



## United States Environmental Protection Agency Region 9 – Pacific Southwest

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### Prevention of Significant Deterioration Permit Pursuant to Clean Air Act Title I, Part C and 40 CFR 52.21

|                    |  |                         |   |
|--------------------|--|-------------------------|---|
| <b>PSD Permit:</b> | AZ-98-01-C   | <b>Source ID:</b>       | 21  |
| <b>Permittee:</b>  | South Point Energy Center, LLC<br>717 Texas Avenue, Suite 1000<br>Houston, Texas 77002 | <b>Source:</b>          | South Point Energy Center                             |
|                    |  | <b>Source Location:</b> | 3779 Courtwright Road<br>Mohave Valley, Arizona 86440 |

**Issue Date:** DRAFT

**Effective Date:** DRAFT

Pursuant to the provisions of the Clean Air Act (CAA) in subchapter I, part C, as amended (42 USC 7401 et seq.), and the Code of Federal Regulations (CFR) title 40, section 52.21, the United States Environmental Protection Agency Region 9 (EPA) is issuing a revised Prevention of Significant Deterioration (PSD) permit to South Point Energy Center, LLC (or Permittee). This revised PSD Permit authorizes the modification and operation of Emissions Units 01 and 02 with Thermal Performance Upgrades at the South Point Energy Center (SPEC, or Source) on the Fort Mojave Indian Reservation and incorporates additional PSD permit revisions determined necessary and appropriate.

The Permittee is authorized to construct and operate the SPEC as described herein, in accordance with its PSD permit application (and plans submitted with the permit application), the federal PSD regulations at 40 CFR 52.21 and other terms and conditions set forth in this PSD permit.

Failure to comply with any condition or term set forth in this approval will be considered grounds for enforcement action pursuant to Section 113 of the CAA. This permit does not relieve South Point Energy Center, LLC from the responsibility to comply with any other applicable provisions of the CAA (including applicable implementing regulations in 40 CFR parts 51, 52, 60, 61, 63, and 72 through 75) or other federal, state, and local requirements.

Per 40 CFR 124.15(b), this permit shall become effective on the date specified above, unless review of the permit is requested in accordance with 40 CFR 124.19. If review is requested, the permit revision will be stayed and the construction activities described above are not authorized until agency review procedures are exhausted and the EPA subsequently issues a final permit decision authorizing construction.

Matthew Lakin  
Director  
Air and Radiation Division



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### Abbreviations, Acronyms and Symbols

|                   |  |
|-------------------|--|
| CAA               | Clean Air Act  |
| CDX               | Central Data Exchange                                |
| CEDRI             | Compliance and Emission Data Reporting Interface     |
| CEMS              | continuous emissions monitoring systems              |
| CFR               | Code of Federal Regulations                          |
| CO                | carbon monoxide                                      |
| CO <sub>2</sub>   | carbon dioxide                                       |
| CTG               | combustion turbine generator                         |
| EPA               | U.S. Environmental Protection Agency, Region 9       |
| E/U               | Emissions Unit                                       |
| gpm               | gallons per minute                                   |
| hp                | horsepower   |
| hr                | hour   |
| HRSG              | heat recovery steam generator                        |
| lbs               | pounds   |
| MACT              | Maximum Achievable Control Technology                |
| MMBtu             | million British thermal units                        |
| NO <sub>x</sub>   | nitrogen oxides                                      |
| NSPS              | New Source Performance Standards                     |
| NSR               | New Source Review                                    |
| O <sub>2</sub>    | oxygen   |
| OMB               | Office of Management and Budget                      |
| Operator          | Calpine Operating Service Company, Inc.              |
| PAG               | power augmentation with steam                        |
| Permittee         | South Point Energy Center, LLC                       |
| PM                | particulate matter                                   |
| PM <sub>2.5</sub> | particulate matter less than 2.5 microns in diameter |
| PM <sub>10</sub>  | particulate matter less than 10 microns in diameter  |
| ppm               | parts per million                                    |
| ppmvd             | parts per million, volumetric dry                    |
| PSD               | Prevention of Significant Deterioration              |
| SCR               | selective catalytic reduction                        |
| SO <sub>2</sub>   | sulfur dioxide                                       |
| Source            | South Point Energy Center                            |
| SPEC              | South Point Energy Center                            |
| tpy               | tons per year  |
| USC               | United States Code                                   |
| VOC               | volatile organic compounds                           |



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### Emissions Units and Equipment Description

This permit authorizes the construction and operation of the equipment described in the table below in accordance with the permit terms specified herein.

| Emissions Units and Equipment Description |  |
|---|--|
| Unit ID                                   | Description  |
| E/U 01                                    | Combined Cycle System 1: <ul style="list-style-type: none"><li>• One Siemens 501F Natural Gas-Fired Combustion Turbine Generator (CTG) with a maximum heat input rate of 2,044 MMBtu/hr</li><li>• One Coen Duct Burner with a maximum heat input rate of 122 MMBtu/hr</li><li>• Vented to one dedicated Heat Recovery Steam Generator (HRSG)</li><li>• Emissions of NO<sub>x</sub> controlled by Selective Catalytic Reduction (SCR)</li></ul> |
| E/U 02                                    | Combined Cycle System 2: <ul style="list-style-type: none"><li>• One Siemens 501F Natural Gas-Fired CTG with a maximum heat input rate of 2,044 MMBtu/hr</li><li>• One Coen Duct Burner with a maximum heat input rate of 122 MMBtu/hr</li><li>• Vented to one dedicated HRSG</li><li>• Emissions of NO<sub>x</sub> controlled by SCR</li></ul>  |
| E/U 04                                    | One 300 horsepower (hp) Cummins Diesel-Fired Internal Combustion Fire Pump Engine  |
| E/U 06                                    | One Marley W499-5.0-11 Mechanical-Draft Cooling Tower with a design circulation rate of 169,100 gallons per minute (gpm) equipped with a high-efficiency drift eliminators   |
| E/U 07                                    | One Diesel Storage Tank, 500 gallons   |
| E/U 08                                    | Rite P50 Brine Concentrator Boiler with a maximum heat input rate of 2.093 MMBtu/hr  |



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## PSD Permit Issuance History

| Date of Issuance  | Permit Number | Description of Permit Action   |
|-------------------|---------------|--------------------------------|
| April 19, 2005    | AZ-98-01-B    | Minor modification             |
| April 21, 2003    | AZ-98-01      | Minor modification             |
| December 26, 2000 | AZ-98-01      | Administrative permit revision |
| May 24, 1999      | AZ-98-01      | Initial permit issued          |

## Permit Conditions

### Section 1: General Provisions

#### 1. *Permit Expiration*

This revised PSD Permit, AZ-98-01-C, shall become invalid (1) if construction is not commenced (as defined in 40 CFR 52.21(b)(8)) within 18 months after the approval takes effect, (2) if construction is discontinued for a period of 18 months or more, or (3) if construction is not completed within a reasonable time.

#### 2. *Agency Notification*

Unless otherwise specified in this permit, the Permittee shall send all required notifications, reports, and test plans required by this permit to the EPA through the EPA’s Central Data Exchange/Compliance and Emission Data Reporting Interface (CDX/CEDRI) or in hardcopy through the U.S. Postal Service at the addresses listed below. Items sent by the U.S. Postal Service shall be postmarked by the applicable due date identified in this permit.

#### CDX/CEDRI

<https://cdx.epa.gov>

(First-time users will need to register with CDX. If no specific reporting option is available in CEDRI, select “Other Reports.” If the system is unavailable, contact the EPA Region 9 at these email addresses: AEO\_R9@epa.gov and R9AirPermits@epa.gov.)

#### U.S. Postal Service

U. S. Environmental Protection Agency Region 9  
Director, Enforcement and Compliance Assurance Division  
Attn: Air Section, ENF-2-1  
75 Hawthorne Street  
San Francisco, CA 94105-3901



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### 3. *Notification of Commencement of Construction and Startup*

- a. The EPA Regional Administrator shall be notified in accordance with Condition 2 of the anticipated date of initial startup (as defined in 40 CFR 60.2) of each affected facility not more than sixty (60) days nor less than thirty (30) days prior to such date, and shall be notified in accordance with Condition 2 of the actual date of commencement of initial startup within fifteen (15) days after such date.
- b. The EPA Regional Administrator shall be notified in accordance with Condition 2 of the actual date of commencement of construction (as defined in 40 CFR 60.2) no later than thirty (30) days after such date.

### 4. *Source Operation*

At all times, including periods of startup, shutdown, and malfunction, the Permittee shall to the extent practicable, maintain and operate the Source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA which may include, but is not limited to, monitoring results, review of operating and maintenance procedures, and inspection of the Source.

### 5. *Right of Entry*

The EPA Regional Administrator, and/or their authorized representative, upon the presentation of credentials, shall be permitted to:

- a. enter upon the premises where the Source is located or emissions-related activity is conducted; or where any records are required to be kept under the terms and conditions of this permit;
- b. have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this permit;
- c. inspect any facilities, equipment (including monitoring and air pollution control equipment), method, practices or operations regulated or required under this permit;
- d. record any inspection by use of written, electronic, magnetic and photographic media; and
- e. sample or monitor substances, emissions, or parameters subject to the requirements in this permit; the sampling shall be conducted during normally scheduled operational periods at the expense of the EPA.

### 6. *Transfer of Ownership*

Prior to any transfer of ownership of the Source, the Permittee shall notify the succeeding owner and operator of the existence of this permit and its conditions by letter, a copy of which shall be forwarded to the EPA Regional Administrator in accordance with Condition 2. In the event of any changes in control or ownership of the Source, the Permittee must notify the EPA as soon as possible but in no case later than 30 days after the change in ownership is effective. This notification to the EPA must specify the date on which ownership was transferred, identify the previous owner, and update the name, street address, mailing address, contact information, and



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any other information about the ownership and/or operation of the Source that will change as a result of the change in ownership. Notification to the EPA shall be made in accordance with Condition 2. The Permittee shall ensure that the Source remains in compliance with this permit during any such transfer of ownership. This permit shall be binding on all subsequent owners and operators.

### 7. *Severability*

The provisions of this permit are severable, and, if any provision of the permit is held invalid, the remaining terms and conditions of this permit shall remain valid and in force.

### 8. *Other Applicable Regulations*

The owner and operator of the Source shall construct and operate the proposed stationary source in compliance with all other applicable provisions of 40 CFR Parts 51, 52, 60, 61, 63, 72 through 75, and all other applicable federal, state, and local air quality regulations.

### 9. *Compliance*

The Permittee must comply with all provisions of this permit. Noncompliance with any permit provision is a violation of the permit and the CAA, and is grounds for an enforcement action.

### 10. *Unavailable Defense*

In an enforcement action, it shall not be a defense for the Permittee that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the provisions of this permit.

### 11. *Property Rights*

The permit does not convey any property rights of any sort or any exclusive privilege.

### 12. *Credible Evidence*

For establishing whether the Permittee violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Source would have been in compliance with applicable requirements if the Permittee had performed the appropriate performance or compliance test or procedure.

### 13. *Notification of Closure*

The Permittee must submit a report of any permanent or indefinite closure to EPA in writing within 90 days after the cessation of any operations at the permitted source. It is not necessary to submit a report of closure for regular, seasonal closures.

### 14. *Signature Verifying Truth, Accuracy, and Completeness*

All reports required by this permit shall be signed by a responsible official as to the truth, accuracy, and completeness of the information. The report must state that, based on information and belief



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formed after reasonable inquiry, the statements and information are true, accurate, and complete. If the Permittee discovers that any reports or notification submitted to the reviewing authority contain false, inaccurate, or incomplete information, the Permittee shall notify the reviewing authority immediately and correct or amend the report as soon as is practicable.

### 15. *Paperwork Reduction Act*

Any requirements established by this permit for the gathering and reporting of information are not subject to review by the Office of Management and Budget (OMB) under the Paperwork Reduction Act because this permit is not an “information collection request” within the meaning of 44 USC 3502(4) & (11), 3507, 3512, and 3518. Furthermore, this permit and any information gathering and reporting requirements established by this permit are exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons, 44 USC 3502(4) & (11); 5 CFR 1320.5(a).

## Section 2: Emissions Limitations and Work Practice Standards

### 16. *Air Pollution Control Equipment/Operation*

On or before the date of startup of the affected facility, and thereafter (as defined in 40 CFR 60.2), the Permittee shall install, continuously operate, and maintain the following air pollution controls and operations to minimize emissions at or below the levels specified in Condition 18 of this permit.

- a. The Permittee shall install and continuously operate Selective Catalytic Reduction (SCR) systems on E/Us 01 and 02 for control of NO<sub>x</sub>. The aforementioned “continuous” periods of operation do not include periods of startup and shutdown.
- b. The Permittee shall use good combustion control operation on E/Us 01 and 02 for control of VOC emissions.
- c. The Permittee shall use good combustion control operation on E/Us 01 and 02 for control of PM<sub>10</sub> emissions.
- d. Permittee shall use Fuel Injection Timing Retardation on the diesel fire pump engine (E/U 04) to minimize NO<sub>x</sub> emissions.
- e. The Permittee shall use good combustion control operation on the diesel fire pump engine (E/U 04) for control of CO, VOC, and PM/PM<sub>10</sub> emissions.
- f. The Permittee shall install and continuously operate high-efficiency drift eliminators on the cooling tower (E/U 06) for control of PM/PM<sub>10</sub> emissions.

### 17. *Fuel Use and Operation Conditions*

- a. The Permittee shall restrict fuel use for the operation of the combustion turbines and supplemental duct firing (E/Us 01 and 02) to pipeline quality natural gas.
- b. The Permittee shall restrict fuel use for the diesel fire pump engine (E/U 04) to that of No. 2 fuel oil with a maximum sulfur content of 0.05 percent by weight.
- c. E/Us 01 and 02 may each operate no more than 8,760 hours per year.





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- d. The Permittee shall restrict the operation of the diesel fire pump engine (E/U 04) to 60 minutes per 24 consecutive hours and no more than 50 hours per year. This restriction is not applicable during emergency situations.

### 18. Emission Limits

- a. The actual ton per year emissions from the entire Source, including emissions during startups and shutdowns, shall not exceed the following allowable emissions, based on a 12-month rolling average:

| Source-wide Allowable Emissions (tpy) |        |                 |       |                  |
|---------------------------------------|--------|-----------------|-------|------------------|
| NO <sub>x</sub>                       | CO     | SO <sub>2</sub> | VOC   | PM <sub>10</sub> |
| 271.7                                 | 1297.6 | 11.6            | 439.0 | 186.5            |

- b. The actual hourly emissions from each emission unit (E/Us 01 and 02) shall not exceed the following allowable emissions, based on a 3-hour rolling average, for SO<sub>2</sub>, PM<sub>10</sub>, and VOC:

| Emissions Unit Allowable Emissions of SO <sub>2</sub> , PM <sub>10</sub> , and VOC |                        |                             |                              |                 |
|--|------------------------|-----------------------------|------------------------------|-----------------|
| E/U ID   | Turbine Configuration  | SO <sub>2</sub><br>(lbs/hr) | PM <sub>10</sub><br>(lbs/hr) | VOC<br>(lbs/hr) |
| 01   | Baseload               | 4.47                        | 18.3                         | 83.1            |
|  | Duct Firing and/or PAG | 4.72                        | 22.8                         | 83.1            |
| 02   | Baseload               | 4.47                        | 18.3                         | 83.1            |
|  | Duct Firing and/or PAG | 4.72                        | 22.8                         | 83.1            |

- c. The actual hourly emissions from each emissions unit (E/Us 01 and 02) shall not exceed the following allowable emissions, based on a 3-hour rolling average for CO and NO<sub>x</sub>, excluding periods of startup and shutdown:

| Emissions Unit Allowable Emissions of NO <sub>x</sub> and CO |                        |                             |  |                |                             |
|--|------------------------|-----------------------------|--|----------------|-----------------------------|
| E/U ID   | Turbine Configuration  | NO <sub>x</sub><br>(lbs/hr) | NO <sub>x</sub><br>(ppmvd <sup>1</sup> ) | CO<br>(lbs/hr) | CO<br>(ppmvd <sup>1</sup> ) |
| 01   | Baseload               | 22.4                        | 3.0                                      | 46.7           | 10.0                        |
|  | Duct Firing and/or PAG | 24.0                        | 3.0                                      | 158.3          | 35.0                        |
| 02   | Baseload               | 22.4                        | 3.0                                      | 46.7           | 10.0                        |
|  | Duct Firing and/or PAG | 24.0                        | 3.0                                      | 158.3          | 35.0                        |

<sup>1</sup> Parts per million volume, dry @ 15 percent O<sub>2</sub>

- d. The 30-day rolling average NO<sub>x</sub> emissions rate of E/Us 01 and 02 each shall not exceed 15 ppmvd at 15 percent O<sub>2</sub>.
  - i. For the purposes of this condition, a 30-day rolling average NO<sub>x</sub> emission rate is the arithmetic average of all hourly NO<sub>x</sub> emission data in ppmvd measured by the



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- continuous emission monitoring equipment for a given day and the twenty-nine (29) unit operating days immediately preceding that unit operating day.
- ii. A new 30-day average is calculated each unit operating day as the average of all hourly NO<sub>x</sub> emissions rates for the preceding thirty (30) unit operating days if a valid NO<sub>x</sub> emission rate is obtained for at least 75 percent of all operating hours within the thirty (30) unit operating day period.
  - e. Total hours for startup and shutdown periods combined shall not exceed 480 hours per year per E/U. Each startup episode shall be limited to a maximum of 4 hours.
  - f. During periods of startup and shutdown, the emissions of CO shall not exceed 3,000 pounds per clock hour, 4,800 pounds per startup event, or 4,800 pounds per shutdown event.

### Section 3: Monitoring and Testing Requirements

#### 19. Continuous Monitoring Systems

- a. Not later than 90 days after commencement of commercial operation (as defined in 40 CFR 72.2), the Permittee shall install, certify, and operate Continuous Emissions Monitoring Systems (CEMS) on E/Us 01 and 02, consisting of a NO<sub>x</sub> concentration monitor, a CO concentration monitor, and an O<sub>2</sub> or CO<sub>2</sub> diluent gas monitor in accordance with the applicable provisions of 40 CFR Part 75, Acid Rain Program.
  - i. Removal of ammonia CEMS—Prior to removal of the ammonia CEMS on E/Us 01 and 02, the Permittee shall install, maintain, and operate thereafter continuous monitoring and recordkeeping systems, to measure and record the following operational parameters:
    - A. The injection rate of SCR reagent in pounds per hour.
    - B. Exhaust gas temperature at the inlet of the SCR reactor.These parameters shall be subject to the provisions in 40 CFR 60.13(f) and (h).
  - ii. The Permittee shall verify the operational status of the continuous monitoring systems in Condition 19.a.i, which shall include, at a minimum, completion of the manufacturer's written requirements or recommendations for installation and operation of the device. Verification of the operational status shall be provided to the EPA no later than fifteen (15) days prior to removal of the ammonia CEMS in accordance with Condition 2.
- b. Not later than 90 days after commencement of commercial operation (as defined in 40 CFR 72.2) of E/Us 01 and 02, the Permittee shall install, certify, and operate equipment to monitor the fuel flow to the combustion turbine generators and the duct burners in accordance with the applicable provisions of 40 CFR 75, Appendix D, Acid Rain Program.
- c. The Permittee shall apply to the EPA Regional Administrator, not later than 45 days following the completion of all certification tests, to use fuel flow as the SO<sub>2</sub> measurement method in accordance with the applicable provisions of 40 CFR 75, Appendix D, Acid Rain Program.
- d. The Permittee shall install, certify, and operate equipment to monitor the operating hours of the diesel fire pump engine (E/U 04).



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- e. All CEMS shall undergo a performance evaluation to demonstrate that they meet the design and performance specifications, pass the field tests, and meet the installation requirements and the data analysis and reporting requirements specified in the applicable Performance Specifications of 40 CFR 75. (Appendix A). The CEMS performance evaluation shall be conducted prior to, during, or within thirty (30) days after the completion of the performance testing identified in Condition 20 of this permit. Results of the CEMS performance evaluation shall be submitted to the EPA Regional Administrator within sixty (60) days after completion.

### 20. Performance Tests

- a. Within 60 days after achieving the maximum production rate of the affected emissions units, but no later than 180 days after the initial startup of equipment (as defined in 40 CFR 60.2), and at such other times as specified by the EPA Regional Administrator, the owner/operator shall conduct or cause to be conducted performance tests (as described in 40 CFR 60.8) for NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC, and PM<sub>10</sub> on the exhausts of E/Us 01 and 02. The performance tests shall be conducted to demonstrate compliance with the emission limits specified in Conditions 18.b and 18.c for E/Us 01 and 02. The tests for NO<sub>x</sub>, SO<sub>2</sub>, CO, VOC, and PM<sub>10</sub> shall be conducted at the maximum operating capacity of the units being tested, in both baseload and duct firing/PAG mode. The Permittee shall conduct performance tests each calendar year (within 90 days before or after the previous performance test anniversary, unless otherwise approved by the EPA Administrator). Testing with PAG is not required when PAG was utilized less than 15 hours since the last performance test but is required at least once every five years. Upon written request from the Permittee, the EPA may approve the conduct of performance tests at a lower specified production rate. After initial performance tests and upon written request and adequate justification from the Permittee, the EPA may waive a specified annual test for the facility.
- b. Performance tests of the emissions of NO<sub>x</sub> from the exhausts of E/Us 01 and 02 shall be conducted and results reported in accordance with the test procedures and methods set forth in 40 CFR 60.8 and 40 CFR 60, Appendix A, Method 20.
- c. Performance tests of the emissions of CO from the exhausts of E/Us 01 and 02 shall be conducted and results reported in accordance with the test procedures and methods set forth in 40 CFR 60.8 and 40 CFR 60, Appendix A, Method 10.
- d. Performance tests of the emissions of SO<sub>2</sub> from the exhausts of E/Us 01 and 02 shall be determined by fuel analysis in accordance with the procedures and methods set forth in 40 CFR 60.8 and 40 CFR 60, Appendix A, Method 20.
- e. Performance tests of the emissions of VOC from the exhausts of E/Us 01 and 02 shall be conducted and results reported in accordance with the test procedures and methods set forth in 40 CFR 60.8 and 40 CFR 60, Appendix A, Methods 25A and 18. Method 18 may be used to determine the methane fraction to subtract from Method 25A's total hydrocarbons.
- f. Performance tests of the emissions of PM<sub>10</sub> from the exhausts of E/Us 01 and 02 shall be conducted and results reported in accordance with the test procedures and methods set forth



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in 40 CFR 60.8 and 40 CFR 60, Appendix A using EPA Methods 5 and 202, or Methods 201A and 202, for filterable and condensable PM<sub>10</sub> collecting a minimum of 120 dry standard cubic feet per test run.

- g. Thirty (30) days prior to such performance tests, the EPA Regional Administrator shall be notified in accordance with Condition 2 of the proposed date of the performance tests, and a performance testing protocol shall be submitted for approval. In lieu of the aforementioned performance test methods, equivalent methods may be used with prior written approval from the EPA Regional Administrator.
- h. For performance test purposes, sampling ports, platforms, and accesses shall be provided on E/Us 01 and 02 exhaust systems in accordance with 40 CFR 60.8(e).

### Section 4: Recordkeeping and Reporting Requirements

#### 21. Certification

The Permittee shall notify the EPA Regional Administrator in accordance with Condition 2 of compliance with Conditions 16 and 19 above, and shall make such notification within fifteen (15) days of such compliance. The letter must be signed by the Responsible Official.

#### 22. Malfunction Reporting

The EPA Regional Administrator shall be notified by email sent to AEO\_R9@epa.gov within two (2) business days following the discovery of any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner, which results in an increase in emissions above any allowable emission limit stated in Condition 18 of this permit. In addition, the EPA Regional Administrator shall be notified in accordance with Condition 2 within fifteen (15) days of the discovery of any such failure. The notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial malfunction, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under Condition 18 of these conditions, and the methods utilized to mitigate emissions and restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violation of this permit or of any law or regulation that such malfunction may cause.

#### 23. Recordkeeping and Reporting

- a. Records shall be maintained of all measurements including continuous monitoring system evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and maintenance performed on these systems or devices, performance and all other information required by 40 CFR 60 or 75 recorded in a permanent form suitable for inspection. Records shall be retained for at least five (5) years following the date of such measurement, maintenance, reports, and records.
- b. The Permittee shall record and maintain records of the daily operating hours and the 12-month rolling operating hours of the diesel fire pump engine (E/U 04).



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- c. A written report of excess emissions shall be submitted to the EPA Regional Administrator postmarked by the 30th day following each calendar quarter, in accordance with Condition 2. The report shall include the following:
  - i. The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each event of excess emissions.
  - ii. Specific identification of each period of excess emissions that occurs during startups, shutdown, and malfunctions of the turbine systems. The nature and cause of any malfunction (if known) and the corrective action taken or preventative measures adopted shall also be reported.
  - iii. The date and time identifying each clock hour during which a CEMS experienced downtime, such as breakdowns, repairs, calibration checks, and zero and span adjustments.
  - iv. When no excess emissions or CEMS downtime have occurred, such information shall be stated in the report.
  - v. Excess emissions shall be defined as emissions exceeding the allowable emission limits contained in Condition 18 of this permit, as determined by the compliance methods listed in Condition 20 of this permit.
- d. Not later than 45 days prior to the first scheduled day of initial certification testing, the Permittee shall provide notification to the EPA Regional Administrator in accordance with Condition 2.