
***MOJAVE DESERT
AIR QUALITY MANAGEMENT DISTRICT***

FOP Evaluation Document

Preliminary Determination - Statement of Basis

for

Minor Modification of

FOP Number: 130202262

For:

BLYTHE ENERGY, INC.

Facility:

BLYTHE ENERGY PROJECT

Facility Address:

385 N. Buck Blvd.

Blythe, CA 92226

Document Date: **September 19, 2018**

Submittal date to EPA/CARB for review: **September 19, 2018**

EPA/CARB 45-day Commenting Period ends: **November 3, 2018**

Public Notice Posted: **September 19, 2018**

Permit Issue date: On or about **November 23, 2018**

Permitting Engineer:
Roseana Brasington

14306 PARK AVENUE, VICTORVILLE, CALIFORNIA 92392
PHONE: (760) 245-1661 • FAX: (760) 245-2022 • EMAIL: PERMITTING@MDAQMD.CA.GOV

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A. Introduction

1. Background

The Blythe Energy Project (BEP), Federal Operating Permit (FOP) number 130202262, located at 385 N Buck Boulevard in Blythe, California, is a 507 MW output natural gas fired combined cycle power generating plant. The facility is located in an area designated as Unclassified/Attainment for ozone.

The Mojave Desert Air Quality Management District (MDAQMD or District) issued the facility's initial FOP on June 4, 2007 and its current FOP on November 18, 2017. The District received an application for Minor Modification of the FOP on August 1, 2018.

BEP is defined as a Major Facility pursuant to District Rule 1201 – *Federal Operating Permit Definitions*, section 1201(S), as this facility has a Potential to Emit (PTE) as shown below:

POLLUTANT	BEP PTE	REGULATION XIII - NSR THRESHOLD	REGULATION XIII - NSR FACILITY STATUS	REGULATION XII - TV THRESHOLD	REGULATION XII - TV FACILITY STATUS
NO _x	97	25	MAJOR	100	NON MAJOR
VOC	24	25	NON MAJOR	100	NON MAJOR
PM10	56	15	MAJOR	100	NON MAJOR
SO _x	12	25	NON MAJOR	100	NON MAJOR
CO	175.0	100	MAJOR	100	MAJOR
HAP	¹	10 ANY HAP 25 ANY COMBINATION OF HAP	MAJOR	10 ANY HAP 25 ANY COMBINATION OF HAP	MAJOR

Pursuant to District Rules 1203 – *Federal Operating Permits* section (B)(1) this document serves as the preliminary determination to modify the FOP. This analysis represents the preliminary compliance review of the proposed Minor Modification to the FOP to determine whether the modified operation of the facility will comply with all applicable MDAQMD, state and federal rules and regulations. This preliminary determination was submitted to USEPA and CARB for review on September 19, 2018 and it will be noticed for public review on that date as well.

While the proposed Minor Modification does not involve any new equipment, it does propose changes to operating procedures. BEP is defined as a NSR Major Facility pursuant to District Rule 1301 – *NSR Definitions*, as the facility has a PTE greater than the threshold amount specified for NO_x, PM10, CO and HAP. The proposed change does not cause any increase in

¹ 2017 CEIR indicates facility emissions are above the major source threshold for single HAP (NH₃) and for combined HAP

any Nonattainment Air Pollutant/Precursor; therefore, no review pursuant to District Rule 1302 – *New Source Review Procedure*, section (D)(1) is required.

BEP is a Major PSD Facility as defined by District Rule 1600 – PSD, incorporating 40 CFR 52 by reference. This facility is not a new major PSD stationary source nor is this facility undergoing a major Modification, therefore PSD is not applicable to this action.

2. Facility Identifying Information

Owner/Company Name: Blythe Energy, Inc.

Facility Names: Blythe Energy Project

Facility Location: 385 N Buck Blvd, Blythe, CA 92225

Mailing Address: P.O. Box 1210, Blythe, CA 92226

Federal Operating Permit Number: 130202262

MDAQMD Company Number: 1302

MDAQMD Facility Number: 2262

Responsible Official: Jason Allen
Vice President of Operations - Power
604-623-4797

Facility “Site” Contact(s): Ramon Campos
Compliance Manager
760-922-9950 ext. 236
ramon.campos@altagas.ca

Alternate Facility “Site” Contact(s): Bill Cotton
Plant General Manager
760-922-9950 ext. 233
william.cotton@altagas.ca

Nature of Business: Electric Power Generation

SIC/NAICS Code: 4911/221112- Electric Power Generation

Facility Coordinates UTM (m) 714609 (E) / 3721719 (N)

3. Description of Modification

The applicant has applied for modification of District permits B007953 and B007954 and the current Title V Operating permits. The proposed modification adds an alternative CO concentration limit which is necessary for the facility to operate at low loads. The facility is requesting to operate at low load because of decreased demand due to increased energy provided by renewable technology. The intermittent nature of wind and solar power generation requires that variable power generation sources are available to fill in the gaps. While operation at low loads is less efficient, the proposed modification does not change the mass based emission limits currently reflected in the facility permits. The facility hourly and annual mass based limits are not changed therefore there is no emissions increase associated with this modification by this modification

B. Rule Applicability

1. District Rules

Rule 201/203 – Permits to Construct/Permit to Operate. Any equipment which may cause the issuance of air contaminants must obtain authorization for such construction from the Air Pollution Control Officer. The facility is in compliance with this rule as they have appropriately applied for a District permit for all new equipment and maintains District permits for all existing equipment per Part II of the FOP.

Rule 204 – Permit Conditions. To assure compliance with all applicable regulations, the Air Pollution Control Officer (Executive Director) may impose written conditions on any permit. The facility complies with all applicable regulations per Part II of the FOP.

Rule 206 – Posting of Permit to Operate. Equipment shall not operate unless the entire permit is affixed upon the equipment or kept at a location for which it is issued and will be made available to the District upon request. The facility complies with this regulation per Part II of the FOP.

Rule 207 – Altering or Falsifying of Permit. A person shall not willfully deface, alter, forge, or falsify any issued permit. The facility complies with this regulation per Part II of the FOP.

Rule 209 – Transfer and Voiding of Permits. The facility shall not transfer, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another. When equipment which has been granted a permit is altered, changes location, or no longer will be operated, the permit shall become void. The facility complies with this regulation per Part II of their FOP.

Rule 210 – Applications. The facility has provided all the required information to correctly address the proposed equipment pursuant to this rule.

Rule 212 – Standards for Approving Permits. This rule establishes baseline criteria for approving permits. In accordance with these criteria, the proposed changes to the permit does

not cause issuance of air contaminants in violation of Sections 41700 or 41701 of the State Health and Safety code.

Rule 221 – Federal Operating Permit Requirement. The facility is in compliance with this rule, as they currently hold and maintain a Federal Operating Permit. The facility complies with this regulation per Part II of the FOP.

Rule 301/312 – Permit Fees/Fees for Federal Operating Permits. The facility’s annual permit fees and Title V permit fees have been paid and are current. The facility complies with this regulation per Part II of the FOP.

Rule 401 – Visible Emissions. This rule limits visible emissions opacity to less than 20 percent (or Ringlemann No. 1). In normal operating mode, visible emissions are not expected to exceed 20 percent opacity. The facility has specific operating conditions that enforce compliance with this rule included in Part II of the FOP.

Rule 402 – Nuisance prohibits facility emissions that cause a public nuisance. The combustion turbines/duct burners are fired on pipeline-quality natural gas and controlled by SCR and oxidation catalyst. Compliance with Rule 402 is expected.

Rule 403 – Fugitive Dust specifies requirements for controlling fugitive dust. The facility is aware of the requirement and utilizes air pollution control devices. The facility is not expected to violate Rule 403.

Rule 404 – Particulate Matter Concentration. The facility shall not discharge into the atmosphere from this facility, particulate matter (PM) except liquid sulfur compounds, in excess of the concentration at standard conditions, shown in Rule 404, Table 404 (a). (a) Where the volume discharged is between figures listed in the table the exact concentration permitted to be discharged shall be determined by linear interpolation. (b) This condition shall not apply to emissions resulting from the combustion of liquid or gaseous fuels in steam generators or gas turbines. (c) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period. The facility has specific operating conditions that enforce compliance with this rule included in Part II of the FOP.

Rule 405 – Solid Particulate Matter, Weight. The facility shall not discharge into the atmosphere from this facility, solid PM including lead and lead compounds in excess of the rate shown in Rule 405, Table 405(a): (a) permitted discharge shall be determined by linear interpolation. (b) operation or one hour, whichever is the lesser time period. The facility has specific operating conditions that enforce compliance with this rule included in Part II of the FOP.

Rule 408 – Circumvention. Circumvention prohibits hidden or secondary rule violations. There are no indications that the facility has violated the rule.

Rule 430 – Breakdown Provisions. Any Breakdown which results in a violation to any rule or regulation as defined by Rule 430 shall be properly addressed pursuant to this rule. The facility has specific operating conditions that enforce compliance with this rule included in Part II of the FOP.

Rule 441 – Research Operations. This rule limits the applicability of Regulation IV to experimental research. The facility has specific operating conditions that enforce compliance with this rule included in Part II of the FOP.

Rule 442 – Usage of Solvents. This rule reduces VOC emissions from VOC containing materials or equipment that is not subject to any other rule in Regulation XI. The facility has specific operating conditions that enforce compliance with this rule included in Part II of the FOP.

Rule 444 – Open Outdoor Fires. This rule ensures that the ambient air quality is not significantly degraded due to Open Outdoor Fires. The facility has specific operating conditions that enforce compliance with this rule included in Part II of the FOP.

Rule 900 – Standards of Performance for New Stationary Sources (NSPS). Rule 900 adopts all applicable provisions regarding standards of performance for new stationary sources as set forth in 40 CFR 60. Each combustion turbine generator is subject to the federal NSPS codified at 40 CFR Part 60, Subparts A (General Provisions) and GG (Standards of Performance for Stationary Gas Turbines) because each is a stationary gas turbine with a heat input greater than 10 MMBtu/hr and was constructed after October 3, 1977. Permit conditions requiring compliance with the NSPS are included in FOP in Section III.

Rule 1104 – Organic Solvent Degreasing Operations. This rule limits the emission of VOCs from wipe cleaning and degreasing operations using organic solvents. The facility has specific operating conditions that enforce compliance with this rule included in Part II of the FOP.

Rule 1113 – Architectural Coatings. This rule limits the quantity of VOC in Architectural Coatings. The facility has specific operating conditions that enforce compliance with this rule included in Part II of the FOP.

Rule 1162 – Polyester Resin Operations. This rule limits VOC emissions from polyester resin operations. The facility is not engaged in polyester resin operations however if operations subject to the rule were to occur, permit conditions requiring compliance with the rule are included in the FOP.

Regulation X – National Emission Standards for Hazardous Air Pollutants. Pursuant to Regulation X, The facility is required to comply with all applicable NESHAPs.

Regulation XII – Title V Permits. This regulation contains requirements for sources which must have a FOP. The facility currently has a FOP and is expected to comply with all applicable rules and regulations.

Rule 1201 – Federal Operating Permit Definitions. The facility is defined as a federal Major Facility pursuant to this rule because the PTE for CO and HAP are in excess of the thresholds defined by 1201(S)(1).

Rule 1203 – Federal Operating Permits. This document represents the preliminary determination for the proposed Minor Modification of the facility’s FOP. This proposed action will be properly noticed pursuant to District Rule 1207, as required.

Rule 1205 – Modifications of Federal Operating Permits. The proposed Minor Modification of the facility’s FOP is subject to the rule and will be processed in accordance with the rule requirements. The Minor Modification will be processed according to the procedure and noticing requirements set forth in Rule 1203.

Rule 1206 – Reopening, Reissuance and Termination of Federal Operating Permits. This action to the facility’s FOP does not constitute a Reopening, Reissuance or Termination of Federal Operating Permits; therefore, this rule is not subject to this action.

Rule 1207 – Notice and Comment specifies District requirements for providing proper Public and Affected State Notice and Comment periods and procedures. The District will follow Rule 1207 noticing procedure. The District will publicly notice the proposed Minor Modification on or about September 19, 2018.

Rule 1208 – Certification. The facility included a Certification of Responsible Official as required with the submitted application for the modification of the FOP.

Rule 1211 – Greenhouse Gas Provisions of Federal Operating Permits. The facility is not a Major GHG Facility pursuant to Rule 1211.

Regulation XIII – New Source Review. This regulation sets forth requirements for the preconstruction review of all new or modified facilities. The proposed change does not cause any increase in any Nonattainment Air Pollutant/Precursor and does not trigger NSR.

BACT

Pursuant to Rule 1303(A), BACT applies to non-attainment air pollutants only. The District is in attainment for CO, therefore BACT does not apply. Furthermore, this modification does not produce an increase in any non-attainment air pollutants therefore BACT is not applicable to this modification on that basis either.

OFFSETS

Rule 1303(B) requires offsets for non-attainment pollutants. CO is an attainment pollutant therefore offsets are not applicable to the proposed modification.

Rule 1520 – Control of Toxic Air Contaminants from Existing Sources. The rule ensures that any new or existing facility is required to control the emissions of Toxic Air Contaminants or Regulated Toxic Substances as required pursuant to Part 6 of Division 26 of the California Health and Safety Code commencing with Section 44300. The facility submitted a Comprehensive Emissions Inventory to the District for the calendar year 2017 and the District performed an analysis in accordance with the procedures outlined in Rule 1520(E). The facility prioritization score was calculated based on the 2017 comprehensive emission inventory report and was generated using the HARP 2 software which coincides with the State of California’s Office of Environmental Health and Hazard Assessment’s revised risk factors, and is consistent with the *CAPCOA Facility Prioritization Guidelines*.

Receptor	1000 m, receptor type: worker
Cancer	0.20
Acute	0.05
Chronic	0.01

The facility’s highest prioritization score is 0.20 which classifies the facility as “low priority”. Pursuant to Rule 1520, low priority facilities having prioritization scores less than 1 are not required to conduct a Health Risk Assessment.

Federal Requirements:

This equipment is also subject to the Federal Acid Rain (Title IV) program. The current version of the Title IV permit is included within the FOP.

40 CFR 60 Subpart GG - Standards of Performance for Stationary Gas Turbines
 The NSPS applies to stationary gas turbines rated at 10 MMBtu/hr or greater and which were built after 10/3/77. This facility is subject to and complies with the NSPS.

40 CFR 64 – *Compliance Assurance Monitoring*
 The Compliance Assurance Monitoring (CAM) Rule (40 CFR 64) applies to each Pollutant Specific Emissions Unit (PSEU) when it is located at a major source that is required to obtain a Title V, Part 70 or 71 permit and it meets all of the following criteria:

- The PSEU must:
- a. Be subject to an emission limitation or standard; AND,
 - b. Use a control device to achieve compliance; AND,
 - c. Have the **potential pre-control** emissions that exceed or are equivalent to the major source threshold.

Note: “PSEU” or Pollutant Specific Emission Unit, means an emissions unit considered separately with respect to each regulated air pollutant.

The combustion turbines and duct burners at BEP do not meet the criteria and are not subject to CAM pursuant to 40 CFR 64 as shown in the Table below.

District Permit	Equipment Description	Pollutant Subject to Limitation or Standard	Uncontrolled PTE greater than 100% of Major Source Threshold	Unit uses a control device	CAM Applicability	CAM Plan Required
B007953 B007955 B007954 B007956	COMBUSTION TURBINES 1-3	NO _x	NO	YES	EXEMPT, CEMS 40 CFR 64.2(a)(3)]	NO

C. Rules and Regulations Not Applicable to the Proposed Permit Modification

1. District Rules

Regulation XIII – *New Source Review*

Rule 1302 – *Procedure*. This rule applies to all new or Modified Facilities and requires certain requirements to be fulfilled when submitting an application. All applicable requirements of this rule are discussed in District NSR documents as part of the Analysis procedure. Certification of compliance with the Federal Clean Air Act, applicable implementation plans, and all applicable District rules and regulations would be addressed. However, as this FOP Minor Modification does not involve any new, modified, relocated, or reconstructed equipment, nor any change in emissions, New Source Review procedures are not required.

Rule 1303 – *Requirements*. This rule requires BACT and offsets for selected facility Modifications. Equipment installed shall meet BACT and prior to the commencement of construction the proponent shall have obtained sufficient offsets to comply with Rule 1303(B)(1). BEP is not installing any new or modified equipment, therefore no new BACT determinations are required. Furthermore, the facility is not subject to the requirements of offsets, as this Minor Modification does not generate an emissions increase.

Rule 1304 – *Emissions Calculations*. This rule delineates procedures for calculating emissions for new or modified equipment installations. As this FOP Minor Modification does not involve any new, modified, relocated, or reconstructed equipment, no emissions calculations are required.

Rule 1320 – *New Source Review for Toxic Air Contaminants*, requires a preconstruction review of all new, modified, relocated, or reconstructed facilities which have the potential to emit any

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Blythe Energy Project
September 19, 2018

Hazardous air Pollutant (HAP), Toxic Air Contaminant (TAC), or Regulated Toxic substance. As this modification does not involve any new, modified, relocated, or reconstructed equipment, and no emissions increase, no Toxic NSR is required.

Regulation XVI – Prevention of Significant Deterioration

PSD relates to sources that emit criteria pollutants above 100 tons/year for 28 specific source categories and 250 tons/year for all other source categories and are located in areas classified as attainment/unclassified for those pollutants. BEP holds a current PSD permit because the facility is engaged in power generation one of the 28 source categories subject to the 100 ton/year PSD threshold. 40 CFR 52.21 defines Major Modification as any physical change in or change in the method of operation of a major stationary source that would result in: a significant emissions increase (as defined in paragraph (b)(40) of this section) of a regulated NSR pollutant (as defined in paragraph (b)(50) of this section); and a significant net emissions increase of that pollutant from the major stationary source. Regulated NSR pollutants include CO because there is a NAAQS for CO. A significant increase for CO is defined as 100 tons/year (paragraph (b)(23)). Because the proposed modification does not result in an increase in the mass based CO emissions it is not considered a Major Modification and is not subject to PSD review.

2. State Regulations

H&S Code 42301.6, Public Notice for Possible Sources of HAP Near a School prior to Approving Permits. This section of the CA Health and Safety Code requires public noticing for any proposed equipment operating within 1,000 feet of a public or private Kindergarten through Twelfth Grade school. As there are no such schools within 1,000 feet of BEP, no H&S Code 42301.6 noticing is required.

3. Federal Regulations

40 CFR 60 Subpart D - Standards of Performance for Fossil-Fuel-Fired Steam Generators This NSPS applies to fossil fuel steam generators with a maximum rating of 250 MMBtu/hr or more. The duct burner associated with the each HRSG is rated at 120 MMBtu/hr therefore the duct burners are not subject to this subpart.

40 CFR 60 Subpart Da – *Standards of Performance for Electric Utility Steam Generating Units.* This NSPS applies to fossil fuel steam generators with a maximum rating of 250 MMBtu/hr or more and which provide 1/3 of the potential electric output capacity and more than 25 MW to any power utility distribution system for sale. Although the duct burner associated with the each HRSG does meet the criteria for an electric utility steam generating unit, it is rated at 120 MMBtu/hr therefore the duct burners are not subject to this subpart.

40 CFR 60 Subpart Db - *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.* This NSPS applies to fossil fuel steam generators with a maximum rating of 100 MMBtu/hr or more. The duct burner associated with the each HRSG is rated at 120 MMBtu/hr however the facility generates power for distribution to the grid and is not

engaged in other industrial, commercial or institutional processes therefore the duct burners are not subject to this subpart.

40 CFR 60 Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*. This NSPS applies to fossil fuel steam generators with a maximum rating between 10 MMBtu/hr and 100 MMBtu/hr. The duct burner associated with the each HRSG is rated at 120 MMBtu/hr therefore the duct burners are not subject to this subpart.

40 CFR 60 Subpart KKKK - *Standards of Performance for Stationary Combustion Turbines*. This NSPS applies to stationary combustion turbines with a maximum heat input greater than or equal to 10 MMBtu/hr constructed after February 18, 2005. The BEP turbines were constructed prior to 2005 therefore pursuant to 60.4305(b), because this unit is subject to 40 CFR 60 Subpart GG, it is exempt from Subpart KKKK.

D. Proposed Permit Conditions

The following conditions will be revised to include the alternative CO concentration limit on the District Permits to Operate and will be updated in the FOP under section (III)(D):

REVISED PERMIT CONDITION APPLICABLE TO COMBUSTION TURBINE PERMITS B007953 AND B07954:

- iii. CO – the most stringent of 17.5 lb/hr or 4.0 ppmvd corrected to 15% oxygen and averaged over three hours except during low load operation defined as when the combustion turbine gross load is less than or equal to 95MW
- iv. CO (low load operation)– iv. CO (low load operation)– the most stringent of 17.5 lb/hr or the averaged three hour concentration as calculated as follows not to exceed 10.0 ppmvd. The concentration during low load hours and non-low load hours will be averaged over three hours with 10.0 ppmvd corrected to 15% concentration oxygen limit applying to hours during which actual low load operation occurs only.

E. Conclusion

The District has reviewed the proposed application for modifying BEP's FOP and conducted a succinct written analysis as required District Rule 1203, section (B)(1)(a). The District has determined that the proposed FOP revision is in compliance with all applicable District, state, and federal rules and regulations when operated in terms of the permit conditions given below and the attached revised FOP. This Document, inclusive of the preliminary determination and statement of legal and factual basis (pursuant to District Rule 1203) was released for public comment and publicly noticed pursuant to District Rule 1207 (please see Appendix C).

F. Public Comment and Notifications

1. Public Comment

This preliminary determination will be publicly noticed on September 19, 2018. Please see Appendix C for noticing details.

2. Notifications

The preliminary determination was submitted to USEPA and CARB pursuant to District Rule 1205 for a forty-five (45) day review period on November 3, 2018. The final modified FOP shall be issued on or about November 23, 2018.

Director, Office of Air Division
United States EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Chief, Stationary Source Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Ramon Campos
Compliance Manager
Blythe Energy Project
P.O. Box 1210
Blythe, CA 92226

Appendix A
BEP Title V Modification Application

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Mojave Desert Air Quality Management District

TITLE V – PERMIT AMENDMENT / MODIFICATION

I. PERMIT ACTION (Check appropriate box)

- ADMINISTRATIVE AMENDMENT
 MINOR MODIFICATION
 SIGNIFICANT MODIFICATION
 OFF-PERMIT CHANGE

1. FACILITY NAME: Blythe Energy LLC.	
2. FACILITY ID: 02262	
3. TITLE V PERMIT NO: 130202262	
4. TYPE OF ORGANIZATION: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
5. COMPANY NAME: Blythe Energy LLC.	
6. COMPANY MAILING/BILLING ADDRESS: P.O. Box 1210 STREET/P.O. BOX: _____ CITY: Blythe STATE: CA 9-DIGIT ZIP CODE: 92226	
7. FACILITY ADDRESS: 385 N Buck Blvd STREET: _____ CITY: Blythe STATE: CA 9-DIGIT ZIP CODE: 92225	PROPOSED DATE OF INSTALLATION:
8. DISTANCES (FEET AND DIRECTION) TO CLOSEST: FENCELINE: 609 N RESIDENCE: 10,433 SW BUSINESS: 5,235 SW SCHOOL: 24,039 E	
9. GENERAL NATURE OF BUSINESS: Electric Power Generation	
10. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Permit #B007953 COMBUSTION TURBINE GENERATOR POWER BLOCK (CT1) Alternative short-term Carbon Monoxide (CO) concentration limit of 10.0 PPM corrected to 15% O2 during low load operating hours, defined as when the combustion turbine gross load is less than or equal to 95 MW. Additional details are provided in the cover letter.	
11. PERSON TO CONTACT FOR INFORMATION ON THIS APPLICATION: NAME: Ramon Campos PHONE NUMBER: (760) 921-1364 TITLE: Compliance Manager EMAIL: Ramon.Campos@altagas.ca	

14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661

Revised: January 8, 2013

Form 1202-N Title V Modification

**FOP Minor Modification – Preliminary Determination
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Blythe Energy Project
September 19, 2018**

II. COMPLIANCE CERTIFICATION (Read each statement carefully and check all for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

 Digitally signed by Steven Brussee
 Date: 2018.07.23 12:15:26 -07'00'

Signature of Responsible Official

Date

Steven Brussee

Name of Responsible Official (please print)

Sr. Manager, Environment & Safety - Power

Title of Responsible Official (please print)

For AQMD Use Only:

DATE STAMP	DISTRICT PERMIT APPLICATION NO: _____	COMPANY /FACILITY ID: _____
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Revised: January 8, 2013

Form 1202-N Title V Modification

Mojave Desert Air Quality Management District

TITLE V – PERMIT AMENDMENT / MODIFICATION

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- ADMINISTRATIVE AMENDMENT
 MINOR MODIFICATION
 SIGNIFICANT MODIFICATION
 OFF-PERMIT CHANGE

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5. COMPANY NAME: Blythe Energy LLC.	
6. COMPANY MAILING/BILLING ADDRESS: P.O. Box 1210 STREET/P.O. BOX: _____ CITY: Blythe STATE: CA 9-DIGIT ZIP CODE: 92226	
7. FACILITY ADDRESS: 385 N Buck Blvd STREET: _____ CITY: Blythe STATE: CA 9-DIGIT ZIP CODE: 92225	PROPOSED DATE OF INSTALLATION:
8. DISTANCES (FEET AND DIRECTION) TO CLOSEST: FENCELINE: 509 N RESIDENCE: 10,472 SW BUSINESS: 5,270 SW SCHOOL: 24,036 E	
9. GENERAL NATURE OF BUSINESS: Electric Power Generation	
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11. PERSON TO CONTACT FOR INFORMATION ON THIS APPLICATION: NAME: Ramon Campos PHONE NUMBER: (760) 921-1364 TITLE: Compliance Manager EMAIL: Ramon.Campos@altagas.ca	

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Form 1202-N Title V Modification

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II. COMPLIANCE CERTIFICATION (Read each statement carefully and check all for confirmation):

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- 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:

 Digitally signed by Steven Brussee
 Date: 2018.07.23 12:17:03 -07'00'

Signature of Responsible Official

Date

Steven Brussee

Name of Responsible Official (please print)

Sr. Manager, Environment & Safety - Power

Title of Responsible Official (please print)

For AQMD Use Only:

DATE STAMP	DISTRICT PERMIT APPLICATION NO: _____	COMPANY / FACILITY ID: _____
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Revised: January 8, 2013

Form 1202-N Title V Modification

Appendix B
Facility 2017 CEIR Prioritization Score &
Emissions Summary

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File name: \\NAS02\Public Docs\Permit Engineering\Emission Inventory\2017_CEIF&CEIR\Facilities\Blythe Energy, Inc\130202262_P9071118.rtf

HARP Facility Prioritization Report

HARP EIM Version: 2.1.1

Reporting Year: 2017
 Project Path: C:\HARP2\CEI
 Project Database: C:\HARP2\CEI\CEI2017RNB.mdb
 CEIDARS Utility Database: C:\HARP2\Tables\CEIDARSTables022016.mdb
 HARP Health Table: HEALTH201708
 Sorting Order: DIS, AB, CO, TS, FACID, POLABBREV
 Date Created: 7/11/2018 4:16:47 PM
 Operator: RNB

.....
 POLLUTANT HEALTH VALUES FROM HARP HEALTH DATABASE:

POLLUTANT ID	POLLUTANT	CANCERURF (INH) (ug/m ³) ⁻¹	ACUTEPEL ug/m ³	CHRONICREL (INH) ug/m ³
106550	1,3-Butadiene	1.70E-04	6.60E+02	2.00E+00
83329	Aceasaphthene	N/A	N/A	N/A
208568	Aceasaphthylene	N/A	N/A	N/A
75070	Acetaldehyde	2.70E-06	4.70E+02	1.40E+02
107028	Acrolein	N/A	2.50E+00	3.50E-01
120127	Anthracene	N/A	N/A	N/A
7440360	Antimony	N/A	N/A	N/A
7440382	Arsenic	3.30E-03	2.00E-01	1.50E-02
56553	B[a]anthracene	1.10E-04	N/A	N/A
50328	B[a]P	1.10E-03	N/A	N/A
205992	B[b]fluoranthene	1.10E-04	N/A	N/A
192972	B[e]pyrene	N/A	N/A	N/A
191242	B[g,h,i]perylene	N/A	N/A	N/A
205823	B[j]fluoranthene	1.10E-04	N/A	N/A
71432	Benzene	2.50E-05	2.70E+01	3.00E+00
7440417	Beryllium	2.40E-03	N/A	7.00E-03
7440439	Cadmium	4.20E-03	N/A	2.00E-02
7440473	Chromium	N/A	N/A	N/A
218019	Chrysene	1.10E-05	N/A	N/A
42101	CO	N/A	N/A	N/A
42101	CO	N/A	N/A	N/A
7440484	Cobalt	N/A	N/A	N/A
7440484	Cobalt	N/A	N/A	N/A
7440508	Copper	N/A	1.00E+02	N/A
18540299	Cr (VI)	1.50E-01	N/A	2.50E-01
110827	Cyclohexane	N/A	N/A	N/A
53703	D[a,h]anthracen	1.20E-03	N/A	N/A
9901	DieselExhPM	3.00E-04	N/A	5.00E+00
9902	DieselExhFOG	N/A	N/A	N/A
106634	EDB	7.10E-05	N/A	8.00E-01
100414	Ethyl Benzene	2.50E-06	N/A	2.00E+03
75003	Ethyl Chloride	N/A	N/A	3.00E+04
206440	Fluoranthene	N/A	N/A	N/A
96737	Fluorene	N/A	N/A	N/A

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50000	Formaldehyde	6.00E-06	5.50E+01	9.00E+00
110943	Hexane	N/A	N/A	7.00E+03
183395	In[1,2,3-cd]pyr	1.10E-04	N/A	N/A
7439921	Lead	1.20E-05	N/A	N/A
7439965	Manganese	N/A	N/A	9.00E-02
7439965	Manganese	N/A	N/A	9.00E-02
7439976	Mercury	N/A	6.00E-01	3.00E-02
7439976	Mercury	N/A	6.00E-01	3.00E-02
91203	Naphthalene	3.40E-05	N/A	9.00E+00
7664417	NH3	N/A	3.20E+03	2.00E+02
7440020	Nickel	2.40E-04	2.00E-01	1.40E-02
42603	NOX	N/A	N/A	N/A
42603	NOX	N/A	N/A	N/A
1150	PAHs-w/	N/A	N/A	N/A
1151	PAHs-w/o	1.10E-03	N/A	N/A
85018	Phenanthrene	N/A	N/A	N/A
11101	PM	N/A	N/A	N/A
85101	PM10	N/A	N/A	N/A
89101	PM25	N/A	N/A	N/A
115071	Propylene	N/A	N/A	3.00E+03
73569	Propylene Oxide	3.70E-06	3.10E+03	3.00E+01
129000	Pyrene	N/A	N/A	N/A
16113	ECG	N/A	N/A	N/A
7782492	Selenium	N/A	N/A	2.00E+01
7782492	Selenium	N/A	N/A	2.00E+01
7782492	Selenium	N/A	N/A	2.00E+01
42401	SOX	N/A	N/A	N/A
43101	TOG	N/A	N/A	N/A
108883	Toluene	N/A	3.70E+04	3.00E+02
43104	VOC	N/A	N/A	N/A
43104	VOC	N/A	N/A	N/A
1330207	Xylenes	N/A	2.20E+04	7.00E+02
7440666	Zinc	N/A	N/A	N/A

PRIORITIZATION SCORE SUMMARY:

Facility Name		Emission and Potency Procedure				Dispersion Adjustment Procedure				Highest Score
Proximity Method		Cancer	Acute	Chronic	NonCancer	Cancer	Acute	Chronic	NonCancer	
Optional Factors										
FACID	CO AB DIS									

BLYTHE ENERGY INC.										
Proximity Method:										
Annual Operating Hours 8760										
Priority Multiplier 0.19										
130202262	35 MD MDJ	0.20	5.25E-02	7.72E-03	5.30E-02	0.18	5.04E-02	6.59E-03	5.10E-02	0.20

PRIORITIZATION SCORES AND POLLUTANTS: (For proximity method or optional factors information, please see section above.)

Note: 1. Annual Emissions units: LBS/YR for toxics, TONS/YR for criteria pollutants, CURIES/YR for radionuclides.

2. Hourly Maximum Emissions units: LBS/HR for toxics, MILLICURIES/HR for radionuclides.
 3. * GNGs, non-regulatory pollutants, and user defined pollutants are marked by an asterisk with the pollutant ID.
 These pollutants are not included in the prioritization score calculation.

Facility Name	CO	AB	DIS	Emission and Potency Procedure			Dispersion Adjustment Procedure				Highest Score	
FACID				Cancer	Acute	Chronic NonCancer	Cancer	Acute	Chronic NonCancer			
BLYTHE ENERGY INC.												
Annual Operating Hours: 8760												
130202262	33	MD	MOJ	0.20	5.29E-02	7.72E-03	5.30E-02	0.18	5.04E-02	6.99E-03	5.10E-02	0.20
Pollutant	POL ID	POLLUTANT	ANNUAL EHS	HR	MAX EHS							
	106990	1,3-butadi	5.530		9.640E-03							
	83329	Acenaphthe	2.947E-05		4.300E-09							
	208968	Acenaphthy	2.477E-05		4.300E-09							
	75070	Acetaldehy	511.318		8.674E-02							
	107028	Acrolein	91.760		7.272E-02							
	120127	Anthracene	3.390E-05		5.720E-09							
	7440360	Antimony	8.030E-02		1.512E-05							
	7440382	Arsenic	8.829E-02		1.092E-04							
	56553	B[a]anthra	2.547E-05		4.300E-09							
	50328	B[a]P	1.668E-05		2.780E-09							
	209992	B[b]fluora	2.947E-05		4.300E-09							
	192972	B[e]pyrene	8.464E-06		2.860E-09							
	191242	B[g,h,i]pe	0.132		2.600E-05							
	205923	B[j]fluora	5.234E-02		2.050E-05							
	71432	Benzene	153.334		2.480E-02							
	7440417	Beryllium	1.647E-04		2.860E-08							
	7440439	Cadmium	0.171		3.100E-05							
	7440473	Chromium	1.941E-02		3.400E-06							
	218016	Chrysene	2.947E-05		4.300E-09							
	42101	CO	23.249		947.000							
	7440484	Cobalt	1.154E-03		2.000E-07							
	7440508	Copper	0.163		3.100E-05							
	18340299	Cr(VI)	2.420E-05		2.800E-06							
	110827	Cyclohexan	2.772E-03		3.700E-03							
	53703	D[a,h]anth	1.692E-05		2.860E-09							
	9901	DieselExhP	5.784		0.669							
	9902	DieselExhT	5.784		0.669							
	106994	EDB	4.804E-04		6.408E-04							
	100414	Ethyl Benz	408.927		6.637E-02							
	75003	Ethyl Chlo	1.683E-05		2.244E-05							
	206440	Fluoranthr	4.239E-05		7.162E-09							
	86737	Fluorene	3.833E-05		6.680E-09							
	50000	Formaldehy	525.415		0.328							
	110543	Hexane	25.454		9.330E-03							
	193395	In[1,2,3-c	2.547E-05		4.300E-09							
	7439921	Lead	8.918E-02		1.162E-04							
	7439965	Manganese	2.154		3.069E-04							
	7439976	Mercury	1.982E-02		3.220E-05							
	91203	Naphthalen	16.624		2.700E-03							
	7664417	NH3	7.270E+04		12.680							
	7440020	Nickel	0.193		5.460E-05							
	42603	NOX	51.877		789.000							
	1150	PAHs-w/	4.260E-03		9.730E-04							
	1151	PAHs-w/o	28.098		4.560E-03							
	85018	Phenanthre	2.406E-04		4.060E-08							
	11101	PM	25.240		9.240							
	85101	PM10	41.064		12.970							

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85105	PM10-NON	7.063	2.000
88101	PM2.5	41.064	12.970
89105	PM2.5-NON	6.365	2.000
11105	PM-NON	6.386	2.000
115071	Propylene	7417.020	1.462
75569	Propylene	370.590	6.015E-02
129000	Pyrene	7.067E-05	1.194E-08
16113	SOX	3.223	1.170
7792492	Selenium	0.217	3.100E-05
42401	SOX	3.733	1.110
43101	TOG	70.288	21.600
108893	Toluene	1662.395	0.270
43104	VOC	3.299	1.170
1330207	Xylenes	817.855	0.133
7440666	Zinc	2.149	3.069E-04

Appendix C Public Notice

Noticing Methods include the following, in accordance with District Rule 1207 (A)(1)(a):

- Published in newspapers of general circulation - *Riverside Press Enterprise* (Riverside County) and the *Daily Press* (San Bernardino County) on Wednesday, September 19, 2018.
- Mailed and/or emailed to MDAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notices in this Appendix) on Wednesday, September 19, 2018.
- Posted on the MDAQMD Website at the following link:
<http://www.mdaqmd.ca.gov/index.aspx?page=416>

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NOTICE OF PRELIMINARY DETERMINATION

NOTICE IS HEREBY GIVEN THAT Blythe Energy, Inc., operating their facility at 385 N. Buck Blvd. in Blythe California, located within the Mojave Desert Air Quality Management District (MDAQMD) has applied for a Minor Modification to their Federal Operating Permit (FOP) pursuant to the provisions of MDAQMD Regulation XII. The applicant is a facility engaged in electric power generation and is of a size requiring a Title V Permit. The applicant has applied for modification of District permits B007953 and B007954 and the current Title V Operating permits. The proposed modification adds an alternative CO concentration limit which is necessary for the facility to operate at low loads. The facility is requesting to operate at low load because of decreased demand due to increased energy provided by renewable technology. The intermittent nature of wind and solar power generation requires that variable power generation sources are available to fill in the gaps. The proposed modification does not change the mass based emission limits currently reflected in the facility permits.

PETITION FOR REVIEW: Title V Permits, once issued, are also subject to review and approval by USEPA. If USEPA has not objected to a proposed permit and the MDAQMD has not addressed a public comment in a satisfactory manner, the public may petition USEPA, Region IX, Operation Permits Section at 75 Hawthorne Street, San Francisco, CA 94105 within 60 days after the end of the USEPA review period which ends on November 3, 2018 for USEPA to reconsider its decision not to object to the permit.

REQUEST FOR COMMENTS: Interested persons are invited to submit written comments and/or other documents regarding the Preliminary Determination. If you submit written comments, you may also request a public hearing on the action. To be considered, comments, documents and requests for public hearing written comments must be received at the above address no later than thirty days after the date this notice is published. A Final Determination and revised permit should be issued by November 23, 2018.

AVAILABILITY OF DOCUMENTS: Copies of the Permit Applications, Preliminary Determination and other supporting documentation are available from the MDAQMD by mail, in person, via the following link on the MDAQMD website: <http://mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting-regulated-industry> or by contacting Roseana Navarro-Brasington, Mojave Desert Air Quality Management District, 14306 Park Avenue, Victorville, CA 92392, Phone: (760) 245-1661, extension 5706, Facsimile: (760) 245-2022 or at rnbrasington@mdaqmd.ca.gov.

Traducción en español esta disponible por solicitud. Por favor llame: (760) 245-1661