Manager that it was turtle, snake and bird nesting season. While on site the DB removed the barricade/exclusion zone from the southeast corner of the contractor overflow parking area. The killdeer had completed nesting activities in that area.

June 15th, the DB received an e-mail from the LEC Compliance Manager, Ms. Saylor, reporting the finding of a dead house sparrow (*Passer domesticus*) by the gas filters and separators on June 7th, Photo 12. The dead bird carcass was disposed of. Also, on June 15th the DB received a second e-mail from Ms. Saylor reporting the observation of three more dead birds. Photo 13 is of a dead European starling that was observed near the CCW heat exchanger and steam turbine building. Photo 14 is of a dead unknown juvenile bird that appeared to have fallen out of a nest. This observation also took place by the CCW heat exchanger and steam turbine building. Photo 15 is of a dead pigeon (*Columba livia*) that was observed near the CTG generator breaker, the pigeon appeared to have been preyed on by a raptor. All three bird carcasses were disposed of.

November 20th, the DB received an e-mail from Ms. Saylor reporting the observation on November 13th of a dead pigeon on the north side of the STIG plant, Photo 16. Also reported was the observation of a house mouse (*Mus musculus*) within a box in the LEC administration building on November 19th, Photo 17. The house mouse was taken out to the field and released. The pigeon carcass was disposed of.

4. Conclusion

The Lodi Energy Center was in compliance with the biological mitigation and protection measures specified in the BRMIMP that were applicable to the facility during operating year 2018.

Appendix A

Site Photos



Photo 1. Barn owl carcass as observed outside of LEC maintenance shop. March 1, 2018.



Photo 2. European starling observed dead on ground below LP Rotor Cooler. February 14, 2018.



Photo 3. LEC contractor overflow parking area as observed prior to use, photo facing west. March 27, 2018.



Photo 4. LEC contractor overflow parking area as observed prior to use, photo facing east. March 27, 2018.



Photo 5. Aquatic turtle observed in canal south of LEC contractor overflow parking area. March 27, 2018.



Photo 6. Pair of killdeer observed mating just south of LEC contractors parking area. April 2, 2018.



Photo 7. LEC contractor overflow parking being utilized, photo taken facing west. April 4, 2018.



Photo 8. Pair of killdeer mating on canal road just south of LEC contractor overflow parking. April 9, 2018.



Photo 9. Killdeer nest with 4 eggs as observed within exclusion area in southeast corner of contractor overflow parking area. April 9, 2018.



Photo 10. Killdeer nest exclusion area in southeast corner of contractor overflow parking area. April 9, 2018.



Photo 11. Adult killdeer on nest as observed in southeast portion of contractor overflow parking area. April 16, 2018.



Photo 12. Photo of dead house sparrow reported by LEC site personnel. June 7, 2018.



Photo 13. Dead European starling as observed by LEC personnel near CCW Heat exchanger and Steam Turbine building. April 15, 2018.



Photo 14. Dead juvenile bird as observed by LEC personnel near CCW Heat exchanger and Steam Turbine building. April 15, 2018.



Photo 15. Dead pigeon carcass as observed by LEC personnel under CTG Generator breaker. April 15, 2018.



Photo 16. Dead pigeon carcass as observed by LEC personnel on north side of STIG water treatment building. November 13, 2018.



**Photo 17. Live house mouse found inside a box in the Administration Building.
November 19, 2018.**

Lodi Energy Center Annual Compliance Report

APPENDIX C: VIS-3 WRITTEN CERTIFICATION



12745 N. Thornton Road
Lodi, CA 95242

(209) 333-6370

www.ncpa.com

January 22, 2019

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

Subject: Lodi Energy Center (08-AFC-10)
Condition of Certification AQ-SC8
Submittal of CEC Air Quality Quarterly Operating Report

Dear Ms. Dyas,

Enclosed is the Quarterly Operating Report (QOR) for the 4th Quarter of 2018 pursuant to the requirements of Part AQ-SC8 of the California Energy Commission's (CEC's) Conditions of Certification for the Northern California Power Agency's (NCPA) Lodi Energy Center. This QOR contains four attachments, as listed below.

- Attachment 1: Summary table identifying each condition relevant to the scope of the QOR and the manner with which compliance is addressed within the QOR
- Attachment 2: Copy of the Quarterly CEMS Report submitted to the San Joaquin Valley Air Pollution Control District (SJVAPCD) pursuant to Part AQ-68 of the Conditions of Certification
- Attachment 3: Compliance summary identifying those conditions not covered by the Quarterly CEMS Report and their corresponding compliance status during the reporting period
- Attachment 4: Copy of Breakdown/Deviation Reports submitted to SJVAPCD pursuant to Part AQ-5 of the Conditions of Certifications and the Title V Permit to Operate

Please contact me at (209) 210-5000 if you have any questions regarding the Quarterly Operating Report.

Sincerely,

Michael DeBortoli
Plant Manager

Attachments

Lodi Energy Center Annual Compliance Report

APPENDIX D: WASTE-6 OPERATIONS WASTE MANAGEMENT PLAN

THERE WERE NO UPDATES TO THIS PLAN FOR THE REPORTING PERIOD.

GRENIER & ASSOCIATES, INC.

ENVIRONMENTAL PLANNING • LICENSING & PERMITTING • REGULATORY COMPLIANCE

June 19, 2012

Compliance Log #2012-015

Ms. Christine Stora
Compliance Project Manager
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814

Subject: Lodi Energy Center (08-AFC-10C)
Condition of Certification WASTE-6

Dear Ms. Stora:

In compliance with Condition of Certification WASTE-6 as set forth in the California Energy Commission's Final Decision for the Lodi Energy Center (LEC) Project, enclosed is an Operations Waste Management Plan for the LEC. If you have any questions regarding this submittal, please contact me at (916) 780-1171.

Sincerely,



Andrea Grenier
Environmental Compliance Manager
for the Lodi Energy Center Project

cc: Mike DeBortoli, NCPA





EY062008001SAC

June 2012

Submitted by



Submitted to

California Energy Commission

With Technical Assistance by

CH2MHILL

Report

Operational Waste Management Plan for the Lodi Energy Center Project

Prepared for
Northern California Power Agency

June 2012

CH2MHILL
2485 Natomas Park Drive, Suite 600
Sacramento, CA 95833

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Tables

2-1	Wastes Generated During Operations
2-2	Solid Waste Disposal Facilities near the LEC Project

Acronyms and Abbreviations

CO	carbon monoxide
DTSC	California Department of Toxic Substances Control
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
HRSG	heat recovery steam generator
LEC	Lodi Energy Center
LORS	laws, ordinances, regulations, and standards
MRF	material recovery facility
NCPA	Northern California Power Agency
Plan	operational waste management plan
SCR	selective catalyst reduction
STIG	steam injected gas turbine
STIG plant	NCPA Combustion Turbine Project #2
TSDF	treatment, storage, disposal facility
WPCF	White Slough Water Pollution Control Facility

Introduction

1.1 Purpose

The Lodi Energy Center (LEC) facility is a state-of-the-art, natural-gas-fired, combined-cycle nominal 296-megawatt power generation facility. Northern California Power Agency (NCPA) owns and operates the following facilities:

- The plant is in San Joaquin County adjacent to the City of Lodi's White Slough Water Pollution Control Facility (WPCF) to the east
- Treatment and holding ponds associated with the WPCF to the north
- The existing 49-megawatt NCPA Combustion Turbine Project #2 (STIG plant¹) to the west
- The San Joaquin County Mosquito and Vector Control facility to the south

This operational waste management plan (Plan), which is required pursuant to Condition of Certification WASTE-6, identifies the expected waste streams and describes the waste management procedures to be used to maximize diversion and reduce the quantity of waste requiring disposal. The Plan specifically addresses the generation and characterization of waste, onsite storage and handling, waste discharge, offsite shipment, and disposal of solid and liquid wastes, including sanitary waste that is generated during operations at the project site.

1.2 Project Summary

The LEC is located on a 4.4-acre site at 12751 North Thornton Road, Lodi, California, adjacent to the existing STIG plant. The LEC includes plant facilities, a natural-gas-fired combustion turbine-generator, a 7-cell cooling tower, selective catalytic reduction (SCR) systems, transmission facilities, and pipelines.

1.3 Responsibilities

The Plant Manager will have overall responsibility for adherence to operational waste management practices at the LEC, including responsibility for implementing, monitoring, and reporting the status of waste management practices at the LEC. The Plant Manager will also be responsible for ensuring that all employees are in compliance with state and federal regulatory requirements for wastes generated during operations, including nonhazardous wastes, hazardous wastes, and any special wastes destined for recycling (such as used oil and drained used oil filters) that are generated by the LEC project.

¹ "STIG plant" refers to the NCPA Combustion Turbine Project, which is a steam injected gas turbine (STIG) plant.

All personnel will adhere to and implement waste handling procedures as set forth in this Plan for the life of the project. Employees will be required to properly label, store, and segregate waste until time of disposal.

SECTION 2

Waste Management Requirements

All solid and liquid wastes generated at the LEC must be classified as either hazardous or nonhazardous. The majority of the operational wastes will be nonhazardous solid waste (CH2M HILL, 2008). However, nonhazardous liquid waste, as well as varying quantities of both solid and liquid hazardous waste, will also be generated periodically.

2.1 Waste Generation

The types of wastes and their estimated quantities to be generated during LEC facility operation are discussed in the following subsections. Table 2-1 summarizes the anticipated operation waste streams, estimated waste quantities, and proposed disposal methods.

TABLE 2-1
Wastes Generated During Operations

Waste	Origin	Composition	Estimated Quantity	Classification	Disposal
Office waste (paper, wood, glass, plastics, traditional "waste")	Office/ operations	Paper, packing material	4-yard dumpster weekly	Nonhazardous municipal waste	Local municipal trash pickup
Universal Waste	Office/ Operations	Fluorescent lamps, small batteries	200 pounds per year	Universal Waste	Recycle if possible, or dispose at approved landfill.
Cooling tower sludge	Cooling tower	Dirt from air	2,000 lb/yr	Hazardous/ nonhazardous*	TSDF facility if hazardous; if nonhazardous, to landfill
Lubricating oil	Small leaks and spills from the gas turbine lubricating oil system	Hydrocarbons	300 lb/yr	Hazardous	Cleaned up using sorbent and rags – disposed of by certified oil recycler
Batteries	Equipment	Metals	50 lb/yr	Hazardous	Recycled by certified recycler
Lubricating oil filters	Gas turbine lubricating oil system	Paper, metal, and hydrocarbons	600 lb/yr	Hazardous	Recycled by certified oil recycler
Laboratory analysis waste	Water treatment	Various agents and reagents	400 gal/yr	Hazardous	Recycled by certified recycler
HRSG/CO catalyst units	HRSG (Use tends to be 3 to 5 years)	Metal and heavy metals, including vanadium	420,000 gallons (every 10 years)	Hazardous	Recycled by manufacturer

TABLE 2-1
Wastes Generated During Operations

Waste	Origin	Composition	Estimated Quantity	Classification	Disposal
Oily rags	Maintenance, wipe-down of equipment, etc.	Hydrocarbons, cloth	One 55-gallon container (monthly)	Hazardous	Recycled by certified oil recycler
Oil sorbents	Cleanup of small spills	Hydrocarbons	150 lb/yr	Hazardous	Recycled or disposed of by certified oil recycler
Turbine washwater	Turbine cleaning	Water and biodegradable detergent possibly heavy metals	1,000 gallons (biannually)	Hazardous/nonhazardous*	TSDF facility is hazardous, if nonhazardous to WPCF
Waste Clarifier Filter Cake	Water treatment process	Concentrated waste water	18,700 lb/day	Hazardous/nonhazardous*	TSDF facility if hazardous; if nonhazardous, to landfill

* = Generally, nonhazardous will be sampled prior to disposal.

CO = carbon monoxide

HRSG = heat recovery steam generator

2.1.1 Nonhazardous Solid Waste

The LEC will produce facility wastes that are typical of power generation facility operations and maintenance activities, including rags, turbine air filters, broken and rusted metal and machine parts, defective or broken electrical materials, empty containers, typical refuse generated by workers and small office operations, and other miscellaneous solid wastes. The quantity of all solid nonhazardous waste generated is estimated to be approximately 39 tons per year (CEC, 2010).

In addition, the LEC water treatment process will produce a concentrated clarifier filter cake waste. The filter cake is produced when the water treatment process treats all incoming water through a clarifier. The concentrated waste stream produced by the clarifier is fed to a filter press, where the press produces a waste cake in dumpsters below the process. The material is expected to be nonhazardous but will be tested as needed to determine proper disposal. If nonhazardous, the filter cake will be disposed of at an appropriate landfill. It is anticipated that approximately 18,700 pounds per day (9.9 cubic yards per day) will be produced during the summer. Large metal parts, office paper, aluminum cans, plastic containers, and other nonhazardous wastes will be recycled to the maximum extent practical.

2.1.2 Nonhazardous Liquid Waste

Nonhazardous liquid waste will consist mainly of wastewater. The project will discharge up to 225 gallons per minute (gpm) of nonhazardous process wastewater to an onsite Class I injection well. Presently, NCPA owns and operates a Class I injection well for wastewater injection at the STIG plant, and a second injection well has been permitted and constructed

for use at the LEC. The process wastewater will consist of tertiary treated makeup water and other recovered process wastewater streams. Process wastewater will be collected in the wastewater discharge tank and conveyed through pipeline to the well pad for injection at a maximum rate of 225 gpm (CEC, 2010).

The primary onsite wastewater collection system will collect drainage from the containment area wash down drains, sample drains, and equipment drains. Wastewater from the areas will be collected in a system of hub drains, sumps, and piping for routing to the cooling tower through a process oil/water separator. The cooling tower blowdown water combined with the wastewater from the equipment and containment drains will go through a filtration system prior to testing and discharge to the injection well. If contamination is present, the water will be trucked offsite for disposal at an approved wastewater disposal facility. Washwater from the combustion turbine will be collected in holding tanks or sumps for offsite disposal at an approved wastewater disposal facility (CEC, 2010).

Stormwater not collected in the wastewater collection system will go through a stormwater oil/water separator and then will be discharged to the WPCF.

The secondary wastewater collection system will collect sanitary waste from sinks, toilets, showers, and other sanitary facilities for discharge to the WPCF through an existing connection in the utility corridor that serves the STIG facility (CEC, 2010).

2.1.3 Hazardous Waste

Hazardous waste generated will include waste lubricating oil, used oil filters from turbine equipment, spent catalyst, and chemical cleaning wastes. The catalyst units will contain heavy metals that are considered hazardous. Chemical cleaning wastes, consisting of alkaline and acidic cleaning solutions, will be generated from periodic cleaning of the piping. The wastes may contain high concentrations of heavy metals and will be collected for offsite disposal. Approximately 3 tons of solid hazardous waste will be generated during operations each year (CEC, 2010).

The chemical feed area drains will collect spillage, tank overflows, effluent from maintenance operations, and liquid from area washdowns. Water collected will be sampled and, if it is not contaminated, routed back to the cooling tower directly or routed back to the mix tank at the start of the water treatment process where it will be cleaned and used again. The quantity of effluent is expected to be minimal.

2.2 Waste Disposal Sites

The disposition of nonhazardous solid waste (often referred to as solid waste, municipal solid waste, or refuse) will be through recycling, or, if the waste is not recyclable, it will be disposed of in a Class III landfill. Potential nonhazardous solid waste disposal facilities are described below and summarized in Table 2-2. Wastes identified as hazardous or potentially hazardous must be segregated and managed separately from other wastes.

TABLE 2-2
Solid Waste Disposal Facilities near the LEC Project

Landfill/MRF/ Transfer Station	Location	Class	Permitted Capacity* (cubic yards)	Remaining Capacity* (cubic yards)	Permitted Throughput* (tons per day)	Estimated Closure Date*	Violation of Minimum State Standards Noted*
North County Recycling Center and Sanitary Landfill	Victor, CA	III	41,200,000	35,400,000	825	12/31/2048	Yes ^a
Foothill Sanitary Landfill	Linden, CA	III	138,000,000	125,000,000	1,500	12/31/2082	Yes ^b
Lovelace Materials Recovery Facility and Transfer Station	Manteca, CA	NA	1,959 tons/day	NA	1,300	Not Listed	No

*Based on CalRecycle Solid Waste Information System Database (CalRecycle, 2012)

MRF = material recovery facility

NA = not applicable

^aTwo violations in 2009 for Vector & Bird Control and Daily Cover. One violation in 2010 for Monitored Parameters. Two violations in 2011 for Grading of Fill Surfaces and Lighting.

^bTwo violations in 2009 for Daily Cover. One violation in 2010 for Monitored Parameters. One violation in 2011 for Daily Cover.

2.2.1 Nonhazardous Waste

Nonhazardous solid waste or refuse will be collected and deposited in a local landfill (Table 2-2). Whenever possible, recycling will be implemented throughout the facility to minimize the quantity of nonhazardous waste that must be disposed of in a landfill.

The City of Lodi contracts with Waste Management to provide local service for residential and commercial solid waste hauling, as well as the collection of recyclable materials. San Joaquin County owns two landfills, the North County Recycling Center and Sanitary Landfill and Foothill Sanitary Landfill, and one material recovery facility (MRF) and transfer station, Lovelace MRF and Transfer Station. The County operates North County Landfill and Lovelace MRF, while Foothill Inc. operates the Foothill Landfill (San Joaquin County, 2012).

The North County Recycling Center and Sanitary Landfill is located at 17900 East Harney Lane in Victor, California (95240), approximately 20 miles from the LEC site. As an active solid waste landfill, North County accepts mixed municipal, construction and demolition debris, industrial waste, tires, other designated, agricultural waste, metals, and wood waste. The disposal area currently covers 185 acres, and the entire facility comprises 320 acres (CalRecycle, 2012). The North County Recycling Center and Sanitary Landfill has adequate capacity to handle and dispose of solid waste generated by the LEC facility, as shown in Table 2-2. The other landfills included in Table 2-2, Foothill Sanitary Landfill and Lovelace Materials Recovery Facility and Transfer Station, are alternatives to the North County Recycling Center and Sanitary Landfill.

The Foothill Sanitary Landfill is located at 6484 North Waverly Road, approximately 30 miles east of the LEC project site, near Linden. Foothill Sanitary Landfill has been owned by San Joaquin County since 1993. Foothill Sanitary is the destination of wastes from Lovelace MRF and Transfer Station (San Joaquin County, 2012). As an active solid waste landfill, Foothill Sanitary accepts mixed municipal, construction and demolition debris, industrial waste, tires, agricultural waste, dead animals, and wood waste. The disposal area currently covers 674 acres, and the entire facility comprises 800 acres (CalRecycle, 2012).

According to CalRecycle, the combined capacity of the North County Landfill and Foothill Sanitary Landfill is 179.2 million cubic yards of refuse and the estimated combined remaining capacity of approximately 160.4 million cubic yards of refuse. According to CalRecycle, North County Landfill had two violations in 2009 for Vector & Bird Control and Daily Cover, one violation in 2010 for Monitored Parameters, and two violations in 2011 for Grading of Fill Surfaces and Lighting. At the Foothill Sanitary Landfill, there were two violations in 2009 and one in 2011 for Daily Cover, and one violation in 2010 for Monitored Parameters (CalRecycle, 2012).

2.2.2 Hazardous Waste Disposal

NCPA is registered with the U.S. Environmental Protection Agency (EPA) as a Hazardous Waste Generator and has a hazardous waste identification number for removal and disposal of hazardous wastes. The number is kept on file at the project site pursuant to Condition of Certification WASTE-4.

Hazardous waste generated at the LEC facility will be stored at the facility for less than 90 days. The waste will then be transported to a treatment, storage, and disposal facility by a permitted hazardous waste transporter. The facilities vary considerably in what they can do with the hazardous waste they receive. Some can only store waste, some can treat and stabilize the waste to recover usable products, and others can dispose of the waste by incineration, deep-well injection, or landfilling. However, incineration and deep-well injection of the materials are not permitted in California.

According to the California Department of Toxic Substances Control (DTSC), 54 facilities in California can accept hazardous waste for treatment or recycling (DTSC, 2012). For ultimate disposal, California has the three hazardous waste (Class I) landfills, described in the following subsections. The closest commercial hazardous waste disposal facility is the Waste Management Kettleman Hills Landfill.

NCPA will retain receipts, hazardous waste manifests, and waste analysis records for the disposal of all wastes in the project records for the life of the facility.

Waste Management Kettleman Hills Landfill

The facility accepts Class I and II waste. The B-18 landfill is permitted for and will accept all hazardous wastes except radioactive, medical, and unexploded ordinance. Currently, B-18 landfill phase 1 and 2 are in operation with a permitted capacity of 10.7 million cubic yards. B-18 phase 1 and 2 are near capacity, but B-18 phase 3 will be opening with a permitted capacity of approximately 5 million cubic yards and a life expectancy of 8 years (Henry, 2012). After B-18 closes, a new B-20 landfill will be opened on currently undeveloped land on the site. B-20 has a permitted capacity of 15 million cubic yards and a life expectancy of

24 years (Henry, 2012). As a whole, Kettleman Hills Landfill will be accepting waste for the next 32 years, until 2044. However, it is continuously searching for more expansion opportunities (Henry, 2012).

Clean Harbors Buttonwillow Landfill

The landfill is permitted at 13.1 million cubic yards and can accept 4,050 tons per day (Linton, 2012). The landfill is permitted to accept waste until 2040 (CalRecycle, 2012). Buttonwillow has been permitted to manage a wide range of hazardous wastes, including Resource Conservation and Recovery Act hazardous wastes, California hazardous waste, and nonhazardous waste for stabilization treatment, solidification, and landfill. It can handle waste in bulk (solids and liquids) and in containers. Typical waste streams include nonhazardous soil, California hazardous soil, hazardous soil for direct landfill, hazardous waste for treatment of metals, plating waste, hazardous and nonhazardous liquid, and debris for microencapsulation (Clean Harbors, 2012).

Clean Harbors Westmoreland Landfill

The facility is not currently open and accepting waste because the Buttonwillow facility can accommodate the current hazardous waste generation rate. The facility is, however, available in reserve and could be reopened if necessary. The landfill's conditional use permit prohibits the acceptance of some types of waste, including radioactive (except geothermal) waste, flammables, biological hazard waste (medical), polychlorinated biphenyls, dioxins, air- and water-reactive wastes, and strong oxidizers.

Additional Facilities

In addition to hazardous waste landfills, numerous offsite commercial liquid hazardous waste treatment and recycling facilities exist in California. Some of the closest facilities include the following: Clean Harbors, LLC, in San Jose; Evergreen Environmental Services in Davis; Evergreen Oil Company in Newark; Ramos Environmental Services in West Sacramento; and Veolia Environmental Services in Richmond (DTSC, 2012).

Waste Management Methods and Mitigation

3.1 Waste Accumulation, Storage, Transportation, and Disposal

The handling and management of waste generated by the LEC will follow the hierarchical approach of source reduction, recycling, treatment, and disposal. The first priority will be to reduce the quantity of waste generated through pollution prevention methods (such as high-efficiency cleaning methods). The next level of waste management will involve reusing or recycling wastes (for instance, used oil recycling). For wastes that cannot be recycled, treatment will be used when possible to make the waste nonhazardous (for instance, by neutralization). Finally, offsite disposal will be used to dispose of residual wastes that cannot be reused, recycled, or treated.

Good housekeeping practices will be implemented and maintained at work locations and temporary waste storage areas. The practices include providing the appropriate type, size, and number of containers to store all waste generated. Waste collection/management will be monitored onsite to ensure that only acceptable wastes are deposited for disposal and that sufficient containers are available and maintained in accordance with good housekeeping practices.

The following subsections present methods for managing both nonhazardous and hazardous waste generated by the LEC.

3.1.1 Nonhazardous Wastes

Whenever applicable, recycling will be implemented throughout the facility. Nonhazardous solid waste or refuse that cannot be recycled will be collected and deposited in a local landfill (see Table 2-2). Wastewater from facility sinks and toilets will be discharged to the sanitary sewer.

Onsite, the waste to be landfilled will be placed in a yard dumpster for weekly pickup by a waste disposal contractor. Recycling containers will be evaluated for aluminum cans, glass bottles, plastic bottles, office paper, cardboard, and other recyclable materials. A certified hauler will be used to transport the waste to an approved disposal site.

3.1.2 Hazardous Wastes

To avoid the potential effects on human health and the environment from handling and disposing of hazardous wastes, procedures will be developed to ensure proper labeling, storage, packaging, recordkeeping, and disposal of all hazardous wastes. The following general procedures will be employed:

- The LEC is classified as a hazardous waste generator and has a site-specific EPA identification number that is used to manifest hazardous waste from the LEC facility. Hazardous waste from the LEC facility will be stored onsite for less than 90 days before offsite disposal, treatment, or recycling.

- Hazardous wastes will be accumulated at the facility according to the California Code of Regulations Title 22 requirements for satellite accumulation.
- Hazardous wastes will be stored in appropriately segregated storage areas surrounded by berms to contain leaks and spills. The bermed areas will be sized to hold the full contents of the largest single container; if not roofed, the bermed areas will be sized for an additional 20 percent to allow for rainfall. These areas will be inspected weekly.
- Hazardous wastes will be collected by a licensed hazardous waste hauler using a hazardous waste manifest. Wastes will be shipped only to authorized hazardous waste management facilities. If necessary, biannual hazardous waste generator reports will be prepared and submitted to the DTSC. Copies of manifests, reports, waste analyses, and other documents will be kept onsite and will remain accessible for inspection for at least 3 years.
- Employees will be trained in hazardous waste procedures, spill contingencies, and waste minimization.
- Procedures will be developed to reduce the quantity of hazardous waste generated. Nonhazardous materials will be used instead of hazardous materials whenever practical, and wastes will be recycled whenever practical.

Specifically, hazardous waste handling will include the following practices:

- Waste lubricating oil will be recovered and recycled by a waste oil recycling contractor.
- Spent oil filters and oily rags will be recycled.
- Spent SCR and oxidation catalysts will be recycled by the supplier, if possible, or will be disposed of in a Class I landfill.

Handling of hazardous wastes according to the specifications listed above will minimize the quantity of waste deposited to landfills.

3.2 Waste Testing Methods and Classification

The majority of wastes will be characterized by LEC using knowledge of the process that generated the waste. However, wastes of questionable nature will be tested by an appropriate laboratory to ensure correct classification.

If a hazardous waste stream has not been characterized, the waste will be held at the 90-day storage area until required testing has been performed. After testing, the hazardous waste will be disposed of at an approved disposal facility. The approved disposal facility will likely conduct additional testing to confirm characterization of the hazardous waste stream. If necessary, the hauler can carry out tests to determine or confirm waste type as well.

Wastewater collected onsite will be sampled and, if it is not contaminated, will be disposed of using the WPCF (CH2M HILL, 2008).

3.3 Contingency Plan

For a temporary closure, where there is no release of hazardous materials, facility security will be deployed on a 24-hour basis, and the California Energy Commission will be notified. Depending on the length of shutdown necessary, a contingency plan for the temporary cessation of operations will be implemented. The plan will be developed to ensure conformance with all applicable laws, ordinances, regulations, and standards (LORS) and the protection of public health and safety and the environment. The plan, depending on the expected duration of the shutdown, could include draining all chemicals from storage tanks and other equipment and safely shutting down all equipment. All wastes will be disposed of according to applicable LORS.

Where the temporary closure is in response to facility damage, or where there is a release or threatened release of hazardous waste or materials into the environment, procedures will be followed as set forth in a risk management plan. Procedures include methods to control releases, notification of applicable authorities and the public, emergency response, and training for generating facility personnel in responding to and controlling releases of hazardous materials and hazardous waste. Once the immediate problem of hazardous waste and materials release has been contained and any release has been cleaned up, temporary closure will proceed as described for a closure where no release of hazardous materials or waste has occurred (CH2M HILL, 2008).

3.4 Facility Closure

The planned life of the generation facility is 30 years, although operation could be longer. When the facility is permanently closed, the handling of nonhazardous and hazardous waste and hazardous materials will be part of a general closure plan that will attempt to maximize the recycling of facility components. Unused chemicals will be sold back to the suppliers, other purchasers, or users. All equipment containing chemicals will be drained and shut down to protect public health and safety and the environment. All nonhazardous wastes will be collected and disposed of in appropriate landfills or waste collection facilities. All hazardous wastes will be disposed of according to applicable LORS. The site will be secured 24 hours per day during the LEC decommissioning activities (CH2M HILL, 2008).

SECTION 4

Waste Minimization and Recycling

Employees working at the LEC will implement and actively practice waste minimization and recycling efforts to reduce the volume and toxicity of all wastes generated during operations. All employees will incorporate the following waste minimization approaches into daily operational and maintenance routines:

- Segregate useable products from the waste stream for reuse, recycling, or reclamation (such as plastic, glass, and scrap metal from “trash”).
- Select nonhazardous alternatives to hazardous substances.
- Procure and store onsite only the required amount of materials to perform the task.

SECTION 5

References

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Department of Toxic Substance Control (DTSC). 2012. *California Commercial Offsite Hazardous Waste Management Facilities*. http://www.envirostor.dtsc.ca.gov/public/commercial_offsite.asp. Accessed May 2012.

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Linton, Ken. 2012. Clean Harbors Buttonwillow Landfill. Personal communication with Beth Storelli/CH2M HILL. January 11.

San Joaquin County. 2012. Solid Waste Division. <http://www.sjgov.org/solidwaste/>. Accessed May 2012.

Lodi Energy Center Annual Compliance Report

APPENDIX E: COPIES OF PERMITS RECEIVED FROM OTHER GOVERNMENT AGENCIES



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trinityconsultants.com



March 1, 2018

Mr. Nick Peirce
San Joaquin Valley Air Pollution Control District
Northern Regional Office
4800 Enterprise Way
Modesto, CA 95356-8718

RE: *Lodi Energy Center (Facility #N-2697)*
Title V Renewal Application

Dear Mr. Peirce:

On behalf of Northern California Power Agency (NCPA), Trinity Consultants Inc. (Trinity) is pleased to submit the enclosed Title V Renewal Application for NCPA's power plant (Lodi Energy Center or Facility #N-2697) located in Lodi, California. NCPA's existing Title V permit issued by the San Joaquin Valley Air Pollution Control District (SJVAPCD) expires on May 31, 2019. Pursuant to SJVAPCD Rule 2520, 5.2 and Condition #37 of permit N-2697-0-4, NCPA must submit a Title V Renewal Application between six and eighteen months prior to the expiration of the current permit. This submittal satisfies that application deadline.

The Title V Renewal Application contains the following application forms:

- Title V Application Package Checklist;
- Main Application Form;
- Actual Emissions Form;
- Insignificant Activities Form;
- Compliance Plan;
- Compliance Plan Streamlining Table;
- Title V Facility-Wide Template Qualification Form; and
- Compliance Certification Form.

HEADQUARTERS >

12700 Park Central Drive | Suite 2100 | Dallas, TX 75251 | P (972) 661-8100 | F (972) 385-9203

North America | Europe | Middle East | Asia

March 1, 2018

In accordance with SJVAPCD Rule 3010, Section 2.2, a check in the amount of \$105 for the Title V application filing fees is enclosed with this application.¹ In addition, NCPA will pay any additional fees invoiced by SJVAPCD as a result of SJVAPCD's processing of the Application as appropriate under SJVAPCD Rule 3010.

If you have any questions or comments about the Application, please contact me at (916) 273-5127, or Brooklyn Saylor (NCPA) at (209) 210-5009.

Sincerely,

Trinity Consultants

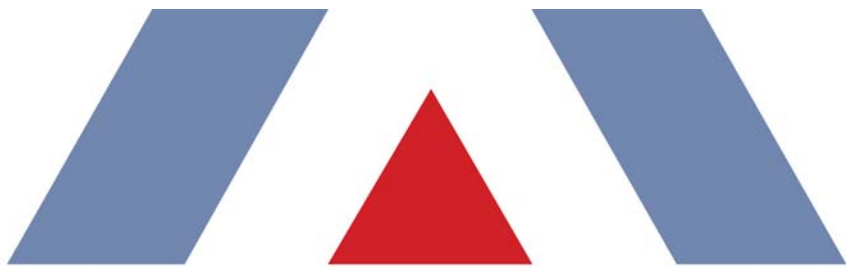
A handwritten signature in black ink, appearing to read "Jeff Adkins". The signature is stylized with a large, looped initial "J" and a cursive "Adkins".

Jeff Adkins
Principal Consultant

Enclosure

cc: Ms. Brooklyn Saylor, Northern California Power Agency (Lodi, CA)

¹ Per SJVAPCD Rule 3010, Section 2.2, application fees for a Part 70 permit renewal are calculated as the filing fee (\$21/source) for 5 sources.



PROJECT REPORT
Northern California Power Agency
Lodi Energy Center
Lodi, CA



San Joaquin Valley Air Pollution Control District
Title V Operating Permit Renewal Application

Prepared By:

Gina Fahnestock – Associate Consultant
Jeff Adkins – Principal Consultant

SIERRA RESEARCH/TRINITY CONSULTANTS

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Sacramento, CA 95816
(916) 444-6666

March 2018

Project 170506.0102



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1. INTRODUCTION

Northern California Power Agency (NCPA) operates a power plant with two natural gas-fired turbines located in Lodi, California (Lodi Energy Center or Facility) under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). The Lodi Energy Center is an existing major source under the Title V Permitting Program and operates under Facility ID No. N-2697 issued by the SJVAPCD. Currently, the Facility operates under a Title V Operating Permit (Title V permit) issued by the SJVAPCD expiring on May 31, 2019.

Pursuant to the SJVAPCD's Rule 2520, Section 5.2, NCPA is required to submit a Title V permit renewal application to SJVAPCD between six and eighteen months prior to the expiration of the current Title V permit. As such, NCPA is required to submit a Title V permit renewal application for the Lodi Energy Center no earlier than November 31, 2017 and no later than November 31, 2018. Section 1.2 below summarizes the required content to be included in the Application. This report and associated appendices contain all the required information, as listed in SJVAPCD Rule 2520-7.1.

1.1. FACILITY OVERVIEW

The Lodi Energy Center is located at 12745 N Thornton Road in Lodi, California. The Facility utilizes two natural gas-fired turbines: one simple-cycle 49 MW power generating system and one 294 MW combined-cycle power generating system. Both turbines include an unfired heat recovery steam generator (HRSG). The simple-cycle unit injects steam from the HRSG into the turbine for power augmentation and oxides of nitrogen (NO_x) control. The combined-cycle unit uses the HRSG steam to generate power in a steam turbine generator. Both engines are also equipped with selective catalytic reduction with ammonia injection for NO_x control, and catalytic oxidation units for carbon monoxide (CO) control. PUC-quality natural gas is used exclusively in the gas turbine engines.

The Lodi Energy Center is a source of NO_x, CO, VOC, SO_x, PM₁₀, and PM_{2.5} emissions¹, which are emitted from the combustion turbines, and a source of PM₁₀ and PM_{2.5} emissions from the cooling tower drift losses.

1.2. TITLE V PERMIT RENEWAL APPLICATION REQUIREMENTS

SJVAPCD Rule 2520-7.1 outlines the requirements for contents of Title V permit applications. The regulatory text from SJVAPCD Rule 2520-7.1 is included in *italic, bold* text. This section also includes NCPA's action to meet each requirement in plain text.

7.1.1 Identifying information, including company name and address (or plant name and address if different from the company name and address), owner's name and agent, and telephone number and names of plant site contact person.

Please refer to the compiled SJVAPCD Permit Application forms in Appendix A for identifying information.

7.1.2 A description of the source's processes and products (by Standard Industrial Classification Code), including any associated with each alternate scenario(s) proposed by the applicant.

Please see Appendix A for the source SIC code and Section 1.1 above for further facility description. NCPA does not request any alternative operating scenarios to be identified in the renewed Title V permit.

¹ NO_x, CO and VOC emissions from the Lodi Energy Center exceed the SJVAPCD's "major source" threshold of 10 tons per year (SJVAPCD Rule 2201-3.24).

7.1.3 The following emission-related information:

7.1.3.1 All emissions of pollutants, including fugitive emissions, for which the source is major, and all emissions of regulated air pollutants, including fugitive emissions, for which the source is subject to an underlying applicable requirement. A permit application shall describe all emissions of regulated air pollutants emitted from any permitted emissions unit, and list the exempt categories from District Rule 2020 which describe any insignificant equipment located at the facility. Applicant may submit quantification of actual emissions, except when potential emissions are needed to demonstrate compliance with an applicable requirement. As a demonstration of actual emissions, a source may submit the most recent emissions statement under District Rule 1160, Emissions Statement, or emissions inventory report under Health and Safety Code 44300, to the extent that the statement addresses all regulated pollutants.

Please refer to Appendix A for SJVAPCD's Title V Actual Emissions Report (TVFORM-001) as a demonstration of an actual emissions summary of permitted emissions units. SJVAPCD's Title V Insignificant Activities (TVFORM-003) provided in Appendix A lists the exempt categories of insignificant equipment at the Facility.

7.1.3.2 Information related to emissions of air pollutants needed by the District to verify which requirements are applicable to the source, and other information necessary to determine and collect the fees as prescribed in Regulation III of the District rules and regulations.

Please refer to Appendix A and the existing Title V permit provided in Appendix B for information needed to determine applicable requirements and appropriate fees.

7.1.3.3 Identification and description of all points of emissions described in section 7.1.3.1 of this rule in sufficient detail to establish the basis for fees and applicable requirements.

Please refer to Appendix A and the existing Title V permit provided in Appendix B for identification and description of emission points and information needed to determine applicable requirements and appropriate fees.

7.1.3.4 Emissions rate in tons per year and in such terms as are necessary to establish compliance consistent with the applicable standard reference test method.

Please refer to Appendix A for TVFORM-001 which includes emission rates in tons per year (tpy). SJVAPCD's Facility Umbrella Template (UM-0-3) includes the applicable source testing requirements and test methods used to establish compliance with permitted emission rates.

7.1.3.5 The following information to the extent it is needed to determine or regulate emissions: fuels, fuel use, raw materials, process weight rate, production rates, and operating schedules.

Please refer to TVFORM-001 provided in Appendix A and the existing Title V permit provided in Appendix B for information needed to determine and regulate emissions.

7.1.3.6 Identification and description of air pollution control equipment and compliance monitoring devices or activities.

Please refer to the existing Title V permit provided in Appendix B for identification and description of air pollution control equipment and monitoring devices/activities. Section 3, *Compliance Assurance Monitoring (CAM) Analysis*, of the Application contains further information regarding air pollution control equipment and compliance monitoring devices and activities.

7.1.3.7 Limitations on source operation affecting emissions or any work practice standards, where applicable, for all regulated pollutants.

Relevant limitations on source operation are established via conditions of the existing Title V permit for the Lodi Energy Center (see Appendix B). NCPA is not proposing any new or altered limitations on source operations as a part of this Application.

7.1.3.8 Other information required pursuant to any applicable requirement (including information related to stack height limitations developed pursuant to section 123 of the CAA).

Please refer to Appendix B for the existing Title V permit and Appendix C for the most recent annual compliance certification that contain all other information required pursuant to applicable requirements.

7.1.3.9 Calculations on which the information in sections 7.1.3.1 through 7.1.3.8 of this rule is based.

Please refer to Appendix A for TVFORM-001, which calculates actual emissions based on actual process information and the information in SJVAPCD Rule 2520, Sections 7.1.3.1 through 7.1.3.8 described above.

7.1.4 The following air pollution control requirements:

7.1.4.1 Citation and description of all applicable requirements, and

Appendix A contains UM-0-3 and SJVAPCD's Title V Compliance Plan (TVFORM-004). These documents identify all applicable requirements for the Facility.

7.1.4.2 Description of or reference to any applicable test method for determining compliance with each applicable requirement.

Please refer to the existing Title V permit provided in Appendix B for all applicable test methods for determining compliance with applicable requirements.

7.1.4.3 In addition to identifying all applicable requirements, an applicant may propose consolidation of overlapping requirements. The applicant shall provide information that demonstrates that the proposed consolidation of requirements, as a whole, is at least as stringent as, and assures compliance with, each individual requirement.

NCPA has proposed to consolidate overlapping requirements that are subsumed by other requirements in the streamlining table provided in Appendix A. The streamlining table demonstrates that the proposed consolidation of requirements is as stringent as, and assures compliance with, each requirement.

7.1.5 Other specific information that may be necessary to implement and enforce other applicable requirements of the CAA or of 40 CFR Part 70 or to determine the applicability of such requirements.

The contents of the Application and existing Title V permit should contain all necessary information to implement and enforce the CAA. NCPA can provide any further information to SJVAPCD upon request.

7.1.6 An explanation of any proposed exemptions from otherwise applicable requirements.

NCPA does not propose any exemptions from otherwise applicable requirements.

7.1.7 The applicant may submit copies of valid Permits to Operate issued by the District, to the extent that the information required under sections 7.1.1 through 7.1.6 is contained in those permits.

Where appropriate throughout the Application, NCPA has referenced the current Title V permit (provided in Appendix B) as allowed by this section of SJVAPCD Rule 2520.

7.1.8 Additional information as determined to be necessary by the District to define alternative operating scenarios proposed by the source or to define other permit terms and conditions implementing the operational flexibility provisions of section 6.4 of this rule.

NCPA does not propose any alternative operating scenarios to be identified in the renewed Title V permit.

7.1.9 A compliance plan that contains all the following:

7.1.9.1 A description of the compliance status of the source with respect to all applicable requirements.

Appendix A contains UM-0-3 and TVFORM-004. These documents include the compliance status of the source with respect to all applicable requirements.

7.1.9.2 For applicable requirements with which the source is in compliance, a statement that the source will continue to comply with such requirements.

Appendix A contains SJVAPCD's Title V Compliance Certification (TVFORM-005) signed by NCPA. As stated in the compliance certification document, NCPA will continue to comply with the applicable requirements with which it is currently in compliance.

7.1.9.3 For applicable requirements that will become effective during the permit term, a statement that the source will meet such requirements on a timely basis.

Appendix A contains TVFORM-005 signed by NCPA. As stated in the compliance certification document, NCPA will comply with the applicable requirements that will become effective during the permit term of the renewed Title V permit in a timely manner.

7.1.9.4 For requirements for which the source is not in compliance at the time of permit issuance, a narrative description of how the source will achieve compliance with such requirements.

NCPA expects to be in compliance with all applicable requirements at the time of permit issuance.

7.1.9.5 A compliance schedule as follows:

7.1.9.5.1 For applicable requirements that will become effective during the permit term, a statement that the source will meet such requirements on a timely basis. A statement that the source will meet in a timely manner applicable requirements that become effective during the permit term shall satisfy this provision, unless a more detailed schedule is expressly required by the applicable requirement.

As noted for the requirement of SJVAPCD Rule 2520-7.1.9.3, NCPA will comply with the applicable requirements that will become effective during the permit term of the renewed Title V permit in a timely manner.

7.1.9.5.2 A schedule of compliance for a source that will not be in compliance with all applicable requirements at the time of permit issuance. Such a schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the source will not be in compliance at the time of permit issuance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree, Hearing Board order or administrative order to which the source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.

NCPA expects to be in compliance with all applicable requirements at the time of permit issuance. Thus, no schedule of compliance is necessary.

7.1.9.6 For sources required to have a schedule of compliance to remedy a violation, a schedule for submission of certified progress reports no less frequently than every 6 months.

NCPA currently is not required to maintain a schedule of compliance for any sources. Thus, no such progress reports are required.

7.1.9.7 The compliance plan content requirements specified in this section shall apply and be included in the acid rain portion of a compliance plan for an affected source, except as specifically superseded by regulations promulgated under title IV of the CAA with regard to the schedule and method(s) the source will used to achieve compliance with the acid rain emissions limitations.

TVFORM-004 in Appendix A and the current Title V permit in Appendix B include applicable acid rain requirements.

7.1.10 Requirements for compliance certification, including the following:

7.1.10.1 A certification of compliance with all applicable requirements by a responsible official consistent with requirements of section 10.0 of this rule and section 114(a)(3) of the CAA;

Appendix A contains TVFORM-005 signed by Lodi Energy Center's responsible official.

7.1.10.2 A statement of methods used for determining compliance, including a description of monitoring, recordkeeping, and reporting requirements and test methods;

In Appendix C, NCPA has provided a copy of its most recent annual compliance certification completed for the Lodi Energy Center. The most recent annual compliance certification provides methods of

determining compliance and relevant notes regarding the monitoring, recordkeeping, and reporting used in determining the compliance status of Lodi Energy Center. The existing Title V permit provided in Appendix B also contains various requirements for monitoring, recordkeeping, and reporting for the Lodi Energy Center. TVFORM-004 in Appendix A describes methods for determining compliance and other related requirements.

7.1.10.3 A schedule for submission of compliance certifications during the permit term, to be submitted no less frequently than annually, or more frequently if specified by the underlying applicable requirement or by the District; and

A schedule for the submission of compliance certifications during the term of the renewed Title V permit is provided in Appendix A, which includes TVFORM-005 signed by NCPA. NCPA requests that it continue with its current compliance certification schedule of completing annual certifications for the period January 1 through December 31.

7.1.10.4 A statement indicating the source's compliance status with any applicable enhanced monitoring and compliance certification requirements of the CAA, which includes 40 CFR part 64 requirements under section 114(a)3 of the CAA.

Section 3 of this Application addresses CAM requirements that are a part of the enhanced monitoring and compliance requirements of the CAA. Appendix A contains the source's compliance status relative to those requirements.

7.1.11 The use of nationally-standardized forms for acid rain portions of permit applications and compliance plans, as required by regulations promulgated under title IV of the Act.

TVFORM-004 in Appendix A and the existing Title V permit in Appendix B include SJVAPCD's standardized conditions for sources subject to acid rain requirements.

7.1.12 Corrected information shall be provided to the District when the responsible official becomes aware that incorrect or incomplete information has been submitted.

If NCPA becomes aware that incorrect or incomplete information has been submitted in this Application, NCPA will promptly provide SJVAPCD with the missing and/or complete information, as available.

7.1.13 Demonstration of applicability of the most stringent applicable requirement amongst multiple options can be made by a simple declaration of applicability by the applicant.

NCPA has indicated requirements that are subsumed by other requirements in a compliance plan streamlining table provided in Appendix A.

Other information provided in this application includes:

- Proposed Changes to Operating Permit – Section 2
- CAM Analysis – Section 3

Based on the information included in this Application, NCPA concludes that this Application is timely and complete pursuant to SJVAPCD Rule 2520, Sections 5.2 and 7.1. The required SJVAPCD Title V Application Checklist and Title V Permit Application Form are included in Appendix A of this Application.

2. PROPOSED CHANGES TO OPERATING PERMIT

NCPA proposes the following updates be made to the Title V permit. Requested text additions have been marked in **bold** and requested deletions have been ~~struck out~~.

2.1. FACILITY-WIDE

- Requirements that terminated before the date of this Title V renewal are no longer applicable to the Facility. NCPA requests that conditions subject to an expired date be removed from the permit. Specifically, NCPA requests the following change to Condition #23 under Facility-wide requirements:

“No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in ~~Table of Standards 1 effective until 12/30/10~~ or ~~Table of Standards 2 effective on and after 1/1/11~~ of District Rule 4601.....”

2.2. PERMIT N-2697-1-7

- NCPA understands that conditions may be extracted from other applicable regulations, such as District Rules. However, in the Title V permit, NCPA requests that language be specific in regards to referenced regulations. NCPA requests that, in Condition #21, references to “this rule” be changed to “District Rule 1080”.
- The owners, operators, and responsible officials of affected units and sources under the Acid Rain Program are applicable to 40 CFR 77 Excess Emissions. Lodi Energy Center is an affected source under the Acid Rain Program and subject to the requirements of 40 CFR 77. The definition of applicability from 40 CFR 77.3(a) states:

The owners and operators of any affected source that has excess emissions of sulfur dioxide in any calendar year shall be liable to offset the amount of such excess emissions by an equal amount of allowances from the source's compliance account.

A proposed offset plan is only required for excess emissions of sulfur dioxide from an affected source. Excess emissions of other pollutants do not result in an offset plan requirement under 40 CFR 77. Furthermore, per 40 CFR 77.6, owners and operators are only designated to pay penalties for excess emissions of sulfur dioxide and nitrogen oxides. Excess emissions of other pollutants do not result in penalties under 40 CFR 77.

Condition #58 dictates the submittal of a proposed offset plan subsequent to excess emissions from an affected unit pursuant to 40 CFR 77. Additionally, Condition #59 states the payment procedures and necessary compliance with approved offset plan requirements for having excess emissions and references 40 CFR 77. However, neither Condition #58 nor Condition #59 specifies the type of pollutant subject to these excess emissions requirements. NCPA requests that the District clarify the applicable pollutants for Conditions #58 and #59. Condition #58 is applicable to sulfur dioxide, while Condition #59 is applicable to nitrogen oxides.

- NCPA requests that regulations cited in conditions include the section reference, as applicable. Referencing the specific origin of the condition will allow NCPA to streamline compliance procedures. Table 1 summarizes the list of proposed changes to the condition citations. Please see the streamlining analysis for additional information regarding subsumed regulations.

Table 1. List of Proposed Changes to Permit N-2697-1-7 Condition Citations

Condition Number	Current Citation	Proposed Citation	Regulation Applicable to Streamlining Analysis
#1	District NSR Rule 40 CFR 60.333(b) Rule 407 (San Joaquin County)	District NSR Rule 2201, 4.0 40 CFR 60.333(b) Rule 407 (San Joaquin County)	
#2	District NSR Rule District Rule 1080 40 CFR 60.334(b)(1)	District NSR Rule 2201, 4.0 District Rule 1080, 4.0 District Rule 4703, 6.2.1 40 CFR 60.334(b)(1)	District Rule 4703, 6.2.1
#3	District NSR Rule	District NSR Rule 2201, 4.0	
#4	District NSR Rule	District NSR Rule 2201, 4.0	
#5	District NSR Rule	District NSR Rule 2201, 4.0	
#6	District NSR Rule	District NSR Rule 2201, 4.0	
#7	District NSR Rule	District NSR Rule 2201, 4.0	
#8	District NSR Rule	District NSR Rule 2201, 4.0	
#12	District NSR Rule	District NSR Rule 2201, 4.0	
#13	District NSR Rule	District NSR Rule 2201, 4.0	
#16	District Rule 1080 District Rule 4703 40 CFR 60.334(b)	District Rule 1080, 6.5 & 6.6 District Rule 4703 40 CFR 60.334(b)(1)	
#18	40 CFR 60.334(j)(1)(iii)(B)	40 CFR 60.334(j)(1)(iii)(B) 40 CFR 60.334(j)(1)(iii)(A)	
#26	District NSR Rule	District NSR Rule 2201, 4.0	
#27	District NSR Rule	District NSR Rule 2201, 4.0	
#28	District NSR Rule	District NSR Rule 2201, 4.0	
#31	District NSR Rule District Rule 4703	District NSR Rule 2201, 4.0 District Rule 4703, 5.1.2	
#32	District NSR Rule District Rule 4703	District NSR Rule 2201, 4.0 District Rule 4703, 5.1.2	
#34	District NSR Rule	District NSR Rule 2201, 4.0	
#35	District NSR Rule	District NSR Rule 2201, 4.0	
#36	District NSR Rule	District NSR Rule 2201, 4.0	
#37	District NSR Rule	District NSR Rule 2201, 4.0	
#38	District NSR Rule	District NSR Rule 2201, 4.0	
#39	District NSR Rule	District NSR Rule 2201, 4.0	
#41	District NSR Rule District Rule 2520, 9.3.2 District Rule 4703, 5.1, 6.3.1, 6.4.1-6.4.3 40 CFR 60.335(a)	District NSR Rule 2201, 4.0 District Rule 2520, 9.3.2 District Rule 4703, 5.1, 6.3.1, 6.4.1-6.4.3 40 CFR 60.335(a)	
#42	District NSR Rule District Rule 1081	District NSR Rule 2201, 4.0 District Rule 1081, 5.0	
#43	District Rule 1081, 3.0 & 6.0	District Rule 1081, 3.0 & 6.0 40 CFR 60.8(e)	40 CFR 60.8(e)
#48	District NSR Rule	District NSR Rule 2201, 4.0 40 CFR 60.13(e)(2)	40 CFR 60.13(e)(2)

#49	40 CFR 72	40 CFR 72(a)(2)	
#50	40 CFR 75	40 CFR 75 40 CFR 72.9(b)(1)	40 CFR 72.9(b)(1)
#51	40 CFR 75	40 CFR 75.1	
#52	40 CFR 73	40 CFR 73 40 CFR 72.9(c)(1)	40 CFR 72.9(c)(1)
#54	40 CFR 72	40 CFR 72.9(c)(4)	
#55	40 CFR 73	40 CFR 73.35 40 CFR 72.9(c)(5)	40 CFR 72.9(c)(5)
#56	40 CFR 72	40 CFR 72.2	
#57	40 CFR 72	40 CFR 72.2	
#58	40 CFR 77	40 CFR 77.3 40 CFR 72.9(e)(1)	40 CFR 72.9(e)(1)
#59	40 CFR 77	40 CFR 77.4(k) 40 CFR 77.6 40 CFR 72.9(e)(2)	40 CFR 72.9(e)(2)
#60	40 CFR 72	40 CFR 72.9(f)(1)(i)	
#61	40 CFR 75	40 CFR 75.3(c) 40 CFR 72.9(f)(1)(ii-iv)	40 CFR 72.9(f)(1)(ii-iv)
#62	40 CFR 75	40 CFR 75 40 CFR 72.9(f)(2)	40 CFR 72.9(f)(2)
#63	District Rule 4703	District Rule 4703, 6.2.4	

2.3. PERMIT N-2697-4-4

- NCPA understands that conditions may be extracted from other applicable regulations, such as 40 CFR 63. However, in the Title V permit, NCPA requests that language be specific in regards to referenced regulations. NCPA requests that, in Condition #10, all references to “this subpart” be changed to “Subpart ZZZZ”.
- NCPA requests that regulations cited in conditions include the section reference, as applicable. Referencing the specific origin of the condition will allow NCPA to streamline compliance procedures. Table 1 summarizes the list of proposed changes to the condition citations. Please see the streamlining analysis for additional information regarding subsumed regulations.

Table 2. List of Proposed Changes to Permit N-2697-4-4 Condition Citations

Condition Number	Current Citation	Proposed Citation	Regulation Applicable to Streamlining Analysis
#1	District NSR Rule	District NSR Rule 2201, 4.0	
#3	District Rule 2201 District Rule 4801 17 CCR 93115 40 CFR Part 63 Subpart ZZZZ	District NSR Rule 2201, 4.0 District Rule 4801 17 CCR 93115.5(b) 40 CFR Part 63 Subpart ZZZZ 63.6604	
#4	District Rule 4702 17 CCR 93115 40 CFR Part 63 Subpart ZZZZ	District Rule 4702, 4.3.1.3 17 CCR 93115 40 CFR Part 63 Subpart ZZZZ 63.6625(f)	
#5	District Rule 4702, 4.3	District Rule 4702, 4.3.1.2	

	17 CCR 93115	17 CCR 93115.3(n)	
#6	District Rule 4702, 6.2 District Rule 2520, 9.3.2 17 CCR 93115	District Rule 4702, 6.2.3 District Rule 2520, 9.3.2 17 CCR 93115.10(f)(1) District Rule 4701, 6.2.2	District Rule 4701, 6.2.2
#7	District Rule 2520, 9.3.2 17 CCR 93115	District Rule 2520, 9.3.2 17 CCR 93115.10(f)(1)(H) District Rule 4701, 6.2.2.2	District Rule 4701, 6.2.2.2
#9	40 CFR Part 63 Subpart ZZZZ	40 CFR Part 63 Subpart ZZZZ Table 2d.4.a	
#10	40 CFR Part 63 Subpart ZZZZ	40 CFR Part 63 Subpart ZZZZ 63.6625(i)	
#11	40 CFR Part 63 Subpart ZZZZ	40 CFR Part 63 Subpart ZZZZ Table 2d.4.c	
#12	40 CFR Part 63 Subpart ZZZZ	40 CFR Part 63 Subpart ZZZZ Table 2d.4.c	
#13	40 CFR Part 63 Subpart ZZZZ	40 CFR Part 63 Subpart ZZZZ 63.6625(e) & (e)(3)	
#14	40 CFR Part 63 Subpart ZZZZ	40 CFR Part 63 Subpart ZZZZ 63.6625(h)	
#16	District Rule 4702 40 CFR Part 63 Subpart ZZZZ	District Rule 4702, 6.2.2 40 CFR Part 63 Subpart ZZZZ 63.6660(b) District Rule 4701, 6.2.3	District Rule 4701, 6.2.3

2.4. PERMIT N-2697-5-2

- District NSR Rule 2201 Section 4.0 dictates quarterly criteria pollutant emission limits from the gas turbine system. Conditions #28 through #33 state the quarterly emission limits and all cite Rule 2201 except for Condition #31. Condition #31 states the NH₃ quarterly emission limits, but no rule number is referenced. For uniformity, NCPA requests that the citation under Condition #31 be updated from “District Rule” to “District NSR Rule 2201, 4.0”.
- As specified in Section 2.2, only excess emissions of sulfur dioxide and nitrogen oxides are subject to 40 CFR 77. Condition #73 requires the submittal of a proposed offset plan subsequent to excess emissions from an affected unit pursuant to 40 CFR 77. Additionally, Condition #74 states the payment procedures and compliance with approved offset plan requirements for having excess emissions, referenced from 40 CFR 77. However, neither Condition #73 nor Condition #74 specifies the type of pollutant subject to these excess emissions requirements. NCPA requests that the District clarify the applicable emissions for Conditions #73 and #74. Condition #73 is applicable to sulfur dioxide, while Condition #74 is applicable to nitrogen oxides.
- NCPA requests that regulations cited in conditions include the section reference, as applicable. Referencing the specific origin of the condition will allow NCPA to streamline compliance procedures. Table 1 summarizes the list of proposed changes to the condition citations. Please see the streamlining analysis for additional information regarding subsumed regulations.

Table 3. List of Proposed Changes to Permit N-2697-5-2 Condition Citations

Condition Number	Current Citation	Proposed Citation	Regulation Applicable to Streamlining Analysis
#1	District Rule 1100	District Rule 1100, 6.1	

#2	District Rule 1100	District Rule 1100, 7.0	
#4	District Rule 1080	District Rule 1080, 11.0	
#5	District NSR Rule	District NSR Rule 2201, 4.0	
#6	District NSR Rule District Rule 4703	District NSR Rule 2201, 4.0 District Rule 4703, 5.3.3	
#7	District NSR Rule	District NSR Rule 2201, 4.0	
#8	District NSR Rule	District NSR Rule 2201, 4.0	
#9	District NSR Rule	District NSR Rule 2201, 4.0	
#10	District NSR Rule	District NSR Rule 2201, 4.0	
#11	District NSR Rule	District NSR Rule 2201, 4.0	
#12	District NSR Rule	District NSR Rule 2201, 4.0	
#13	District NSR Rule	District NSR Rule 2201, 4.0	
#17	District NSR Rule	District NSR Rule 2201, 4.0	
#20	District NSR Rule	District NSR Rule 2201, 4.0	
#21	District NSR Rule District Rule 4703, 5.3.2	District NSR Rule 2201, 4.0 District Rule 4703, 5.3.2	
#22	Condition #22 District NSR Rule District Rule 4001 District Rule 4703	District NSR Rule 2201, 4.0 District Rule 4001 District Rule 4703, 5.1.2 & 5.2	
#23	District NSR Rule	District NSR Rule 2201, 4.0	
#24	District NSR Rule	District NSR Rule 2201, 4.0	
#25	District NSR Rule	District NSR Rule 2201, 4.0	
#26	District NSR Rule	District NSR Rule 2201, 4.0	
#27	District NSR Rule 40 CFR 60.4330(a)(2)	District NSR Rule 2201, 4.0 40 CFR 60.4330(a)(2)	
#28	District NSR Rule	District NSR Rule 2201, 4.0	
#29	District NSR Rule	District NSR Rule 2201, 4.0	
#30	District NSR Rule	District NSR Rule 2201, 4.0	
#31	District Rule	District NSR Rule 2201, 4.0	
#32	District NSR Rule	District NSR Rule 2201, 4.0	
#33	District NSR Rule	District NSR Rule 2201, 4.0	
#34	District NSR Rule	District NSR Rule 2201, 4.0	
#35	District NSR Rule	District NSR Rule 2201, 4.0	
#36	District NSR Rule	District NSR Rule 2201, 4.0	
#37	District Rule 1081	District Rule 1081, 7.1	
#38	District Rule 1081	District Rule 1081, 7.2	
#40	District NSR Rule District Rule 4703 40 CFR 60.4400(a)	District NSR Rule 2201, 4.0 District Rule 4703, 6.3.1 40 CFR 60.4400(a)	
#41	District NSR Rule 40 CFR 60.4360 40 CFR 60.4365(a) 40 CFR 60.4370(c)	District NSR Rule 2201, 4.0 40 CFR 60.4360 40 CFR 60.4365(a) 40 CFR 60.4370(c)	
#42	District Rule 1081 District Rule 4703 40 CFR 60.4400(1)(i)	District Rule 1081, 5.0 District Rule 4703, 6.3.1 & 6.4.1-6.4.3 40 CFR 60.4400(a)(1)(i)	

#44	District Rule 1081	District Rule 1081, 7.2 & 7.3	
#45	District NSR Rule District Rule 4703	District NSR Rule 2201, 4.0 District Rule 4703	
#46	District Rule 1080 District NSR Rule District Rule 4703 40 CFR 60.4340(b)(1) 40 CFR 60.4345(a)	District Rule 1080, 4.0 & 5.0 District NSR Rule 2201, 4.0 District Rule 4703, 6.2.1 40 CFR 60.4340(b)(1) 40 CFR 60.4345(a)	
#47	District Rule 1080 40 CFR 60.4345(a)	District Rule 1080, 6.3, 6.5 & 6.6 40 CFR 60.4345(a)	
#48	District Rule 1080 40 CFR 60.4345(b)	District Rule 1080, 6.4 40 CFR 60.4345(b) 40 CFR 60.13(e)(2)	40 CFR 60.13(e)(2)
#49	District Rule 1080 40 CFR 60.4350	District Rule 1080, 7.2 40 CFR 60.4350(a-c), (e) & (f)	
#50	District Rule 1080	District Rule 1080, 8.0 40 CFR Part 60 Appendix F 5.1.2	40 CFR Part 60 Appendix F 5.1.2
#51	District Rule 1080	District Rule 1080, 8.0 40 CFR Part 60 App. F.5.1.1	40 CFR Part 60 App. F.5.1.1
#53	District Rule 1080	District Rule 1080, 7.1	
#54	District Rule 1080	District Rule 1080, 7.1	
#55	District Rule 1080 District Rule 2201 40 CFR 60.7(b)	District Rule 1080, 7.3 District NSR Rule 2201, 4.0 40 CFR 60.7(b)	
#58	District NSR Rule	District NSR Rule 2201, 4.0	
#59	District NSR Rule	District NSR Rule 2201, 4.0	
#60	District NSR Rule District Rule 4703, 6.26, 6.28, & 6.2.11	District NSR Rule 2201, 4.0 District Rule 4703, 6.2.6, 6.2.8, & 6.2.11	
#61	District NSR Rule District Rule 4703, 6.2.4	District NSR Rule 2201, 4.0 District Rule 4703, 6.2.4 40 CFR 60.7(f)	40 CFR 60.7(f)
#62	District Rule 1080 40 CFR 60.4375(a) 40 CFR 60.4395	District Rule 1080, 8.0 40 CFR 60.4375(a) 40 CFR 60.4395	
#64	40 CFR 72	40 CFR 72.9(a)(2)	
#66	40 CFR 75	40 CFR 75.1	
#67	40 CFR 73	40 CFR 73 40 CFR 72.9(c)(1)	40 CFR 72.9(c)(1)
#69	40 CFR 72	40 CFR 72.9(c)(4)	
#70	40 CFR 73	40 CFR 73.35 40 CFR 72.9(c)(5)	40 CFR 72.9(c)(5)
#72	40 CFR 72	40 CFR 72.2	
#73	40 CFR 77	40 CFR 77.3 40 CFR 72.9(e)(1)	40 CFR 72.9(e)(1)
#74	40 CFR 77	40 CFR 77.4(k)	40 CFR 72.9(e)(2)

		40 CFR 77.6 40 CFR 72.9(e)(2)	
#75	40 CFR 72	40 CFR 72.9(f)(1)(i) 40 CFR 72.9(f)(1)(ii-iv)	40 CFR 72.9(f)(1)(ii) 40 CFR 72.9(f)(1)(iii) 40 CFR 72.9(f)(1)(iv)
#76	40 CFR 75	40 CFR 75.3(c) 40 CFR 72.9(f)(2)	40 CFR 72.9(f)(2)

2.5. PERMIT N-2697-6-1

- NCPA requests that regulations cited in conditions include the section reference, as applicable. Referencing the specific origin of the condition will allow NCPA to streamline compliance procedures. Table 1 summarizes the list of proposed changes to the condition citations. No regulations are requested to be subsumed at this time.

Table 4. List of Proposed Changes to Permit N-2697-6-1 Condition Citations

Condition Number	Current Citation	Proposed Citation
#1	District Rule 1100	District Rule 1100, 6.1
#2	District Rule 1100	District Rule 1100, 7.0
#4	District Rule 7012	District Rule 7012, 5.2.1
#5	District NSR Rule	District NSR Rule 2201, 4.0
#6	District NSR Rule	District NSR Rule 2201, 4.0
#7	District NSR Rule	District NSR Rule 2201, 4.0
#8	District NSR Rule	District NSR Rule 2201, 4.0

2.6. PERMIT N-2697-7-1

- NCPA requests that regulations cited in conditions include the section reference, as applicable. Referencing the specific origin of the condition will allow NCPA to streamline compliance procedures. Table 1 summarizes the list of proposed changes to the condition citations. No regulations are requested to be subsumed at this time.

Table 4. List of Proposed Changes to Permit N-2697-7-1 Condition Citations

Condition Number	Current Citation	Proposed Citation
#1	District NSR Rule	District NSR Rule 2201, 4.0
#3	District NSR Rule District Rule 4320	District NSR Rule 2201, 4.0 District Rule 4320, 5.4.1.1
#4	District NSR Rule 40 CFR 60.48(c)(g)	District NSR Rule 2201, 4.0 40 CFR 60.48(c)(g)
#5	District Rule 1100	District Rule 1100, 6.1
#6	District Rule 1100	District Rule 1100, 7.0
#7	District NSR Rule District Rule 4305 District Rule 4306	District NSR Rule 2201, 4.0 District Rule 4305, 5.1.1 District Rule 4306, 5.1.1

	District Rule 4320	District Rule 4320, 5.2.1
#8	District NSR Rule District Rule 4305 District Rule 4306 District Rule 4320	District NSR Rule 2201, 4.0 District Rule 4305, 5.3 District Rule 4306, 5.1.1 District Rule 4320, 5.2.1
#9	District NSR Rule	District NSR Rule 2201, 4.0
#10	District NSR Rule	District NSR Rule 2201, 4.0
#11	District NSR Rule	District NSR Rule 2201, 4.0
#12	District NSR Rule	District NSR Rule 2201, 4.0
#13	District NSR Rule	District NSR Rule 2201, 4.0
#14	District NSR Rule	District NSR Rule 2201, 4.0
#15	District NSR Rule	District NSR Rule 2201, 4.0
#16	District NSR Rule	District NSR Rule 2201, 4.0
#17	District NSR Rule	District NSR Rule 2201, 4.0
#18	District Rule 4305 District Rule 4306 District Rule 4320	District Rule 4305, 5.5.2 District Rule 4306, 5.5.2 District Rule 4320, 5.8.2
#19	District Rule 4305 District Rule 4306 District Rule 4320	District Rule 4305, 6.3.1 District Rule 4306, 6.3.1 District Rule 4320, 6.3.1
#20	District Rule 4305 District Rule 4306	District Rule 4305, 5.5.1 District Rule 4306, 5.5.1
#21	District Rule 1081	District Rule 1081, 7.1
#22	District Rule 4305 District Rule 4306 District Rule 4320	District Rule 4305, 6.2.2 District Rule 4306, 6.2.2 District Rule 4320, 6.2.2
#23	District Rule 4305 District Rule 4306 District Rule 4320	District Rule 4305, 6.2.3 District Rule 4306, 6.2.3 District Rule 4320, 6.2.3
#24	District Rule 4305 District Rule 4306 District Rule 4320	District Rule 4305, 6.2.4 District Rule 4306, 6.2.4 District Rule 4320, 6.2.4
#25	District Rule 4305 District Rule 4306 District Rule 4320	District Rule 4305, 5.5.5 District Rule 4306, 5.5.5 District Rule 4320, 5.8.5
#26	District Rule 1081	District Rule 1081, 7.3
#27	District Rule 4320	District Rule 4320, 5.7.6.1
#31	District Rule 4305 District Rule 4306 District Rule 4320	District Rule 4305, 5.5.4 District Rule 4306, 5.5.4 District Rule 4320, 5.8.4
#33	District NSR Rule 40 CFF 60.48(c)(g)	District NSR Rule 2201, 4.0 40 CFF 60.48(c)(g)
#34	District NSR Rule	District NSR Rule 2201, 4.0
#35	District Rule 1070 District Rule 4305 District Rule 4306 District Rule 4320	District Rule 1070 District Rule 4305, 6.1 District Rule 4306, 6.1 District Rule 4320, 6.1

3. CAM ANALYSIS

This section presents the basis for the applicability determination for 40 CFR 64, Compliance Assurance Monitoring (CAM).

3.1. CAM BACKGROUND

The U.S. Environmental Protection Agency (EPA) promulgated the CAM rule, 40 CFR 64, on October 22, 1997. Per EPA, the purpose of this rule, is "to provide a reasonable assurance of compliance with applicable requirements" pursuant to the Clean Air Act Amendments of 1990.

Per 40 CFR 64.2(a), CAM applies to emission units that satisfy all of the following criteria:

1. Emission units subject to an emission limitation or standard for a regulated air pollutant (or a surrogate thereof).
2. Emission units that use a control device to achieve compliance with any such emission limitation or standard.
3. Emission units that have potential pre-control device emissions of the regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. Potential pre-control device emissions shall have the same meaning as potential to emit, except that emission reductions achieved by the applicable control device shall not be taken into account.

The following definitions are used in determining applicability, per 40 CFR 64.1 (note that 40 CFR 64 defines emissions unit using the definition provided in 40 CFR 70.2):

Emissions unit means any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under section 112(b) of the Act.

Control device means equipment, other than inherent process equipment, that is used to destroy or remove air pollutant prior to discharge to the atmosphere.

Inherent process equipment means equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations.

Per 40 CFR 64.2(b)(1), emission limitations or standards proposed after November 15, 1990 pursuant to Section 111 of the Clean Air Act [i.e., New Source Performance Standards (NSPS)] or 112 of the Clean Air Act (i.e., NESHAPs) do not constitute emission standards for purposes of evaluating whether an emission unit meets CAM criterion #1.

If an emission unit is determined to be subject to CAM, pursuant to 40 CFR 64.3, NCPA is required to design monitoring to obtain data for one or more indicators of emission-control performance for the control device. Further, pursuant to 40 CFR 64.4, the monitoring as required by 40 CFR 64.3 is required to be summarized in a CAM plan, and the CAM plan must be submitted as part of the Title V permit renewal application.

3.2. CAM APPLICABILITY ANALYSIS BY UNIT

NCPA evaluated the permitted units at the Lodi Energy Center that meet CAM criterion #2 (i.e., emission units that use a control device to achieve compliance with an emission limit or standard) on a pollutant-by-pollutant basis to determine CAM applicability. If criteria #1 and #2 above applied to the unit for the particular pollutant and no exemptions seemed applicable, NCPA determined the uncontrolled potential emissions of the unit for the particular pollutant to determine whether CAM applies.

NCPA previously conducted a CAM Applicability analysis for permit units N-2697-1-7 and N-2697-5-2 provided in Appendix D. Permit Unit N-2697-1-7 represents the 49 MW simple-cycle turbine and Permit Unit N-2697-5-2 represents the 249 MW combined-cycle turbine at the Lodi Energy Center. Under the current Title V permit provided in Appendix B, the turbines are subject to NO_x, CO and VOC emission limits. Both turbines are serviced by a selective catalytic reduction system and an oxidation catalyst system to control NO_x and CO/VOC, respectively. The turbines thus meet criteria #1 and #2 for NO_x, CO and VOC.

Condition #43 of permit N-2697-1-7 requires that a Continuous Emission Monitoring System (CEMS) continuously measures and records the NO_x and CO emissions. Condition #2 of permit N-2697-5-2 requires that a CEMS continuously measures and records the NO_x and CO emissions as well. Per 40 CFR 64.2(b)(1)(vi), units for which a Title V permit specifies a continuous compliance determination method for a permitted emission limit are exempt from the requirements of 40 CFR 64. While the turbines meet criteria #1 and #2 of the CAM applicability for NO_x and CO emissions, the turbines are exempt from the requirements of 40 CFR 64 for NO_x and CO due to the Title V permit requirements to continuously monitor NO_x and CO concentrations using continuous monitoring systems. As such, CAM does not apply to the turbines under permit N-2697-1-7 and N-2697-5-2 for CO and NO_x emissions.

The turbines have VOC emission limitations that meet criteria #1 of the applicability criteria, and VOC emission control that satisfies criteria #2. Uncontrolled VOC emissions from each turbine were determined to exceed the federal major source thresholds within the SJVAPCD (10 tons per year of VOC) in the previous analysis. Both turbines trigger CAM requirements for VOC pursuant to 40 CFR 64.

Further justification for CAM Applicability to permit units N-2697-1-7 and N-2697-5-2 is provided in Appendix D. No modifications to the permitted units which would affect the CAM Applicability analysis have occurred since the last revision of the CAM Plan in April 2014.

NCPA currently operates pursuant to the most recent CAM Plan which was revised in April 2014. The CAM Plan has not been updated since this date. Since each turbine's oxidation catalyst system controls VOC emissions to some extent, the oxidation catalyst temperature was chosen as a performance indicator. When the temperature is within an effective range, VOC emissions are reduced. The CAM approach to monitor VOC emissions was developed to ensure the oxidation catalyst operate within the effective temperature range. Further rationale for the performance indicator selection and monitoring approach is provided in Appendix D. NCPA proposes to continue using the current CAM Plan provided in Appendix D to meet the requirements of 40 CFR 64.

APPENDIX A: SJVAPCD TITLE V RENEWAL APPLICATION

Title V Application Package Checklist

Forms necessary to prepare a complete Title V permit application are shown in the table below. These forms can be found on the District website at <http://www.valleyair.org/permits/TVforms> or can be obtained by request via email to sba@valleyair.org. Electronic copies of the existing valid permits and emissions inventory statements or reports for the facility can also be obtained upon request. The existing permits and/or emission inventory statements or reports may be used to prepare a complete Title V application package. In lieu of the forms provided by the District, you may submit facility generated documents or worksheets with the information in a similar format to the District forms.

Please read the instructions for each form. A pre-application meeting with the District staff to address the requirements and any questions that you may have is encouraged. To arrange for a pre-application meeting, please call the District office nearest to you.

Please identify on this checklist the forms and documents that are being submitted as a part of your Title V application. Submit your Title V application package to the District (an electronic copy of the application package will be sent to EPA). **Return this checklist as a cover to your Title V application package.**

Company Name: Northern California Power Agency	Facility ID: N-2697
TITLE V APPLICATION FORMS	√ If submitted
1. Permit Application Form	√
2. Actual Emissions Report (TVFORM-001)	√
3. Potential Emissions Report (TVFORM-002)	
4. Insignificant Activities (TVFORM-003)	√
5. Compliance Plan (TVFORM-004)	√
6. Compliance Certification (TVFORM-005)	√
7. Compliance Schedule	
8. Title IV Form (Acid Rain Units)	
9. General Permit Forms	
10. General Permit Template Forms	√
11. Other:	
12. Other:	
13. Other:	

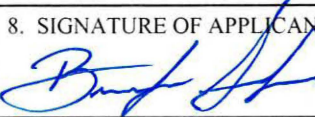


San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

- | | | |
|-------------------------------------|---------------------------|--|
| ☐ | INITIAL TITLE V PERMIT | - First Federal Title V Operating Permit |
| ☒ | RENEWAL OF TITLE V PERMIT | - Federal Title V Operating Permit Renewal |
| ☐ | NEW TITLE V PERMIT | - New Stationary Source Commencing Operation After June 15, 1995 |

1. PERMIT TO BE ISSUED TO: Northern California Power Agency											
2. MAILING ADDRESS: STREET/P.O. BOX: <u>651 Commerce Dr.</u> CITY: <u>Roseville</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95678-6411</u>											
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>12745 Thornton Road</u> CITY: <u>Lodi</u> _____/4 SECTION _____ TOWNSHIP _____ RANGE _____	S.I.C. CODE(S) OF FACILITY (If known): 4911										
4. GENERAL NATURE OF BUSINESS: Electrical Power Generation											
5. DESCRIPTION OF EQUIPMENT FOR WHICH APPLICATION IS MADE. Include Permit Numbers, a separate CAM plan if applicable and use additional sheets, if necessary: N-2697-1-7: A General Electric LM5000 natural gas-fired 463 MMBtu/hr (HHV) steam injected gas turbine with oxidation catalyst, ammonia injection, and selective catalytic reduction catalyst serving a 49 MW electrical generator. N-2697-4-4: A 240 HP Cummins Diesel-fired IC engine with turbocharger and aftercooler powering an emergency fire pump. N-2697-5-2: A Siemens STG6-5000F natural gas-fired 2,142 MMBtu/hr (HHV) combined cycle gas turbine with DLN combustors, oxidation catalyst, ammonia injection, and selective catalytic reduction catalyst serving a 185 MW electrical generator. N-2697-6-1: A 69,000 gpm cooling tower with seven cells. N-2697-7-1: A 36.5 MMBtu Rentech Type D boiler equipped with an ultra-low-NOx burner. Please refer to Appendix D for the most recent CAM Plan for both gas turbines (N-2697-1-7 & 5-2).											
<table border="0"><tr><td>Optional Section</td><td>"HEALTH AIR LIVING"</td><td></td><td>"INSPECT"</td><td></td></tr><tr><td>6. CHECK WHETHER YOU ARE A PARTICIPANT IN EITHER OF THESE VOLUNTARY PROGRAMS:</td><td>☐ Yes ☐ No ☐ Send info</td><td></td><td>☐ Yes ☐ No ☐ Send info</td><td></td></tr></table>		Optional Section	"HEALTH AIR LIVING"		"INSPECT"		6. CHECK WHETHER YOU ARE A PARTICIPANT IN EITHER OF THESE VOLUNTARY PROGRAMS:	☐ Yes ☐ No ☐ Send info		☐ Yes ☐ No ☐ Send info	
Optional Section	"HEALTH AIR LIVING"		"INSPECT"								
6. CHECK WHETHER YOU ARE A PARTICIPANT IN EITHER OF THESE VOLUNTARY PROGRAMS:	☐ Yes ☐ No ☐ Send info		☐ Yes ☐ No ☐ Send info								
7. TYPE OR PRINT NAME OF APPLICANT: Brooklyn Saylor	TITLE OF APPLICANT: Environmental Health & Safety Specialist										
8. SIGNATURE OF APPLICANT: 	DATE: 3/1/2018	PHONE #: (209) 210-5009 FAX #: (209) 333-6374 E-MAIL: Brooklyn.Saylor@ncpa.com									

FOR APCD USE ONLY:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK #: DATE PAID: PROJECT #: _____ FACILITY ID:
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TVFORM-main



San Joaquin Valley Unified Air Pollution Control District



Title V Application - ACTUAL EMISSIONS REPORT

Refer to the attached instructions for more information.

COMPANY NAME: Northern California Power Agency							FACILITY ID: N -2697		
LIST OF EQUIPMENT AND CALCULATED ANNUAL EMISSIONS - In numerical order, list all permitted equipment and describe the emissions (See Instructions). If more space is required, use additional forms. Attach sample calculations. <u>In certain cases (See Instructions), previously approved emissions statements or inventory reports may be attached and submitted in lieu of this form. If this option is chosen, do not list permitted equipment described in those emissions inventory statements or reports on this form.</u>									
<u>Column 1</u> Permit Number	<u>Column 2</u> Specific Source of Emissions (if applicable)	<u>Column 3</u> Actual Annual Pollutant Emissions in tons per year (one pollutant per column) List the pollutant(s) for which the facility is a major source:							
		NOx	VOC	PM ₁₀	SOx	CO	NH ₃	Other:	Other:
N-2697-1-7	CT2 Gas Turbine	0.17	0.02	0.03	0.01	0.19	0.31		
N-2697-4-4	Fire Pump Engine	0.13	0.01	0.01	0.01	0.03	N/A		
N-2697-5-2	LEC Gas Turbine	9.70	1.46	8.15	1.16	11.47	68.04		
N-2697-6-1	Cooling Tower	N/A	N/A	0.03	N/A	N/A	N/A		
N-2697-7-1	Auxiliary Boiler	0.17	0.17	0.17	0.17	0.17	8.5 E-05		
N-2697	TOTALS	10.05	1.50	61.36	1.18	11.75	68.35		

Emissions for year ending: 2016



San Joaquin Valley Unified Air Pollution Control District

Title V Application - INSIGNIFICANT ACTIVITIES



COMPANY NAME:	FACILITY ID: -
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Check the box next to the exemption category from Rule 2020 which describes any insignificant activity or equipment at your facility not requiring a permit.

Exemption Category	Rule 2020 Citation	✓	Exemption Category	Rule 2020 Citation	✓
Structure or incinerator assoc. with a structure designed as a dwelling for 4 families or less	4.1		Containers used to store refined lubricating oils	6.6.8	✓
Locomotives, airplanes, and watercraft used to transport passengers or freight	4.4		Unvented pressure vessels used exclusively to store liquified gases or assoc with exempt equipment	6.6.9 or 6.13	
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less	6.1.1		Portable tanks used exclusively to store produced fluids for ≤ six months	6.6.10	
Piston-type i.c.engine with maximum continuous rating of 50 braking horsepower (bhp) or less	6.1.2	✓	Mobile transport tanks on delivery vehicles of VOCs	6.6.11	
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less	6.1.3		Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥0.8251	6.7.1.1	
Space heating equipment other than boilers	6.1.4	✓	Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762	6.7.1.2	
Cooling towers with a circulation rate less than 10,000 gal/min, and that are not used for cooling of process water, or water from barometric jets or condensers++	6.2	✓	Equipment used exclusively for the transfer of refined lubricating oil	6.7.2	✓
Use of less than 2 gal/day of graphic arts materials	6.3		Equipment used to apply architectural coatings	6.8.1	✓
Equipment at retail establishments used to prepare food for human consumption	6.4.1		Unheated, non-conveyorized cleaning equipment with < 10 ft ² open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr. evaporative losses	6.9	✓
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by sec. 6.1.1	6.4.3		Brazing, soldering, or welding equipment	6.10	✓
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plastisizer or blowing agent is used	6.5		Equipment used to compress natural gas	6.11	✓
Containers used to store clean produced water	6.6.1		Fugitive emissions sources assoc. with exempt equipment	6.12	✓
Containers ≤100 bbl used to store oil with specific gravity ≥ 0.8762	6.6.2		Pits and Ponds as defined in Rule 1020	6.15	
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762	6.6.3		On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature <150 F	6.6.4	✓	Emissions less than 2 lb/day from units not included above	6.19	✓
Containers used to store unheated organic material with an initial boiling point ≥ 302 F	6.6.5	✓	Venting PUC quality natural gas from for sole purpose of pipeline and compressor repair and or maintenance	7.2	✓
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥0.9042	6.6.6		Non-structural repairs & maintenance to permitted equipment	7.3	✓
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251	6.6.7	✓	Detonation of explosives ≤ 100 lb/day and 1,000 lb/year	7.4	

☐ No insignificant activities (Check this box if no equipment in the above categories exist at your facility.)



San Joaquin Valley Unified Air Pollution Control District



Title V Application - COMPLIANCE PLAN

In numerical order list all permitted equipment that are subject to one or more applicable requirements. List all requirements for a permit, each in a separate box, before moving on to the next permit number. Refer to the attached instructions for more information.

COLUMN 1	COLUMN 2	COLUMN 3	COLUMN 4	COLUMN 5
Permit Number	Cite Applicable Requirement(s) Specify the applicable Rule, Regulation, & Section number. See Instructions	Compliance Status: YES NO EXEMPT SUBSUMED	How Will You Comply With The Applicable Requirement? Describe operational requirements and limitations, and/or monitoring, recordkeeping, & reporting protocol to assure compliance with the applicable requirements. See instructions for further details. If SUBSUMED, leave this column blank.	Future Effective Date (List future effective dates of the applicable requirement, if any.)
Facility-Wide Requirements N-2697-0-4				
N-2697-0-4	Facility-Wide Template SJV-UM-0-2	YES	See Facility-Wide Umbrella Template for all conditions.	Not Applicable
N-2697-0-4	Conditions #1 - #40	YES	Incorporated into Facility-Wide Umbrella Template	Not Applicable
N-2697-0-4	Condition #41	YES	Routine O&M procedures.	Not Applicable
N-2697-0-4	Condition #42	YES	Tracked with a compliance calendar.	Not Applicable
Gas Turbine Unit N-2697-1-7				
N-2697-1-7	Condition #1 District NSR Rule 2201, 4.0 40 CFR 60.333(b) Rule 407 (San Joaquin County)	YES	Routine operating procedures.	Not Applicable
N-2697-1-7	Condition #2 District NSR Rule 2201, 4.0 District Rule 1080, 4.0 District Rule 4703, 6.2.1 40 CFR 60.334(b)(1)	YES	Recorded in DAHS reports.	Not Applicable
N-2697-1-7	Condition #3 District NSR Rule 2201, 4.0	YES	Routine O&M procedures.	Not Applicable
N-2697-1-7	Condition #4 District NSR Rule 2201, 4.0	YES	Confirmed during construction.	Not Applicable
N-2697-1-7	Condition #5 District NSR Rule 2201, 4.0	YES	Confirmed during construction.	Not Applicable
N-2697-1-7	Condition #6 District NSR Rule 2201, 4.0	YES	Confirmed during construction.	Not Applicable

N-2697-1-7	Condition #7 District NSR Rule 2201, 4.0	YES	Tracked with a compliance calendar. Routine compliance procedures.	Not Applicable
N-2697-1-7	Condition #8 District NSR Rule 2201, 4.0	YES	Confirmed during construction.	Not Applicable
N-2697-1-7	Condition #9 40 CFR Part 64	YES	Confirmed during construction.	Not Applicable
N-2697-1-7	Condition #10 40 CFR Part 64	YES	Routine operating procedures. Modified operations as necessary.	Not Applicable
N-2697-1-7	Condition #11 40 CFR Part 64	YES	Tracked with compliance calendar. Routine testing procedures.	Not Applicable
N-2697-1-7	Condition #12 District NSR Rule 2201, 4.0	YES	Confirmed during construction.	Not Applicable
N-2697-1-7	Condition #13 District NSR Rule 2201, 4.0	YES	Confirmed during construction.	Not Applicable
N-2697-1-7	Condition #14 District Rule 1080, 6.4 40 CFR 60.334(b)(2)	YES	Routine operating procedures. Data validation confirmed in DAHS.	Not Applicable
N-2697-1-7	Condition #15 District Rule 1080	YES	Standardized report format for the Quarterly CEMS Report.	Not Applicable
N-2697-1-7	Condition #16 District Rule 1080, 6.5 & 6.6 District Rule 4703 40 CFR 60.334(b)(1)	YES	Tracked with a compliance calendar. Review the Source Test Plan. Supervise the source testing. Review the Annual Source Test Report.	Not Applicable
N-2697-1-7	Condition #17 District Rule 1080, 7.3 40 CFR 60.7(b)	YES	Recorded in DAHS reports, Operator Log, and CEMS QA Log.	Not Applicable
N-2697-1-7	Condition #18 40 CFR 60.334(j)(1)(iii)(B) 40 CFR 60.334(j)(1)(iii)(A)	N/A	Definition.	Not Applicable
N-2697-1-7	Condition #19 District Rule 1080, 9.0	YES	Routine compliance procedures.	Not Applicable
N-2697-1-7	Condition #20 District Rule 1080, 10.0	YES	Routine compliance procedures.	Not Applicable
N-2697-1-7	Condition #21 District Rule 1080, 11.0	YES	Tracked with compliance calendar.	Not Applicable
N-2697-1-7	Condition #22 40 CFR 60.8(c)	YES	Definition.	Not Applicable
N-2697-1-7	Condition #23	YES	Data averaging confirmed in DAHS.	Not Applicable

	District Rule 4703, 5.1 & 6.4 40 CFR 60.13(h)			
N-2697-1-7	Condition #24 District Rule 4703, 6.2.6	YES	Recorded in Operator Log and DAHS reports.	Not Applicable
N-2697-1-7	Condition #25 District Rule 1080, 8.0 40 CFR 60.334(j)(5)	YES	Tracked with a compliance calendar. Review DAHS reports and Deviation Reports. Standardized report format for the Quarterly CEMS Report.	Not Applicable
N-2697-1-7	Condition #26 District NSR Rule 2201, 4.0	YES	Routine operating procedures. Tracked via DAHS.	Not Applicable
N-2697-1-7	Condition #27 District NSR Rule 2201, 4.0	N/A	Definition.	Not Applicable
N-2697-1-7	Condition #28 District NSR Rule 2201, 4.0	YES	Confirmed in DAHS.	Not Applicable
N-2697-1-7	Condition #29 District Rule 2080	YES	Routine maintenance procedures for daily calibrations. RATA tracked with a compliance calendar. Review the RATA Test Plan. Routine operating procedures for the RATAs. Supervise the RATA testing. Review the RATA Report.	Not Applicable
N-2697-1-7	Condition #30 District Rule 4201, 3.1	YES	Routine operating procedures.	Not Applicable
N-2697-1-7	Condition #31 District NSR Rule 2201, 4.0 District Rule 4703, 5.1.2	YES	Routine operating procedures. Steam injection and SCR w/ feed forward and feedback control on SCR ammonia injection.	Not Applicable
N-2697-1-7	Condition #32 District NSR Rule 2201, 4.0 District Rule 4703, 5.2	YES	Routine operating procedures. Steam injection w/ feed forward and feedback control.	Not Applicable
N-2697-1-7	Condition #33 District Rule 4102	N/A	District only requirement.	Not Applicable
N-2697-1-7	Condition #34 District NSR Rule 2201, 4.0	YES	Routine operating procedures. Steam injection and SCR w/ feed forward and feedback control on SCR ammonia injection.	Not Applicable
N-2697-1-7	Condition #35 District NSR Rule 2201, 4.0	YES	Routine operating procedures.	Not Applicable
N-2697-1-7	Condition #36 District NSR Rule 2201, 4.0	YES	Routine operating procedures. Feed forward and feedback control on ammonia injection for the SCR.	Not Applicable
N-2697-1-7	Condition #37 District NSR Rule 2201, 4.0	YES	Routine operating procedures.	Not Applicable
N-2697-1-7	Condition #38	YES	Fuel sulfur content specified in gas purchase contract with	Not Applicable

	District NSR Rule 2201, 4.0		PG&E.	
N-2697-1-7	Condition #39 District NSR Rule 2201, 4.0	YES	Routine O&M procedures.	Not Applicable
N-2697-1-7	Condition #40 District Rule 2520, 9.3.2	YES	Tracked with a compliance calendar. Incorporated into annual source test.	Not Applicable
N-2697-1-7	Condition #41 District NSR Rule 2201, 4.0 District Rule 2520, 9.3.2 District Rule 4703, 5.1, 6.3.1, 6.4.1-6.4.3 40 CFR 60.335(a)	YES	Tracked with a compliance calendar. Review the Source Test Plan. Supervise the source testing. Review the Annual Source Test Report.	Not Applicable
N-2697-1-7	Condition #42 District NSR Rule 2201, 4.0 District Rule 1081, 5.0	YES	Tracked with a compliance calendar. Review the Source Test Plan. Supervise the source testing. Review the Annual Source Test Report.	Not Applicable
N-2697-1-7	Condition #43 District Rule 1081, 3.0 & 6.0	YES	Confirmed during construction. Review the Source Test Plan. Supervise the source testing. Review the Annual Source Test Report.	Not Applicable
N-2697-1-7	Condition #44 District Rule 1081, 7.1	YES	Tracked with a compliance calendar. Review the Source Test Plan.	Not Applicable
N-2697-1-7	Condition #45 District Rule 1081, 7.2 & 7.3	YES	Tracked with a compliance calendar. Review the Source Test Report.	Not Applicable
N-2697-1-7	Condition #46 40 CFR 60.335(h)(3)	YES	Fuel sulfur content specified in gas purchase contract with PG&E.	Not Applicable
N-2697-1-7	Condition #47 40 CFR 60.334(b)(3) 40 CFR 60.7 (c)	YES	Routine compliance procedures.	Not Applicable
N-2697-1-7	Condition #48 District NSR Rule 2201, 4.0	YES	Recorded in DAHS reports.	Not Applicable
N-2697-1-7	Condition #49 40 CFR 72(a)(2)	YES	Tracked with a compliance calendar. Routine O&M procedures. Acid Rain Permit incorporated into Title V Permit.	Not Applicable
N-2697-1-7	Condition #50 40 CFR 75	YES	Tracked with a compliance calendar. Routine O&M procedures.	Not Applicable
N-2697-1-7	Condition #51 40 CFR 75.1	N/A	No applicable SOx or NOx limits under Acid Rain.	Not Applicable
N-2697-1-7	Condition #52 40 CFR 73	YES	Tracked with a compliance calendar and DAHS reports.	Not Applicable
N-2697-1-7	Condition #53	N/A	No applicable SOx limits under Acid Rain.	Not Applicable

	40 CFR 77			
N-2697-1-7	Condition #54 40 CFR 72.9(c)(4)	YES	Tracked with a compliance calendar. Routine compliance procedures.	Not Applicable
N-2697-1-7	Condition #55 40 CFR 73.35	N/A	Definition.	Not Applicable
N-2697-1-7	Condition #56 40 CFR 72.2	N/A	Definition.	Not Applicable
N-2697-1-7	Condition #57 40 CFR 72.2	N/A	Definition.	Not Applicable
N-2697-1-7	Condition #58 40 CFR 77.3	YES	No offset plan yet necessary. Prepare offset plan, as necessary.	Not Applicable
N-2697-1-7	Condition #59 40 CFR 77.4(k) 40 CFR 77.6	YES	No excess emissions yet. Pay penalties, as necessary. Comply with offset plan, as necessary.	Not Applicable
N-2697-1-7	Condition #60 40 CFR 72.9(f)(1)(i)	YES	Routine recordkeeping procedures.	Not Applicable
N-2697-1-7	Condition #61 40 CFR 75.3(c)	YES	Routine recordkeeping procedures.	Not Applicable
N-2697-1-7	Condition #62 40 CFR 75	YES	Tracked with a compliance calendar. Routine compliance procedures.	Not Applicable
N-2697-1-7	Condition #63 District Rule 4703, 6.2.4	YES	See Conditions #9 and #19 of N-2697-0-4.	Not Applicable
N-2697-1-7	Condition #64 District Rule 2520, 13.2	N/A	Permit shield.	Not Applicable
N-2697-1-7	Condition #65 District Rule 2520, 13.2	N/A	Permit shield.	Not Applicable
N-2697-1-7	Condition #66 District Rule 2520, 13.2	N/A	Permit shield.	Not Applicable
N-2697-1-7	Rule 1080, Section 4.0	SUBSUMED	See Condition #2.	Not Applicable
N-2697-1-7	Rule 1080, Section 6.3	YES	Routine O&M procedures.	Not Applicable
N-2697-1-7	Rule 1080, Section 6.5	SUBSUMED	See Condition #16.	Not Applicable
N-2697-1-7	Rule 1080, Section 6.6	SUBSUMED	See Condition #16.	Not Applicable
N-2697-1-7	Rule 1080, Section 7.1	YES	CEMS linked to a data logger.	Not Applicable
N-2697-1-7	Rule 1080, Section 7.2	YES	Tracked with a compliance calendar. Routine maintenance procedures for the linearity checks. Review the RATA Test Plan. Routine operating procedures for the RATAs. Supervise the RATA testing. Review the RATA Report.	Not Applicable

N-2697-1-7	Rule 1081, Section 4.0	YES	Routine recordkeeping procedures.	Not Applicable
N-2697-1-7	Rule 1081, Section 5.0	SUBSUMED	See Condition #42.	Not Applicable
N-2697-1-7	Rule 1081, Section 6.4	SUBSUMED	See Condition #14.	Not Applicable
N-2697-1-7	Rule 2080	N/A	Definition.	Not Applicable
N-2697-1-7	Rule 2520	SUBSUMED	See Permit N-2697-0-4 and Conditions #34-36 and #40-41.	Not Applicable
N-2697-1-7	Rule 4101	SUBSUMED	See Condition #22 of N-2697-0-4.	Not Applicable
N-2697-1-7	Rule 4201	SUBSUMED	See Condition #30.	Not Applicable
N-2697-1-7	Rule 4703, Section 5.2	SUBSUMED	See Condition #32.	Not Applicable
N-2697-1-7	Rule 4703, Section 5.3.1.1	YES	Routine SU/SD procedures.	Not Applicable
N-2697-1-7	Rule 4703, Section 5.3.2	YES	Routine SU/SD procedures.	Not Applicable
N-2697-1-7	Rule 4703, Section 6.2.1	SUBSUMED	See Condition #2.	Not Applicable
N-2697-1-7	Rule 4703, Section 6.2.4	SUBSUMED	See Condition #63.	Not Applicable
N-2697-1-7	Rule 4703, Section 6.2.8	YES	Recorded in Operator Log and DAHS reports.	Not Applicable
N-2697-1-7	40 CFR 60.4(a)	YES	Routine compliance procedures.	Not Applicable
N-2697-1-7	40 CFR 60.7(a)(4)	YES	Routine compliance procedures.	Not Applicable
N-2697-1-7	40 CFR 60.7(d)	YES	Routine reporting procedures.	Not Applicable
N-2697-1-7	40 CFR 60.7(f)	YES	Routine recordkeeping procedures.	Not Applicable
N-2697-1-7	40 CFR 60.8(a)	YES	As required by the District. Tracked with a compliance calendar. Review the Performance Test Plan. Supervise the performance testing. Review the Performance Test Report.	Not Applicable
N-2697-1-7	40 CFR 60.8(b)	YES	Review the Performance Test Plan. Supervise the performance testing. Review the Performance Test Report.	Not Applicable
N-2697-1-7	40 CFR 60.8(d)	YES	Tracked with a compliance calendar.	Not Applicable
N-2697-1-7	40 CFR 60.8(e)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-1-7	40 CFR 60.8(f)	YES	Review the Performance Test Plan. Supervise the performance testing. Review the Performance Test Report.	Not Applicable
N-2697-1-7	40 CFR 60.8(g)	YES	Review the Performance Test Plan. Supervise the performance testing. Review the Performance Test Report.	Not Applicable
N-2697-1-7	40 CFR 60.11(d)	YES	Routine O&M procedures.	Not Applicable
N-2697-1-7	40 CFR 60.13(a)	N/A	Definition.	Not Applicable
N-2697-1-7	40 CFR 60.13(c)	YES	As required by the District. Tracked with a compliance calendar. Review the Performance Test Plan. Supervise the performance testing. Perform the 7-day calibration drift test	Not Applicable

			per Part 60 Appendix B. Review the Performance Test Report.	
N-2697-1-7	40 CFR 60.13(c)(2)	YES	As required by the District. Review the Performance Test Report.	Not Applicable
N-2697-1-7	40 CFR 60.13(d)(1)	YES	Routine O&M procedures.	Not Applicable
N-2697-1-7	40 CFR 60.13(e)(2)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-1-7	40 CFR Part 60 App. F.3	YES	QA/QC Plan reviewed periodically and updated, as necessary.	Not Applicable
N-2697-1-7	40 CFR Part 60 App. F.4	YES	Routine maintenance procedures for the daily calibration drift assessments.	Not Applicable
N-2697-1-7	40 CFR Part 60 App. F.5.1.1	YES	Tracked with a compliance calendar. Review the RATA Test Plan. Routine operating procedures for the RATAs. Supervise the RATA testing. Review the RATA Report.	Not Applicable
N-2697-1-7	40 CFR Part 60 App. F.5.1.2	YES	Tracked with a compliance calendar. Routine maintenance procedures for the CGAs.	Not Applicable
N-2697-1-7	40 CFR Part 60 App. F.7	YES	Review the Daily Calibration Reports. Review the Quarterly CGA/LC Reports. Review the RATA Report. Standardized report format for the Quarterly CEMS Report.	Not Applicable
N-2697-1-7	40 CFR 60.332(a)(1)	YES	Routine reporting procedures.	Not Applicable
N-2697-1-7	40 CFR 60.334(b)(3)	SUBSUMED	See Condition #47.	Not Applicable
N-2697-1-7	40 CFR 60.334(j)(1)(iii)(A)	SUBSUMED	See Condition #18.	Not Applicable
N-2697-1-7	40 CFR 60.335	YES	Tracked with a compliance calendar. Review the Source Test Plan. Supervise the source testing. Review the Annual Source Test Report	Not Applicable
N-2697-1-7	40 CFR 72.9(a)(2)	SUBSUMED	See Condition #49.	Not Applicable
N-2697-1-7	40 CFR 72.9(b)(1)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-1-7	40 CFR 72.9(c)(1)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-1-7	40 CFR 72.9(c)(4)	SUBSUMED	See Condition #54.	Not Applicable
N-2697-1-7	40 CFR 72.9(c)(5)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-1-7	40 CFR 72.9(e)(1)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-1-7	40 CFR 72.9(e)(2)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-1-7	40 CFR 72.9(f)(1)(i)	SUBSUMED	See Condition #60.	Not Applicable
N-2697-1-7	40 CFR 72.9(f)(1)(ii-iv)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-1-7	40 CFR 72.9(f)(2)	SUBSUMED	See Streamlining Analysis.	Not Applicable
Emergency Diesel Fire Pump Engine N-2697-4-4				

N-2697-4-4	Condition #1 District NSR Rule 2201, 4.0	YES	Routine O&M procedures.	Not Applicable
N-2697-4-4	Condition #2 District Rule 4201,3.1	YES	Routine operating procedures.	Not Applicable
N-2697-4-4	Condition #3 District NSR Rule 2201, 4.0 District Rule 4801 17 CCR 93115.5(b) 40 CFR Part 63 Subpart ZZZZ 63.6604	YES	Standard fuel purchase procedures.	Not Applicable
N-2697-4-4	Condition #4 District Rule 4702, 4.3.1.3 17 CCR 93115 40 CFR Part 63 Subpart ZZZZ 63.6625(f)	YES	Confirmed after construction.	Not Applicable
N-2697-4-4	Condition #5 District Rule 4702, 4.3.1.2 17 CCR 93115.3(n)	YES	Routine O&M procedures.	Not Applicable
N-2697-4-4	Condition #6 District Rule 4702, 6.2.3 District Rule 2520, 9.3.2 17 CCR 93115.10(f)(1)	YES	Routine O&M procedures. Review engine log.	Not Applicable
N-2697-4-4	Condition #7 District Rule 2520. 9.3.2 17 CCR 93115.10(f)(1)(H)	YES	Standard fuel purchase procedures. Review engine log.	Not Applicable
N-2697-4-4	Condition #8 District Rule 2520, 13.2	N/A	Permit Shield.	Not Applicable
N-2697-4-4	Condition #9 40 CFR Part 63 Subpart ZZZZ Table 2d.4.a	YES	Standard fuel purchase procedures.	Not Applicable
N-2697-4-4	Condition #10 40 CFR Part 63 Subpart ZZZZ 63.6625(i)	N/A	Definition.	Not Applicable
N-2697-4-4	Condition #11 40 CFR Part 63 Subpart ZZZZ Table 2d.4.c	YES	Routine O&M procedures.	Not Applicable
N-2697-4-4	Condition #12 40 CFR Part 63 Subpart	YES	Routine O&M procedures. Review engine log.	Not Applicable

	ZZZZ Table 2d.4.c			
N-2697-4-4	Condition #13 40 CFR Part 63 Subpart ZZZZ 63.6625(e) & (e)(3)	YES	Standard fuel purchase procedures. Review fuel purchase records.	Not Applicable
N-2697-4-4	Condition #14 40 CFR Part 63 Subpart ZZZZ 63.6625(h)	YES	Routine O&M procedures. Review engine log.	Not Applicable
N-2697-4-4	Condition #15 40 CFR Part 63 Subpart ZZZZ	YES	Recordkeeping.	Not Applicable
N-2697-4-4	Condition #16 District Rule 4702, 6.2.2 40 CFR Part 63 Subpart ZZZZ 63.6660(b)	YES	Recordkeeping.	Not Applicable
N-2697-4-4	Rule 4101	YES	See Condition #22 of N-2697-0-4.	Not Applicable
N-2697-4-4	Rule 4201	SUBSUMED	See Condition #2.	Not Applicable
N-2697-4-4	Rule 4701, Section 4.2	YES	Recordkeeping.	Not Applicable
N-2697-4-4	Rule 4701, Section 6.2.2	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-4-4	Rule 4701, Section 6.2.2.2	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-4-4	Rule 4701, Section 6.2.3	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-4-4	Rule 4702, Section 4.3.1.1	YES	Recordkeeping.	Not Applicable
N-2697-4-4	Rule 4702, Section 4.3.1.2	SUBSUMED	See Condition #5.	Not Applicable
N-2697-4-4	Rule 4702, Section 4.3.1.3	SUBSUMED	See Condition #4.	Not Applicable
N-2697-4-4	Rule 4702, Section 6.2.2	SUBSUMED	See Condition #16.	Not Applicable
N-2697-4-4	Rule 4702, Section 6.2.3	SUBSUMED	See Condition #6.	Not Applicable
N-2697-4-4	40 CFR 63.6603(a)	YES	Tracked with a compliance calendar. Routine maintenance procedures.	Not Applicable
N-2697-4-4	40 CFR 63.6604	SUBSUMED	See Condition #3.	Not Applicable
N-2697-4-4	40 CFR 63.6605(b)	YES	Routine O&M procedures.	Not Applicable
N-2697-4-4	40 CFR 63.6625(e)(3)	YES	Routine O&M procedures.	Not Applicable
N-2697-4-4	40 CFR 63.6625(f)	SUBSUMED	See Condition #4.	Not Applicable
N-2697-4-4	40 CFR 63.6625(h)	SUBSUMED	See Condition #14.	Not Applicable
N-2697-4-4	40 CFR 63.6625(i)	SUBSUMED	See Condition #10.	Not Applicable
N-2697-4-4	40 CFR 63.6640(f)(1)	YES	Recordkeeping.	Not Applicable
N-2697-4-4	40 CFR 63.6655(e)	SUBSUMED	See Condition #13.	Not Applicable
N-2697-4-4	40 CFR 63.6655(f)	YES	Routine O&M and recordkeeping procedures.	Not Applicable

N-2697-4-4	CCR 93115.3(n)	SUBSUMED	See Condition #5.	Not Applicable
N-2697-4-4	CCR 93115.5(b)	SUBSUMED	See Condition #3.	Not Applicable
N-2697-4-4	CCR 93115.10(f)(1)	SUBSUMED	See Condition #6.	Not Applicable
N-2697-4-4	CCR 93115.10(f)(2)	N/A	District only requirement.	Not Applicable
Gas Turbine Unit N-2697-5-2				
N-2697-5-2	Condition #1 District Rule 1100, 6.1	SUBSUMED	See Condition #1 of N-2697-0-4.	Not Applicable
N-2697-5-2	Condition #2 District Rule 1100, 7.0	SUBSUMED	See Condition #2 of N-2697-0-4.	Not Applicable
N-2697-5-2	Condition #3 District Rule 4201	YES	Routine operating procedures.	Not Applicable
N-2697-5-2	Condition #4 District Rule 1080, 11.0	YES	Routine O&M procedures.	Not Applicable
N-2697-5-2	Condition #5 District NSR Rule 2201, 4.0	N/A	Obsolete commissioning requirement.	Not Applicable
N-2697-5-2	Condition #6 District NSR Rule 2201, 4.0 District Rule 4703, 5.3.3	YES	Routine SU/SD procedures. Tracked via DAHS.	Not Applicable
N-2697-5-2	Condition #7 District NSR Rule 2201, 4.0	YES	Routine SU/SD procedures. Tracked via DAHS.	Not Applicable
N-2697-5-2	Condition #8 District NSR Rule 2201, 4.0	YES	Recorded by the DAHS.	Not Applicable
N-2697-5-2	Condition #9 District NSR Rule 2201, 4.0	N/A	12-month evaluation period is ongoing.	2/7/2014
N-2697-5-2	Condition #10 District NSR Rule 2201, 4.0	N/A	Definition.	Not Applicable
N-2697-5-2	Condition #11 District NSR Rule 2201, 4.0	N/A	Definition.	Not Applicable
N-2697-5-2	Condition #12 District NSR Rule 2201, 4.0	YES	Routine operating procedures. Automatic process controls.	Not Applicable
N-2697-5-2	Condition #13 District NSR Rule 2201, 4.0	YES	Confirmed during construction. Recorded by the DAHS.	Not Applicable
N-2697-5-2	Condition #14 40 CFR 64	YES	Confirmed during construction.	Not Applicable
N-2697-5-2	Condition #15 40 CFR 64	N/A	Definition	Not Applicable
N-2697-5-2	Condition #16	YES	Routine testing procedures.	Not Applicable

	40 CFR 64			
N-2697-5-2	Condition #17 District NSR Rule 2201, 4.0	YES	Routine maintenance procedures. Recorded by the DAHS.	Not Applicable
N-2697-5-2	Condition #18 District Rule 4703, 3.29	N/A	Definition	Not Applicable
N-2697-5-2	Condition #19 District Rule 4703, 3.26	N/A	Definition	Not Applicable
N-2697-5-2	Condition #20 District NSR Rule 2201, 4.0	YES	Routine operating procedures. Feed forward and feedback control on SCR ammonia injection.	Not Applicable
N-2697-5-2	Condition #21 District NSR Rule 2201, 4.0 District Rule 4703, 5.3.2	N/A	Routine SU/SD procedures.	Not Applicable
N-2697-5-2	Condition #22 District NSR Rule 2201, 4.0 District Rule 4001 District Rule 4703, 5.1.2 & 5.2	YES	Routine operating procedures. DLN combustors and SCR w/ feed forward and feedback control on SCR ammonia injection for NOx. DLN combustors and oxidation catalyst for CO. Oxidation catalyst for VOC. Pipeline quality natural gas with sulfur content < 1 gr/100 scf for SOx. Tracked via DAHS.	Not Applicable
N-2697-5-2	Condition #23 District NSR Rule 2201, 4.0	YES	Routine operating procedures. DLN combustors and SCR w/ feed forward and feedback control on SCR ammonia injection for NOx. DLN combustors and oxidation catalyst for CO. Oxidation catalyst for VOC. Pipeline quality natural gas with sulfur content < 1 gr/100 scf for SOx. Tracked via DAHS.	Not Applicable
N-2697-5-2	Condition #24 District NSR Rule 2201, 4.0	YES	Fuel sulfur content specified in gas purchase contract with PG&E.	Not Applicable
N-2697-5-2	Condition #25 District NSR Rule 2201, 4.0	YES	Tracked via DAHS.	Not Applicable
N-2697-5-2	Condition #26 District NSR Rule 2201, 4.0	YES	Tracked via DAHS.	Not Applicable
N-2697-5-2	Condition #27 District NSR Rule 2201, 4.0 40 CFR 60.4330(a)(2)	YES	Tracked via DAHS.	Not Applicable
N-2697-5-2	Condition #28 District NSR Rule 2201, 4.0	YES	Tracked via DAHS.	Not Applicable
N-2697-5-2	Condition #29 District NSR Rule 2201, 4.0	YES	Tracked via DAHS.	Not Applicable
N-2697-5-2	Condition #30	YES	Tracked via DAHS.	Not Applicable

	District NSR Rule 2201, 4.0			
N-2697-5-2	Condition #31 District NSR Rule 2201, 4.0	YES	DAHS monitoring for gas turbine. Spreadsheet tracking for combined emissions from the gas turbine and auxiliary boiler.	Not Applicable
N-2697-5-2	Condition #32 District NSR Rule 2201, 4.0	N/A	Routine operating procedures.	Not Applicable
N-2697-5-2	Condition #33 District NSR Rule 2201, 4.0	YES	Confirmed during construction. Routine O&M procedures.	Not Applicable
N-2697-5-2	Condition #34 District NSR Rule 2201, 4.0	YES	Tracked with a compliance calendar. Review the Source Test Plan. Supervise the source testing. Review the Annual Source Test Report.	Not Applicable
N-2697-5-2	Condition #35 District NSR Rule 2201, 4.0	YES	Review the Source Test Plan.	Not Applicable
N-2697-5-2	Condition #36 District NSR Rule 2201, 4.0	YES	Tracked with a compliance calendar. Review the Source Test Plan. Supervise the source testing. Review the Annual Source Test Report.	Not Applicable
N-2697-5-2	Condition #37 District Rule 1081, 7.1	YES	Tracked with a compliance calendar. Review the Source Test Plan. Supervise the source testing. Review the Annual Source Test Report.	Not Applicable
N-2697-5-2	Condition #38 District Rule 1081, 7.2	YES	Fuel sulfur content specified in gas purchase contract with PG&E.	Not Applicable
N-2697-5-2	Condition #39 District Rule 1081	YES	Review the Source Test Plan. Supervise the source testing. Review the Annual Source Test Report.	Not Applicable
N-2697-5-2	Condition #40 District NSR Rule 2201, 4.0 District Rule 4703, 6.3.1 40 CFR 60.4400(a)	YES	Tracked with a compliance calendar.	Not Applicable
N-2697-5-2	Condition #41 District NSR Rule 2201, 4.0 40 CFR 60.4360 40 CFR 60.4365(a) 40 CFR 60.4370(c)	YES	Tracked with a compliance calendar. Review the Source Test Report.	Not Applicable
N-2697-5-2	Condition #42 District Rule 1081, 5.0 District Rule 4703, 6.3.1 & 6.4.1-6.4.3 40 CFR 60.4400(a)(1)(i)	YES	Tracked with a compliance calendar. Routine maintenance procedures for the annual accuracy test.	Not Applicable
N-2697-5-2	Condition #43	YES	Confirmed during construction. Routine O&M procedures.	Not Applicable

	40 CFR 60.4415(a)(1)(i)		QA is tracked with a compliance calendar.	
N-2697-5-2	Condition #44 District Rule 1081, 7.2 & 7.3	YES	Confirmed during construction. Routine O&M procedures. QA is tracked with a compliance calendar.	Not Applicable
N-2697-5-2	Condition #45 District NSR Rule 2201, 4.0 District Rule 4703	YES	Incorporated into 40 CFR 60.4345(b).	Not Applicable
N-2697-5-2	Condition #46 District Rule 1080, 4.0 & 5.0 District NSR Rule 2201, 4.0 District Rule 4703, 6.2.1 40 CFR 60.4340(b)(1) 40 CFR 60.4345(a)	YES	Data averaging confirmed in DAHS.	Not Applicable
N-2697-5-2	Condition #47 District Rule 1080, 6.3, 6.5 & 6.6 40 CFR 60.4345(a)	YES	Tracked with a compliance calendar. Routine maintenance procedures for the CGAs. Standardized report format for the Quarterly CEMS Report.	Not Applicable
N-2697-5-2	Condition #48 District Rule 1080, 6.4 40 CFR 60.4345(b)	YES	Tracked with a compliance calendar. Review the RATA Test Plan. Routine operating procedures for the RATAs. Supervise the RATA testing. Review the RATA Report.	Not Applicable
N-2697-5-2	Condition #49 District Rule 1080, 7.2 40 CFR 60.4350(a-c), (e) & (f)	YES	Tracked with a compliance calendar. Routine maintenance procedures for the linearity checks. Review the RATA Test Plan. Routine operating procedures for the RATAs. Supervise the RATA testing. Review the RATA Report.	Not Applicable
N-2697-5-2	Condition #50 District Rule 1080, 8.0	YES	Incorporated into Condition #51.	Not Applicable
N-2697-5-2	Condition #51 District Rule 1080, 8.0	YES	Confirmed during installation.	Not Applicable
N-2697-5-2	Condition #52 District Rule 1080	YES	Recorded in DAHS reports, Operator Log, and CEMS QA Log.	Not Applicable
N-2697-5-2	Condition #53 District Rule 1080, 7.1	YES	Confirmed during construction.	Not Applicable
N-2697-5-2	Condition #54 District Rule 1080, 7.1	YES	Data invalidation confirmed in DAHS.	Not Applicable
N-2697-5-2	Condition #55 District Rule 1080, 7.3 District NSR Rule 2201, 4.0 40 CFR 60.7(b)	YES	Routine maintenance procedures for the combustor tuning. Routine compliance procedures for the recordkeeping.	Not Applicable
N-2697-5-2	Condition #56	YES	Recorded in DAHS reports.	Not Applicable

	District Rule 1081			
N-2697-5-2	Condition #57 40 CFR 60.4380(b)(2)	YES	Recorded in Operator Log and DAHS reports.	Not Applicable
N-2697-5-2	Condition #58 District NSR Rule 2201, 4.0	YES	Incorporated into Conditions #9 and #19 of N-2697-0-3.	Not Applicable
N-2697-5-2	Condition #59 District NSR Rule 2201, 4.0	YES	Tracked with a compliance calendar. Review DAHS reports and Deviation Reports. Standardized report format for the Quarterly CEMS Report.	Not Applicable
N-2697-5-2	Condition #60 District NSR Rule 2201, 4.0 District Rule 4703, 6.2.6, 6.2.8, & 6.2.11	YES	Obsolete construction requirement. NOx correlation submitted.	Not Applicable
N-2697-5-2	Condition #61 District NSR Rule 2201, 4.0 District Rule 4703, 6.2.4	YES	Acid Rain Permit incorporated into Title V Permit. Routine O&M procedures. Permit renewal tracked with a compliance calendar.	Not Applicable
N-2697-5-2	Condition #62 District Rule 1080, 8.0 40 CFR 60.4375(a) 40 CFR 60.4395	YES	Tracked with a compliance calendar. Routine O&M procedures.	Not Applicable
N-2697-5-2	Condition #63 District Rule 4703, 6.2.5	N/A	No applicable SOx or NOx limits under Acid Rain.	Not Applicable
N-2697-5-2	Condition #64 40 CFR 72.9(a)(2)	YES	Tracked with compliance calendar and DAHS reports.	Not Applicable
N-2697-5-2	Condition #65 40 CFR 75	N/A	No applicable SOx limits under Acid Rain.	Not Applicable
N-2697-5-2	Condition #66 40 CFR 75.1	YES	Tracked with a compliance calendar. Routine compliance procedures.	Not Applicable
N-2697-5-2	Condition #67 40 CFR 73	N/A	Definition.	Not Applicable
N-2697-5-2	Condition #68 40 CFR 77	N/A	Definition.	Not Applicable
N-2697-5-2	Condition #69 40 CFR 72.9(c)(4)	N/A	Definition.	Not Applicable
N-2697-5-2	Condition #70 40 CFR 73.35	YES	No offset plan yet necessary. Prepare offset plan, as necessary.	Not Applicable
N-2697-5-2	Condition #71 40 CFR 72	YES	No excess emissions yet. Pay penalties, as necessary. Comply with offset plan, as necessary.	Not Applicable
N-2697-5-2	Condition #72	YES	Routine recordkeeping procedures.	Not Applicable

	40 CFR 72.2			
N-2697-5-2	Condition #73 40 CFR 77.3	YES	Routine recordkeeping procedures.	Not Applicable
N-2697-5-2	Condition #74 40 CFR 77.4(k) 40 CFR 77.6	YES	No excess emissions yet. Pay penalties, as necessary. Comply with offset plan, as necessary.	Not Applicable
N-2697-5-2	Condition #75 40 CFR 72.9(f)(1)(i)	YES	Routine recordkeeping procedures.	Not Applicable
N-2697-5-2	Condition #76 40 CFR 75.3(c)	YES	Routine recordkeeping procedures.	Not Applicable
N-2697-5-2	Condition #77 40 CFR 75	YES	Tracked with a compliance calendar. Routine compliance procedures.	Not Applicable
N-2697-5-2	Rule 1080, Section 4.0	SUBSUMED	See Condition #46.	Not Applicable
N-2697-5-2	Rule 1080, Section 6.3	SUBSUMED	See Condition #47.	Not Applicable
N-2697-5-2	Rule 1080, Section 6.4	SUBSUMED	See Condition #48.	Not Applicable
N-2697-5-2	Rule 1080, Section 6.5	SUBSUMED	See Condition #47.	Not Applicable
N-2697-5-2	Rule 1080, Section 6.6	SUBSUMED	See Condition #47.	Not Applicable
N-2697-5-2	Rule 1080, Section 7.1	SUBSUMED	See Condition #53 and Condition #54.	Not Applicable
N-2697-5-2	Rule 1080, Section 7.2	SUBSUMED	See Condition #49.	Not Applicable
N-2697-5-2	Rule 1080, Section 7.3	SUBSUMED	See Condition #55.	Not Applicable
N-2697-5-2	Rule 1080, Section 8.0	SUBSUMED	See Condition #50 and Condition #51.	Not Applicable
N-2697-5-2	Rule 1080, Section 9.0	YES	Routine compliance procedures.	Not Applicable
N-2697-5-2	Rule 1080, Section 10.0	YES	Routine compliance procedures.	Not Applicable
N-2697-5-2	Rule 1080, Section 11.0	SUBSUMED	See Condition #4.	Not Applicable
N-2697-5-2	Rule 1081, Section 3.0	YES	Confirmed during construction.	Not Applicable
N-2697-5-2	Rule 1081, Section 4.0	YES	Routine recordkeeping procedures.	Not Applicable
N-2697-5-2	Rule 1081, Section 5.0	SUBSUMED	See Condition #42.	Not Applicable
N-2697-5-2	Rule 1081, Section 6.0	YES	Review the Source Test Plan. Supervise the source testing. Review the Annual Source Test Report.	Not Applicable
N-2697-5-2	Rule 1081, Section 7.1	SUBSUMED	See Condition #37.	Not Applicable
N-2697-5-2	Rule 1081, Section 7.2	SUBSUMED	See Condition #38 and Condition #44.	Not Applicable
N-2697-5-2	Rule 1081, Section 7.3	SUBSUMED	See Condition #44.	Not Applicable
N-2697-5-2	Rule 4101	SUBSUMED	See Condition #22 of N-2697-0-4.	Not Applicable
N-2697-5-2	Rule 4201	SUBSUMED	See Condition #3.	Not Applicable

N-2697-5-2	Rule 4703, Section 5.1.2	SUBSUMED	See Condition #22.	Not Applicable
N-2697-5-2	Rule 4703, Section 5.2	SUBSUMED	See Condition #22.	Not Applicable
N-2697-5-2	Rule 4703, Section 5.3.2	SUBSUMED	See Condition #21.	Not Applicable
N-2697-5-2	Rule 4703, Section 5.3.3	SUBSUMED	See Condition #6.	Not Applicable
N-2697-5-2	Rule 4703, Section 6.2.1	SUBSUMED	See Condition #46.	Not Applicable
N-2697-5-2	Rule 4703, Section 6.2.4	SUBSUMED	See Condition #61.	Not Applicable
N-2697-5-2	Rule 4703, Section 6.2.5	SUBSUMED	See Condition #63.	Not Applicable
N-2697-5-2	Rule 4703, Section 6.2.6	SUBSUMED	See Condition #60.	Not Applicable
N-2697-5-2	Rule 4703, Section 6.2.8	SUBSUMED	See Condition #60.	Not Applicable
N-2697-5-2	Rule 4703, Section 6.3.1	SUBSUMED	See Condition #40 and Condition #42.	Not Applicable
N-2697-5-2	Rule 4703, Section 6.4.1	SUBSUMED	See Condition #42.	Not Applicable
N-2697-5-2	Rule 4703, Section 6.4.2	SUBSUMED	See Condition #42.	Not Applicable
N-2697-5-2	Rule 4703, Section 6.4.3	SUBSUMED	See Condition #42.	Not Applicable
N-2697-5-2	40 CFR 60.4(a)	YES	Routine compliance procedures.	Not Applicable
N-2697-5-2	40 CFR 60.7(a)(4)	YES	Routine compliance procedures.	Not Applicable
N-2697-5-2	40 CFR 60.7(b)	YES	Recordkeeping.	Not Applicable
N-2697-5-2	40 CFR 60.7(c)	YES	Tracked with Compliance Calendar.	Not Applicable
N-2697-5-2	40 CFR 60.7(d)	YES	Routine reporting procedures.	Not Applicable
N-2697-5-2	40 CFR 60.7(f)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-5-2	40 CFR 60.8(a)	YES	As required by the District. Tracked with a compliance calendar. Review the Performance Test Plan. Supervise the performance testing. Review the Performance Test Report.	Not Applicable
N-2697-5-2	40 CFR 60.8(b)	YES	Review the Performance Test Plan. Supervise the performance testing. Review the Performance Test Report.	Not Applicable
N-2697-5-2	40 CFR 60.8(c)	YES	Records request incorporated into Condition #16 of N-2697-0-3. Review the Performance Test Plan. Supervise the performance testing. Review the Performance Test Report.	Not Applicable
N-2697-5-2	40 CFR 60.8(d)	YES	Tracked with a compliance calendar.	Not Applicable
N-2697-5-2	40 CFR 60.8(e)	YES	Confirmed during construction.	Not Applicable
N-2697-5-2	40 CFR 60.8(f)	YES	Review the Performance Test Plan. Supervise the performance testing. Review the Performance Test Report.	Not Applicable
N-2697-5-2	40 CFR 60.8(g)	YES	Review the Performance Test Plan. Supervise the performance testing. Review the Performance Test Report.	Not Applicable
N-2697-5-2	40 CFR 60.11(d)	YES	Routine operating procedures.	Not Applicable
N-2697-5-2	40 CFR 60.13(a)	N/A	Definition.	Not Applicable
N-2697-5-2	40 CFR 60.13(c)	YES	As required by the District. Tracked with a compliance	Not Applicable

			calendar. Review the Performance Test Plan. Supervise the performance testing. Perform the 7-day calibration drift test per Part 60 Appendix B. Review the Performance Test Report.	
N-2697-5-2	40 CFR 60.13(c)(2)	YES	As required by the District. Review the Performance Test Report.	Not Applicable
N-2697-5-2	40 CFR 60.13(d)(1)	YES	Routine maintenance procedures.	Not Applicable
N-2697-5-2	40 CFR 60.13(e)(2)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-5-2	40 CFR 60.13(h)(2)	YES	Data validation confirmed in DAHS.	Not Applicable
N-2697-5-2	40 CFR Part 60 App. F.3	YES	QA/QC Plan reviewed periodically and updated, as necessary.	Not Applicable
N-2697-5-2	40 CFR Part 60 App. F.4	YES	Routine maintenance procedures for the daily calibration drift assessments.	Not Applicable
N-2697-5-2	40 CFR Part 60 App. F.5.1.1	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-5-2	40 CFR Part 60 App. F.5.1.2	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-5-2	40 CFR Part 60 App. F.7	YES	Review the Daily Calibration Reports. Review the Quarterly CGA/LC Reports. Review the RATA Report. Standardized report format for the Quarterly CEMS Report.	Not Applicable
N-2697-5-2	40 CFR 60.4320(a)	YES	Routine operating procedures.	Not Applicable
N-2697-5-2	40 CFR 60.4333(a)	YES	Routine operating and O&M procedures.	Not Applicable
N-2697-5-2	40 CFR 60.4340(b)(1)	SUBSUMED	See Condition #46.	Not Applicable
N-2697-5-2	40 CFR 60.4345(a)	SUBSUMED	See Condition #46 & #47.	Not Applicable
N-2697-5-2	40 CFR 60.4345(b)	SUBSUMED	See Condition #48.	Not Applicable
N-2697-5-2	40 CFR 60.4345(c)	YES	Certified per Part 75, Appendix D.	Not Applicable
N-2697-5-2	40 CFR 60.4345(e)	YES	QA/QC Plan reviewed periodically and updated, as necessary.	Not Applicable
N-2697-5-2	40 CFR 60.4350	SUBSUMED	See Condition #49.	Not Applicable
N-2697-5-2	40 CFR 60.4360	SUBSUMED	See Condition #41.	Not Applicable
N-2697-5-2	40 CFR 60.4365(a)	SUBSUMED	See Condition #41.	Not Applicable
N-2697-5-2	40 CFR 60.4375(a)	SUBSUMED	See Condition #62.	Not Applicable
N-2697-5-2	40 CFR 60.4380(b)(1)	N/A	Definition.	Not Applicable
N-2697-5-2	40 CFR 60.4380(b)(2)	SUBSUMED	See Condition #57.	Not Applicable
N-2697-5-2	40 CFR 60.4395	SUBSUMED	See Condition #62.	Not Applicable
N-2697-5-2	40 CFR 60.4400(a)(1)(i)	SUBSUMED	See Condition #42.	Not Applicable

N-2697-5-2	40 CFR 72.9(a)(2)	SUBSUMED	See Condition #64.	Not Applicable
N-2697-5-2	40 CFR 72.9(b)(1)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-5-2	40 CFR 72.9(c)(1)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-5-2	40 CFR 72.9(c)(4)	SUBSUMED	See Condition #69.	Not Applicable
N-2697-5-2	40 CFR 72.9(c)(5)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-5-2	40 CFR 72.9(e)(1)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-5-2	40 CFR 72.9(e)(2)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-5-2	40 CFR 72.9(f)(1)(i)	SUBSUMED	See Condition #75.	Not Applicable
N-2697-5-2	40 CFR 72.9(f)(1)(ii-iv)	SUBSUMED	See Streamlining Analysis.	Not Applicable
N-2697-5-2	40 CFR 72.9(f)(2)	SUBSUMED	See Streamlining Analysis.	Not Applicable
Cooling Tower N-2697-6-1				
N-2697-6-1	Condition #1 District Rule 1100, 6.1	YES	Report as needed.	Not Applicable
N-2697-6-1	Condition #2 District Rule 1100, 7.0	YES	Report as needed.	Not Applicable
N-2697-6-1	Condition #3 District Rule 4201	YES	Drift eliminator. Monitor TDS in cooling water.	Not Applicable
N-2697-6-1	Condition #4 District Rule 7012, 5.2.1	YES	Routine operating procedures.	Not Applicable
N-2697-6-1	Condition #5 District NSR Rule 2201, 4.0	N/A	Confirmed during construction.	Not Applicable
N-2697-6-1	Condition #6 District NSR Rule 2201, 4.0	YES	Drift eliminator. Monitor TDS in cooling water.	Not Applicable
N-2697-6-1	Condition #7 District NSR Rule 2201, 4.0	YES	Recorded in a spreadsheet.	Not Applicable
N-2697-6-1	Condition #8 District Rule 1081, 7.3 District NSR Rule 2201, 4.0	YES	Tracked with a compliance calendar. Routine compliance procedures.	Not Applicable
N-2697-6-1	Rule 1081, Section 7.3	SUBSUMED	See Condition #7.3.	Not Applicable
N-2697-6-1	Rule 2520, Section 9.3.2	N/A	Routine operating and monitoring procedures. Recordkeeping.	Not Applicable
N-2697-6-1	Rule 4201	SUBSUMED	See Condition #3.	Not Applicable
N-2697-6-1	Rule 7012	SUBSUMED	See Condition #4.	Not Applicable
Auxiliary Boiler N-2697-7-1				
N-2697-7-1	Condition #1 District NSR Rule 2201, 4.0	YES	Routine O&M procedures.	Not Applicable
N-2697-7-1	Condition #2	YES	Routine operating procedures.	Not Applicable

	District NSR Rule 4201			
N-2697-7-1	Condition #3 District NSR Rule 2201, 4.0 District Rule 4320, 5.4.1.1	YES	Routine operating procedures.	Not Applicable
N-2697-7-1	Condition #4 District NSR Rule 2201, 4.0 40 CFR 60.48(c)(g)	YES	Confirmed during construction. Routine maintenance procedures.	Not Applicable
N-2697-7-1	Condition #5 District Rule 1100, 6.1	YES	Report as needed.	Not Applicable
N-2697-7-1	Condition #6 District Rule 1100, 7.0	YES	Report as needed.	Not Applicable
N-2697-7-1	Condition #7 District NSR Rule 2201, 4.0 District Rule 4305, 5.1.1 District Rule 4306, 5.1.1 District Rule 4320, 5.2.1	YES	Routine O&M procedures. Ultra-low-NOx burner.	Not Applicable
N-2697-7-1	Condition #8 District NSR Rule 2201, 4.0 District Rule 4305, 5.3 District Rule 4306, 5.1.1 District Rule 4320, 5.2.1	YES	Routine O&M procedures. Ultra-low-NOx burner.	Not Applicable
N-2697-7-1	Condition #9 District NSR Rule 2201, 4.0	YES	Routine O&M procedures. Ultra-low-NOx burner.	Not Applicable
N-2697-7-1	Condition #10 District NSR Rule 2201, 4.0	YES	Routine O&M procedures. Emission limit reflects AP-42 emission factor.	Not Applicable
N-2697-7-1	Condition #11 District NSR Rule 2201, 4.0	YES	Fuel sulfur content specified in gas purchase contract with PG&E.	Not Applicable
N-2697-7-1	Condition #12 District NSR Rule 2201, 4.0	YES	Recorded in spreadsheet.	Not Applicable
N-2697-7-1	Condition #13 District NSR Rule 2201, 4.0	YES	Recorded in spreadsheet.	Not Applicable
N-2697-7-1	Condition #14 District NSR Rule 2201, 4.0	YES	Recorded in spreadsheet.	Not Applicable
N-2697-7-1	Condition #15 District NSR Rule 2201, 4.0	YES	Recorded in spreadsheet.	Not Applicable
N-2697-7-1	Condition #16 District NSR Rule 2201, 4.0	YES	Recorded in spreadsheet.	Not Applicable
N-2697-7-1	Condition #17	YES	Recorded in spreadsheet.	Not Applicable

	District NSR Rule 2201, 4.0			
N-2697-7-1	Condition #18 District Rule 4305, 5.5.2 District Rule 4306, 5.5.2 District Rule 4320, 5.8.2	YES	Routine compliance procedures.	Not Applicable
N-2697-7-1	Condition #19 District Rule 4305, 6.3.1 District Rule 4306, 6.3.1 District Rule 4320, 6.3.1	YES	Tracked with a compliance calendar. Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Condition #20 District Rule 4305, 5.5.1 District Rule 4306, 5.5.1	YES	Review the Source Test Plan.	Not Applicable
N-2697-7-1	Condition #21 District Rule 1081, 7.1	YES	Tracked with a compliance calendar. Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Condition #22 District Rule 4305, 6.2.2 District Rule 4306, 6.2.2 District Rule 4320, 6.2.2	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Condition #23 District Rule 4305, 6.2.3 District Rule 4306, 6.2.3 District Rule 4320, 6.2.3	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Condition #24 District Rule 4305, 6.2.4 District Rule 4306, 6.2.4 District Rule 4320, 6.2.4	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Condition #25 District Rule 4305, 5.5.5 District Rule 4306, 5.5.5 District Rule 4320, 5.8.5	YES	Review the Source Test Report.	Not Applicable
N-2697-7-1	Condition #26 District Rule 1081, 7.3	YES	Tracked with a compliance calendar. Review the Source Test Report.	Not Applicable
N-2697-7-1	Condition #27 District Rule 4320, 5.7.6.1	YES	Fuel sulfur content specified in gas purchase contract with PG&E.	Not Applicable
N-2697-7-1	Condition #28 District Rule 4320	YES	Routine compliance procedures.	Not Applicable
N-2697-7-1	Condition #29	YES	Tracked with a compliance calendar. Routine compliance	Not Applicable

	District Rule 4305 District Rule 4306 District Rule 4320		procedures.	
N-2697-7-1	Condition #30 District Rule 4305 District Rule 4306 District Rule 4320	YES	Routine compliance procedures. Routine maintenance procedures.	Not Applicable
N-2697-7-1	Condition #31 District Rule 4305, 5.5.4 District Rule 4306, 5.5.4 District Rule 4320, 5.8.4	YES	Routine compliance procedures.	Not Applicable
N-2697-7-1	Condition #32 District Rule 4305 District Rule 4306 District Rule 4320	YES	Routine compliance procedures.	Not Applicable
N-2697-7-1	Condition #33 District NSR Rule 2201, 4.0 40 CFF 60.48(c)(g)	YES	Recorded in spreadsheet.	Not Applicable
N-2697-7-1	Condition #34 District NSR Rule 2201, 4.0	YES	Recorded in spreadsheet.	Not Applicable
N-2697-7-1	Condition #35 District Rule 1070 District Rule 4305, 6.1 District Rule 4306, 6.1 District Rule 4320, 6.1	YES	Recordkeeping.	Not Applicable
N-2697-7-1	Rule 1081, Section 3.0	YES	Confirmed during construction.	Not Applicable
N-2697-7-1	Rule 1081, Section 4.0	YES	Routine recordkeeping procedures.	Not Applicable
N-2697-7-1	Rule 1081, Section 5.0	YES	Tracked with a compliance calendar. Review the Source Test Plan. Supervise the source testing. Review the Annual Source Test Report.	Not Applicable
N-2697-7-1	Rule 1081, Section 6.0	YES	Review the Source Test Plan. Supervise the source testing. Review the Annual Source Test Report.	Not Applicable
N-2697-7-1	Rule 1081, Section 7.1	SUBSUMED	See Condition #21.	Not Applicable
N-2697-7-1	Rule 1081, Section 7.2	YES	Review the Source Test Plan.	Not Applicable
N-2697-7-1	Rule 1081, Section 7.3	SUBSUMED	See Condition #26.	Not Applicable
N-2697-7-1	Rule 4101	YES	See Condition #22 of N-2697-0-4.	Not Applicable

N-2697-7-1	Rule 4201	SUBSUMED	See Condition #2.	Not Applicable
N-2697-7-1	Rule 4305, Section 5.1.1	SUBSUMED	See Condition #7.	Not Applicable
N-2697-7-1	Rule 4305, Section 5.2.1	YES	Tracked with a compliance calendar. Routine maintenance procedures.	Not Applicable
N-2697-7-1	Rule 4305, Section 5.3	SUBSUMED	See Condition #8.	Not Applicable
N-2697-7-1	Rule 4305, Section 5.4.2	YES	Confirmed during construction. Routine O&M procedures.	Not Applicable
N-2697-7-1	Rule 4305, Section 5.5.1	SUBSUMED	See Condition #20.	Not Applicable
N-2697-7-1	Rule 4305, Section 5.5.2	SUBSUMED	See Condition #18.	Not Applicable
N-2697-7-1	Rule 4305, Section 5.5.4	SUBSUMED	See Condition #31.	Not Applicable
N-2697-7-1	Rule 4305, Section 5.5.5	SUBSUMED	See Condition #25.	Not Applicable
N-2697-7-1	Rule 4305, Section 6.1	SUBSUMED	See Condition #35.	Not Applicable
N-2697-7-1	Rule 4305, Section 6.1.4	YES	Routine maintenance procedures. Routine recordkeeping procedures.	Not Applicable
N-2697-7-1	Rule 4305, Section 6.2.1	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Rule 4305, Section 6.2.2	SUBSUMED	See Condition #22.	Not Applicable
N-2697-7-1	Rule 4305, Section 6.2.3	SUBSUMED	See Condition #23.	Not Applicable
N-2697-7-1	Rule 4305, Section 6.2.4	SUBSUMED	See Condition #24.	Not Applicable
N-2697-7-1	Rule 4305, Section 6.2.5	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Rule 4305, Section 6.2.6	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Rule 4305, Section 6.2.7	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Rule 4305, Section 6.3.1	SUBSUMED	See Condition #19.	Not Applicable
N-2697-7-1	Rule 4305, Section 8.1	YES	Routine compliance procedures.	Not Applicable
N-2697-7-1	Rule 4305, Section 8.2	YES	Routine compliance procedures.	Not Applicable
N-2697-7-1	Rule 4306, Section 5.1.1	SUBSUMED	See Conditions #7 and #8.	Not Applicable
N-2697-7-1	Rule 4306, Section 5.2.1	YES	Tracked with a compliance calendar. Routine maintenance procedures.	Not Applicable
N-2697-7-1	Rule 4306, Section 5.4.2	YES	Confirmed during construction. Routine O&M procedures.	Not Applicable
N-2697-7-1	Rule 4306, Section 5.5.1	SUBSUMED	See Condition #20.	Not Applicable
N-2697-7-1	Rule 4306, Section 5.5.2	SUBSUMED	See Condition #18.	Not Applicable
N-2697-7-1	Rule 4306, Section 5.5.4	SUBSUMED	See Condition #31.	Not Applicable
N-2697-7-1	Rule 4306, Section 5.5.5	SUBSUMED	See Condition #25.	Not Applicable
N-2697-7-1	Rule 4306, Section 6.1	SUBSUMED	See Condition #35.	Not Applicable

N-2697-7-1	Rule 4306, Section 6.1.3	SUBSUMED	See Condition #19.	Not Applicable
N-2697-7-1	Rule 4306, Section 6.2.1	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Rule 4306, Section 6.2.2	SUBSUMED	See Condition #22.	Not Applicable
N-2697-7-1	Rule 4306, Section 6.2.3	SUBSUMED	See Condition #23.	Not Applicable
N-2697-7-1	Rule 4306, Section 6.2.3	SUBSUMED	See Condition #24.	Not Applicable
N-2697-7-1	Rule 4306, Section 6.2.4	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Rule 4306, Section 6.2.5	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Rule 4306, Section 6.2.6	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Rule 4306, Section 6.2.7	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Rule 4306, Section 6.3.1	SUBSUMED	See Condition #19.	Not Applicable
N-2697-7-1	Rule 4306, Section 8.1	YES	Routine compliance procedures.	Not Applicable
N-2697-7-1	Rule 4306, Section 8.2	YES	Routine compliance procedures.	Not Applicable
N-2697-7-1	Rule 4320, Section 5.2.1	SUBSUMED	See Conditions #7 and #8.	Not Applicable
N-2697-7-1	Rule 4320, Section 5.4.1.1	SUBSUMED	See Conditions #3.	Not Applicable
N-2697-7-1	Rule 4320, Section 5.7.1	YES	Confirmed during construction. Routine O&M procedures.	Not Applicable
N-2697-7-1	Rule 4320, Section 5.7.6.1	SUBSUMED	See Condition #27.	Not Applicable
N-2697-7-1	Rule 4320, Section 5.8.1	YES	Review the Source Test Plan.	Not Applicable
N-2697-7-1	Rule 4320, Section 5.8.2	SUBSUMED	See Condition #18.	Not Applicable
N-2697-7-1	Rule 4320, Section 5.8.4	SUBSUMED	See Condition #31.	Not Applicable
N-2697-7-1	Rule 4320, Section 5.8.5	SUBSUMED	See Condition #25.	Not Applicable
N-2697-7-1	Rule 4320, Section 6.1	SUBSUMED	See Condition #35.	Not Applicable
N-2697-7-1	Rule 4320, Section 6.1.3	SUBSUMED	See Condition #19.	Not Applicable
N-2697-7-1	Rule 4320, Section 6.2.1	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Rule 4320, Section 6.2.2	SUBSUMED	See Condition #22.	Not Applicable
N-2697-7-1	Rule 4320, Section 6.2.3	SUBSUMED	See Condition #23.	Not Applicable
N-2697-7-1	Rule 4320, Section 6.2.4	SUBSUMED	See Condition #24.	Not Applicable
N-2697-7-1	Rule 4320, Section 6.2.5	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Rule 4320, Section 6.2.6	YES	Review the Source Test Plan. Supervise the source testing. Review the Source Test Report.	Not Applicable
N-2697-7-1	Rule 4320, Section 6.2.7	YES	Review the Source Test Plan. Supervise the source testing.	Not Applicable

			Review the Source Test Report.	
N-2697-7-1	Rule 4320, Section 6.3.1	SUBSUMED	See Condition #19.	Not Applicable
N-2697-7-1	Rule 4320, Section 8.1	YES	Routine compliance procedures.	Not Applicable
N-2697-7-1	Rule 4320, Section 8.2	YES	Routine compliance procedures.	Not Applicable

TVFORM-004

**San Joaquin Valley
Unified Air Pollution Control District**

Title V Application - COMPLIANCE PLAN STREAMLINING ANALYSIS

Facility Name: NORTHERN CALIFORNIA POWER AGENCY			Facility ID: N - 2697
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Permit Requirement
Gas Turbine Permit N-2967-1-7			
Sampling	40 CFR 60.8(e) The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows: Sampling ports adequate for test methods applicable to such facility. This includes (i) constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures and (ii) providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures. Safe sampling platform(s). Safe access to sampling platform(s). Utilities for sampling and testing equipment.	Condition #43 The owner or operator shall be required to conform to the sampling facilities and testing procedures described in District Rule 1081, 3.0, & 6.0 (as amended 12/16/93). [District Rule 1081, 3.0 & 6.0] Federally Enforceable Through Title V Permit District Rule 1081, Section 3.0 Upon the request of the APCO and as directed by him, the owner of any source operation which emits or may emit air contaminants, for which emission limits have been established, shall provide the following facilities, constructed in accordance with the general industry safety orders of the State of California. 3.1 Sampling ports: Sampling port locations must be determined according to criteria in the California	The owner or operator shall be required to conform to the sampling facilities and testing procedures described in District Rule 1081, 3.0, & 6.0 (as amended 12/16/93). [District Rule 1081, 3.0 & 6.0 and 40 CFR 60.8(e)] Federally Enforceable Through Title V Permit

Facility Name: NORTHERN CALIFORNIA POWER AGENCY			Facility ID: N - 2697
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Permit Requirement
		Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. 3.2 Sampling platforms: Sampling platforms must be constructed according to specifications shown in the Air Resources Board publication entitled Supplement to Stationary Source Test Methods, Volume I, Appendix A, page 1-A-15. 3.3 Access to sampling platforms: In addition to the general industry safety orders of the State of California Title 14, Number 32776, Chapter 4, Subchapter 7, pertaining to ladders, all ladders accessing sampling platforms on any stack, chimney, or other structure will be caged and equipped with rest platforms at 20 foot intervals.	
Monitoring	40 CFR 60.13(e)(2) All continuous monitoring systems referenced by paragraph (c) of this section for measuring emissions, except opacity, shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.	Condition #48 The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA.	The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA. [District Rule 1080 and 40 CFR 60.13(e)(2) & 60.4345(b)] Federally

Facility Name: NORTHERN CALIFORNIA POWER AGENCY			Facility ID: N - 2697
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Permit Requirement
		[District Rule 1080 and 40 CFR 60.4345(b)] Federally Enforceable Through Title V Permit	Enforceable Through Title V Permit
Monitoring	40 CFR 72.9(b)(1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in part 75 of this chapter.	Condition #50 The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit	The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 72.9(b)(1) & 75] Federally Enforceable Through Title V Permit
Emission Limit	40 CFR 72.9(c)(1) The owners and operators of each source and each affected unit at the source shall: Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under §73.34(c) of this chapter) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and Comply with the applicable Acid Rain emissions limitation for sulfur dioxide.	Condition #52 The owners and operators of each source and each affected unit at the source shall: (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit	The owners and operators of each source and each affected unit at the source shall: (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 72.9(c)(1) & 73] Federally Enforceable Through Title V Permit
	40 CFR 72.9(c)(5) An allowance shall not be deducted, in order to comply with the requirements under paragraph (c)(1)(i) of this section,	Condition #55 An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the	An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the calendar year for which the allowance was allocated. [40 CFR 72.9(c)(5) &

Facility Name: NORTHERN CALIFORNIA POWER AGENCY			Facility ID: N - 2697
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Permit Requirement
	prior to the calendar year for which the allowance was allocated.	calendar year for which the allowance was allocated. [40 CFR 73] Federally Enforceable Through Title V Permit	73] Federally Enforceable Through Title V Permit
	40 CFR 72.9(e)(1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under part 77 of this chapter.	Condition #58 The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit	The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77. [40 CFR 72.9(e)(1) & 77] Federally Enforceable Through Title V Permit
	40 CFR 72.9(e)(2) The owners and operators of an affected source that has excess emissions in any calendar year shall: Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by part 77 of this chapter; and Comply with the terms of an approved offset plan, as required by part 77 of this chapter.	Condition #59 The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) Pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit	The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) Pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77. [40 CFR 72.9(e)(2) & 77] Federally Enforceable Through Title V Permit
	40 CFR 72.9(f)(1)(ii-iv) All emissions monitoring information, in accordance with part 75 of this chapter; provided that to the extent that part 75 provides for a 3-year period for recordkeeping, the 3-year period shall	Condition #61 The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created.	The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing

Facility Name: NORTHERN CALIFORNIA POWER AGENCY			Facility ID: N - 2697
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Permit Requirement
	apply. Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program. Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.	This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority; (ii) All emissions monitoring information, in accordance with 40 CFR part 75; (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit	by the Administrator or permitting authority; (ii) All emissions monitoring information, in accordance with 40 CFR part 75; (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program. [40 CFR 72.9(f)(1)(ii-iv) & 75] Federally Enforceable Through Title V Permit
	40 CFR 72.9(f)(2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under subpart I of this part and part 75 of this chapter.	Condition #62 The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 Subpart I. [40 CFR 75] Federally Enforceable Through Title V Permit	The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 Subpart I. [40 CFR 72.9(f)(2) & 75] Federally Enforceable Through Title V Permit
Emergency Diesel Fire Pump Engine			
Recordkeeping	District Rule 4701, 6.2.2 An owner claiming an exemption under Sections 4.2 or 4.3 shall maintain annual operating records. This information shall be submitted to the APCO upon request and at	Condition #6 The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of	The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and

Facility Name: NORTHERN CALIFORNIA POWER AGENCY			Facility ID: N - 2697
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Permit Requirement
	the end of each calendar year in a manner and form approved by the APCO. The records shall include, but are not limited to, the following: 6.2.2.1 Total hours of operation, 6.2.2.2 The type and quantity (cubic feet of gas or gallons of liquid) of fuel used, 6.2.2.3 The purpose for operating the engine, 6.2.2.4 For standby engines, all hours of non-emergency and emergency operation shall be reported, and 6.2.2.5 Other support documentation necessary to demonstrate a claim to the exemption.	emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4702, 6.2 and 2520, 9.3.2 and 17 CCR 931151 Federally Enforceable Through Title V Permit	maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4701, 6.2.2, 4702, 6.2 & 2520, 9.3.2 and 17 CCR 931151 Federally Enforceable Through Title V Permit
Recordkeeping	District Rule 4701, 6.2.2.2 The type and quantity (cubic feet of gas or gallons of liquid) of fuel used,	Condition #7 The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [District Rule 2520, 9.3.2 and 17 CCR	The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [District Rule 2520, 9.3.2 & 4701, 6.2.2.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit

Facility Name: NORTHERN CALIFORNIA POWER AGENCY			Facility ID: N - 2697
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Permit Requirement
		93115] Federally Enforceable Through Title V Permit	
Recordkeeping	District Rule 4701, 6.2.3 Information kept pursuant to Section 6.2.1 or Section 6.2.2 shall be retained for a period of at least five years, shall be readily available, and be made available to the APCO upon request.	Condition #16 All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit	All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4701, 6.2.3 & 4702, 6.2.3 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
Gas Turbine Permit N-2967-5-2			
Monitoring	40 CFR 60.13(e)(2) All continuous monitoring systems referenced by paragraph (c) of this section for measuring emissions, except opacity, shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.	Condition #48 The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA. [District Rule 1080 and 40 CFR 60.4345(b)] Federally Enforceable Through Title V Permit	The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA. [District Rule 1080, 6.4, 40 CFR 60.13(e)(2), and 60.4345(b)] Federally Enforceable Through Title V Permit
Testing	40 CFR Part 60 Appendix F 5.1.2 Cylinder Gas Audit (CGA). If applicable, a CGA may be conducted in three of four calendar quarters, but in no more than three quarters in succession.	Condition #50 In accordance with 40 CFR Part 60, Appendix F, 5.1, the CO CEMS must be audited at least once each calendar quarter, by conducting cylinder gas audits (CGA) or relative accuracy audits (RAA). CGA or RAA may be conducted three of four calendar quarters, but no more than three calendar quarters in succession, Audit reports shall be submitted along with	In accordance with 40 CFR Part 60, Appendix F, 5.1, the CO CEMS must be audited at least once each calendar quarter, by conducting cylinder gas audits (CGA) or relative accuracy audits (RAA). CGA or RAA may be conducted three of four calendar quarters, but no more than three calendar quarters in succession, Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080 and 40 CFR Part 60

Facility Name: NORTHERN CALIFORNIA POWER AGENCY			Facility ID: N - 2697
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Permit Requirement
		quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit	Appendix F, 5.1.2] Federally Enforceable Through Title V Permit
Testing	40 CFR Part 60 App. F.5.1.1 Relative Accuracy Test Audit (RATA). The RATA must be conducted at least once every four calendar quarters, except as otherwise noted in section 5.1.4 of this appendix. Conduct the RATA as described for the RA test procedure in the applicable PS in appendix B (e.g., PS 2 for SO₂ and NO_x). In addition, analyze the appropriate performance audit samples received from EPA as described in the applicable sampling methods (e.g., Methods 6 and 7).	Condition #51 The owner/operator shall perform a RATA for CO as specified by 40 CFR Part 60, Appendix F, 5.1.1, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit	The owner/operator shall perform a RATA for CO as specified by 40 CFR Part 60, Appendix F, 5.1.1, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F [District Rule 1080 and 40 CFR Part 60 Appendix F, 5.1.1] Federally Enforceable Through Title V Permit
Recordkeeping	40 CFR 60.7(f) Any owner or operator subject to the provisions of this part shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records	Condition #61 The owner or operator shall maintain all records of required monitoring data and support information for a period of five years from the date of data entry and shall make such records available to the District upon request. [District Rules 2201 and 4703, 6.2.4] Federally Enforceable Through Title V Permit	The owner or operator shall maintain all records of required monitoring data and support information for a period of five years from the date of data entry and shall make such records available to the District upon request. [District Rules 2201 & 4703, 6.2.4 and 40 CFR 60.7(f)] Federally Enforceable Through Title V Permit

Facility Name: NORTHERN CALIFORNIA POWER AGENCY			Facility ID: N - 2697
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Permit Requirement
Monitoring	40 CFR 72.9(b)(1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in part 75 of this chapter.	Condition #65 The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit	The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 72.9(b)(1) and 75] Federally Enforceable Through Title V Permit
Recordkeeping	40 CFR 72.9(c)(1) The owners and operators of each source and each affected unit at the source shall: 72.9(c)(1)(i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under §73.34(c) of this chapter) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and 72.9(c)(1)(ii) Comply with the applicable Acid Rain emissions limitation for sulfur dioxide.	Condition #67 The owners and operators of each source and each affected unit at the source shall: (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit	The owners and operators of each source and each affected unit at the source shall: (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 72.9(c)(1) and 73] Federally Enforceable Through Title V Permit
Recordkeeping	40 CFR 72.9(c)(5) An allowance shall not be deducted, in order to comply with the requirements under paragraph (c)(1)(i) of this section, prior to the calendar year for which the allowance was allocated.	Condition #70 An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the calendar year for which the allowance was allocated, [40 CFR 73] Federally Enforceable Through Title V Permit	An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the calendar year for which the allowance was allocated. [40 CFR 72.9(c)(5) and 73.35] Federally Enforceable Through Title V Permit
Reporting	40 CFR 72.9(e)(1) The designated representative of an affected	Condition #73 The designated representative of an	The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed

Facility Name: NORTHERN CALIFORNIA POWER AGENCY			Facility ID: N - 2697
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Permit Requirement
	source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under part 77 of this chapter.	affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit	offset plan, as required under 40 CFR part 77. [40 CFR 72.9(e)(1) and 77.3] Federally Enforceable Through Title V Permit
Reporting	40 CFR 72.9(e)(2) The owners and operators of an affected source that has excess emissions in any calendar year shall: 72.9(e)(2)(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by part 77 of this chapter; and 72.9(e)(2)(ii) Comply with the terms of an approved offset plan, as required by part 77 of this chapter	Condition #74 The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) Pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit	The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) Pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77. [40 CFR 72.9(e)(2), 77.4(k) and 77.6] Federally Enforceable Through Title V Permit

Facility Name: NORTHERN CALIFORNIA POWER AGENCY			Facility ID: N - 2697
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Permit Requirement
Recordkeeping	40 CFR 72.9(f)(1)(ii) All emissions monitoring information, in accordance with part 75 of this chapter; <i>provided</i> that to the extent that part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply. 40 CFR 72.9(f)(1)(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program. 40 CFR 72.9(f)(1)(iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.	Condition #75 The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority; (ii) All emissions monitoring information, in accordance with 40 CFR part 75; (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit	The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority; (ii) All emissions monitoring information, in accordance with 40 CFR part 75; (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program. [40 CFR 72.9(f)(1)(ii-iv) and 75.3(c)] Federally Enforceable Through Title V Permit
Reporting	40 CFR 72.9(f)(2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under subpart I of this part and part 75 of this chapter.	Condition #76 The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 Subpart I. [40 CFR 75] Federally Enforceable Through Title V Permit	The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 72.9 Subpart I and 40 CFR 75. [40 CFR 72.9(f)(2) and 75] Federally Enforceable Through Title V Permit



San Joaquin Valley Air Pollution Control District

TITLE V COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☐ INITIAL TITLE V PERMIT

☒ PERMIT RENEWAL

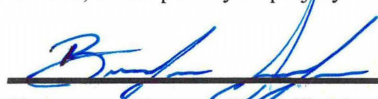
☐ NEW TITLE V PERMIT

COMPANY NAME: Northern California Power Agency	FACILITY ID: N - 2697
1. Type of Organization: ☐ Corporation ☐ Sole Ownership ☐ Government ☐ Partnership ☒ Utility	
2. Owner's Name: Northern California Power Agency	
3. Agent to the Owner:	
4. Compliance Certifications will be submitted on: year 1: <u>1 / 30 / 2019</u> year 2: <u>1 / 30 / 2020</u> year 3: <u>1 / 30 / 2021</u> year 4: <u>1 / 30 / 2022</u> year 5: <u>1 / 30 / 2023</u> Other dates if required by regulations or compliance schedule: _____	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial each circle 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) which the source is in compliance as identified in the Compliance Plan.
- ☒ 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 as identified in the Compliance Plan, on a timely basis.
- ☐ Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance at the time of permit issuance with the applicable federal requirement(s), as identified in the Compliance Plan, and I have attached a compliance schedule.
- ☒ 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

3/1/2018

Date

Brooklyn Saylor

Name of Responsible Official (please print)

Environmental Health & Safety Specialist

Title of Responsible Official (please print)

Title V General Permit Template Qualification Form
for
Facility-wide Umbrella General Permit Template

District facility ID # _____

N-2697

To use this template, remove this sheet and attach to application. The conditions outlined in this template will be placed on your Title V permit.

Any facility may use this facility-wide template as part of its Title V application.

Based on information and belief formed after reasonable inquiry: 1) the information on this form is true and correct and 2) the facility certifies compliance with this template's permit conditions.


Signature of Responsible Official

3/1/2018
Date

Brooklyn Saylor

Name of Responsible Official (Please Print)

APPENDIX B: CURRENT TITLE V PERMIT



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

Permit to Operate

FACILITY: N-2697

EXPIRATION DATE: 05/31/2019

LEGAL OWNER OR OPERATOR:
MAILING ADDRESS:

NORTHERN CALIFORNIA POWER
651 COMMERCE DR
ROSEVILLE, CA 95678

FACILITY LOCATION:

12745 N THORNTON RD
LODI, CA 95241

FACILITY DESCRIPTION:

COGENERATION FACILITY

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

Seyed Sadredin
Executive Director / APCO

Arnaud Marjollet
Director of Permit Services

San Joaquin Valley Air Pollution Control District

FACILITY: N-2697-0-4

EXPIRATION DATE: 05/31/2019

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: NORTHERN CALIFORNIA POWER
Location: 12745 N THORNTON RD, LODI, CA 95241
N-2697-0-4 : Jun 18 2014 1:39PM - KAHLOW

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon January 1 of each year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days of the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2697-1-7

EXPIRATION DATE: 05/31/2019

EQUIPMENT DESCRIPTION:

ONE (1) GENERAL ELECTRIC LM5000 NATURAL GAS FIRED GAS TURBINE ENGINE WITH STEAM INJECTION, SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION, AND AN OXIDIZATION CATALYST SERVING A 49 MW ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired exclusively on PUC-quality natural gas. [District NSR Rule, 40 CFR 60.333(b); Rule 407 (San Joaquin County)] Federally Enforceable Through Title V Permit
2. Operator shall operate and maintain in calibration a system which continuously measures and records: control system operating parameters, elapsed time of operation, and the exhaust gas NO_x, CO and O₂ concentrations. [40 CFR 60.334 (b)(1), District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit
3. The turbine and associated ancillary equipment must be maintained and kept in good operating condition at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. A selective catalytic reduction (SCR) system shall be installed in the path of the heat recovery boiler where the temperature range is 450 to 750 degrees F. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The permittee shall provide a continuous temperature monitoring and recording system to indicate the flue gas temperature through the SCR system. [District NSR Rule] Federally Enforceable Through Title V Permit
6. A SCR system shall have an effective catalyst volume of at least 100 cubic feet at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The catalyst bed and other components of the SCR system shall be made available for visual inspection by the District at least once a year. The District shall be notified at least 30 days prior to scheduling such inspection. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The turbine shall be equipped with an oxidation catalyst to reduce CO and NMHC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The oxidation catalyst shall be equipped with a continuous temperature monitoring system to measure and record the temperature at the inlet face of the oxidation catalyst. [40 CFR Part 64] Federally Enforceable Through Title V Permit
10. The oxidation catalyst shall be maintained between 450°F and 1,350°F except during startup or shutdown periods. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. The District may administratively re-establish temperature range as necessary following any replacement of the oxidation catalyst material. [40 CFR Part 64] Federally Enforceable Through Title V Permit
11. Source testing to measure the VOC emissions shall be conducted during the upcoming annual source testing in the 4th quarter of 2014 and annually thereafter. EPA Method 18 or 25, or alternative District approved methods may be used to measure VOC emissions. The owner or operator shall measure and record temperature at the inlet of the oxidation catalyst during each source test while measuring VOC emissions. [40 CFR Part 64] 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. The turbine shall be equipped with an automatic air/fuel ratio control system. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The stack height shall be minimum of 50 feet, and shall be adequate for stack sampling pursuant to EPA reference methods for source testing. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [40 CFR 60.334(b)(2) and District Rule 1080, 6.4] Federally Enforceable Through Title V Permit
15. The NOx and O2 CEMS shall be installed, certified, and audited in accordance with the applicable requirements of 40 CFR Part 75. Linearity reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
16. The NOx and O2 CEMS installed, certified, and audited in accordance with the applicable requirements of 40 CFR Part 75 may be used to meet the requirements of 40 CFR 60.334. However, the missing data substitution methodology provided for in Part 75 is not required for purposes of identifying excess emissions. Instead, periods of missing CEMS data are to be reported as monitor downtime in the quarterly CEMS report. [40 CFR 60.334(b) and District Rules 1080 and 4703] Federally Enforceable Through Title V Permit
17. The owner or operator shall maintain CEMS records that contain the following: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emission measurements. [District Rule 1080, 7.3 and 40 CFR 60.7(b)] Federally Enforceable Through Title V Permit
18. A period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or O2 (or both). [40 CFR 60.334(j)(1)(iii)(B)] Federally Enforceable Through Title V Permit
19. A violation of NOx emission standards indicated by the NOx CEM shall be reported by the operator to the APCO within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
20. Operator shall notify the APCO no later than eight hours after the detection of a breakdown of the CEM. Operator shall inform the APCO of the intent to shut down the CEM at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
21. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the monitoring devices required by this rule to ensure that such devices are functioning properly. [District Rule 1080, 11.0] Federally Enforceable Through Title V Permit
22. Operations during periods of startup or shutdown shall not constitute representative conditions for the purpose of a NOx performance test nor shall NOx emissions in excess of the level of the emission limit shown in this permit during periods of startup and shutdown be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard. [40 CFR 60.8(c)] Federally Enforceable Through Title V Permit
23. Results of the CEM system shall be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with all applicable requirements of CFR 60.13(h). [40 CFR 60.13(h), and District Rule 4703, 5.1, 6.4] Federally Enforceable Through Title V Permit
24. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation type and quantity of fuel used. [District Rule 4703, 6.2.6] 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...

25. Operators of CEM systems installed at the direction of the APCO shall submit a written report for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative, except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [40 CFR 60.334 (j)(5) and District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
26. The fuel consumption, based on the higher heating value of the fuel, shall not exceed 463 million Btu in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
27. All emissions during start-up and shutdown periods shall be counted towards the applicable daily emissions limitations. [District NSR Rule] Federally Enforceable Through Title V Permit
28. The daily emission rates shall be calculated based on the hourly average stack concentrations and the calculated stack gas flowrates. [District NSR Rule] Federally Enforceable Through Title V Permit
29. The continuous emissions monitoring equipment shall be calibrated at least once per day. Relative Accuracy Testing shall be performed annually in accordance with 40 CFR Part 60, Appendices B & F or Part 75 if approved by the EPA. [District Rule 2080] Federally Enforceable Through Title V Permit
30. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
31. The unit shall comply with the Rule 4703 NOx limit of 5 ppmvd @ 15% O2 within two hours of the commencement of start-up and shut-down periods as defined in Rule 4703. Within three hours of commencing the start-up or shutdown sequence, the NOx emissions shall not exceed 3.0 ppmvd @ 15% O2 over a three hour rolling average. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
32. The unit shall comply with the Rule 4703 CO limit of 200 ppmvd @ 15% O2 within two hours of the commencement of start-up and shutdown periods as defined in Rule 4703. Within three hours of commencing the start-up or shutdown sequence, the CO emissions shall not exceed 200 ppmvd @ 15% O2 over a three hour rolling average [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
33. The ammonia slip shall not exceed 25 ppmv, dry, corrected to 15% O2. [District Rule 4102]
34. The NOx emissions shall not exceed 112.0 pounds during any one day when burning natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
35. The PM10 emissions shall not exceed 48.0 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
36. The CO emissions shall not exceed 322.0 pounds in any one day when burning natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
37. The VOC emissions shall not exceed 142.0 pounds in any one day and 19,992 pounds in any one year. [District NSR Rule] Federally Enforceable Through Title V Permit
38. The fuel sulfur content shall not exceed 1.0 gr/100 scf. [District NSR Rule] Federally Enforceable Through Title V Permit
39. There shall be no visible emissions (except for uncombined water) from the entire system except during periods of startup and shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit
40. Visible emissions shall be inspected annually 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

41. The owner or operator shall conduct and provide source test information annually regarding the exhaust gas NO_x and CO concentration corrected to 15% O₂ (dry). EPA Methods 7E or 20 shall be used for NO_x emissions. EPA Methods 10 or 10B shall be used for CO emissions. EPA Methods 3, 3A, or 20 shall be used for Oxygen content of the exhaust gas. [40 CFR 60.335(a), District NSR Rule and District Rules 2520, Section 9.3.2, 4703, 5.1, 6.3.1, 6.4.1, 6.4.2, and 6.4.3] Federally Enforceable Through Title V Permit
42. The owner or operator shall conduct and provide source test information annually regarding, the NH₃ emissions, and shall be measured using BAAQMD Method ST-1B. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
43. The owner or operator shall be required to conform to the sampling facilities and testing procedures described in District Rule 1081, 3.0, & 6.0 (as amended 12/16/93). [District Rule 1081, 3.0 & 6.0] Federally Enforceable Through Title V Permit
44. The District must be notified 30 days prior to any performance testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
45. Performance testing shall be witnessed or authorized District personnel. Test results must be submitted to the District within 60 days of performance testing. [District Rule 1081, 7.2 & 7.3] Federally Enforceable Through Title V Permit
46. The sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or Gas Processors Association Standard 2377. If sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the Monitoring frequency shall be every six (6) months. If any six (6) month monitoring show exceedance, weekly monitoring shall resume and exceedance shall be reported to APCO [40 CFR 60.335(h)(3)] Federally Enforceable Through Title V Permit
47. The operator shall submit a quarterly report of excess emissions and monitor downtime as defined and specified in 40 CFR 60.334 (b)(3) and (j). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction. [40 CFR 60.334 (b)(3) and 40 CFR 60.7 (c)] Federally Enforceable Through Title V Permit
48. A daily log showing the hourly rate of ammonia injection and the pressure drop across the catalyst shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
49. The owners and operators of each affected source and each affected unit at the source shall have an Acid Rain permit and operate in compliance with all permit requirements. [40 CFR 72] Federally Enforceable Through Title V Permit
50. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit
51. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
52. The owners and operators of each source and each affected unit at the source shall: (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit
53. Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act. [40 CFR 77] Federally Enforceable Through Title V Permit
54. Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program. [40 CFR 72] Federally Enforceable Through Title V Permit
55. An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the calendar year for which the allowance was allocated. [40 CFR 73] 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.

56. An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization. [40 CFR 72] Federally Enforceable Through Title V Permit
57. An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right. [40 CFR 72] Federally Enforceable Through Title V Permit
58. The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
59. The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) Pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
60. The owners and operators of the each affected unit at the source shall keep on site the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority: (i) The certificate of representation for the designated representative for the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site beyond such five-year period until such documents are superceded because of the submission of a new certificate of representation changing the designated representative. [40 CFR 72] Federally Enforceable Through Title V Permit
61. The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority; (ii) All emissions monitoring information, in accordance with 40 CFR part 75; (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
62. The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 Subpart I. [40 CFR 75] Federally Enforceable Through Title V Permit
63. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4703] Federally Enforceable Through Title V Permit
64. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
65. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332(a)(1), (b), 60.333 (b); 60.334, (b)(1), (b)(2), (b)(3), (h)(3), (i)(2), (j)(3); 60.335(a), (b)(1), (b)(2), and (b)(10)(ii). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
66. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b), 60.8(a), (c), (d), and 60.13(b); District Rules 1080 (as amended 12/17/92), Sections 6.3, 6.4, 6.5, 7.0, 7.1, 7.2, 7.3, 8.0, 9.0, 10.0, and 11.0; and 1081 (as amended 12/16/93) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2697-4-4

EXPIRATION DATE: 05/31/2019

EQUIPMENT DESCRIPTION:

240 BHP CUMMINS MODEL 6CTA8.3-F1 DIESEL FIRED IC ENGINE WITH A TURBOCHARGER AND AFTERCOOLER SYSTEM POWERING AN EMERGENCY FIRE PUMP

PERMIT UNIT REQUIREMENTS

1. The NOx emissions rate shall not exceed 6.12 g/bhp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
3. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115 and 40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115 and 40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
5. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, 4.3 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4702, 6.2 and 2520, 9.3.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [District Rule 2520, 9.3.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
9. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. The owner or operator has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
11. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
12. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
13. The owner or operator shall operate and maintain the engine according to the manufacturer's emission-related written instructions or develop its own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
14. The owner or operator 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 Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
15. The owner or operator shall keep records of the maintenance conducted on the engine to demonstrate that the engine and the associated emissions control equipment (if any) is being operated and maintained according to the manufacturer's maintenance plan. These records shall include, but are not limited to the date, hour meter reading, action performed (e.g., engine oil and filter change/analysis, air filter inspection, hoses and belt inspection, etc.), name of the individual conducting maintenance and company affiliation. [40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
16. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2697-5-2

EXPIRATION DATE: 05/31/2019

EQUIPMENT DESCRIPTION:

294 MW (NOMINAL) COMBINED-CYCLE ELECTRIC GENERATION PLANT CONSISTING OF A SIEMENS INDUSTRIAL FRAME "FLEX PLANT 30" STG6-5000F NATURAL GAS-FIRED TURBINE ENGINE WITH DRY LOW-NOX COMBUSTORS, AN UNFIRED HEAT RECOVERY STEAM GENERATOR SERVED BY A SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION AND AN OXIDIZATION CATALYST AND A STEAM TURBINE GENERATOR

PERMIT UNIT REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100]
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100]
3. Particulate matter emissions from the gas turbine system shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit
5. Commissioning period shall commence when all mechanical, electrical, and control systems are installed and individual system startup has been completed, or when a gas turbine is first fired, whichever occurs first. The commissioning period shall terminate when the plant has completed initial source testing, completed final plant tuning, and is available for commercial operation. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The duration of startup or shutdown period shall not exceed 3.0 hours per event for any type of startup event (hot, warm, or cold). [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
7. The combined startup and shutdown duration for all events shall not exceed 6.0 hours during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The owner/operator shall maintain records of the date, start-up time, downtime for gas turbine and the steam turbine prior to startup, startup type, minute-by-minute turbine load (MW), and NOx and CO concentrations (ppmvd @ 15% O2) measurement using CEMS, for each startup event in the first 12 months of operation following the end of the commissioning period. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Within 15 months of the end of the commissioning period, the owner/operator shall submit to the District, the CARB and the EPA proposed new time limits for each type of startup that reflect the effect of "Flex Plant 30" fast start-up technology. The proposed time limits shall be based on the required data collected in the first 12 months of operation following the end of the commissioning period. The submittal must include all CEMS data. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. A margin of compliance of 60 minutes (or less) may be added to the longest startup to establish a startup limit for each type of startup event (hot, warm, or cold). The established startup limit shall not exceed 3.0 hours. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The District shall administratively establish appropriate startup times for each startup mode (hot, warm, or cold), and associated recordkeeping requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
12. During all types of operation, including startup (cold, warm and hot), shutdown, and combustor tuning periods, ammonia injection into the SCR system shall occur once the minimum temperature of 406°F at the catalyst face has been reached to ensure NOx emission reductions can occur with a reasonable level of ammonia slip. The District may administratively modify the temperature as necessary following any replacement of the SCR catalyst material. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The SCR system shall be equipped with a continuous temperature monitoring system to measure and record the temperature at the catalyst face. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The oxidation catalyst shall be equipped with a continuous temperature monitoring system to measure and record the temperature at the inlet face of the oxidation catalyst. [40 CFR Part 64] Federally Enforceable Through Title V Permit
15. The oxidation catalyst shall be maintained between 450°F and 1,350°F except during startup, shutdown, and combustor tuning periods. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. The District may administratively re-establish temperature range as necessary following any replacement of the oxidation catalyst material. [40 CFR Part 64] Federally Enforceable Through Title V Permit
16. The owner or operator shall measure and record temperature at the inlet face of the oxidation catalyst during each source test while measuring VOC emissions. [40 CFR Part 64] Federally Enforceable Through Title V Permit
17. During start-up, and shutdown and combustor tuning periods, the emissions shall not exceed any of the following limits: NOx (as NO2) - 160.00 lb/hr; CO - 1,500.00 lb/hr; VOC (as methane) - 16.00 lb/hr; PM10 - 9.00 lb/hr; SOx (as SO2) - 6.10 lb/hr; or NH3 - 28.76 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. . [District Rule 4703, 3.29] Federally Enforceable Through Title V Permit
19. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status ending when the fuel supply to the unit is completely turned off. [District Rule 4703, 3.26] Federally Enforceable Through Title V Permit
20. Combustor tuning periods are any periods, not to exceed 8 hours in any calendar day or 40 hours in any calendar year, when combustor tuning activities are taking place. Combustor tuning activities are defined as any testing, adjustment, tuning, and calibration activities recommended by the gas turbine manufacturer to ensure safe and reliable steady-state operation of the gas turbine following replacement of the combustor components, during seasonal tuning events, or at other times when recommended by the turbine manufacturer or necessary to maintain low emissions performance. This includes, but is not limited to, adjusting the amount of fuel distributed between the combustion turbine's staged fuel systems to simultaneously minimize NOx and CO production while minimizing combustor dynamics and ensuring combustor stability. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup, shutdown and combustor tuning periods. [District Rules 2201 and 4703, 5.3.2] Federally Enforceable Through Title V Permit
22. Except during startup, shutdown and combustor tuning periods, emissions from the gas turbine system shall not exceed any of the following limits: NOx (as NO2) - 15.54 lb/hr and 2.0 ppmvd @ 15% O2; CO - 9.46 lb/hr and 2.0 ppmvd @ 15% O2; VOC (as methane) - 3.79 lb/hr and 1.4 ppmvd @ 15% O2; PM10 - 9.0 lb/hr; or SOx (as SO2) - 6.10 lb/hr. NOx (as NO2) emission limits are based on 1-hour rolling average period. All other emission limits are based on 3-hour rolling average period. [District Rules 2201, 4001 and 4703] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. NH3 emissions shall not exceed any of the following limits: 10.0 ppmvd @ 15% O2 over a 24-hour rolling average period and 28.76 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Each 3-hour rolling average period will be compiled from the three most recent one hour periods. Each one hour period shall commence on the hour. Each one hour period in a twenty-four hour rolling average for ammonia slip will commence on the hour. The twenty-four hour rolling average shall be calculated using the most recent twenty-four one-hour periods. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Emissions from the gas turbine system, on days when startup, shutdown and/or combustor tuning activities occur, shall not exceed the following limits: NOx (as NO2) - 879.7 lb/day; CO - 5,570.3 lb/day; VOC - 164.2 lb/day; PM10 - 216.0 lb/day; SOx (as SO2) - 146.4 lb/day, or NH3 - 690.3 lb/day. Daily emissions shall be compiled for a twenty-four hour period starting and ending at twelve-midnight. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Emissions from the gas turbine system, on days when startup, shutdown and/or combustor tuning activities do not occur, shall not exceed the following: NOx (as NO2) - 373.0 lb/day; CO - 227.0 lb/day; VOC - 91.0 lb/day; PM10 - 216.0 lb/day; SOx (as SO2) - 146.4 lb/day, or NH3 - 690.3 lb/day. Daily emissions shall be compiled for a twenty-four hour period starting and ending at twelve-midnight. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Gas turbine system shall be fired on PUC-regulated natural gas with a sulfur content of no greater than 1.0 grain of sulfur compounds (as S) per 100 dscf of natural gas. [District Rule 2201 and 40 CFR 60.4330(a)(2)] Federally Enforceable Through Title V Permit
28. NOx (as NO2) emissions from the gas turbine system shall not exceed any of the following: 1st quarter: 38,038 lb; 2nd quarter: 38,411 lb; 3rd quarter: 37,126 lb; 4th quarter: 37,840 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
29. CO emissions from the gas turbine system shall not exceed any of the following: 1st quarter: 142,312 lb; 2nd quarter: 142,539 lb; 3rd quarter: 86,374 lb; 4th quarter: 113,660 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
30. VOC emissions from the gas turbine system shall not exceed any of the following: 1st quarter: 8,086 lb; 2nd quarter: 8,177 lb; 3rd quarter: 8,417 lb; 4th quarter: 8,323 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
31. NH3 emissions from the SCR system shall not exceed any of the following: 1st quarter: 62,122 lb; 2nd quarter: 62,812 lb; 3rd quarter: 63,502 lb; 4th quarter: 63,502 lb. [District Rule] Federally Enforceable Through Title V Permit
32. PM10 emissions from the gas turbine system shall not exceed any of the following: 1st quarter: 19,440 lb; 2nd quarter: 19,656 lb; 3rd quarter: 19,872 lb; 4th quarter: 19,872 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
33. SOx (as SO2) emissions from the gas turbine system shall not exceed any of the following: 1st quarter: 13,176 lb; 2nd quarter: 13,322 lb; 3rd quarter: 13,469 lb; 4th quarter: 13,469 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
34. The total CO emissions from the gas turbine system (N-2697-5) and the auxiliary boiler (N-2697-7) shall not exceed 198,000 pounds in any 12-consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
35. A selective catalytic reduction (SCR) system and an oxidation catalyst shall serve the gas turbine system. [District Rule 2201] Federally Enforceable Through Title V Permit
36. The gas turbine engine and generator lube oil vents shall be equipped with mist eliminators or equivalent technology sufficient to limit the visible emissions from the lube oil vents to not exceed 5% opacity, except for a period not exceeding three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
37. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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38. Source testing shall be witnessed or authorized by District personnel and samples shall be collected by a California Air Resources Board (CARB) certified testing laboratory or a CARB certified source testing firm. [District Rule 1081] Federally Enforceable Through Title V Permit
39. Source testing to measure startup and shutdown NO_x, CO, and VOC mass emission rates shall be conducted at least once every seven years. CEM relative accuracy for NO_x and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEM data is not certifiable to determine compliance with NO_x and CO startup emission limits, then startup and shutdown NO_x and CO testing shall be conducted every 12 months. If an annual startup and shutdown NO_x and CO relative accuracy audit demonstrates that the CEM data is certifiable, the startup and shutdown NO_x and CO testing frequency shall return to the once every seven years schedule. [District Rule 1081] Federally Enforceable Through Title V Permit
40. Source testing to determine compliance with the NO_x, CO, VOC and NH₃ emission rates (lb/hr and ppmvd @ 15% O₂) and PM₁₀ emission rate (lb/hr) shall be conducted at least once every 12 months. [District Rules 2201 and 4703, 40 CFR 60.4400(a)] Federally Enforceable Through Title V Permit
41. The sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract, or (ii) monitored within 60 days after the end of commissioning period and weekly thereafter. If the sulfur content is less than or equal to 1.0 gr/100 dsct for eight consecutive weeks, then the monitoring frequency shall be every six months. If the result of any six month monitoring demonstrates that the fuel does not meet the fuel sulfur content limit, weekly monitoring shall resume until compliance is demonstrated for eight consecutive weeks. [District Rule 2201 and 40 CFR 60.4360, 60.4365(a) and 60.4370(c)] Federally Enforceable Through Title V Permit
42. The following test methods shall be used: NO_x - EPA Method 7E or 20 or CARB Method 100; CO - EPA Method 10 or 10B or CARB Method 100; VOC - EPA Method 18 or 25; PM₁₀ - EPA Method 5 (front half and back half) or 201 and 202a; ammonia - BAAQMD ST-1B; and O₂ - EPA Method 3, 3A, or 20 or CARB Method 100. EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081 and 4703, 40 CFR 60.4400(1)(i)] Federally Enforceable Through Title V Permit
43. Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D6228, D6667 or Gas Processors Association Standard 2377. [40 CFR 60.4415(a)(1)(i)] Federally Enforceable Through Title V Permit
44. 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
45. A mass or volumetric fuel flow meter that meets the requirements of 40 CFR Part 75 shall be installed, utilized and maintained to measure the amount of natural gas combusted in the unit. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
46. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NO_x, CO and O₂ concentrations. Continuous emissions monitor(s) shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CEMS passes the relative accuracy requirement for startups and shutdowns specified herein. If relative accuracy of CEMS cannot be demonstrated during startup conditions, CEMS results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits contained in this document. [District Rules 1080, 2201 and 4703, 40 CFR 60.4340(b)(1) and 40 CFR 60.4345(a)] Federally Enforceable Through Title V Permit
47. The NO_x and O₂ CEMS shall be installed and certified in accordance with the requirements of 40 CFR Part 75. The CO CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specification 4A (PS 4A), or shall meet equivalent specifications established by mutual agreement of the District, the CARB, and the EPA. [District Rule 1080 and 40 CFR 60.4345(a)] Federally Enforceable Through Title V Permit
48. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA. [District Rule 1080 and 40 CFR 60.4345(b)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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49. The CEMS data shall be reduced to hourly averages as specified in 40 CFR 60.13(h) and in accordance with 40 CFR 60.4350, or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [District Rule 1080 and 40 CFR 60.4350] Federally Enforceable Through Title V Permit
50. In accordance with 40 CFR Part 60, Appendix F, 5.1, the CO CEMS must be audited at least once each calendar quarter, by conducting cylinder gas audits (CGA) or relative accuracy audits (RAA). CGA or RAA may be conducted three of four calendar quarters, but no more than three calendar quarters in succession. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
51. The owner/operator shall perform a RATA for CO as specified by 40 CFR Part 60, Appendix F, 5.1.1, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
52. The NO_x and O₂ CEMS shall be audited in accordance with the applicable requirements of 40 CFR Part 75. Linearity reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
53. Upon written notice from the District, the owner or operator shall provide a summary of the data obtained from the CEMS. This summary shall be in the form and the manner prescribed by the District. [District Rule 1080] Federally Enforceable Through Title V Permit
54. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEMS data polling software system and shall make CEMS data available to the District's automated polling system on a daily basis. Upon notice by the District that the facility's CEMS is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEMS data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
55. The owner or operator shall maintain the following records: the date, time and duration of any malfunction of the continuous monitoring equipment; dates of performance testing; dates of evaluations, calibrations, checks, and adjustments of the continuous monitoring equipment; date and time period which a continuous monitoring system or monitoring device was inoperative. [District Rules 1080 and 2201 and 40 CFR 60.7(b)] Federally Enforceable Through Title V Permit
56. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NO_x, CO, and O₂ analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
57. Monitor Downtime is defined as any unit operating hour in which the data for NO_x, O₂ concentrations is either missing or invalid. [40 CFR 60.4380(b)(2)] Federally Enforceable Through Title V Permit
58. The owner or operator shall maintain records of the following items on the combustor tuning activities: (1) date on which combustor tuning activity occurs, (2) description of each combustor tuning activity, (3) reason why each combustor tuning activity is required, (4) documentation (such as operating manuals, letters, e-mails, etc.) showing that each combustor tuning activity is necessary. [District Rule 2201] Federally Enforceable Through Title V Permit
59. The owner or operator shall maintain records of the following items: (1) hourly and daily emissions, in pounds, for each pollutant listed in this permit on the days startup, shutdown and/or combustor tuning activities of the gas turbine system occur, (2) hourly and daily emissions, in pounds, for each pollutant in this permit on the days startup, shutdown and/or combustor tuning activities of the gas turbine system do not occur, (3) quarterly emissions, in pounds, for each pollutant listed in this permit, and (4) the combined CO emissions (12 consecutive month rolling total), in pounds, for permit unit N-2697-5 and N-2697-7. [District Rule 2201] 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.

60. The owner or operator shall maintain a stationary gas turbine system operating log that includes, on a daily basis, the actual local startup and stop time, total hours of operation, the type and quantity of fuel used, mode of start-up (cold, warm, or hot), duration of each start-up, duration of each shutdown, and duration of each combustor tuning event. [District Rule 2201 and 4703, 6.26, 6.28, 6.2.11] Federally Enforceable Through Title V Permit
61. The owner or operator shall maintain all records of required monitoring data and support information for a period of five years from the date of data entry and shall make such records available to the District upon request. [District Rules 2201 and 4703, 6.2.4] Federally Enforceable Through Title V Permit
62. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the District. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Date, time intervals, data and magnitude of excess NOx emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative, except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080 and 40 CFR 60.4375(a) and 60.4395] Federally Enforceable Through Title V Permit
63. The owner or operator shall submit to the District information correlating the NOx control system operating parameters to the associated measured NOx output. The information must be sufficient to allow the District to determine compliance with the NOx emission limits of this permit when the CEMS is not operating properly. [District Rule 4703, 6.2.5] Federally Enforceable Through Title V Permit
64. The owners and operators of each affected source and each affected unit at the source shall have an Acid Rain permit and operate in compliance with all permit requirements. [40 CFR 72] Federally Enforceable Through Title V Permit
65. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit
66. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
67. The owners and operators of each source and each affected unit at the source shall: (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit
68. Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act. [40 CFR 77] Federally Enforceable Through Title V Permit
69. Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program. [40 CFR 72] Federally Enforceable Through Title V Permit
70. An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the calendar year for which the allowance was allocated. [40 CFR 73] Federally Enforceable Through Title V Permit
71. An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization. [40 CFR 72] Federally Enforceable Through Title V Permit
72. An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right. [40 CFR 72] Federally Enforceable Through Title V Permit
73. The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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74. The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) Pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
75. The owners and operators of the each affected unit at the source shall keep on site the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority: (i) The certificate of representation for the designated representative for the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site beyond such five-year period until such documents are superceded because of the submission of a new certificate of representation changing the designated representative. [40 CFR 72] Federally Enforceable Through Title V Permit
76. The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority: (ii) All emissions monitoring information, in accordance with 40 CFR part 75; (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
77. The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 Subpart I. [40 CFR 75] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2697-6-1

EXPIRATION DATE: 05/31/2019

EQUIPMENT DESCRIPTION:

69,000 GALLONS PER MINUTE COOLING TOWER WITH SEVEN CELLS SERVED BY HIGH EFFICIENCY DRIFT ELIMINATORS

PERMIT UNIT REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100]
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. No hexavalent chromium containing compounds shall be added to cooling tower circulating water. [District Rule 7012] Federally Enforceable Through Title V Permit
5. The drift rate shall not exceed 0.0005%. [District Rule 2201] Federally Enforceable Through Title V Permit
6. PM10 emissions shall not exceed 22.4 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Compliance with the PM10 emission limit (lb/day) shall be demonstrated by using the following equation: Water Recirculation Rate (gal/day) x 8.34 lb/gal x Total Dissolved Solids Concentration in the blowdown water (ppm x 10E-06) x Design Drift Rate (%). [District Rule 2201] Federally Enforceable Through Title V Permit
8. Compliance with PM10 emission limit shall be determined by blowdown water sample analysis by independent laboratory within 60 days after the end of commissioning period of the gas turbine system and at least once quarterly thereafter. [District Rules 2201 and 1081] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2697-7-1

EXPIRATION DATE: 05/31/2019

EQUIPMENT DESCRIPTION:

36.5 MMBTU/HR RENTECH BOILER SYSTEMS INC "D" TYPE BOILER EQUIPPED WITH A TODD/COEN RMB ULTRA LOW-NOX BURNER (PART OF SIEMENS' "FLEX-PLANT 30" SYSTEM)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The unit shall only be fired on PUC-regulated natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201, 40 CFR60.48(c)(g)] Federally Enforceable Through Title V Permit
5. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100]
6. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100]
7. NOx (as NO2) emissions shall not exceed 7.0 ppmvd @ 3% O2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
8. CO emissions shall not exceed 50 ppmvd @ 3% O2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
9. VOC (as CH4) emissions shall not exceed 10.0 ppmvd @ 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. NOx (as NO2) emissions from this unit shall not exceed any of the following: 1st quarter: 310 lb; 2nd quarter: 310 lb; 3rd quarter: 310 lb; 4th quarter: 310 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
13. CO emissions from this unit shall not exceed any of the following: 1st quarter: 1,348 lb; 2nd quarter: 1,348 lb; 3rd quarter: 1,348 lb; 4th quarter: 1,348 lb. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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14. VOC emissions from this unit shall not exceed any of the following: 1st quarter: 154 lb; 2nd quarter: 154 lb; 3rd quarter: 154 lb; 4th quarter: 154 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
15. PM10 emissions from this unit shall not exceed any of the following: 1st quarter: 277 lb; 2nd quarter: 277 lb; 3rd quarter: 277 lb; 4th quarter: 277 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
16. SOx (as SO2) emissions from this unit shall not exceed any of the following: 1st quarter: 104 lb; 2nd quarter: 104 lb; 3rd quarter: 104 lb; 4th quarter: 104 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The total CO emissions from the gas turbine system (N-2697-5) and the auxiliary boiler (N-2697-7) shall not exceed 198,000 pounds in any 12-consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. 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
22. NOx emissions for source test purposes shall be determined using EPA Method 7E or CARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. CO emissions for source test purposes shall be determined using EPA Method 10 or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. 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. [District Rules 4305, 4306 and 4320] 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] Federally Enforceable Through Title V Permit
27. The owner or operator shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel's sulfur content. [District Rule 4320] Federally Enforceable Through Title V Permit
28. Fuel sulfur content shall be determined using EPA Method 11 or EPA Method 15 or District, CARB and EPA approved alternative methods. [District Rule 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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29. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications given in District Policy SSP-1105. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, 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 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. 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 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
32. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (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 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. The permittee shall maintain daily records of the type and quantity of fuel combusted by the boiler. [District Rule 2201, 40 CFR 60.48(c)(g)] Federally Enforceable Through Title V Permit
34. The permittee shall maintain records of: (1) the date, (2) heat input rate, MMBtu/day, (3) daily emissions, in pounds, for each pollutant listed in this permit, (4) quarterly emissions, in pounds, for each pollutant listed in this permit, and the combined CO emissions (12 consecutive month rolling total), in pounds, for permit unit N-2697-5 and N-2697-7. [District Rule 2201] Federally Enforceable Through Title V Permit
35. 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 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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