MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

Preliminary Determination/Decision - Statement of Basis
for Renewal of

FOP Number: 130202262
For:
BLYTHE ENERGY, INC.
Facility:
BLYTHE ENERGY PROJECT
Facility Address:
385 N. Buck Blvd.
Blythe, CA 92226

Document Date: September 5, 2023
Submittal date to EPA/CARB for review: September 5, 2023
EPA/CARB 45-day Commenting Period ends: October 21, 2023
Public Notice Posted: September 5, 2023
Public Commenting Period ends: October 6, 2023
Permit Issue date: November 1, 2023

Permitting Engineer:
Roseana Brasington

14306 PARK AVENUE, VICTORVILLE, CALIFORNIA 92392
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A. Introduction

1. Application and Setting

BACKGROUND:

Federal Operating Permit (FOP) number 130202262 is for Blythe Energy, Inc. (BEP). BEP uses two F-Class Siemens V84.3A combustion turbine generators (CTGs) with dedicated heat recovery steam generators (HRSGs) to produce electricity. Inlet air to the CTGs is filtered and, during seasonally warm conditions, conditioned with chilled air supported by a mechanical draft wet cooling tower (chiller). Compressed air and natural gas are mixed and combusted in the turbine combustion chamber. Lean pre-mixed air and low-NOx combustors are used to minimize NOx formation during combustion. Exhaust gas from the combustion chamber is expanded through a multi-stage power turbine, which drives both the air compressor and electric power generator. Heat from the exhaust gas is then recovered in the HRSG.

Each HRSG is equipped with a duct burner to provide supplementary firing during high ambient temperatures to maintain constant steam production to the condensing steam turbine generator (STG). A Selective Catalytic Reduction (SCR) system is used to reduce NOx emissions. An Oxidation Catalyst is used to reduce CO and VOC. Steam is produced in each HRSG and flows to the STG. The STG drives an electric generator to produce electricity. STG exhaust steam is condensed in a surface condenser with water from the main cooling tower.

BEP also has a 303 bhp emergency diesel-fueled internal combustion engine that drives a water pump for fire suppression and a propane fueled 114 bhp internal combustion engine that drives an emergency electrical power generator.

BEP is located in a "Zone B" area as defined by Rule 1201(S)(2) which means that the area is designated Federal Attainment or Unclassified for Ozone.

POLLUTANT	STATE AREA DESIGNATION	FEDERAL AREA DESIGNATION
OZONE Precursors: NOx, VOC	NONATTAINMENT	UNCLASSIFIED/ATTAINMENT
NO2	ATTAINMENT	UNCLASSIFIED/ATTAINMENT
CO	ATTAINMENT	UNCLASSIFIED/ATTAINMENT
PM10 Precursors: SOx, NOx, VOC	NONATTAINMENT	NONATTAINMENT
PM2.5	NONATTAINMENT	UNCLASSIFIED/ATTAINMENT
SO2	ATTAINMENT	UNCLASSIFIED

BEP is defined as a Major Facility pursuant to District Rule 1201 – *Federal Operating Permit Definitions,* section 1201(S) and also pursuant to PSD Program, 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	PSD THRESHOLD	PSD STATUS
NOx	97	25	***MAJOR***	100	NON MAJOR	100	NON MAJOR
VOC	24	25	NON MAJOR	100	NON MAJOR	100	NON MAJOR
PM10	56.9	15	***MAJOR***	100	NON MAJOR	100	NON MAJOR
SOx	12	25	NON MAJOR	100	NON MAJOR	100	NON MAJOR
CO	*175.0*	100	***MAJOR***	100	***MAJOR***	100	***MAJOR***
HAP		10 ANY HAP 25 ANY COMBINATION OF HAP	***AREA***	10 ANY HAP 25 ANY COMBINATION OF HAP	***AREA***	NONE HAP IS NOT A PSD POLLUTANT	NA

2. Description of Proposed Action

BEP proposes to renew the FOP and to make changes to the monitoring requirements related to the Continuous Emissions Monitoring System. The Mojave Desert Air Quality Management District (MDAQMD or District) received the following applications:

- June 2, 2021 application to renew Acid Rain Permit
- October 8, 2021 application to renew the current Title V Federal Operating Permit (FOP) for BEP.
- September 12, 2022 application for modification. The proposed administrative modification changes the facility primary and alternate contacts.

This document serves as the preliminary determination to revise the permit as necessary to renew it pursuant to Rule 1203(B). This preliminary determination will be submitted to USEPA, CARB, and the public for review and comment. Please refer to the cover page of this document for the noticing and comment period timeframes.

The FOP will be formatted to conform with new District guidelines and minor typographical and spelling errors will be corrected. The permit has been updated to include citations from PSD permit SE 02-01. BEP has proposed to revise the permit conditions related to the CO CEMS, harmonizing the monitoring requirements of Part 60 and Part 75 and to establish in the Operating Permit ongoing quality assurance requirements for the CEMS. None of these changes alter any emissions limitations or relax any monitoring, recordkeeping, or reporting requirements.

Pursuant to Regulation XII, *Federal Operating Permits*, the District has reviewed the terms and conditions of this Federal Operating Permit. This review included an analysis of federal, state, and local applicability determinations for all sources, including those that have been modified or permitted since the original issuance of the Federal Operating Permit. The review also included an assessment of all monitoring in the permit for sufficiency to determine compliance. This *Statement of Legal and Factual Basis,* pursuant to Rule 1203(B)(1)(a)(i), is intended to assess the adequacy of the proposed Title V Permit renewal and explain the District's basis in composing the proposed Title V Permit renewal.

B. Title V Permit/FOP

1. Proposed Changes to FOP

The proposed changes to the FOP are indicated in the red-line version of the draft. Additionally, a description and explanation of those changes are indicated below:

PART I: INTRODUCTORY INFORMATION

This section of the Federal Operating Permit contains general information about the BEP facility, including facility identifying information (section A), a description of the facility (section B), and a description of the facility's equipment (section C).

Changes made to this section of the FOP:

- Update of Responsible Official, facility primary and alternate contacts
- Added language indicating what pollutants trigger Title V applicability
- Updated Model/Serial Numbers for cooling tower under permit B007958

PART II: FACILITYWIDE APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains requirements applicable to the entire facility and equipment (section A), facility-wide monitoring, recordkeeping, and reporting requirements (section B), and facility-wide compliance conditions (section C).

Changes made to this section of the FOP:

- Section A
    - Added Rule 201 language in accordance with current permitting standards as it is an applicable requirement
    - Updated Rule 203 language to current permitting standards
    - Updated Rule 204 language to current permitting standards
    - Updated Rule 206 language to current permitting standards
    - Updated Rule 207 language to current permitting standards
    - Updated Rule 209 language to current permitting standards
    - Updated Rule 217 language to current permitting standards
    - Updated Rule 219 language to current permitting standards
    - Updated Rule 221 language to current permitting standards
    - Updated Rule 301 language to current permitting standards
    - Updated Rule 312 language to current permitting standards
    - Updated Rule 401 language to reflect current rule requirements
    - Added Rule 402 language in accordance with current permitting standards as it is an applicable requirement
    - Updated Rule 403 language to reflect current rule requirements
    - Updated Rule 403.2 language to reflect current rule requirements
    - Updated Rule 404 language to reflect current rule requirements
    - Added Rule 431 language in accordance with current permitting standards as it is an applicable requirement
    - Added Rule 441 language in accordance with current permitting standards as it is an applicable requirement
    - Updated Rule 442 language to reflect current rule requirements

    - Added Rule 462 language in accordance with current permitting standards as it is an applicable requirement
    - Added Rule 463 language in accordance with current permitting standards as it is an applicable requirement
    - Added Rule 900 language in accordance with current permitting standards as it is an applicable requirement
    - Added Rule 1104 language in accordance with current permitting standards
    - Updated Rule 1113 language to reflect current rule requirements
    - Updated Rule 1114 language to reflect current rule requirements
    - Updated Rule 1115 language to reflect current rule requirements
    - Added Rule 1116 language in accordance with current permitting standards as it is an applicable requirement
    - Added Rule 1159 in accordance with current permitting standards as it is an applicable requirement
    - Added Rule 1168 in accordance with current permitting standards as it is an applicable requirement
    - Added Rule 1211 in accordance with current permitting standards as it is an applicable requirement
    - Added requirement for deadlines pertaining to the submission of Title V Permit Renewal per District Rule 1202.
    - Updated citation of regulatory requirements related to Comprehensive Emission Inventory reporting
    - Updated Rule 1203 and 1208 related to Compliance Certification to current permitting standards
- Section B updated rule citations, added requirements and citations associated with PSD permit SE 02-01 4/07
- Section C
    - Updated 40 CFR 61 Subparts A and M language to current permitting standards
    - Added 40 CFR 63 Subpart ZZZZ as it is an applicable requirement
    - Added 40 CFR 60 Subpart GG as it is an applicable requirement
    - Added 40 CFR 60 Subpart Db as it is an applicable requirement

PART III: EQUIPMENT SPECIFIC APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains equipment-specific applicable requirements including emission limitations, monitoring and recordkeeping, reporting and testing, and compliance plans.

Changes made to this section of the FOP:

- Sections A and B related to the combustion turbines:

- updated rule citations, added requirements and citations associated with PSD permit SE 02-01 4/07
- revised permit condition related to the monitoring requirements for the CO CEMS
- added references to 40 CFR 60 Subparts A and Db and Title IV Acid Rain Program
- Updated conditions 11 and 13 to reference the District Compliance Test Procedural Manual
- Modified Condition 16 to add ongoing NO_x, O_2 and CO CEMS QA requirements and to clarify how each analyzer is certified (NO_x and O_2 by 40 CFR 75, CO by 40 CFR 60 Appendix B, PS-4).
- For the NOx and CO CEMS, the current permit references only analyzer performance specifications from 40 CFR 60 Appendix B. This condition was updated to specify that the NOx and O2 analyzers are certified in accordance with 40 CFR 75 and to add ongoing CEMS QA requirements for NOx, O2 and CO. Since ongoing CEMS QA is not currently specified by permit, Blythe would like to document that the NOx and O2 analyzers follow 40 CFR 75 and the CO analyzers follows 40 CFR 60 Appendix F with certain provisions adopted from 40 CFR 75. This hybrid approach for CO enables Blythe to conduct quarterly audits on the same schedule. Harmonizing 40 CFR 60 with 40 CFR 75 monitoring provisions has been the subject of many EPA and State/local monitoring petition approvals. Also, in 2007, EPA harmonized certain 40 CFR 60 subparts to allow for data from certified 40 CFR 75 monitors to be used to demonstrate compliance with 40 CFR 60 emissions limits. For example, 40 CFR 60 Subpart GG allows for alternative testing and monitoring procedures harmonizing the requirements of Subpart GG with the monitoring provisions of 40 CFR 75. A comparison of the 40 CFR 60 and 40 CFR 75 differences specific to Blythe's QA program are shown below.
    - QA Test Schedules and Grace Periods:
        - RATAs: 40 CFR 60 Appendix F QA RATAs are required once every four calendar quarters with an option to extend if the fourth quarter is a non-operating quarter. 40 CFR 75 QA RATAs are required at least once every four QA operating quarters (a "QA operating quarter" is a calendar quarter in which the unit operated in at least 168 hours; "four QA operating quarters" assumes the incentive criteria is satisfied, which is common; otherwise, the standard frequency is every two QA operating quarters) but no less frequently than once every eight calendar quarters, plus a 720-unit operating hour grace period following the expiration of the standard deadline.
        - Linearity Checks / CGAs: 40 CFR 60 Appendix F CGAs are required in all quarters in which a RATA is not conducted with an exclusion for non-operating quarters. 40 CFR 75 linearity checks

(analogous to the 40 CFR 60 CGA) are required at least once during each QA operating quarter, not to exceed four calendar quarters, plus a 168-unit operating hour grace period following the expiration of the standard deadline.

        - Analyzer Range Exemptions for CGAs: 40 CFR 60 does not contain CGA exemptions for low-emitting sources, while 40 CFR 75 contains linearity check exemptions for analyzer ranges with span values less than or equal to 30 ppm. Blythe uses this exemption for the NOx and CO low ranges.
        - RATA Load: 40 CFR 60 specifies that RATAs are to be conducted while operating at more than 50 percent of normal load while 40 CFR 75 specifies that testing shall be conducted at a normal load level(s) as determined in accordance with 40 CFR 75 Appendix A Section 2.3.1.3(a).
    - added permit condition specifying Comprehensive Emission Inventory Requirements
- Sections C and D related to the duct burners:
    - Clarified and expanded citation of 40 CFR 60 Subpart Db
    - updated rule citations, added requirements and citations associated with PSD permit 02-01
    - added permit condition specifying Comprehensive Emission Inventory Requirements
- Sections E and F related to the SCR Units
    - updated rule citations, added requirements and citations associated with PSD permit 02-01
- Sections G & H related to the oxidation catalysts
    - updated rule citations, added requirements and citations associated with PSD permit 02-01
- Section I related to the main cooling tower
    - updated rule citations, added requirements and citations associated with PSD permit 02-01
- Section J related to the chiller cooling tower
    - Updated equipment details to correct model/serial numbers
    - updated rule citations, added requirements and citations associated with PSD permit 02-01
- Section K related to the diesel emergency fire pump and Section L related to the propane emergency generator
    - Updated rule citations
    - Updated permit condition 4 of permits E007961 and E009492 removing the vacated provision of 40 CFR 63 Subpart ZZZZ Section 63.6640(f)(1)(ii) Added condition to permit for E008159 which clarifies appropriate non-emergency use as allowed under 40 CFR 63.6640(f)at an area HAP source.
    - Clarified citation for permit condition 5 for E007961 with respect to operating for the purposes of compliance with NFPA 25 requirements.

- Updated recordkeeping requirements in accordance with 40 CFR 63.6655(f)
- Added requirements 40 CFR 63.6603(a)
- added permit condition specifying Comprehensive Emission Inventory Requirements

PART IV: STANDARD FEDERAL OPERATING PERMIT CONDITIONS

No changes were made to this section

PART V: OPERATIONAL FLEXIBILITY

No changes were made to this section

PART VI: ACID RAIN PERMIT

- Updated Title IV Acid Rain Permit with current designated representative and facility contact person.

PART VII: CONVENTIONS, ABREVIATIONS, DEFINITIONS

Changes made to this section of the FOP:

- Updated SIP table

5. Rules and Regulations Applicable to the Proposed Project

District Rules

Rules 203 – 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. BEP is in compliance with this rule as they maintain District permits for all residing equipment per Part II, section A of their FOP.

Rule 204 – Permit Conditions. To assure compliance with all applicable regulations, the Air Pollution Control Officer may impose written conditions on any permit. BEP complies with all applicable regulations per Part II, section A of their 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. BEP complies with this regulation per Part II, section A of their FOP.

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

Rule 209 – Transfer and Voiding of Permits. BEP 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. BEP complies with this regulation per Part II, section A of their FOP.

Rule 217 – Provisions for Sampling and Testing Facilities. This rule requires the applicant to provide and maintain requirements for sampling and testing. BEP is in compliance with this rule per Part II, section A of their FOP.

Rule 219 – Equipment not Requiring a Permit. This rule exempts certain equipment from District Permit. BEP is in compliance with this rule per Part II, section A.

Rule 221 – Federal Operating Permit Requirement. BEP is in compliance with this rule, as they currently hold and maintain a Federal Operating Permit.

Rule 301/312 – Permit Fees/Fees for Federal Operating Permits. BEP annual permit fees are due by the applicable dates. BEP is currently not delinquent for any fees.

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. BEP has specific operating conditions that enforce compliance with this rule, specifically Part II, section A.

Rule 403 – Fugitive Dust. This rule prohibits fugitive dust beyond the property line of any emission source. BEP has specific operating conditions to ensure compliance with this condition, specifically Part II, section A.

Rule 404 – Particulate Matter Concentration. BEP 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.
BEP adheres to this rule per Part II, section A of their FOP

Rule 405 – Solid Particulate Matter, Weight. BEP 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) Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.
(b) 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.
BEP adheres to this rule per Part II, section A of their FOP.

Rule 406 – Specific Contaminants. This rule limits single source of emissions of specific compounds. BEP meets this requirement by complying with operating condition listed in Part II, section A of their FOP.

Rule 407 – Liquid and Gaseous Air Contaminants. This rule limits CO emissions from facilities. BEP meets this requirement by complying with operating condition listed in Part II, section A of their FOP.

Rule 408 – Circumvention. This rule prohibits hidden or secondary rule violations. The proposed renewal is not expected to violate Rule 408. BEP meets this requirement by complying with operating condition listed in Part II, section A of their FOP.

Rule 409 – Combustion Contaminants. This rule limits the emissions of combustion contaminants exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12 percent of carbon dioxide (CO2) at standard averaged over a minimum of 15 consecutive minutes. BEP meets this requirement by complying with operating condition listed in Part II, section A of their FOP.

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. BEP meets this requirement by complying with operating condition listed in Part II, section A of their FOP.

Rule 431 – *Sulfur Content of Fuels*. This rule limits the sulfur content allowed in fuels burned at the facility. BEP meets this requirement by complying with operating condition listed in Part II, Section A of their 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. BEP meets the requirement by complying with operating condition listed in Part II, section A of their 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. The provisions of applicable NSPS's have been incorporated into the conditions of the District Permits for applicable units in Part III of the FOP.

Rule 1000 – *National Emission Standards for Hazardous Air Pollutants (NESHAP)*. Rule 1000 adopts all applicable provisions regarding standards of performance for new stationary sources as set forth in 40 CFR 61. The provisions of applicable NESHAPS's have been incorporated into the conditions of the District Permits for applicable units in Part III of the FOP.

Rule 1104 – *Organic Solvent Degreasing Operations*. This rule limits the emission of VOCs from wipe cleaning and degreasing operations using organic solvents. BEP meets this requirement by complying with operating condition listed in Part II, Section A of their FOP.

Rule 1113 – *Architectural Coatings*. This rule limits the quantity of VOC in Architectural Coatings. BEP meets the requirements of this rule by complying with operating condition listed in Part II, Section A of their FOP.

Rule 1114 – *Wood Products Coatings*. This rule limits the emission of VOC from coatings associated with Wood Products. BEP meets the requirements of this rule by complying with operating condition listed in Part II, Section A of their FOP.

Rule 1115 – *Metal Parts and Products Coatings*. This rule limits the emission of VOC from coatings associated with Metal Parts and Products. BEP meets the requirements of this rule by complying with operating condition listed in Part II, Section A of their FOP.

Rule 1168 - Adhesives and Sealants. This rule limits the emission of VOC from adhesives and sealants. The requirements are largely placed on the adhesive and sealant manufacture as the product categories regulated by this rule are largely consumer products. BEP meets the requirements of this rule by complying with the requirements of Part II.A.

Regulation XII – *Federal Operating Permits*. This regulation contains requirements for sources which must have a FOP. BEP currently has a FOP and is expected to comply with all applicable rules and regulations.

Rule 1201 – *Federal Operating Permit Definitions.* BEP is defined as a federal Major Facility pursuant to this rule.

Rule 1203 – *Federal Operating Permits*. This rule outlines the permit term, issuance, restrictions, content, operational flexibility, compliance certification, permit shield, and violations of Federal Operating Permits. BEP complies with this rule per Part II, Sections B and C, and Part IV and V of their FOP.

Rule 1205 – *Modifications of Federal Operating Permits*. The proposed equipment classifies as a Modification to the Federal Operating Permit (FOP), and subsequently, this permit modification is issued in accordance with the provisions of District Rule 1203.

Rule 1207 – *Notice and Comment*. This rule outlines the noticing requirements for Notice and Comment. BEP will properly notice their renewal pursuant to this rule.

Rule 1208 – *Certification*. BEP included a Certification of Responsible Official as required with the submitted application for the proposed modification.

Rule 1211 – *Greenhouse Gas Provisions of Federal Operating Permits*. BEP is a Major GHG Facility pursuant to Rule 1211. BEP meets the requirements of this rule by complying with operating condition listed in Part II, Section A of their FOP.

Regulation XIII – *New Source Review* This regulation sets forth requirements for the preconstruction review of all new or modified facilities. This permitting action does not constitute any NSR actions.

Regulation XVII – *Prevention of Significant Deterioration*. Please take notice that this regulation is not currently implemented by the MDAQMD because the USEPA has not delegated authority for the PSD Program to the District at this time. However, this facility is a major stationary source for CO under the language in the applicability procedures of 40 CFR 52.21 (a)(2)(i) and (ii). The proposed renewal does not result in a new major stationary source and do not constitute a major modification of any existing major stationary source, the proposed Title V permit renewal is not subject to PSD. This facility operates under existing PSD permit SE 02-01. The PSD permit requirements have been added as operating conditions under the proposed renewal of the FOP.

State Regulations

CCR §93115 – Airborne Toxic Control Measure for Stationary Compression Ignition (CI) Engines. The purpose of this airborne toxic control measure (ATCM) is to reduce diesel particulate matter (PM) and criteria pollutant emissions from stationary diesel-fueled compression ignition (CI) engines. The provisions of this ATCM have been incorporated into the conditions of the District Permits for applicable units in Part III of the FOP.

Federal Regulations

40 CFR 60, Subpart A – NSPS General Provisions – this facility is subject to Subpart A because it operates equipment subject to Subparts Db and GG.

40 CFR 60 Subpart Db Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units – this facility is subject to the NSPS because it owns and operates natural gas fired duct burners which are capable of combusting more than 100 MMbtu/hour heat input.

40 CFR 60 Subpart GG New Source Performance Standard for Stationary Gas Turbines – this facility is subject to the NSPS because it owns and operates stationary gas turbines with a heat input greater than 10 MMBtu/hr which were constructed after October 3, 1977. This facility complies with the NOx emission limits set forth in 60.332(a)(1) and (a)(3) and the SO2 emissions limits set forth in 60.333. Permit conditions have been included that specify recordkeeping requirements and fuel certification as required by the NSPS.

40 CFR 61, Subpart M – National Emission Standard for Asbestos - BEP complies with 40 CFR 61, Subpart M – per conditions in Part II, section C.

40 CFR 63 Subpart ZZZZ – National Emissions Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines - BEP is an area source for HAP and complies with this regulation via operating conditions listed in Part III for each applicable IC engine.

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 Facility that is required to obtain Title V, Part 70 or 71 permit and it meets all of the following criteria. "PSEU" means an emissions unit considered separately with respect to each regulated air pollutant. The PSEU must:
a. Be subject to an emission limitation or standard [40 CFR 64; AND,
b. Use a control device to achieve compliance [40 CFR 64.2(a)(2)]; AND,
c. Have the potential pre-control emissions that exceed or are equivalent to the major source threshold. [40 CFR 64.2(a)(3)]

The combustion turbines each have a pre-control PTE which is in excess of the major source threshold. The turbines each vent through a selective catalytic reduction control and an oxidation catalyst control. The turbine emissions are monitored by a Continuous Emissions Monitor (CEMS). **40 CFR 64.2(b)(1)(vi) specifically exempts the turbines and their associated controls from CAM because the CEMS is required in the Part 70 (Title V) permit.** There is no other equipment at the facility which satisfies the criteria specified in "a", "b", and "c" above; therefore, none of the other facility equipment is subject to CAM either. See the CAM Plan applicability determination, included in the renewal application materials included in Appendix A.

40 CFR 75 Acid Rain Program – The combustion turbines and duct burners are subject the Acid Rain Program. Pursuant to 40 CFR Part 72.6(a)(3)(i), the affected units specified above meet the 72.2 definition for a new utility unit and are subject to the acid rain permit requirements of 72.9(a). The affected units do not qualify for a new unit exemption pursuant to 40 CFR 72.7(b)(1) since each serves a generator with a nameplate capacity greater than 25 MW. The affected units specified above are not listed in table-2 of 40 CFR Part 73, therefore, the operator

is not required to obtain SO2 allowances under the Acid Rain Program. This unit is not subject to the NOx requirements from 40 CFR Part 76 as this unit is not capable of firing on coal.

7. Conclusion and Recommendation

The District has reviewed the applications for the proposed renewal of the BEP Federal Operating Permit and conducted a written analysis as required by District Rule 1203, section (B)(1)(a). The District has determined that the proposed renewal is compliant with all applicable District, State, and Federal rules and regulations as projected when operated in the terms of the permit conditions given herein, and the attached revised FOP. The proposed permit and corresponding statement of legal and factual basis will be released for public comment and publicly noticed pursuant to District Rule 1207. To view the public notice please refer to Appendix B of this document. Please refer to the cover sheet of this document for noticing and review dates.

8. Public Comment and Notifications:

a. Public Comment
This preliminary determination will be publicly noticed for the required 30-Day Public commenting period. Noticing Methods include the following, per District Rule 1207 (A)(1)(a):

- Publish in newspapers of general circulation - Press Enterprise and the Daily Press.
- Mail and/or email to MDAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notice in Appendix B).
- Posted on the MDAQMD Website at the following link: https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting

b. Notifications/USEPA & CARB Review The preliminary determination(s) will be submitted via e-mail to EPA and CARB pursuant to District Rule 1207 for a forty-five (45) day review period. The final renewed FOP shall be issued after the review period is over, provided there are no comments that require resubmission. All correspondence as required by District Rule 1207 were forwarded electronically to the following recipients. Please refer to the cover page for noticing dates. This preliminary decision/determination will be submitted to USEPA, CARB, the facility and the public for review and comment.

Please refer to the cover page of this document for the noticing and comment period timeframes.

Director, Office of Air Division
United States EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Notified via electronic reporting to cdx.epa.gov (EPA Central Data Exchange)

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

Notified via email to permits@arb.ca.gov

Mary Dyas, Project Manager
California Energy Commission
715 P Street
Sacramento, CA 95814
Notified vie email to: CME@energy.ca.gov

Mike Ludwin, Senior Director Operations - Power
Blythe Energy Project
P.O. Box 1210
Blythe, CA 92226

Appendix A
Application

Title V Operating Permit Renewal Application

Blythe Energy Inc.

Federal Operating Permit 130202262

Blythe, CA

October 8, 2021

Submitted to:
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, CA 92392-2383

Submitted by:
Blythe Energy Inc.
385 N. Buck Blvd
Blythe, CA 92225

Table of Contents

SECTION 1: MDAQMD Form 1202E2-A

General Facility Information

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – GENERAL FACILITY INFORMATION

1. FACILITY ID: 2262 FACILITY SIC CODE: 4911

TITLE V PERMIT NUMBER: 130202262 PERMIT EXPIRATION DATE: November 18, 2022

2. COMPANY NAME: Blythe Energy Inc.

3. COMPANY MAILING ADDRESS:

STREET/P.O. BOX: 385 N. Buck Blvd

CITY: Blythe STATE: California 9-DIGIT ZIP CODE: 92225

4. FACILITY NAME: Blythe Energy Project

5. FACILITY MAILING ADDRESS:

STREET/P.O. BOX: 385 N. Buck Blvd

CITY: Blythe STATE: California 9-DIGIT ZIP CODE: 92225

6. RESPONSIBLE OFFICIAL (AS DEFINED IN 40 CFR 70.2 AND MDAQMD RULE 1201)

NAME: Aaron Honor TITLE: Plant General Manager PHONE NUMBER 760-921-1360

7. TITLE V PERMIT CONTACT PERSON

NAME: Andreas Mehlich TITLE: Manager Maintenance PHONE NUMBER 760-921-1358

8. TYPE OF ORGANIZATION:

☒ CORPORATION ☐ SOLE OWNERSHIP ☐ GOVERNMENT ☐ PARTNERSHIP ☐ UTILITY

9. CAM (COMPLIANCE ASSURANCE MONITORING) PLANS

Are you required to submit a CAM plan for any emissions unit at this facility? ☐ Yes ☒ No

If yes, submit a CAM plan for each emissions unit as an attachment to the application. See attached CAM plan instructions for more detail.

10. ALTERNATE OPERATING SCENARIOS

Does this application request alternative operating scenarios pursuant to Rule 1203(E)? ☐ Yes ☒ No
If yes, submit an Alternate Operating Scenarios form, as applicable.

11. RISK MANAGEMENT PLAN

Has this facility been required to prepare a federal Risk Management Plan pursuant to Section 112(r) of the federal Clean Air Act and 40 CFR Part 68? ☒ Yes ☐ No

If yes, has the federal Risk Management Plan been submitted to the implementing agency? ☒ Yes ☐ No

If a federal Risk Management Plan is required but has not been submitted to the implementing agency, provide a detailed explanation as an attachment to the application.

12. STRATOSPHERIC OZONE

Does the facility conduct any activities that are regulated by the federal protection of stratospheric ozone requirements in 40 CFR Part 82? ☒ Yes ☐ No

13. ACID RAIN

Is this facility subject to the acid rain requirement in 40 CFR Part 72 through 40 CFR Part 78? ☒ Yes ☐ No

14. MAJOR SOURCE STATUS

Is this facility a major source of greenhouse gases, as defined in MDAQMD Rule 1211? ☒ Yes ☐ No

Is this facility a major source of any of the following pollutants:

☐ VOCs ☐ Particulate Matter ☒ Carbon Monoxide ☐ Nitrogen Oxides ☐ Sulfur Dioxides
☐ Lead ☐ HAP

15. PERMIT SHIELDS

Does the current Title V permit for this facility include any permit shields? ☒ Yes ☐ No

If yes, is the basis for each permit shield still correct? ☒ Yes ☐ No

If the current Title V permit contains any permit shield for which the basis is no longer correct, provide a detailed explanation as an attachment to the application. If you are requesting an additional permit shield, complete the attached Permit Shield Request form.

16. CERTIFICATION BY RESPONSIBLE OFFICIAL

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: _____ Date: 10-8-2021

SECTION 2: MDAQMD Form 1202E2-B

Application Certification

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – APPLICATION CERTIFICATION

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Energy Project
2. FACILITY ID: 2262
3. TITLE V PERMIT #: 130202262

II. TITLE V PERMIT CERTIFICATION (Read each statement carefully and check one):

☒ * The current Title V permit has been reviewed and it has been determined that equipment descriptions are correct, and all requirements are still applicable.

*The current Title V permit is included in this application with proposed redline changes to clarify CEMS monitoring requirements.

☐ The current Title V permit has been reviewed and errors have been found in equipment descriptions and/or permit requirements. A copy of the Title V permit is attached with redline changes. Permit application and/or modification forms are enclosed, as applicable.

III. 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), except for those requirements listed in the "Title V Non-Compliant Operations Report". -All equipment currently in compliance

☒ 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, except for those requirements listed in the "Title V Non-Compliant Operations Report". -N/A

☒ 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.

	10-8-2021
Signature of Responsible Official	Date
Aaron Honor	
Name of Responsible Official (please print)	
Plant General Manager	
Title of Responsible Official (please print)	

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

SECTION 3: MDAQMD Form 1202E2-D

List of Exempt Equipment

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – LIST OF EXEMPT EQUIPMENT

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Energy Project
2. FACILITY ID: 2262
3. TITLE V PERMIT #: 130202262

II. SUMMARY OF EQUIPMENT EXEMPT FROM PERMIT REQUIREMENTS (INCLUDING PORTABLE)

4. EXEMPT EQUIPMENT DESCRIPTION	5. VENTING TO CONTROL (PERMIT #)	6. CONTROL DEVICE DESCRIPTION	7. BASIS FOR EXEMPTION (e.g. Rule 219(D)(2)(b))
Internal combustion engines less than 50 hp			MDAQMD Rule 219(E)(2)(a)
Natural gas and/or LPG combustion units less than 2 MMBtu/hr			MDAQMD Rule 219 (E)(2)(b)
Portable internal combustion engines in the Statewide Registration Program			MDAQMD 219 (E)(2)(d)
Aqueous and anhydrous ammonia storage tanks		Tanks are not vented to atmosphere	MDAQMD 219(d)
Refrigeration units			MDAQMD 219 (E)(4)(b)
Space heaters			MDAQMD 219 (E)(4)(e)
Lubricating oil transfer and storage			MDAQMD 219(E)(15)(h)
Machining equipment and associated control devices			MDAQMD Rule 219 (E)(7)
Oil/water separators			MDAQMD Rule 219(E)(13)(y)
Sulfuric acid storage tank			MDAQMD 219(E)(15)(a)(i)
Propane tanks (Liquefied gas)			MDAQMD 219(E)(15)(b)
Diesel transfer and storage			MDAQMD 219(E)(15)(c)(i)
Used oil transfer and storage equipment less than 793-gallon capacity			MDAQMD 219(E)(15)(e)

SECTION 4: MDAQMD Form 1202E2-E

Potential Emissions Report, Criteria Pollutants HAPs
Potential Greenhouse Gas Emission Report

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – POTENTIAL EMISSIONS REPORT, CRITERIA POLLUTANTS & HAPs

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Energy Project
2. FACILITY ID: 2262
3. TITLE V PERMIT #: 130202262

II. POTENTIAL ANNUAL EMISSIONS

4. EMISSION UNIT (APPLICATION OR PERMIT #)	5. EQUIPMENT DESCRIPTION	6. POTENTIAL ANNUAL EMISSIONS							
		NOx (TPY)	VOC (TPY)	PM10 (TPY)	PM2.5 (TPY)	SOx (TPY)	CO (TPY)	Other: HAPs (TPY)	Other: (TPY)
B007953	natural gas fueled combustion turbine generator	97	24	56.9	--	12	175	3.78	--
B007954	natural gas fueled combustion turbine generator	97	24	56.9	--	12	175	3.78	--
B007955	natural gas burners w/in HRSG	combined with B007953	combined with B007953	combined with B007953	--	combined with B007953	combined with B007953	combined with B007953	--
B007956	natural gas burners w/in HRSG	combined with B007954	combined with B007954	combined with B007954	--	combined with B007954	combined with B007954	combined with B007954	--
B007957	wet cooling tower	--	--	2.4	--	--	--	0.0034	--
B007958	air and water circulation, treatment & handling equipment	--	--	2.4	--	--	--	0.0007	--
E007961	IC engine, emergency fire pump	0.24	0.02	0.02	--	0.02	--	0.199	--
E009492	propane IC Engine, emergency generator	0.003	0.002	0.0001	0.0001	0.000009	0.003	2.36	--
	facility-wide limits	97	24	56.9	--	12	175	--	--

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – POTENTIAL GREENHOUSE GAS EMISSIONS REPORT

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Energy Project
2. FACILITY ID: 2262
3. TITLE V PERMIT #: 130202262

II. POTENTIAL ANNUAL EMISSIONS

4. EMISSION UNIT (APPLICATION OR PERMIT #)	5. EQUIPMENT DESCRIPTION	6. POTENTIAL ANNUAL EMISSIONS							
		CO_2 (TPY)	N_2O (TPY)	CH_4 (TPY)	HFCs (TPY)	PFCs (TPY)	SF_6 (TPY)	Other: (TPY)	$CO_2(e)$ (TPY)
B007953	natural gas fueled combustion turbine generator	924,575.5	1.7	17.2	--	--	--	--	925,467.2
B007954	natural gas fueled combustion turbine generator	924,575.5	1.7	17.2	--	--	--	--	925,467.2
B007955	natural gas burners w/in HRSG	62,471.3	0.1	1.2	--	--	--	--	62,531.5
B007956	natural gas burners w/in HRSG	62,471.3	0.1	1.2	--	--	--	--	62,531.5
B007957	wet cooling tower	--	--	--	--	--	--	--	--
B007958	air and water circulation, treatment & handling equipment	--	--	--	--	--	--	--	--
E007961	IC engine, emergency fire pump	1,379.8	0.0	0.1	--	--	--	--	1,384.4
E009492	propane IC engine, emergency generator	779.9	0.0	0.0	--	--	--	--	782.5

Note: Effective May 7, 2016 total fuel use in the two gas turbines and two duct burners (Permit # B007953, B007954, B007955, and B007956) shall not exceed 31,852,800 mmBtu in any rolling 12-month period. PTE calculations for this application are based on a maximum combined rolling 12-month heat input of 33,217,920 mmBtu, calculated by applying the maximum hourly heat input designated for each piece of equipment over 8760 annual operating hours.

HAP Emission Rates for Single CTG/Duct Burner (Combined)

Pollutant Name	Emission Factor (lb/MMCF)[1]	Potential Emission Rate (Ton/yr)
Acetaldehyde	3.61E-02	0.31
Acrolein	5.78E-03	0.05
Arsenic	1.19E-05	0.00
Benzene	1.08E-02	0.09
Beryllium	7.15E-07	0.00
1,3-Butadiene	3.88E-04	0.00
Cadmium	6.55E-05	0.00
Chromium	8.34E-05	0.00
Ethyl benzene	2.89E-02	0.25
Formaldehyde[2]	4.26E-02	0.37
Hexane	1.07E-01	0.92
Lead	2.98E-05	0.00
Manganese	2.26E-05	0.00
Mercury	1.55E-05	0.00
Nickel	1.25E-04	0.00
PAHs/POMs	2.03E-03	0.02
Naphthalene [PAH, POM]	1.17E-03	0.01
Propylene oxide	2.62E-02	0.23
Selenium	1.43E-06	0.00
Toluene	1.17E-01	1.01
Xylenes	5.78E-02	0.50
	Total	**3.76**
(1) All emission factors from WEBFIRE, except as noted.		
(2) Formaldehyde emission rate is based on source test data.		

HAP Emission Rates for Cooling Tower B007957

Pollutant Name	Emission Factor (lb/mmgal)[1]	Potential Emission Rate (Ton/yr)
Arsenic	1.63E-06	0.000
Cadmium	4.06E-06	0.000
Copper	4.06E-06	0.000
Lead	2.02E-06	0.000
Manganese	4.06E-05	0.001
Mercury	4.06E-07	0.000
Nickel	4.06E-06	0.000
Selenium	4.06E-06	0.000
Zinc	4.06E-05	0.001
	Total	**0.0034**

(1) Emission factors from Supplemental Health Risk Assessment (HRA) dated December 2003.

HAP Emission Rates for Propane IC Engine, 114 bhp

Pollutant Name	Emission Factor (lb/kgal)[1]	Potential Emission Rate (Ton/yr)
Acetaldehyde	7.23E+00	0.38
Acrolein	6.06E+00	0.32
Benzene	1.45E+00	0.08
1,3-Butadiene	8.04E-01	0.04
Ethyl benzene	6.14E-02	0.00
Ethylene dibromide	5.34E-02	0.00
Formaldehyde	2.73E+01	1.44
Hexane	7.78E-01	0.04
PAHs/POMs	1.48E-01	0.01
Toluene	7.44E-01	0.04
Xylenes	2.81E-01	0.01
	Total	**2.36**

(1) Emission factors sourced from EPA AP-42 as summarized in "MDAQMD DEFAULT EMISSION FACTORS FOR INTERNAL COMBUSTION ENGINES (ICE)" spreadsheet

Summary of Total HAP Emission Rates for Permitted Equipment

Pollutant Name	Potential Emission Rate (Ton/yr)
Acetaldehyde	1.05E+00
Acrolein	4.20E-01
Arsenic	8.04E-04
Benzene	2.75E-01
Beryllium	1.23E-05
1,3-Butadiene	6.23E-02
Cadmium	1.49E-03
Chromium	1.44E-03
Copper	5.25E-04
Ethyl benzene	5.02E-01
Ethylene dibromide	2.81E-03
Formaldehyde	2.28E+00
Hexane	1.89E+00
Lead	9.02E-04
Manganese	3.58E-03
Mercury	4.35E-04
Nickel	2.67E-03
PAHS/POMS	4.61E-02
Propylene oxide	4.51E-01
Naphthalene	2.02E-02
Selenium	9.25E-04
Toluene	2.07E+00
Xylenes	1.01E+00
Zinc	4.37E-03
Total	**10.09**

Potential Emission Rate represents the sum of the two combustion turbines with duct burners, one emergency fire pump chiller, cooling tower, and propane emergency generator.

SECTION 5: MDAQMD Form 1202E2-F

Compliance Assurance Monitoring Applicability Determination

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING

APPLICABILITY DETERMINATION FORM

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Energy Project
2. FACILITY ID: 2262
3. TITLE V PERMIT #: 130202262

II. CAM STATUS SUMMARY FOR EMISSION UNITS

4. Based on the criteria in the instructions (check one and attach additional pages as necessary):

a. ☐ There are no emission units with control devices at this Title V facility.

b. ☒ There are emission units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM plan is attached for each affected emissions unit. (None)

5. EMISSION UNIT (APPLICATION OR PERMIT #	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? (ENTER YES OR NO. IF YES, STATE THE REASON FOR EXEMPTION)	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			
C007959	selective catalytic reduction system	NOx	5,680.3	yes	40 CFR 64.2(b)(1)(vi)	No
C007960	selective catalytic reduction system	NOx	5,630.4	yes	40 CFR 64.2(b)(1)(vi)	No

Note: Uncontrolled NOx PTE is calculated by applying the P75 Monitoring Plan Maximum Emission Rate (MER) of 0.6840 lb/mmBtu for CT-1/DB-1 and 0.6780 lb/mmBtu for CT-2/DB-2 over a maximum of 8760 annual operating hours with the maximum heat input of the combined combustion turbine and duct burner system.

SECTION 6

40 CFR 75 and 40 CFR 60 Monitoring Clarifications

40 CFR 75 and 40 CFR 60 Monitoring Clarifications
Blythe Energy
09/30/2021

Blythe Energy consists of two combustion turbine generators ("CTGs") for electrical generation, Unit 1 and Unit 2, that were issued a renewed Operating Permit (130202262) on 11/18/17. A renewed Acid Rain Program Permit (ORIS Code 55295) was issued on 12/5/16. A Final Prevention of Significant Deterioration Permit (SE 02-01) was issued on 4/25/07. The combustion turbines are equipped with Continuous Emission Monitoring Systems ("CEMS") that measure NO_x, CO, and NH_3, as well as O_2, which serves as the diluent.

.

The NO_x and CO analyzers are each configured with two scale ranges with a span value equal to the corresponding upper range value. The low range for the NO_x analyzer is set to 0-10 ppm, and the high range is set to 0-100 ppm. The low range for the CO analyzer is set to 0-20 ppm, and the high range is set to 0-1200 ppm. The O_2 analyzer range is set to 0-25%. The NH_3 analyzer is a tunable Diode Laser ("TDL"). In accordance with the Operating Permit, the facility follows a District approved procedure for NH_3 as defined in the facility's QA/QC Plan and is not further discussed in this document.

40 CFR 75 and 40 CFR 60 contain parallel monitoring requirements that are similar but not identical; also, 40 CFR 75 contains more monitoring provisions and options than 40 CFR 60. This document summarizes the use of 40 CFR 75 QA test schedules, grace periods, and RATA load requirements in lieu of certain 40 CFR 60 specifications, or lack thereof.

The NO_x CEMS utilizes the 40 CFR 75 harmonization provisions of 40 CFR 60.334(b) for Subpart GG compliance. In addition to the Subpart GG NO_x limit, the NO_x CEMS utilizes 40 CFR 75 Appendix B provisions for monitoring compliance with other permit limits according to the PSD Permit. CO CEMS are used to demonstrate compliance with various emission limits specified in the Operating Permit, and it is monitoring for these limits that the facility adopts certain 40 CFR 75 provisions, as outlined below.

1. Cylinder Gas Audits ("CGAs") / Linearity Checks

A CGA is a two-point audit, conducted with low- and mid-level calibration gases, required by 40 CFR 60 Appendix F Procedure 1. CGAs are conducted each calendar quarter, with the exception of the quarter in which the RATA is performed. Ongoing QA audits (i.e. CGAs and RATAs) shall occur no closer than 2 months. A linearity check is conducted with low-, mid- and high-level calibration gases, required by 40 CFR 75 Appendix B Section 2.2.1. 40 CFR 75 Appendix A Section 6.2 exempts low analyzer ranges (i.e. less than or equal to 30 ppm) from the linearity check. For the CO CEMS, the facility utilizes the Part 60 CGA requirements with the following exceptions:

a. The CGA frequency shall follow 40 CFR 75 Appendix B Sections 2.2.1 and 2.2.4. Specifically, a CGA shall be required at least once during each QA operating quarter, not to exceed four calendar quarters, plus a 168-unit operating hour grace period following the expiration of a required CGA. CGAs will be conducted no less than 30 days apart, to the extent practicable.

b. Analyzer ranges less than or equal to 30 ppm (i.e. CO low range) are exempt from CGA requirements [40 CFR 75 Appendix A Section 6.2].

QA operating quarter means a calendar quarter in which there are at least 168 unit operating hours. *Unit operating hour* means a clock hour during which a unit combusts any fuel, either for part of the hour or for the entire hour.

2. Relative Accuracy Test Audits (RATAs)

The Part 60 RATA is required once every four calendar quarters while operating at more than 50 percent of normal load. In lieu of these requirements, the facility adopts the following Part 75 RATA requirements:

a. All RATA testing shall be conducted at least once every four QA operating quarters but no less frequently than once every eight calendar quarters as provided in 40 CFR 75 App. B, §2.3.1.1. If RATA testing is not completed within this timeframe, a 720 unit operating hour grace period may be used, as provided in 40 CFR 75 App. B, §2.3.3.
b. All RATA testing shall be conducted at the normal load level(s) as determined in accordance with 40 CFR 75 Appendix A Section 2.3.1.3(a) in lieu of 40 CFR 60 Appendix B Performance Specification 2 Section 8.4.1 that specifies to conduct the RATA "while operating at more than 50 percent of normal load".

Basis for Harmonizing

The 40 CFR 75 Appendix B timelines take into account intermittent operating usage in determining the frequency of QA testing while the older and less refined 40 CFR 60 Appendix F provisions are based solely on elapsed calendar time. Conformance with 40 CFR 60 Appendix F RATA and CGA timelines, then, can cause significant economic and logistical difficulties, particularly during limited operating quarters. The procedures for determining normal load levels for RATA testing that are described in 40 CFR 75 Appendix A ensure that RATA testing occurs under representative operating conditions and emission concentrations when tested.

SECTION 7

Red-lined Copy of Current Operating Permit

Mojave Desert Air Quality Management District

Clean air is everybody's business.

FEDERAL OPERATING PERMIT

Permit No.: **130202262**

Company: **Blythe Energy, LLC**

Facility: **Blythe Energy Project**

Issue date: **11/18/17**

Expiration date: **11/18/22**

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

14306 Park Avenue
Victorville, CA 92392-2310
760.245.1661 • Fax 760.245.2022
Email: **permitting@MDAQMD.ca.gov**

www.MDAQMD.ca.gov • @MDAQMD

Signed and issued by

BRAD POIRIEZ

EXECUTIVE DIRECTOR/
AIR POLLUTION CONTROL OFFICER

PERMIT REVISIONS

November 6, 2019 Administrative Modification
Update of responsible official, alternate facility "site" contact and Facility "Site" Contact phone number.

November 1, 2019 Significant Modification
Processed by Roseana Brasington
Part III, page III-X condition 15: Condition modified to remove VOC emissions testing of the turbines every 5 years under hot, warm, cold startup conditions. Requirement proposed for removal is replaced by hard emissions rates based on approved historical test data.

November 18, 2017 Permit Renewal & Significant Modification
Processed by Roseana Brasington

Cover page updated with renewal dates and executive director
Part I updated to include new responsible official and facility contact, updated permit descriptions and removal of permit units no longer existing at the facility
Part II updated for consistency with current applicable requirements
Part III, page III-44 (significant modification) condition 7, CO limit increased to include CO emissions from SEP. SEP permits have been cancelled. Condition 8 which referenced combined emissions from BEP & SEP (one facility under Regulation XIII) has been removed in its entirety.
Part III, rule cites and formatting updated, permit descriptions updated, permit unit which no longer exists at facility removed from Part III.
Parts IV and V not substantively changed
Part VI Acid Rain Permit and application updated to current.
Part VII SIP Rule table updated

December 18, 2015 Significant Modification:
Processed by Roseana Brasington

Page I-5 Updated Alternative Facility "Site" Contact

Pages III-25 through III-27
Modified permit conditions for combustion turbines B007953 and B007954
Condition 2: reduced maximum permitted fuel sulfur content
Condition 4: reduced lb/hr PM_{10} emissions limit
Condition 6: reduced lb/day PM_{10} emissions limit
Condition 7: reduced ton/year SO_X and PM_{10} emission limits

April 24, 2015 Significant Modification:
Processed by Roseana Brasington

Page I-5: Removed reference to model/serial numbers for the steam generator and steam

condensing turbine. Model and serial numbers for the combustion turbines have been provided and are reflected in the current permits.
Page III-25: Removed reference to model/serial numbers for the steam generator and steam condensing turbine. Model and serial numbers for the combustion turbines have been provided and are reflected in the current permits.
Pages III-26-III-27: added annual average emission concentration limit for NOx, annual average mass emission limits for CO and 12-month rolling fuel use limit for the gas turbines, reduced annual NOx, CO and PM10 emission limits and clarified that the emissions limits include all Blythe Energy Project permitted equipment and updated condition language for consistency with District permit. Facility name typographical error corrected.
Page III-29: Removed Authority to Construct permit condition which required the surrender of emission reduction credits. The facility has satisfied the offset requirement.
Page III-34. E007961, permit condition updated and corrected to reflect testing and maintenance hours allowed under CCR Section 93115.6

July 29, 2014 Administrative Modification:
Processed by R.N. Brasington
Updated the following: owner/company name, owner mailing address, facility name, responsible official, facility site contact and alternative facility site contact.

July 2, 2012 Administrative Title V Renewal and Title IV Acid Rain Permit revision (by: Samuel J Oktay, PE)**;** Revised Rule 1113 references, Page II-15 through II-16; added Rule SIP History Reference, Page VII-48; Revised Rule 442 references; Page II-13; Page II-23 added 40 CFR 98 reference for GHG reporting; added 40 CFR 63 Subpart ZZZZ requirements to permits E007961, E008981, and E009492; Pages I-7; III-33 through III-34, III-34 through III-36, and III-36 through III-38 respectively; page III-25 clarified conditions 6 & 7 for permits B007953 & B007954 regarding VOC limits; page III-26 clarified condition 10 for permits B007953 & B007954; changed Permit # C010833, Pages I-7 and III-38 to read Unit 2; Title IV Acid Rain Permit revisions VI-44 through VI-46; Phase II Application added to pages VI-47 through VI-49.

April 11, 2011 Administrative Modification:
Updated physical address due to incorporation into City of Blythe city limits (no change to location of facility), and updated responsible official.

April 8, 2010 Administrative Modification described as follows:
Intro; Addition of oxidation catalyst to each Combustion Turbine Generator/Heat Recovery Steam Generator unit. The design of the units are accommodating to the retrofit of the oxidation catalyst. An emission decrease is anticipated but current permit limits will remain unchanged. Permit is revised as follows:
Part I
-Description revised to include two oxidation catalysts.
-Section 1.PART III, ITEM A- added Oxidation Catalyst description.
Part III
-Permits B007953 and B007954, revised condition #10 to include reference to Oxidation Catalyst. Deleted reference to future installation of OC (condition #28), renumbered following condition.

-Permits B007955 and B007956, updated condition #3 specifying OC installed and applicable permit numbers thereof.

-Added permit units C010832 (“new” subpart L) and C010833, creating subparts L and M respectively.

Changes made by C. Anderson

TABLE OF CONTENTS

PART I
INTRODUCTORY INFORMATION

A. 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:	Steve Brussee Sr. Manager, Environment & Safety - Power ASUS 909-622-3308
Facility "Site" Contact(s):	Ramon Campos Compliance Manager 760-921-1364 ramon.campos@altagas.ca
Alternate Facility "Site" Contact(s):	Aaron Honor Plant General Manager 760-921-1360 aaron.honor@altagas.ca
Nature of Business:	Electric Power Generation
SIC/NAICS Code:	4911/221112- Electric Power Generation
Facility Coordinates	UTM (m) 714609 (E) / 3721719 (N)

B. FACILITY DESCRIPTION:

The plant uses two F-Class Siemens V84.3A combustion turbine generators (CTGs) with dedicated heat recovery steam generators (HRSGs) to produce electricity. Inlet air to the CTGs is filtered and, during seasonally warm conditions, conditioned with chilled air supported by a mechanical draft wet cooling tower (chiller). Compressed air and natural gas are mixed and combusted in the turbine combustion chamber. Lean pre-mixed air and low-NOx combustors are used to minimize NOx formation during combustion. Exhaust gas from the combustion chamber is expanded through a multi-stage power turbine, which drives both the air compressor and electric power generator. Heat from the exhaust gas is then recovered in the HRSG.

Each HRSG is equipped with a duct burner to provide supplementary firing during high ambient temperatures to maintain constant steam production to the condensing steam turbine generator (STG). A Selective Catalytic Reduction (SCR) system is used to reduce NOx emissions. An Oxidation Catalyst is used to reduce CO and VOC. Steam is produced in each HRSG and flows to the STG. The STG drives an electric generator to produce electricity. STG exhaust steam is condensed in a surface condenser with water from the main cooling tower.

The project site has a 303 bhp emergency diesel-fueled internal combustion engine that drives a water pump for fire suppression and a propane fueled 114 bhp internal combustion engine that drives an emergency electrical power generator.

C. FACILITY PERMITTED EQUIPMENT:

1. PERMIT B007953 COMBUSTION TURBINE GENERATOR POWER BLOCK (CT1) consisting of: Natural gas fueled Siemens F Class Model V84.3A(2) Serial No. 800436 combustion turbine generator power block producing approximately 260 MW(e) with a connected heat recovery steam generator and a steam condensing turbine (shared with B007954), maximum turbine heat input of 1776 MMBtu/hr.

2. PERMIT B007954 COMBUSTION TURBINE GENERATOR POWER BLOCK (CT2) consisting of: Natural gas fueled Siemens F Class Model V84.3A(2) Serial No. 800437 combustion turbine generator power block producing approximately 260 MW(e) with a connected heat recovery steam generator and a steam condensing turbine (shared with B007953), maximum turbine heat input of 1776 MMBtu/hr.

3. PERMIT B007955 DUCT BURNER UNIT 1: Natural gas burner located within the heat recovery steam generator covered by B007953, maximum heat input of 120 MMBtu/hr. Manufacturer is Forney, model # 1002-WPS-C1 and serial #17130.

4. PERMIT B007956 DUCT BURNER UNIT 2: Natural gas burner located within the heat recovery steam generator covered by B007954, maximum heat input of 120 MMBtu/hr. Manufacturer is Forney, model # 1002-WPS-C1 and serial #17202.

5. PERMIT B007957 A Marathon Model 9B 445TTFN4573AA wet cooling tower with water circulation, treatment and handling equipment and air circulation equipment, including the following:

Capacity	Equipment Name	Order
250.00	Cooling Cell Fan #8, Motor Serial No. MU402450-2/22-02	1
250.00	Cooling Cell Fan #7, Motor Serial No. MU402450-2/22-01	2
250.00	Cooling Cell Fan #6, Motor Serial No. MU402450-2/22-05	3

Capacity	Equipment Name	Order
250.00	Cooling Cell Fan #5, Motor Serial No. MU402450-2/22-03	4
250.00	Cooling Cell Fan #4, Motor Serial No. MU402450-2/22-06	5
250.00	Cooling Cell Fan #3, Motor Serial No. MU402450-2/22-07	6
250.00	Cooling Cell Fan #2, Motor Serial No. MU402450-2/22-04	7
250.00	Cooling Cell Fan #1, Motor Serial No. MU402450-2/22-08	8
1000.00	Circulating Water Pump #12, Johnson Serial No. 01JB1129B	9
1000.00	Circulating Water Pump #11, Johnson Serial No. 01JB1129A	10

6. PERMIT B007958 Water circulation, treatment and handling equipment and air circulation equipment, including units as follows:

Capacity	Equipment Name	Order
250.00	Cooling Cell Fan #12, BAC Model CXV-T08 Serial No. U025323712	1
250.00	Cooling Cell Fan #11, BAC Model CXV-T08 Serial No. U025323711	2
250.00	Cooling Cell Fan #10, BAC Model CXV-T08 Serial No. U025323710	3
250.00	Cooling Cell Fan #9, BAC Model CXV-T08 Serial No. U025323709	4
250.00	Cooling Cell Fan #8, BAC Model CXV-T08 Serial No. U025323708	5
250.00	Cooling Cell Fan #7, BAC Model CXV-T08 Serial No. U025323707	6
250.00	Cooling Cell Fan #6, BAC Model CXV-T08 Serial No. U025323706	7
250.00	Cooling Cell Fan #5, BAC Model CXV-T08 Serial No. U025323705	8
250.00	Cooling Cell Fan #4, BAC Model CXV-T08 Serial No. U025323704	9
250.00	Cooling Cell Fan #3, BAC Model CXV-T08 Serial No. U025323703	10
250.00	Cooling Cell Fan #1, BAC Model CXV-T08 Serial No. U025323701	11
250.00	Cooling Cell Fan #2, BAC Model CXV-T08 Serial No. U025323702	12
750.00	Chiller Recirulating Pump #4, Cascade Serial No. 16061	13
750.00	Chiller Recirulating Pump #3, Cascade Serial No. 16060	14
750.00	Chiller Recirulating Pump #2, Cascade Serial No. 16059	15
750.00	Chiller Recirulating Pump #1, Cascade Serial No. 16058	16

7. PERMIT C007959 SCR UNIT 1 consisting of: SELECTIVE CATALYTIC REDUCTION system with a catalyst located within the power train covered by B007953 and an ammonia injection system. Manufacturer is Haldor Topsoe; model H05.331cpsi MODULE.

8. PERMIT C007960 SCR UNIT 2 consisting of: SELECTIVE CATALYTIC REDUCTION system with a catalyst located within the power train covered by B007954 and an ammonia injection system. Manufacturer is Haldor Topsoe; model H05.331cpsi MODULE.

9. PERMIT C010832 OXIDATION CATALYST UNIT 1 consisting of: Oxidation Catalyst located within the duct burner covered by B007955. Manufacturer is Johnson Matthey; model is Honeycat, serial number 200cpsi.

10. PERMIT C010833 OXIDATION CATALYST UNIT 2 consisting of: Oxidation Catalyst located within the duct burner covered by B007956. Manufacturer is Johnson Matthey; model is Honeycat, serial number 200cpsi.

11. PERMIT E007961 NON-CERTIFIED DIESEL IC ENGINE, EMERGENCY FIRE PUMP consisting of: Year of Manufacture 2002; USEPA Family Name NA; CARB Executive Order NA; Tier 0, One John Deere, Diesel fired internal combustion engine, Model No. 6081HF001 and Serial No. RG6081H145432, Direct Injected, Turbo Charged, producing 303 bhp with 6 cylinders at 2200 rpm while consuming a maximum of 14 gal/hr. This equipment powers a Pump.

12. PERMIT E009492 PROPANE IC ENGINE, EMERGENCY GENERATOR (CHILLER BLDG) consisting of: One Ford, Propane fired internal combustion engine, Model No. WSG106816005E-NA and Serial No. 01-11- 012316, Direct Injected, Inter Cooled, producing 114 bhp with 4 cylinders at 1800 rpm while consuming a maximum of 12 gal/hr. This equipment powers a Generator.

PART II
FACILITYWIDE APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

A. REQUIREMENTS APPLICABLE TO ENTIRE FACILITY AND EQUIPMENT:

1. A permit is required to operate this facility.
[Rule 203 - *Permit to Operate*]

2. The equipment at this facility shall not be operated contrary to the conditions specified in the District Permit to Operate.
[Rule 203 - *Permit to Operate*]

3. The Air Pollution Control Officer (APCO) may impose written conditions on any permit.
[Rule 204 - *Permit Conditions*]

4. Commencing work or operation under a permit shall be deemed acceptance of all the conditions so specified.
[Rule 204 - *Permit Conditions*]

5. Posting of the Permit to Operate is required on or near the equipment or as otherwise approved by the APCO/District.
[Rule 206 - *Posting of Permit to Operate*]

6. Owner/Operator shall not willfully deface, alter, forge, or falsify any permit issued under District rules.
[Rule 207 - *Altering or Falsifying of Permit*]

7. Permits are not transferable.
[Rule 209 - *Transfer and Voiding of Permit*;]

8. The APCO may require the Owner/Operator to provide and maintain such facilities as are necessary for sampling and testing.
[Rule 217 - *Provision for Sampling And Testing Facilities*]

9. The equipment at this facility shall not require a District permit or be listed on the Title V permit if such equipment is listed in Rule 219 and meets the applicable criteria contained in Rule 219 (B). However, any exempted insignificant activities/equipment are still subject to all applicable facility-wide requirements.
[SIP Pending: Rule 219 - *Equipment Not Requiring a Written Permit*]

10. The Owner/Operator of this facility shall obtain a Federal Operating Permit for operation of this facility.

[Rule 221 - *Federal Operating Permit Requirement*]

11. Owner/Operator shall pay all applicable MDAQMD permit fees.
[Rule 301 - *Permit Fees*]

12. Owner/Operator shall pay all applicable MDAQMD Title V Permit fees.
[Rule 312 - *Fees for Federal Operating Permits*]

13. Stack and point source visible emissions from this facility, of any air contaminant (including smoke) into the atmosphere, shall not equal or exceed Ringelmann No. 1 for a period or periods aggregating more than three minutes in any one hour:
    (a) While any unit is fired on Public Utilities Commission (PUC) grade natural gas, Periodic Monitoring for combustion equipment is not required to validate compliance with the Rule 401 Visible Emissions limit. However, the Owner/Operator shall comply with the recordkeeping requirements stipulated elsewhere in this permit regarding the logging of fuel type, amount, and suppliers' certification information.
    (b) While any unit is fired on diesel fuel, Periodic Monitoring, in addition to required recordkeeping, is required to validate compliance with Rule 401 Visible Emissions limit as indicated below:
    (i). Reciprocating engines equal or greater than 1000 horsepower, firing on only diesel with no restrictions on operation, a visible emissions inspection is required every three (3) months or during the next scheduled operating period if the unit ceases firing on diesel/distillate within the 3-month time frame.
    (ii). Diesel Standby and emergency reciprocating engines using California low sulfur fuels require no additional monitoring for opacity.
    (iii). Diesel/Distillate-Fueled Boilers firing on California low sulfur fuels require a visible emissions inspection after every 1 million gallons diesel combusted, to be counted cumulatively over a 5-year period.
    (iv). On any of the above, if a visible emissions inspection documents opacity, an U.S. Environmental Protection Agency (EPA) Method 9 "Visible Emissions Evaluation" shall be completed within 3 working days, or during the next scheduled operating period if the unit ceases firing on diesel/distillate within the 3 working day time frame.
    [Rule 204 - *Permit Conditions*]
    [Rule 401 - *Visible Emissions*]

14. Owner/Operator is limited to use of the following quality fuels for fuel types specified elsewhere in this permit: PUC quality natural gas fuel - sulfur compounds shall not exceed 800 parts per million (ppm) calculated as hydrogen sulfide at standard conditions; diesel fuel - sulfur content shall not exceed 0.0015 percent by weight. Compliance with Rule 431 fuel sulfur limits is assumed for PUC quality natural gas fuel and CARB certified diesel fuel. Records shall be kept on-site and available for review by District, state, or federal personnel at any time. The sulfur content of non-CARB certified diesel fuel shall be determined by use of American Society for Testing and Materials (ASTM) method D 2622-82 or ASTM method D 2880-71, or equivalent.

[*40 CFR 70.6 (a)(3)(i)(B) - Periodic Monitoring Requirements*]
[Rule 431 - *Sulfur Content of Fuels*;]

15. Emissions of fugitive dust from any transport, handling, construction, or storage activity at this facility shall not be visible in the atmosphere beyond the property line of the facility.
[Rule 403 - *Fugitive Dust*;]

16. Owner/Operator shall comply with the applicable requirements of Rule 403.2 unless an "Alternative PM_{10} Control Plan" (ACP) pursuant to Rule 403.2(G) has been approved.
[Rule 403.2 - *Fugitive Dust Control for the Mojave Desert Planning Area*]

17. Owner/Operator 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.
    [Rule 404 - *Particulate Matter Concentration*]

18. Owner/Operator 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) Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.
    (b) 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.
    [Rule 405 - *Solid Particulate Matter, Weight*]

19. Owner/Operator shall not discharge into the atmosphere from this facility, from any single source of emissions whatsoever, sulfur compounds, which would exist as a liquid or gas at standard conditions, calculated as sulfur dioxide (SO_2), greater than or equal to 500 ppm by volume.
    [Rule 406 - *Specific Contaminants*]

20. Owner/Operator shall not discharge into the atmosphere from this facility, carbon monoxide (CO) exceeding 2000 ppm measured on a dry basis, averaged over a minimum of 15 consecutive minutes.
    (a) The provisions of this condition shall not apply to emissions from internal combustion engines.
    [Rule 407 - *Liquid and Gaseous Air Contaminants*]

21. Owner/Operator shall not build, erect, install, or use any equipment at this facility, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission that would otherwise constitute a violation

of Chapter 3 (commencing with Section 41700) of Part 4, of Division 26 of the Health and Safety Code or of District Rules.

(a) This condition shall not apply to cases in which the only violation involved is of Section 41700 of the Health and Safety Code, or of District Rule 402.

[Rule 408 - *Circumvention*]

22. Owner/Operator shall not discharge into the atmosphere from this facility from the burning of fuel, combustion contaminants exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12 percent of carbon dioxide (CO_2) at standard conditions averaged over a minimum of 25 consecutive minutes.
[Rule 409 - *Combustion Contaminants*;]

23. APCO, at his/her discretion, may refrain from enforcement action against an Owner/Operator of any equipment that has violated a technology-based emission limitation, including but not limited to conditions contained in any permit issued by the District establishing such emission limitation, provided that a Breakdown has occurred and:

(a) Any breakdown that results in emissions exceeding a technology-based emission limitation is reported to the District within one hour of such breakdown or within one hour of the time a person knew or reasonably should have known of the occurrence of such breakdown; and

(b) An estimate of the repair time is provided to the District as soon as possible after the report of the breakdown; and

(c) All reasonable steps are immediately taken to minimize the levels of emissions and to correct the condition leading to the excess emissions.

(d) The equipment is operated only until the end of a cycle or twenty-four (24) hours, whichever is sooner, at which time it shall be shut down for repairs unless a petition for an emergency variance has been filed with the clerk of the Hearing Board in accordance with Regulation V.

(e) If the breakdown occurs outside normal District working hours, the intent to file an emergency variance shall be transmitted to the District in a form and manner prescribed by the APCO.

[Rule 430 - *Breakdown Provisions*]

24. Owner/Operator of this facility shall not discharge into the atmosphere emissions in excess of the following from VOC containing materials or from organic solvents which are not VOCs unless such emissions have been reduced by at least 85%:

(a) VOCs from all VOC containing materials, Emissions Units, equipment or processes subject to this rule, in excess of 540 kilograms (1,190 pounds) per month per Facility.

(b) a non-VOC organic solvent in excess of 272 kilograms (600 pounds) per day as calculated on a thirty (30) day rolling average.

(c) The provisions of this condition shall not apply to:

(1) The manufacture of organic solvents, or the transport or storage of organic solvents, or the transport or storage of materials containing organic solvents.

(2) The emissions of VOCs from VOC-containing materials or equipment which are subject to the rules of Regulation IV or which are exempt from air pollution control requirements by said rules.

(3) The spraying or other employment of organic solvents as insecticides, pesticides or herbicides.

(4) The use of equipment or materials for which other requirements are specified in source specific rules of Regulation XI after the compliance dates specified in such source specific rules.

(5) The use of 1-1-1 Trichloroethane.

(6) Aerosol products

[Rule 442 – *Usage of Solvents*]

25. Owner/Operator shall not set open outdoor fires unless in compliance with Rule 444. Outdoor fires burned according to an existing District permit are not considered "open outdoor fires" for the purposes of Rule 444 (reference Rule 444(B)(10)).
[Rule 444 – *Open Outdoor Fires*]

26. Owner/Operator of this facility shall comply with the Organic Solvent Degreasing Operations requirements of Rule 1104 when engaged in wipe cleaning, cold solvent cleaning, and/or vapor cleaning (degreasing) operations for metal/non-metal parts/products. These requirements are listed as follows:

(a) All degreasers shall be equipped with a cover, which reduces solvent evaporation and minimizes disturbing the vapor zone.

(b) A permanent, conspicuous label summarizing the applicable operating requirements contained in Rule 1104. In lieu of a label, operating instructions may be posted near the degreaser where the operators can access the proper operating requirements of this rule.

(c) <u>Cold Solvent Degreasers - Freeboard Requirements:</u>

(i) Cold solvent degreasers using only low volatility solvents, which are not agitated, shall operate with a freeboard height of not less than 6 inches.

(ii) Cold solvent degreasers using only low volatility solvents may operate with a freeboard ratio equal to or greater than 0.50 when the cold solvent degreaser has a cover, which remains closed during the cleaning operation.

(iii) Any cold solvent degreasers using solvent which is agitated, or heated above 50^{o}C (120^{o}F) shall operate with a freeboard ratio equal to or greater than 0.75.

(iv) A water cover may be used as an acceptable control method to meet the freeboard requirements, when the solvent is insoluble in water and has a specific gravity greater than one.

(d) <u>Cold Solvent Degreasers - Cover Requirements:</u>

(i) Cold solvent degreasers using high volatility solvent shall have a cover that is a sliding, rolling or guillotine (bi-parting) type, which is designed to easily open and close without disturbing the vapor zone.

(e) <u>Cold Solvent Degreasers - Solvent Level Identification:</u>

(i) A permanent, conspicuous mark locating the maximum allowable solvent level conforming to the applicable freeboard requirements.

(f) All Degreasers shall comply with the following operating requirements:

(i) Any solvent cleaning equipment and any emission control device shall be operated and maintained in strict accord with the recommendations of the manufacturer.

(ii) Degreasers shall not be operating with any detectable solvent leaks.

(iii) All solvent, including waste solvent and waste solvent residues, shall be stored in closed containers at all times. All containers for any solvent(s) shall have a label indicating the name of the solvent/material they contain.

(iv) Waste solvent and any residues shall be disposed of by one of the following methods: a commercial waste solvent reclamation service licensed by the State of California; **or** a federally or state licensed facility to treat, store or dispose of such waste; **or** the originating facility may recycle the waste solvent and materials in conformance with requirements of Section 25143.2 of the California Health and Safety Code.

(v) Degreasers shall be covered to prevent fugitive leaks of vapors, except when processing work or to perform maintenance.

(vi) Solvent carry-out shall be minimized by the following methods:

(a) Rack workload arranged to promote complete drainage

(b) Limit the vertical speed of the power hoist to 3.3 meters per minute (11 ft/min) or less when such a hoist is used.

(c) Retain the workload inside of the vapor zone until condensation ceases.

(d) Tip out any pools of solvent remaining on the cleaned parts before removing them from the degreaser if the degreasers are operated manually.

(e) Do not remove parts from the degreaser until the parts are visually dry and not dripping/leaking solvent. (This does not apply to an emulsion cleaner workload that is rinsed with water within the degreaser immediately after cleaning.)

(vii) The cleaning of porous or absorbent materials such as cloth, leather, wood or rope is prohibited.

(viii) Except for sealed chamber degreasers, all solvent agitation shall be by either pump recirculation, a mixer, or ultrasonics.

(ix) The solvent spray system shall be used in a manner such that liquid solvent does not splash outside of the container. The solvent spray shall be a continuous stream, not atomized or shower type, unless, the spray is conducted in a totally enclosed space, separated from the environment.

(x) For those degreasers equipped with a water separator, no solvent shall be visually detectable in the water in the separator.

(xi) Wipe cleaning materials containing solvent shall be kept in closed containers at all times, except during use.

(xii) A degreaser shall be located so as to minimize drafts being directed across the cleaning equipment, the exposed solvent surface, or the top surface of the vapor blanket.

(xiii) A method for draining cleaned material, such as a drying rack suspended above the solvent and within the freeboard area, shall be used so that the

drained solvent is returned to the degreaser or container.

(g) Rule 442 Applicability: Any solvent using operation or facility which is not subject to the source-specific Rule 1104 shall comply with the provisions of Rule 442. Any solvent using operation or facility which is exempt from all or a portion of the volatile organic compound (VOC) limits, equipment limits or the operational limits of Rule 1104 shall be subject to the applicable provisions of Rule 442.

(h) Solvent Usage Records: Owner/Operator subject to Rule 1104 or claiming any exemption under Rule 1104, Section (E), shall comply with the following requirements:

(1) Maintain and have available during an inspection, a current list of solvents in use at the facility which provides all of the data necessary to evaluate compliance, including the following information separately for each degreaser, as applicable:

(i) product name(s) used in the degreaser, and

(ii) the mix ratio of solvent compounds mixtures of solvents are used, and

(iii) VOC content of solvent or mixture of compounds as used, and

(iv) the total volume of the solvent(s) used for the facility, on a monthly basis, and

(v) the name and total volume applied of wipe cleaning solvent(s) used, on a monthly basis.

(2) Additionally, for any degreaser utilizing an add-on emission control device/system as a means of complying with provisions of Rule 1104 shall, on a monthly basis, maintain records of key system operating and maintenance data. Such data are recorded for the purpose of demonstrating continuous compliance during periods of emission producing activities. The data shall be recorded in a manner as prescribed by the District.

(3) Documentation shall be maintained on site of the disposal or on-site recycling of any waste solvent or residues.

(4) Records shall be retained (at facility) and available for inspection by District, state or federal personnel for the previous 5-year period as required by this Title V / Federal Operating Permit (Reference Rule 1203(D)(1)(d)(ii)).

[Rule 1104 - *Organic Solvent Degreasing Operations*]

27. Owner/Operator's use of *Architectural Coatings* at this facility shall comply with the applicable requirements of Rule 1113, including the VOC limits specified in Rule 1113, part C, Table of Standards, as listed below:
[Rule 1113 - *Architectural Coatings*]

Coating Category	Limit
Primary Coatings	
Flat Coatings	50
Nonflat Coatings	100
Nonflat-High Gloss Coatings	150
Specialty Coatings	
Aluminum Roof Coatings	400
Basement Specialty Coatings	400
Bituminous Roof Coatings	50
Bituminous Roof Primers	350
Bond Breakers	350
Concrete Curing Compounds	350
Concrete/Masonary Sealers	100
Driveway Sealers	50
Dry Fog Coatings	150
Faux Finishing Coatings	350
Fire Resistive Coatings	350
Floor Coatings	100
Form-Release Compounds	250
Graphic Arts Coatings (Sign Paints)	500
High Temperature Coatings	420
Industrial Maintenance Coatings	250
Low Solids Coatings	120[a]
Magnesite Cement Coatings	450
Mastic Texture Coatings	100
Metallic Pigmented Coatings	500
Multi-Color Coatings	250
Pre-Treatment Wash Primers	420
Primers, Sealers, and Undercoaters	100
Reactive Penetrating Sealers	350
Recycled Coatings	250
Roof Coatings	50
Rust Preventative Coatings	250
Shellacs:	
Clear	730
Opaque	550
Specialty Primers, Sealers, and Undercoaters	100
Stains	250

Stone Consolidants	450
Swimming Pool Coatings	340
Traffic Marking Coatings	100
Tub and Tile Refinish Coatings	420
Waterproofing Membranes	250
Wood Coatings	275
Wood Preservatives	350
Zinc-Rich Primers	340

28. Owner/Operator's use of *Wood Products Coatings* at this facility shall comply with the applicable requirements of Rule 1114, including the VOC limits specified in Rule 1114, part C, Table of Standards, as listed below:

(1) VOC Content of Coatings & Adhesives

(a) Any Owners and/or Operators of Wood Products Coating Application Operations shall not apply any Coating or Adhesive to a Wood Product which has a VOC Content, including any VOC-containing material added to the original Coating supplied by the manufacturer, which exceeds the applicable limit specified below, unless emissions to the atmosphere are controlled by air pollution abatement equipment with an Overall Control Efficiency of at least 85 percent. Any Coating subject to this rule that meets either of the two VOC Content limit formats (grams per liter or pounds per gallon [lb/gal]) is in compliance with this subsection.

LIMITS
Grams of VOC Per Liter of Coating,
Less Water and Less Exempt Compounds (VOC Content)

Coating	Current Limit g/L (lb/gal)	On and After 7/1/97		On and After 7/1/2005
		Column I or g/L (lb/gal)	Column II g/L (lb/gal)	g/L (lb/gal)
Clear Sealers	680 (5.7)	550 (4.6)	680 (5.7)	275 (2.3)
Clear Topcoat	680 (5.7)	550 (4.6)	275 (2.3)	275 (2.3)
Pigmented Primers, Sealers and Undercoats	600 (5.0)	550 (4.6)	600 (5.0)	275 (2.3)
Pigmented Topcoats	600 (5.0)	550 (4.6)	275 (2.3)	275 (2.3)

(i) Effective July 1, 1997, a person or facility shall use Coatings on Wood Products that comply with either all VOC Content limits in Column I or all VOC Content limits in Column II. A person or facility that applies a Pigmented Primer, Sealer or Undercoat, but not a Clear Topcoat or Pigmented Topcoat, to a Wood Product shall be subject to column I for that product.

(ii) Notwithstanding the requirements of subsection (C)(1)(a)(i), a person or facility that applies a topcoat and a primer, sealer or undercoat to a Shutter may, until July 1, 2005, choose to comply with the VOC Content limits specified below for that Shutter:

(b) LIMITS
Grams of VOC Per Liter of Coating,
Less Water and Less Exempt Compounds (VOC Content)

Coating	g/L (lb/gal)
Clear Sealers	275 (2.3)
Clear Topcoat	680 (5.7)
Pigmented Primers, Sealers & Undercoats	275 (2.3)
Pigmented Topcoats	600 (5.0)

(c) LIMITS
Grams of VOC Per Liter of Coating,
Less Water and Less Exempt Compounds (VOC Content)

Coating	Current Limit g/L (lb/gal)	On and After 7/1/97 g/L (lb/gal)	On and After 7/1/2005 g/L (lb/gal)
Fillers	500 (4.2)	500 (4.2)	275 (2.3)
High-Solid Stains	700 (5.8)	550 (4.6)	350 (2.9)
Inks	500 (4.2)	500 (4.2)	500 (4.2)
Mold-Seal Coatings	750 (6.3)	750 (6.3)	750 (6.3)
Multi-Colored Coatings	685 (5.7)	685 (5.7)	275 (2.3)
Low-Solids Stains, Toners and Washcoats	800 (6.7)	480 (4.0)	120 (1.0)
Adhesives	250 (2.1)	250 (2.1)	250 (2.1)

[Rule 1114 - *Wood Products Coating Operations*]

29. Owner/Operator's use of *Metal Parts and Products Coatings* at this facility shall comply with the applicable requirements of Rule 1115, including the VOC limits specified in Rule 1115, as listed below:

Owner/Operator shall not apply to metal parts and products any coatings, including any VOC-containing materials added to the original coating supplied by the manufacturer, which

contain VOC in excess of the limits specified below unless emissions to the atmosphere are controlled to an equivalent level by air pollution abatement equipment with a capture and control system Combined Efficiency of at least 85 percent:

LIMITS
(Grams of VOC Per Liter of Coating, Less Water and Less Exempt Compounds)

Coating	Air Dried		Baked	
	g/L	(lb/gal)	g/L	(lb/gal)
General	420	(3.5)	360	(3.0)
Military Specification	420	(3.5)	360	(3.0)
Etching Filler	420	(3.5)	420	(3.5)
Solar-Absorbent	420	(3.5)	360	(3.0)
Heat-Resistant	420	(3.5)	360	(3.0)
High-Gloss	420	(3.5)	360	(3.0)
Extreme High-Gloss	420	(3.5)	360	(3.0)
Metallic	420	(3.5)	420	(3.5)
Extreme Performance	420	(3.5)	360	(3.0)
Prefabricated Architectural				
Component	420	(3.5)	275	(2.3)
Touch Up	420	(3.5)	360	(3.0)
Repair	420	(3.5)	360	(3.0)
Silicone-Release	420	(3.5)	420	(3.5)
High Performance				
Architectural	420	(3.5)	420	(3.5)
Camouflage	420	(3.5)	420	(3.5)
Vacuum-Metalizing	420	(3.5)	420	(3.5)
Mold-Seal	420	(3.5)	420	(3.5)
High-Temperature	420	(3.5)	420	(3.5)
Electric-Insulating Varnish	420	(3.5)	420	(3.5)
Pan-Backing	420	(3.5)	420	(3.5)
Pretreatment Wash Primer	420	(3.5)	420	(3.5)
Clear Coating	520	(4.3)	520	(4.3)

[Rule 1115 - *Metal Parts and Products Coating Operations*]

30. Owner/Operator shall comply with all requirements of the District's Title V Program, MDAQMD Rules 1200 through 1210.
[Regulation XII - *Federal Operating Permits*]

31. Owner/Operator shall comply with all applicable requirements of 40 CFR Part 68; Risk Management Program.
[40 CFR 68]

B. FACILITY-WIDE MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS:

1. Any data and records generated and/or kept pursuant to the requirements in this federal operating permit (Title V Permit) shall be kept current and on site for a minimum of five (5) years from the date generated. Any records, data, or logs shall be supplied to District, state, or federal personnel upon request.
[40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

2. Any Compliance/Performance testing required by this Federal Operating Permit shall follow the administrative procedures contained in the District's *Compliance Test Procedural Manual***.** Any required annual Compliance and/or Performance Testing shall be accomplished by obtaining advance written approval from the District pursuant to the District's *Compliance Test Procedural Manual*. All emission determinations shall be made as stipulated in the *Written Test Protocol* accepted by the District. When proposed testing involves the same procedures followed in prior District approved testing, then the previously approved *Written Test Protocol* may be used with District concurrence.
[Rule 204 - *Permit Conditions*]

3. Owner/Operator of permit units subject to Comprehensive Emissions Inventory Report / Annual Emissions Determinations for District, state, and federal required Emission Inventories shall monitor and record the following for each unit:
   (a) The cumulative annual usage of each fuel type. The cumulative annual usage of each fuel type shall be monitored from utility service meters, purchase or tank fill records.

   (b) Fuel suppliers' fuel analysis certification/guarantee including fuel sulfur content shall be kept on site and available for inspection by District, state or federal personnel upon request. The sulfur content of diesel fuel shall be determined by use of ASTM method D2622-82, or (ASTM method D 2880-71, or equivalent). Vendor data meeting this requirement are sufficient.

[*40 CFR 70.6(a)(3)(B) – Periodic Monitoring Requirements*]
[Rule 204 - *Permit Conditions*]
[Federal Clean Air Act: §110(a)(2)(F, K & J); §112; §172(c)(3); §182(a)(3)(A & B); §187(a)(5); § 301(a) and in California Clean Air Act, Health and Safety Code §§39607 and §§44300 et seq.]

4. (a) Owner/Operator shall submit Compliance Certifications as prescribed by Rule 1203(F)(1) and Rule 1208, in a format approved by MDAQMD. Compliance Certifications by a Responsible Official shall certify the truth, accuracy and completeness of the document submitted and contain a statement to the effect that the certification is based upon information and belief, formed after a reasonable inquiry; the statements and information in the document are true, accurate, and complete.
[40 CFR 70.6(c)(5)(i); Rule 1208; Rule 1203(D)(1)(vii-x)]

(b) Owner/Operator shall include in any Compliance Certification the methods used for monitoring such compliance.

[40 CFR 70.6(c)(5)(ii); Rule 1203(D)(1)(g)(viii)]

(c) Owner/Operator shall comply with any additional certification requirements as specified in 42 United States Code (U.S.C.) §7414(a)(3), Recordkeeping, Inspections, Monitoring and Entry (Federal Clean Air Act §114(a)(3)) and 42 U.S.C. §7661c(b), Permit Requirements and Conditions (Federal Clean Air Act §503(b)), or in regulations promulgated thereunder.

[Rule 1203 (D)(1)(g)(x)]

(d) On an ***annual*** basis, of any given year, Owner/Operator shall submit a *Compliance Certification Report* to the APCO/District pursuant to District Rule 1203 on the following schedule:

Report covering June 5 – June 4	Due by July 5

Each report shall be certified to be true, accurate, and complete by "The Responsible Official" and a copy of this annual report shall also be contemporaneously submitted to the EPA Region IX Administrator. Compliance Certification Form/Format shall be obtained from MDAQMD Compliance Section.

[40 CFR 72.90.a and Rule 1203 (D)(1)(g)(v - x)]

5. Owner/Operator shall submit, on a semi-annual basis, a *Monitoring Report* to the Air Pollution Control Officer (APCO) / District. Each *Monitoring Report* shall be submitted each semi-annual compliance period on the following schedule:

Report covering June 5 – December 5	Due by January 5
Report covering December 4 – June 4	Due by July 5

This *Monitoring Report* shall be certified to be true, accurate, and complete by "The Responsible Official" and shall include the following information and/or data:

(a) Summary of deviations from any federally enforceable requirement in this permit.

(b) Summary of all emissions monitoring and analysis methods required by any Applicable Requirement / federally - enforceable requirement.

(c) Summary of all periodic monitoring, testing or record keeping (including test methods sufficient to yield reliable data) to determine compliance with any Applicable Requirement / federally - enforceable requirement that does not directly require such monitoring.

An alternate Monitoring Report format may be used upon prior approval by MDAQMD.

[Rule 1203(D)(1)(e)(i)]

6. Owner/Operator shall promptly report all deviations from Federal Operating Permit

requirements including, but not limited to, any emissions in excess of permit conditions, deviations attributable to breakdown conditions, and any other deviations from permit conditions. Such reports shall include the probable cause of the deviation and any corrective action or preventative measures taken as a result of the deviation. [Rule 1203(D)(1)(e)(ii) and Rule 430(C)]

Prompt reporting shall be determined as follows:

(a) For deviations involving emissions of air contaminants in excess of permit conditions including but not limited to those caused by a breakdown, prompt reporting shall be within one hour of the occurrence of the excess emission or within one hour of the time a person knew or reasonably should have known of the excess emission. Documentation and other relevant evidence regarding the excess emission shall be submitted to the District within sixty (60) days of the date the excess emission was reported to the District. [SIP Pending: Rule 430 - Breakdown Provisions as amended 12/21/94 and submitted 2/24/95]

(b) For other deviations from permit conditions not involving excess emissions of air contaminants shall be submitted to the District with any required monitoring reports at least every six (6) months. [Rule 1203(D)(1)(e)(i)]

7. If any facility unit(s) should be determined not to be in compliance with any federally-enforceable requirement during the 5-year permit term, then Owner/Operator shall obtain a *Schedule of Compliance* approved by the District Hearing Board pursuant to the requirements of MDAQMD Regulation 5 (Rules 501 - 518). In addition, Owner/Operator shall submit a *Progress Report* on the implementation of the *Schedule of Compliance*. The *Schedule of Compliance* shall contain the information outlined in (b), below. The *Progress Report* shall contain the information outlined in (c), below. The *Schedule of Compliance* shall become a part of this Federal Operating Permit by administrative incorporation. The *Progress Report* and *Schedule of Compliance* shall comply with Rule 1201(I)(3)(iii) and shall include:

(a) A narrative description of how the facility will achieve compliance with such requirements; and

(b) A *Schedule of Compliance* which contains a list of remedial measures to be taken for the facility to come into compliance with such requirements, an enforceable sequence of actions, with milestones, leading to compliance with such requirements and provisions for the submission of *Progress Reports* at least every six (6) months. The *Schedule of Compliance* shall include any judicial order, administrative order, and/or increments of progress or any other schedule as issued by any appropriate judicial or administrative body or by the District Hearing Board pursuant to the provisions of Health & Safety Code §42350 et seq.; and

(c) *Progress Reports* submitted under the provisions of a *Schedule of Compliance* shall include: Dates for achieving the activities, milestone, or compliance required in the schedule of compliance; and dates when such activities, milestones or compliance were achieved; and an explanation of why any dates in the schedule

of compliance were not or will not be met; and any preventive or corrective measures adopted due to the failure to meet dates in the schedule of compliance. [Rule 1201 (I)(3)(iii); Rule 1203 (D)(1)(e)(ii); Rule 1203 (D)(1)(g)(v)]

C. FACILITY-WIDE COMPLIANCE CONDITIONS:

1. Owner/Operator shall allow an authorized representative of the MDAQMD to enter upon the permit holder's premises at reasonable times, with or without notice.
[40 CFR 70.6(c)(2)(i); Rule 1203(D)(1)(g)(i)]

2. Owner/Operator shall allow an authorized representative of the MDAQMD to have access to and copy any records that must be kept under condition(s) of this Federal Operating Permit.
[40 CFR 70.6(c)(2)(ii); Rule 1203(D)(1)(g)(ii)]

3. Owner/Operator shall allow an authorized representative of the MDAQMD to inspect any equipment, practice or operation contained in or required under this Federal Operating Permit.
[40 CFR 70.6(c)(2)(iii); Rule 1203(D)(1)(g)(iii)]

4. Owner/Operator shall allow an authorized representative of the MDAQMD to sample and/or otherwise monitor substances or parameters for the purpose of assuring compliance with this Federal Operating Permit or with any Applicable Requirement.
[40 CFR 70.6(c)(2)(iv); Rule 1203(D)(1)(g)(iv)]

5. Owner/Operator shall remain in compliance with all Applicable Requirements / federally enforceable requirements by complying with all compliance, monitoring, record-keeping, reporting, testing, and other operational conditions contained in this Federal Operating Permit. Any noncompliance constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action; the termination, revocation and re-issuance, or modification of this Federal Operating Permit; and/or grounds for denial of a renewal application.
[1203 (D)(1)(f)(ii)]

6. Owner/Operator shall comply in a timely manner with all applicable requirements / federally - enforceable requirements that become effective during the term of this permit.
[Rule 1201 (I)(2); Rule 1203(D)(1)(g)(v)]

7. Owner/Operator shall insure that all applicable subject processes comply with the provisions of 40 CFR 61, *National Emission Standards for Hazardous Air Pollutants*, subpart A, *General Provisions*, and subpart M, *Asbestos*.
[40 CFR 61, subparts A and M]. Note: Blythe Energy, Inc. Power Plant is an asbestos-free facility and will remain so.

8. Owner/Operator shall comply with all applicable requirements of 40 CFR 98, the

Mandatory Greenhouse Gas Reporting rule. [40 CFR 98]

PART III
EQUIPMENT SPECIFIC APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

EQUIPMENT DESCRIPTIONS:

PERMIT CONDITIONS; (UNLESS OTHERWISE STATED ALL CONDITIONS RESULT FROM RULE 204 - PERMIT CONDITIONS; VERSION IN SIP = CARB EX. ORDER G-73, 40 CFR 52.220(C)(39)(II)(B) - 11/09/78 43 FR 52237; CURRENT RULE VERSION = 07/25/77:

A. PERMIT B007953 COMBUSTION TURBINE GENERATOR POWER BLOCK (CT1) consisting of: Natural gas fueled Siemens F Class Model V84.3A(2) Serial No. 800436 combustion turbine generator power block producing approximately 260 MW(e) with a connected heat recovery steam generator and a steam condensing turbine (shared with B007954), maximum turbine heat input of 1776 MMBtu/hr.

B. PERMIT B007954 COMBUSTION TURBINE GENERATOR POWER BLOCK (CT2) consisting of: Natural gas fueled Siemens F Class Model V84.3A(2) Serial No. 800437 combustion turbine generator power block producing approximately 260 MW(e) with a connected heat recovery steam generator and a steam condensing turbine (shared with B007953), maximum turbine heat input of 1776 MMBtu/hr.

PERMIT CONDITIONS:

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.

2. This equipment shall be exclusively fueled with pipeline quality natural gas with a sulfur content not exceeding 0.5 grains per 100 dscf on a twenty-four hour basis and not exceeding 0.25 grains per 100 dscf on a rolling twelve month average basis, and shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles.

3. This equipment 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). This equipment is also subject to the Prevention of Significant Deterioration (40 CFR 51.166) and Federal Acid Rain (Title IV) programs. Compliance with all applicable provisions of these regulations is required.

4. Emissions from this equipment (including its associated duct burner) shall not exceed the following emission limits at any firing rate, except for CO, NOx, and VOC during

periods of startup, shutdown and malfunction:

a. Hourly rate, computed every 15 minutes, verified by CEMS and annual compliance tests:
   i. NOx as NO2 – the most stringent of 19.80 lb/hr or 2.5 ppmvd corrected to 15% oxygen and averaged over one hour
   ii. NOx as NO2 – effective May 7, 2016, 2.0 ppmvd corrected to 15% oxygen and averaged over a rolling 12 month period.
   iii. CO – the most stringent of 17.5 lb/hr or 4.0 ppmvd corrected to 15% oxygen and averaged over three hours
   iv. CO – 10 lb/hr averaged over a rolling 12-month period
b. Hourly rates, verified by annual compliance tests or other compliance methods in the case of SOx:
   i. VOC as CH4 - 2.9 lb/hr (based on 1 ppmvd corrected to 15% oxygen)
   ii. SOx as SO2 - 2.7 lb/hr (based on 0.5 grains/100 dscf fuel sulfur)
   iii. PM10 - 6.2 lb/hr

5. Emissions of CO and NOx from this equipment shall only exceed the limits contained in Condition 4 during startup and shutdown periods as follows:
   a. Startup is defined as the period beginning with ignition and lasting until either the equipment complies with all Condition 4 operating permit limits for two consecutive 15-minute averaging periods or four hours after ignition, whichever occurs first. Shutdown is defined as the period beginning with the lowering of equipment from base load and lasting until fuel flow is completely off and combustion has ceased.
   b. The emissions from each startup or shutdown event shall not exceed the following, verified by CEMS:
      i. NOx - 376 lb
      ii. CO - 3600 lb
   c. Effective May 7, 2016, the CO emissions from all startup and shutdown events at both power blocks, averaged over a rolling 12-month period, shall not exceed 750 lb/event, verified by CEMS.

6. Aggregate emissions from B007953 and B007954, including the associated duct burners, shall not exceed the following emission limits, based on a calendar day summary:
   a. NOx - 5762 lb/day, verified by CEMS
   b. CO - 8004 lb/day, verified by CEMS
   c. VOC as CH4 - 239 lb/day, verified by compliance tests and hours of operation in steady-state, pre-mix mode.
   d. SOx as SO2 - 130 lb/day, verified by fuel sulfur content and fuel use data
   e. PM10 - 298.5 lb/day, verified by compliance tests and hours of operation

7. Emissions from all Blythe Energy Project I permit units at this facility (as listed in Part I.A.1 of this Permit), including the cooling towers, shall not exceed the following emission limits, based on a rolling 12 month summary:
   a. NOx - 97 tons/year, verified by CEMS
   b. CO - 175 tons/year, verified by CEMS

c. VOC as CH4 - 24 tons/year, verified by compliance tests and hours of operation in steady-state, pre-mix mode
d. SOx as SO2 - 12 tons/year, verified by fuel sulfur content and fuel use data
e. PM10 - 56.9 tons/year, verified by compliance tests and hours of operation

These limits shall apply to all emissions from all Blythe Energy Project permit units at this facility (as listed in Part I.A.1, of the Federal Operating Permit), and shall include emissions during all modes of operation, including startup, shutdown and malfunction.

8. Particulate emissions from this equipment shall not exceed opacity equal to or greater than twenty percent (20%) for a period aggregating more than three (3) minutes in any one (1) hour, excluding uncombined water vapor.

9. This equipment shall exhaust through a stack at a minimum height of 130 feet.

10. ***For Permit B007953 only:*** The owner/operator (o/o) shall not operate this equipment after the initial commissioning period without the selective catalytic NOx reduction system with valid District permit C007959, as well as the oxidation catalyst with valid District permit C010832 installed and fully functional.

10. ***For Permit B007954 only:*** The owner/operator (o/o) shall not operate this equipment after the initial commissioning period without the selective catalytic NOx reduction system with valid District permit C007960 as well as the oxidation catalyst with valid District permit C010833 installed and fully functional.

11. The o/o shall provide stack sampling ports and platforms necessary to perform source tests required to verify compliance with District rules, regulations and permit conditions. The location of these ports and platforms shall be subject to District approval.

12. Emissions of NOx, CO, oxygen and ammonia slip shall be monitored using a Continuous Emissions Monitoring System (CEMS). Each CEMS shall be operational whenever the associated combustion turbine generator is in operation, including during periods of startup, shutdown and malfunction. Turbine fuel consumption shall be monitored using a continuous monitoring system. Stack gas flow rate shall be monitored using either a Continuous Emission Rate Monitoring System (CERMS) meeting the requirements of 40 CFR Part 75 Appendix A or a stack flow rate calculation method. The o/o shall install, calibrate, maintain, and operate these monitoring systems according to a District-approved monitoring plan and MDAQMD Rule 218, and they shall be installed prior to initial equipment startup. Six (6) months prior to installation the operator shall submit a monitoring plan for District review and approval.

13. The o/o shall conduct all required compliance/certification tests in accordance with a District-approved test plan. Thirty (30) days prior to the compliance/certification tests the o/o shall provide a written test plan for District review and approval. Written notice of the compliance/certification test shall be provided to the District ten (10) days prior to the tests so that an observer may be present. A written report with the results of such compliance/certification tests shall be submitted to the District within forty-five (45) days

after testing.

14. The o/o shall perform the following annual compliance tests in accordance with the MDAQMD Compliance Test Procedural Manual. The test report shall be submitted to the District no later than six weeks prior to the expiration date of this permit. The following compliance tests are required:
    a. NOx as NO2 in ppmvd at 15% oxygen and lb/hr (measured per USEPA Reference Methods 19, 20, or 7E). If testing is performed at 90%-100% of rated capacity, then the annual calibration RATA associated with the NOx CEMS in use on these units may be used in lieu of the required annual EPA Reference Method 20, as long as all of the requirements of prior test notification, proper test result submittal, etc., are followed.
    b. VOC as CH4 in ppmvd at 15% oxygen and lb/hr (measured per USEPA Reference Methods 25A and 18).
    c. SOx as SO2 in ppmvd at 15% oxygen and lb/hr.
    d. CO in ppmvd at 15% oxygen and lb/hr (measured per USEPA Reference Method 10).
    e. PM10 in mg/m3 at 15% oxygen and lb/hr (measured per USEPA Reference Methods 5 and 202 or CARB Method 5)
    f. Flue gas flow rate in dscfm.
    g. Opacity (measured per USEPA Reference Method 9).
    h. Ammonia slip in ppmvd at 15% oxygen.

15. VOC emissions during startup and shutdown periods will be calculated by the CEMS using the following emissions factors:

    For Permit B007953 CTG1 ***only:***
    a. startup events: 0.0048 lb/mmBtu
    b. shutdown events: 0.0220 lb/mmBtu

    For Permit B007954 CTG2 ***only:***
    a. startup events: 0.0056 lb/mmBtu
    b. shutdown events: 0.0107 lb/mmBtu

16. Continuous monitoring systems shall be installed, calibrated, certified, maintained, and operated in accordance with the following: ~~meet the following acceptability testing requirements from 40 CFR 60 Appendix B:~~
    a. For NOx and oxygen, 40 CFR 75 appendices A and B ~~Performance Specification 2.~~
    b. ~~For oxygen, Performance Specification 3.~~
    c. For CO, 40 CFR 60 Appendix B Performance Specification 4 and 40 CFR 60 Appendix F except that:
        i. The CGA frequency will follow 40 CFR 75 Appendix B Sections 2.2.1 and 2.2.4. Specifically, a CGA will be required at least once during each QA operating quarter, not to exceed four calendar quarters, plus a 168-unit operating hour grace period will apply following the expiration of a required CGA. CGAs will be conducted no less than 30 days apart, to the extent practicable.
        ii. Analyzer ranges less than or equal to 30 ppm (i.e. CO low range) will be exempt from CGA requirements.
        iii. All RATA testing shall be conducted at least once every four QA operating quarters but no less frequently than once every eight calendar quarters as provided in 40 CFR 75 App. B, §2.3.1.1. If RATA testing is not completed within this timeframe, a 720 unit operating hour grace period may be used, as provided in 40 CFR 75 App. B, §2.3.3.b. All RATA testing shall be conducted at the normal load level(s) as determined in accordance with 40 CFR 75 Appendix A Section 2.3.1.3(a).
    d. ~~For stack gas flow rate, Performance Specification 6 (if CERMS is installed).~~
    e. For ammonia, a District approved procedure that is to be submitted by the o/o.

17. The o/o shall submit to the Air Pollution Control Officer (APCO) and USEPA Region IX the following information for the preceding calendar quarter by January 30, April 30, July 30 and October 30 of each year this permit is in effect. Each January 30 submittal shall include a summary of the reported information for the previous year. This information shall be maintained on site for a minimum of five (5) years and shall be provided to District personnel on request:

a. Operating parameters of emission control equipment, including but not limited to ammonia injection rate, NOx emission rate and ammonia slip.
b. Total plant operation time (hours), number of startups, hours in startup, and hours in shutdown period.
c. Date and time of the beginning and end of each startup and shutdown period.
d. Average plant operation schedule (hours per day, days per week, weeks per year).
e. All continuous emissions data reduced and reported in accordance with the District-approved CEMS protocol.
f. Maximum hourly, maximum daily, total quarterly, and total calendar year emissions of NOx, CO, PM10, VOC and SOx (including calculation protocol).
g. Total monthly and rolling 12-month emissions of NOx, CO and PM10 from all permit units.
h. Total monthly and rolling 12-month fuel use in the gas turbines and duct burners.
i. Average NOx concentration and average CO mass emission rate, for all operating periods except during startup, shutdown and malfunction, for each gas turbine and associated duct burner, calculated on a rolling 12-month basis.
j. Average CO emissions from all startups and shutdowns of the gas turbines, on a per event basis, calculated on a rolling 12-month basis.
k. Fuel sulfur content (monthly laboratory analyses, monthly natural gas sulfur content reports from the natural gas supplier(s), or the results of a custom fuel monitoring schedule approved by USEPA for compliance with the fuel monitoring provisions of 40 CFR 60 Subpart GG).
l. A log of all excess emissions, including the information regarding malfunctions/breakdowns required by Rule 430.
m. Any permanent changes made in the plant process or production, which would affect air pollutant emissions, and indicate when changes were made.
n. Any maintenance to any air pollutant control system (recorded on an as-performed basis).

18. Effective May 7, 2016, total fuel use in the two gas turbines and two duct burners (Permit #B007953 COMBUSTION TURBINE GENERATOR POWER BLOCK (CT1), Permit #B007954 COMBUSTION TURBINE GENERATOR POWER BLOCK (CT2), Permit #B007955 DUCT BURNER UNIT 1 and Permit #B007956 DUCT BURNER UNIT 2) shall not exceed 31,852,800 MMBtu in any rolling 12-month period.

C. **PERMIT B007955 DUCT BURNER UNIT 1:** Natural gas burner located within the heat recovery steam generator covered by B007953, maximum heat input of 120 MMBtu/hr. Manufacturer is Forney, model # 1002-WPS-C1 and serial #17130.

PERMIT CONDITIONS:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless

otherwise noted below.

2. This equipment shall be exclusively fueled with natural gas and shall be operated and maintained in strict accord with the recommendations of the manufacturer/supplier and/or sound engineering principles.

3. This duct burner shall not be operated unless the combustion turbine generator with valid District permit B007953, selective catalytic reduction system with valid District permit C007959, and oxidation catalyst C010832 are in operation.

4. Fuel use by this equipment shall be recorded and maintained on site for a maintained on site for a minimum of five (5) years and shall be provided to District, State or Federal personnel on request.

D. **PERMIT B007956 DUCT BURNER UNIT 2:** Natural gas burner located within the heat recovery steam generator covered by B007954, maximum heat input of 120 MMBtu/hr. Manufacturer Forney, model # 1002-WPS-C1 and serial #17202.

PERMIT CONDITIONS:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.

2. This equipment shall be exclusively fueled with natural gas and shall be operated and maintained in strict accord with the recommendations of the manufacturer/supplier and/or sound engineering principles.

3. This duct burner shall not be operated unless the combustion turbine generator with valid District permit B007954, selective catalytic reduction system with valid District permit C007960, and oxidation catalyst C010833 are in operation.

4. Fuel use by this equipment shall be recorded and maintained on site for a minimum of five (5) years and shall be provided to District, State or Federal personnel on request.

E. **PERMIT C007959 SCR UNIT 1** consisting of: Selective Catalytic Reduction system with a catalyst located within the power train covered by B007953 and an ammonia injection system. Manufacturer is Haldor Topsoe; model HO5.331cpsi.

PERMIT CONDITIONS:

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.

2. This equipment shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles.

3. This equipment shall be operated concurrently with the combustion turbine generator with valid MDAQMD permit B007953.

4. Ammonia shall be injected whenever the selective catalytic reduction system has reached or exceeded 550 deg Fahrenheit. Except during periods of startup and shutdown, ammonia slip shall not exceed 10 ppmvd (corrected to 15% oxygen), averaged over three hours.

5. Ammonia injection by this equipment in pounds per hour shall be recorded and maintained on site for a minimum of five (5) years and shall be provided to District, State or Federal personnel on request.

F. **PERMIT C007960 SCR UNIT 2** consisting of: SELECTIVE CATALYTIC REDUCTION system with a catalyst located within the power train covered by B007954 and an ammonia injection system. Manufacturer is Haldor Topsoe; model HO5.331cpsi

PERMIT CONDITIONS:

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.

2. This equipment shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles.

3. This equipment shall be operated concurrently with the combustion turbine generator with valid MDAQMD permit B007954.

4. Ammonia shall be injected whenever the selective catalytic reduction system has reached or exceeded 550 deg Fahrenheit. Except during periods of startup and shutdown, ammonia slip shall not exceed 10 ppmvd (corrected to 15% oxygen), averaged over three hours.

5. Ammonia injection by this equipment in pounds per hour shall be recorded and maintained on site for a minimum of five (5) years and shall be provided to District, State or Federal personnel on request.

G. **PERMIT C010832 OXIDATION CATALYST, UNIT 1** consisting of: Oxidation Catalyst System with a catalyst located within the power train covered by B007953. Johnson Matthey, Honeycat, serial number 200cpsi.

PERMIT CONDITIONS:

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.

2. This equipment shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles.

3. This equipment shall be operated concurrently with the combustion turbine generator with valid District permit B007953.

H. **PERMIT C010833 OXIDATION CATALYST, UNIT 2** consisting of: Oxidation Catalyst System with a catalyst located within the power train covered by B007954. Johnson Matthey, Honeycat, serial number 200cpsi.

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.

2. This equipment shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles.

3. This equipment shall be operated concurrently with the combustion turbine generator with valid District permit B007954.

I. **PERMIT B007957 (Main Cooling Tower)** consisting of: A Marathon Model 9B 445TTFN4573AA wet cooling tower with water circulation, treatment and handling equipment and air circulation equipment, including the following:

Capacity	Equipment Name	Order
250.00	Cooling Cell Fan #8, Motor Serial No. MU402450-2/22-02	1
250.00	Cooling Cell Fan #7, Motor Serial No. MU402450-2/22-01	2
250.00	Cooling Cell Fan #6, Motor Serial No. MU402450-2/22-05	3
250.00	Cooling Cell Fan #5, Motor Serial No. MU402450-2/22-03	4

Capacity	Equipment Name	Order
250.00	Cooling Cell Fan #4, Motor Serial No. MU402450-2/22-06	5
250.00	Cooling Cell Fan #3, Motor Serial No. MU402450-2/22-07	6
250.00	Cooling Cell Fan #2, Motor Serial No. MU402450-2/22-04	7
250.00	Cooling Cell Fan #1, Motor Serial No. MU402450-2/22-08	8
1000.00	Circulating Water Pump #12, Johnson Serial No. 01JB1129B	9
1000.00	Circulating Water Pump #11, Johnson Serial No. 01JB1129A	10

PERMIT CONDITIONS:

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.

2. This equipment shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles.

3. The drift rate shall not exceed 0.0006 percent with a maximum circulation rate of 146,000 gallons per minute for the Main Cooling Tower. The maximum hourly PM10 emission rate shall not exceed 0.546 pounds per hour from both the Main and the Chiller Cooling Towers, as calculated per the written District-approved protocol.

4. Whenever the power plant is in operation, the operator shall perform tests of the blow-down water quality once in every seven day period at a minimum; to clarify, if at any time during that same seven day period the power plant has run, then the owner operator shall perform blow-down water quality tests. The operator shall maintain a log, which contains the date and result of each blow-down water quality test, and the resulting mass emission rate. This log shall be maintained on site for a minimum of five (5) years and shall be provided to District, State or Federal personnel on request.

5. The operator shall conduct all required cooling tower water quality tests in accordance with a District-approved test and emissions calculation protocol.

6. A maintenance procedure shall be established that states how often and what procedures will be used to ensure the integrity of the drift eliminators. This procedure shall be submitted to the District for approval at least thirty (30) days prior to construction and shall be kept on-site and available to District personnel on request.

J. **PERMIT B007958 (Chiller Cooling Tower)** consisting of: A Water circulation, treatment and handling equipment and air circulation equipment, including units as follows:

Capacity	Equipment Name	Order
250.00	Cooling Cell Fan #12, BAC Model CXV-T08 Serial No. U025323712	1
250.00	Cooling Cell Fan #11, BAC Model CXV-T08 Serial No. U025323711	2
250.00	Cooling Cell Fan #10, BAC Model CXV-T08 Serial No. U025323710	3
250.00	Cooling Cell Fan #9, BAC Model CXV-T08 Serial No. U025323709	4
250.00	Cooling Cell Fan #8, BAC Model CXV-T08 Serial No. U025323708	5
250.00	Cooling Cell Fan #7, BAC Model CXV-T08 Serial No. U025323707	6
250.00	Cooling Cell Fan #6, BAC Model CXV-T08 Serial No. U025323706	7
250.00	Cooling Cell Fan #5, BAC Model CXV-T08 Serial No. U025323705	8
250.00	Cooling Cell Fan #4, BAC Model CXV-T08 Serial No. U025323704	9
250.00	Cooling Cell Fan #3, BAC Model CXV-T08 Serial No. U025323703	10
250.00	Cooling Cell Fan #1, BAC Model CXV-T08 Serial No. U025323701	11
250.00	Cooling Cell Fan #2, BAC Model CXV-T08 Serial No. U025323702	12
750.00	Chiller Recirulating Pump #4, Cascade Serial No. 16061	13
750.00	Chiller Recirulating Pump #3, Cascade Serial No. 16060	14
750.00	Chiller Recirulating Pump #2, Cascade Serial No. 16059	15
750.00	Chiller Recirulating Pump #1, Cascade Serial No. 16058	16

PERMIT CONDITIONS:

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.

2. This equipment shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles.

3. The drift rate shall not exceed 0.0006 percent with a maximum circulation rate of 22,000 gallons per minute for the Chiller Cooling Tower. The maximum hourly PM10 emission rate shall not exceed 0.546 pounds per hour from both the Main and the Chiller Cooling Towers, as calculated per the written District-approved protocol.

4. Whenever the power plant is in operation, the operator shall perform weekly tests of the blow-down water quality. The operator shall maintain a log, which contains the date and result of each blow-down water quality test, and the resulting mass emission rate. This log shall be maintained on site for a minimum of five (5) years and shall be provided to District, State or Federal personnel on request.

5. The operator shall conduct all required cooling tower water quality tests in accordance with a District-approved test and emissions calculation protocol. Thirty (30) days prior to the first such test the operator shall provide a written test and emissions calculation protocol for District review and approval.

6. A maintenance procedure shall be established that states how often and what procedures will be used to ensure the integrity of the drift eliminators. This procedure shall be submitted to the District for approval at least thirty (30) days prior to construction and shall be kept on-site and available to District personnel on request.

K. PERMIT E007961 NON-CERTIFIED DIESEL IC ENGINE, EMERGENCY FIRE PUMP

PERMIT E007961 NON-CERTIFIED DIESEL IC ENGINE, EMERGENCY FIRE PUMP consisting of: Year of Manufacture 2002; USEPA Family Name NA; CARB Executive Order NA; Tier 0, One John Deere, Diesel fired internal combustion engine, Model No. 6081HF001 and Serial No. RG6081H145432, Direct Injected, Turbo Charged, producing 303 bhp with 6 cylinders at 2200 rpm while consuming a maximum of 14 gal/hr. This equipment powers a Pump.

PERMIT CONDITIONS:

1. This equipment shall be installed, operated and maintained in strict accord with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of contaminants. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.
[40 CFR Part 63, Subpart ZZZZ]

2. This unit shall only be fired on ultra-low sulfur diesel fuel, whose sulfur concentration is less than or equal to 0.0015% (15 ppm) on a weight per weight basis per CARB Diesel or equivalent requirements.
[Title 17 CCR 93115]

3. A non-resettable hour meter with a minimum display capability of 9,999 hours shall be installed and maintained on this unit to indicate elapsed engine operating time.

[Title 17 CCR 93115; 40 CFR §63.6625(f)]

4. This unit shall be limited to use for emergency power, defined as in response to a fire or due to low fire water pressure. In addition, this unit shall be operated no more than 20 hours per year for testing and maintenance, excluding compliance source testing. Time required for source testing will not be counted toward the 20 hour per year limit.
[Title 17 CCR 93115.6]

5. The requirements of section 93115.6, the hour limits indicated above, do not apply to in-use emergency fire pump assemblies that are driven directly by stationary diesel-fueled CI engines and only operated the number of hours necessary to comply with the testing requirements of National Fire Protection Association (NFPA) 25 "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems," 2002 edition, which is incorporated herein by reference.
[Title 17 CCR 93115.3]

6. The owner/operator (o/o) shall maintain an operations log for this unit current and on-site, either at the engine location or at an on-site location, for a minimum of five (5) years, and provided to District, State and Federal personnel upon request. The log shall include, at a minimum, the information specified below:
   a. Date of each use and duration of each use (in hours), using the engines hour meter;
   b. Reason for use (testing & maintenance, emergency, required emission testing);
   c. Monthly and calendar year operation in terms of fuel consumption (in gallons) and total hours;
   d. Monthly and rolling 12-month total CO, NOx and PM_{10} emissions, calculated based on monthly fuel use and District-approved emission factors;
   e. Fuel sulfur concentration (the o/o may use the supplier's certification of sulfur content if it is maintained as part of this log).

   [40 CFR §63.6655(f); Rule 204 - Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 43 FR 52237; Current Rule Version = 07/25/77]

7. The owner/operator shall conduct inspections in accord with the following schedule. All inspections must occur at least annually regardless of operating hours.
   a. Change oil and filter every 500 hours of operation or annually, whichever comes first, or use an oil change analysis program to extend oil change frequencies per the requirements in 40 CFR 63.6625(i);
   b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and
   c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

   [40 CFR Part 63.6630(a); Table 2d.4.; Subpart ZZZZ]

8. The owner/operator shall 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 63.6625(h)].

9. This unit is subject to the requirements of the Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition Engines Title 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ (RICE NESHAPs). In the event of conflict between conditions and the referenced regulatory citations, the more stringent requirements shall govern.
[Title 17 CCR 93115; 40 CFR 63, Subpart ZZZZ]

L. PERMIT E009492 PROPANE IC ENGINE, EMERGENCY GENERATOR (CHILLER BLDG) consisting of: One Ford, Propane fired internal combustion engine, Model No. WSG106816005E-NA and Serial No. 01-11- 012316, Direct Injected, Inter Cooled, producing 114 bhp with 4 cylinders at 1800 rpm while consuming a maximum of 12 gal/hr. This equipment powers a Generator.

PERMIT CONDITIONS:

1. This equipment shall be installed, operated and maintained in strict accord with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of contaminants. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.
[40 CFR Part 63, Subpart ZZZZ]

2. This ICE shall only be fired on propane (LPG).
[District Rule 1302]

3. A non-resettable hour meter with a minimum display capability of 9,999 hours shall be installed and maintained on this unit to indicate elapsed engine operating time.
[40 CFR §63.6625(f)]

4. This unit shall be limited to use for emergency power, defined as in response to a fire or when commercially available power has been interrupted. In addition, this unit shall be operated no more than 100 hours per year for testing and maintenance, excluding compliance source testing. Time required for source testing will not be counted toward the 100 hour per year limit.
[40 CFR Part 63, Subpart ZZZZ]

5. The o/o shall maintain an operations log for this unit current and on-site (or at a central location) for a minimum of five (5) years, and this log shall be provided to District, State and Federal personnel upon request. The log shall include, at a minimum, the information specified below:
   a. Date of each use and duration of each use (in hours);
   b. Reason for use (testing & maintenance, emergency, required emission testing);
   c. Monthly and calendar year operation in terms of fuel consumption (in gallons)

and total hours;

d. Monthly and rolling 12-month total CO, NOx and PM_{10} emissions, calculated based on monthly fuel use and District-approved emission factors.

[40 CFR §63.6655(f)]

6. The owner/operator shall conduct inspections in accord with the following schedule. All inspections must occur at least annually regardless of operating hours.
   a. Change oil and filter every 500 hours of operation or annually, whichever comes first; or use an oil change analysis program to extend oil change frequencies per the requirements in 40 CFR 63.6625(i);
   b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first;
   c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

   [40 CFR Part 63.6640; Table 2d.5, Subpart ZZZZ]

7. The owner/operator shall 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 63.6625(h)]

8. This unit is subject to the requirements of 40 CFR 63 Subpart ZZZZ (RICE NESHAPs). In the event of conflict between conditions and the referenced regulatory citation, the more stringent requirements shall govern.
   [40 CFR 63, Subpart ZZZZ]

PART IV
STANDARD FEDERAL OPERATING PERMIT CONDITIONS

A. STANDARD CONDITIONS:

1. If any portion of this Federal Operating Permit is found to be invalid by the final decision of a court of competent jurisdiction the remaining portion(s) of this Federal Operating Permit shall not be affected thereby.
[40 CFR 70.6(a)(5); Rule 1203(D)(1)(f)(i)]

2. Owner/Operator shall comply with all condition(s) contained herein. Noncompliance with any condition(s) contained herein constitutes a violation of the Federal Clean Air Act and of MDAQMD Regulation XII and is grounds for enforcement action; termination, revocation and re-issuance, or modification of this Federal Operating Permit; and/or grounds for denial of a renewal of this Federal Operating Permit.
[40 CFR 70.6(a)(6)(i); Rule 1203(D)(1)(f)(ii)]

3. It shall not be a defense in an enforcement action brought for violation(s) of condition(s) contained in this Federal Operating Permit that it would have been necessary to halt or reduce activity to maintain compliance with those condition(s).
[40 CFR 70.6(a)(6)(ii); Rule 1203(D)(1)(f)(iii)]

4. This Federal Operating Permit may be modified, revoked, reopened or terminated for cause.
[40 CFR 70.6(a)(6)(iii); Rule 1203(D)(1)(f)(iv)]

5. The filing of an application for modification; a request for revocation and re-issuance; a request for termination; notifications of planned changes; or anticipated noncompliance with condition(s) does not stay the operation of any condition contained in this Federal Operating Permit.
[40 CFR 70.6(a)(6)(iii); Rule 1203(D)(1)(f)(v)]

6. The issuance of this Federal Operating Permit does not convey any property rights of any sort nor does it convey any exclusive privilege.
[40 CFR 70.6(a)(6)(iv); Rule 1203(D)(1)(f)(vi)]

7. Owner/Operator shall furnish to the MDAQMD, within a reasonable time as specified by the MDAQMD, any information that the MDAQMD may request in writing.
[40 CFR 70.6(a)(6)(v); Rule 1203(D)(1)(f)(vii)]

8. Owner/Operator shall furnish to District, state or federal personnel, upon request, copies of any records required to be kept pursuant to condition(s) of this Federal Operating Permit.
[40 CFR 70.6(a)(6)(v); Rule 1203(D)(1)(f)(viii)]

9. Any records required to be generated and/or kept by any portion of this Federal Operating Permit shall be retained by the facility Owner/Operator for at least five (5) years from the date the records were created.
[40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

10. Owner/Operator shall pay all applicable fees as specified in MDAQMD Regulation III, including those fees related to permits as set forth in Rules 301 and 312.
[40 CFR 70.6(a)(7); Rule 1203(D)(1)(f)(ix)]

11. Owner/Operator shall not be required to revise this permit for approved economic incentives, marketable permits, emissions trading or other similar programs provided for in this permit.
[40 CFR 70.6(a)(8); Rule 1203(D)(1)(f)(x)]

12. Compliance with condition(s) contained in this Federal Operating Permit shall be deemed compliance with the Applicable Requirement underlying such condition(s). The District clarifies that "only" Applicable Requirements listed & identified elsewhere in this Title V Permit are covered by this Permit Shield and does not extend to any unlisted/unidentified conditions pursuant to the requirements of 40 CFR 70.6(f)(1)(i).
[40 CFR 70.6(f)(1)(i); Rule 1203(G)(1)]

13. The Permit Shield set forth above, in condition 12 of Part IV, shall not be construed to limit the emergency powers of USEPA as set forth in 42 U.S.C. §7603.
[40 CFR 70.6(f)(3)(i); Rule 1203(G)(3)(a)]

14. The Permit Shield set forth above, in condition 12 of Part IV, shall not be construed to limit liability for violations, which occurred prior to the issuance of this Federal Operating Permit.
[40 CFR 70.6(f)(3)(ii); Rule 1203(G)(3)(b)]

15. The Permit Shield set forth above, in condition 12 of Part IV, shall not be construed to alter any Applicable Requirement Contained in the Acid Rain Program.
[40 CFR 70.6(f)(3)(iii); Rule 1203(G)(3)(c)]

16. The Permit Shield set forth above, in condition 12 of Part IV, shall not be construed to limit the ability of USEPA or the MDAQMD to obtain information pursuant to other provisions of law including but not limited to 42 U.S.C. §7414. [40 CFR 70.6(f)(3)(iv); Rule 1203(G)(3)(d)]

17. The Permit Shield set forth above, in condition 12 of Part IV, shall not be construed to apply to emissions trading pursuant to provisions contained in an applicable State

Implementation Plan.
[40 CFR 70.4(b)(12)(ii)(B); Rule 1203(G)(3)(e)]

18. The Permit Shield set forth above, in condition 12 of Part IV, shall not be construed to apply to changes made which are not expressly allowed by this Federal Operating Permit.
[40 CFR 70.4(b)(14)(iii); Rule 1203(G)(3)(f)]

19. The Permit Shield set forth in Part IV, condition 12, shall not be construed to apply to changes made pursuant to the Significant Permit Modification provisions until such changes are included in this Federal Operating Permit.
[40 CFR 70.5(a)(1)(ii), 70.7(e)(2)(vi); Rule 1203 (G)(3)(g)]

20. If Owner/Operator performs maintenance on, or services, repairs, or disposes of appliances, Owner/Operator shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. These requirements are Federally Enforceable through this Title V Permit.
[40 CFR Part 82, Subpart F]

21. If Owner/Operator performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), Owner/Operator 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. These requirements are Federally Enforceable through this Title V Permit.
[40 CFR Part 82, Subpart B]

22. Notwithstanding the testing requirements contained elsewhere in this Title V Permit, any credible evidence may be used to establish violations, including but not limited to; reference test methods, engineering calculations, indirect estimates of emissions, CEMS data, and parametric monitoring data. Data need not be required to be collected in a Title V permit in order to be considered credible.
[Section 113(a) of the Clean Air Act]

23. Owner/operator desiring to renew this Federal Operating Permit shall submit an application for renewal at least six (6) months, but no earlier than eighteen (18) months, prior to the expiration date of this Federal Operating Permit.
[40 CFR 70, Rule 1202(B)(3)(b)]

PART V
OPERATIONAL FLEXIBILITY

A. ALTERNATIVE OPERATING SCENARIO(S):

B. OFF PERMIT CHANGES:

I. Permitee may make a proposed change to equipment covered by this permit that is not expressly allowed or prohibited by this permit if:

A. Permitee has applied for and obtained all permits and approvals required by MDAQMD Regulation II and Regulation XII unless the equipment involved in the change is exempt from obtaining such permits and approvals pursuant to the provisions of Rule 219; and

1. The proposed change is not:
   a. Subject to any requirements under Title IV of the Federal Clean Air Act; or *[See 1203(E)(1)(c)(i)d]*
   b. A modification under Title I of the Federal Clean Air Act; or
   c. A modification subject to Regulation XIII; and *[See 1203(E)(1)(c)(i) d]*
   d. The change does not violate any Federal, State or Local requirement, including an applicable requirement; and *[See 1203(E)(1)(c)(i)c]*
   e. The change does not result in the exceedance of the emissions allowable under this permit (whether expressed as an emissions rate or in terms of total emissions). *[See 1203(E)(1)(c)(i)e]*

II. Procedure for "Off Permit" Changes

A. If a proposed "Off Permit Change" qualifies under Part V, Section (B)(I)(A)(1) above, permitee shall implement the change as follows:

1. Permitee shall apply for an Authority To Construct permit pursuant to the provisions of Regulation II. *[See 1203(E)(1)(c)(i)b]*
2. In addition to the information required pursuant to the provisions of Regulation II and Regulation XIII such application shall include:
   a. A notification that this application is also an application for an "Off Permit" Change pursuant to this condition; and *[See 1203(E)(1)(c)(i)b]*
   b. A list of any new Applicable Requirements which would apply as a result of the change; and *[See 1203(E)(1)(c)(i)b.]*
   c. A list of any existing Applicable Requirements, which would cease to apply as a result of the change. *[See 1203(E)(1)(c)(i)c]*
3. Permitee shall forward a copy of the application and notification to USEPA upon submitting it to the District. *[See 1203(E)(1)(c)(i)a]*

B. Permitee may make the proposed change upon receipt from the District of the Authority to Construct Permit or thirty (30) days after forwarding the copy of the notice and application to USEPA whichever occurs later. *[See 1203(E)(1)(c)(i)a*

and g]

C. Permitee shall attach a copy of the Authority to Construct Permit and any subsequent Permit to Operate, which evidences the Off Permit Change to this Title V permit. *[See 1203(E)(1)(c)(i)f]*

D. Permitee shall include each Off-Permit Change made during the term of the permit in any renewal application submitted pursuant to Rule 1202(B)(3)(b). *[See 1203(E)(1)(c)(i)f]*

III. Other Requirements:

A. The provisions of Rule 1205 – Modifications do not apply to an Off Permit Change made pursuant to this condition.

B. The provisions of Rule 1203(G) – Permit Shield do not apply to an Off Permit Change made pursuant to this condition. *[See 40 CFR 70.4(b)(i)(B)]*

[Rule 1203(E)(1)(c)]

PART VI
Title IV Acid Rain Permit

Effective Dates: December 5, 2016 to December 5, 2021

Issued to: BLYTHE ENERGY, INC.

Plant Site Location: 385 N. Buck Blvd.
Blythe, CA 92225

Type of Facility: Combined Cycle Generation Facility

SIC Code: 4911 – Electric Power Generation

ORIS Code: 55295

DESIGNATED REPRESENTATIVE

Name: Jason Allen

Title: Vice President of Operations - Power

FACILITY CONTACT PERSONS

Name: Bill Cotton

Title: Plant General Manager

Name: Ramon Campos

Title: Compliance Manager

ACID RAIN PERMIT CONTENTS

1) PERMIT APPLICATION - see page VI-46
The owners and operators of the source must comply with the standard requirements and special provisions set forth in the application submitted for this source.

2) Applicable Requirements
a. SO2 allowance allocated under this permit and NOx requirements for each affected unit:

	12/5/16-12/5/21
SO2 allowances under Table 2 of 40 CFR Part 73	None
NOx limit, 40 CFR Part 76	none

b. Standard Requirements

Citation	Requirement
40 CFR 72 Rule 1210	Owner/Operator of Blythe Energy Project shall comply with all applicable provisions of 40 CFR 72, Permits Regulation (Title IV) and their Title IV permit application as indicated in this combined, Federal Operating Permit / Title IV Acid Rain Permit, Part VIII.
40 CFR 72 Rule 1210	Owner / Operator shall comply with *all listed compliance conditions contained within this Title IV Acid Rain Permit and associated Title V Permit.*
40 CFR 70.6(a)(1)(ii)	Where an applicable requirement of the Act is more stringent than an applicable requirement of Title IV regulations, both provisions shall be incorporated into the permit and is enforceable by the Administrator.
Monitoring, 40 CFR Part 72, Section 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. (2) The emissions measurements recorded and reported in accordance with part 75 of this chapter shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. (3) The requirements of part 75 of this chapter shall not affect the responsibility of the owners and operators to monitor emissions of other

	pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.
Reporting, 40 CFR Part 72, Section 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.
Recordkeeping, 40 CFR Part 72, Section 72.9(f)(1)	(1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority. (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with §72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative. (ii) 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 apply. (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 under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
Section 113(a) of the Clean Air Act	Notwithstanding the testing requirements contained elsewhere in this combined Title IV / V Permit, any credible evidence may be used to establish violations, including but not limited to; reference test methods, engineering calculations, indirect estimates of emissions, CEMS data, and parametric monitoring data. Data need not be required to be collected in a Title V permit in order to be considered credible.

3) Statement of Basis

The Mojave Desert Air Quality Management District issues this permit pursuant to Regulation XII, Rule 1210 and Titles IV and V of the Clean Air Act. Questions or comments regarding this permit should be addressed to:

Brad Poiriez, Executive Director
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, CA 92392
760-245-1661
760-245-2022 (fax)

This Acid Rain Permit applies to the following units:

MDAQMD PERMIT NUMBER	DESCRIPTION	BASIS
B007953 B007956	COMBUSTION TURBINE GENERATOR POWER BLOCK (CT1) DUCT BURNER UNIT 1	40 CFR Part 72.6(a)(3)(i)
B007954 B007956	COMBUSTION TURBINE GENERATOR POWER BLOCK (CT2) DUCT BURNER UNIT 2	40 CFR Part 72.6(a)(3)(i)

Comments, notes and justifications regarding this Acid Rain Program permit

- Pursuant to 40 CFR Part 72.6(a)(3)(i), the affected units specified above meet the 72.2 definition for a new utility unit and are subject to the acid rain permit requirements of 72.9(a). The affected units do not qualify for a new unit exemption pursuant to 40 CFR 72.7(b)(1) since each serves a generator with a nameplate capacity greater than 25 MW.
- The affected units specified above are not listed in table-2 of 40 CFR Part 73, therefore, the operator is not required to obtain SO2 allowances under the Acid Rain Program.
- This unit is not subject to the NOx requirements from 40 CFR Part 76 as this unit is not capable of firing on coal

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Approval expires 12/31/2021

Acid Rain Permit Application

For more information, see instructions and 40 CFR 72.30 and 72.31.

This submission is: ☐ new ☐ revised ☑ for ARP permit renewal

STEP 1

Identify the facility name, State, and plant (ORIS) code.

Blythe Energy	CA	55295
Facility (Source) Name	State	Plant Code

STEP 2

Enter the unit ID# for every affected unit at the affected source in column "a."

a	b
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)
1	Yes
2	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes

Blythe Energy
Facility (Source) Name (from STEP 1)

STEP 3

Read the standard requirements.

Permit Requirements

(1) The designated representative of each affected source and each affected unit at the source shall:
  (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
  (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;

(2) The owners and operators of each affected source and each affected unit at the source shall:
  (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
  (ii) Have an Acid Rain Permit.

Monitoring Requirements

(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 40 CFR part 75.

(2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.

(3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

(1) 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 source's compliance account (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 affected units at the source; and
  (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.

(2) 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.

(3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
  (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
  (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.

(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.

(6) 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 an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Blythe Energy
Facility (Source) Name (from STEP 1)

STEP 3, Cont'd.

Excess Emissions Requirements

(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 40 CFR part 77.
(2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
   (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
   (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

(1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
   (i) The certificate of representation for the designated representative for the source and each affected unit at 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 at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
   (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
   (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
   (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.
(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 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
(4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
(5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Blythe Energy
Facility (Source) Name (from STEP 1)

STEP 3, Cont'd.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a source can hold; provided, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;

(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

STEP 4

Certification

Read the certification statement, sign, and date.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Andreas Mehlich

Signature A. Mehlich Date 06/02/2021

Instructions for the Acid Rain Program Permit Application

The Acid Rain Program requires the designated representative to submit an Acid Rain permit application for each source with an affected unit. A complete Certificate of Representation must be received by EPA before the permit application is submitted to the Title V permitting authority. A complete Acid Rain permit application, once submitted, is binding on the owners and operators of the affected source and is enforceable in the absence of a permit until the Title V permitting authority either issues a permit to the source or disapproves the application.

Please type or print. If assistance is needed, contact the Title V permitting authority.

STEP 1 A Plant Code is a 4 or 5 digit number assigned by the Department of Energy's (DOE) Energy Information Administration (EIA) to facilities that generate electricity. For older facilities, "Plant Code" is synonymous with "ORISPL" and "Facility" codes. If the facility generates electricity but no Plant Code has been assigned, or if there is uncertainty regarding what the Plant Code is, send an email to the EIA. The email address is EIA-860@eia.gov.

STEP 2 In column "a," identify each unit at the facility by providing the appropriate unit identification number, consistent with the identifiers used in the Certificate of Representation and with submissions made to DOE and/or EIA. Do not list duct burners. For new units without identification numbers, owners and operators must assign identifiers consistent with EIA and DOE requirements. Each Acid Rain Program submission that includes the unit identification number(s) (e.g., Acid Rain permit applications, monitoring plans, quarterly reports, etc.) should reference those unit identification numbers in exactly the same way that they are referenced on the Certificate of Representation.

Submission Deadlines

For new units, an initial Acid Rain permit application must be submitted to the Title V permitting authority 24 months before the date the unit commences operation. Acid Rain permit renewal applications must be submitted at least 6 months in advance of the expiration of the acid rain portion of a Title V permit, or such longer time as provided for under the Title V permitting authority's operating permits regulation.

Submission Instructions

Submit this form to the appropriate Title V permitting authority. If you have questions regarding this form, contact your local, State, or EPA Regional Acid Rain contact, or call EPA's Clean Air Markets Hotline at (202) 343-9620.

Paperwork Burden Estimate

The public reporting and record keeping burden for this collection of information is estimated to average 8 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. **Do not send the completed form to this address.**

PART VII
CONVENTIONS, ABREVIATIONS, DEFINITIONS

A. CONVENTIONS:

The following referencing conventions are used in this federal operating permit:

40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS)
40 CFR Part 60, Appendix F, Quality Assurance Procedures
40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAPS)
40 CFR Part 61, Subpart M, National Emission Standards for Asbestos
40 CFR Part 63--National Emission Standards For Hazardous Air Pollutants For Affected Source Categories
40 CFR Part 72, Permits Regulation (Acid Rain Program)
40 CFR Part 73, Sulfur Dioxide Allowance System
40 CFR Part 75, Continuous Emission Monitoring
40 CFR Part 75, Subpart D, Missing Data Substitution Procedures
40 CFR Part 75, Appendix B, Quality Assurance and Quality Control Procedures
40 CFR Part 75, Appendix C, Missing Data Estimating Procedures
40 CFR Part 75, Appendix D, Optional SO_2 Emissions Data Protocol
40 CFR Part 75, Appendix F, Conversion Procedures
40 CFR Part 75, Appendix G, Determination of CO_2 Emissions

B. OTHER CONVENTIONS:

1. Unless otherwise noted, a "day" shall be considered a 24-hour period from midnight to midnight (i.e., calendar day).
2. The process unit identifications represent the District permit number designations. These numbers are not sequential. The use of District permit numbers provides continuity between the District and Federal Operating Permit systems.

C. ABBREVIATIONS

Abbreviations used in this permit are as follows:

CFR	Code of Federal Regulations
APCO	Air Pollution Control Officer
bhp	brake horsepower
Btu	British thermal units
CCR	California Code of Regulations
CEMS	continuous emissions monitoring system
CO	carbon monoxide
CO_2	carbon dioxide
District	Mojave Desert Air Quality Management District (formed July 1993)
MDAQMD	Mojave Desert Air Quality Management District (formed July 1993)

MD	Mojave Desert Air Quality Management District (formed July 1993)
SB	San Bernardino County APCD (1975 to formation of MDAQMD)
gr/dscf	grains per dry standard cubic foot
gpm	gallons per minute
gph	gallons per hour
hp	horse power
H&SC	California Health and Safety Code
lb	pounds
lb / hr	pounds per hour
lb / MM Btu	pounds per million British thermal units
MM Btu	million British thermal units
MM Btu/hr	million British thermal units per hour
MW	Megawatt electrical power
MW(e) net	net Megawatt electrical power
NH_3	ammonia
NMOC	non-methane organic compounds
NO_x	oxides of nitrogen
NO_2	nitrogen dioxide
O_2	oxygen
pH	pH (acidity measure of solution)
PM_{10}	particulate matter less than 10 microns aerodynamic diameter
ppmv	parts per million by volume
psig	pounds per square inch gauge pressure
QA	quality assurance
rpm	revolutions per minute
RVP	Reid vapor pressure
SCAQMD	South Coast Air Quality Management District
scfm	standard cubic feet per minute
scfh	standard cubic feet per hour
SIC	Standard Industrial Classification
SIP	State of California Implementation Plan
SO_x	oxides of sulfur
SO_2	sulfur dioxide
tpy	tons per year
TVP	true vapor pressure

D. MDAQMD RULE SIP HISTORY

SIP Rule Citations for Mojave Desert Air Quality Management District Rules

District Rule Number	District Rule Title	SIP Rule Version	SIP Citation	Federally Enforceable
203	*Permit to Operate*	1/7/77	Approved 11/9/78, 43 FR 52237, 40 CFR 52.220(c)(39)(ii)(B) and 40 CFR 52.220(c)(31)(vi)(C)	Y
204	*Permit Conditions*	1/9/76	Approved 11/9/78, 43 FR 52237, 40 CFR 52.220(c)(39)(ii)(B) and 40 CFR 52.220(c)(31)(vi)(C)	Y
206	*Posting of Permit to Operate*	1/9/76	Approved 11/9/78, 43 FR 52237, 40 CFR 52.220(c)(39)(ii)(B) and 40 CFR 52.220(c)(31)(vi)(C)	Y
207	*Altering or Falsifying of Permit*	1/9/76	Approved 11/09/78, 43 FR 52237, 40 CFR 52.220(c)(39)(ii)(B) and 52.220(c)(31)(vi)(C)	Y
209	*Transfer and Voiding of Permit*	1/9/76	Approved 11/9/78, 43 FR 52237, 40 CFR 52.220(c)(39)(ii)(B) and 40 CFR 52.220(c)(31)(vi)(C)	Y
217	*Provision for Sampling And Testing Facilities*	1/9/76	Approved 11/9/78, 43 FR 52237, 40 CFR 52.220(c)(39)(ii)(B) and 40 CFR 52.220(c)(31)(vi)(C)	Y
218	*Stack Monitoring*	7/25/79	Approved 9/28/81, 46 FR 47451,40 CFR 52.220(c)(65)(ii)	Y

219	*Equipment Not Requiring a Written Permit*	6/6/77	Approved 11/9/78, 43 FR, 52237, 40 CFR 52.220(c)(31)(vi)(C), 40 CFR 52.220(c)(32)(iv)(C), and 40 CFR 52.220(c)(39)(ii)(B)	Y
221	*Federal Operating Permit Requirement*	12/21/94	Approved 2/5/96, 61 FR 4217, 40 CFR 52.220(c)(216)(i)(A)(2)	Y
301	*Permit Fees*	Not in SIP	Applicable Version = Most current amendment, Applicable via Title V Program interim approval 02/05/96 61 FR 4217	Y
312	*Fees for Federal Operating Permits*	Not in SIP	Applicable Version = Amended: 12/21/94, Applicable via Title V Program interim approval 02/05/96 61 FR 4217	Y
401	*Visible Emissions*	7/25/1977	Approved 9/8/78, 43 FR 4001, 40 CFR 52.220(c)(39)(ii)(C)	Y
403	*Fugitive Dust*	7/25/1977	Approved 9/8/78, 43 FR 4001, 40 CFR 52.220(c)(39)(ii)(B)	Y

403.2	*Fugitive Dust Control for the Mojave Desert Planning Area*	9/22/96	Approved 12/9/98, 63 FR 67784, 40 CFR 52.220(c)(194)(i)(H)(1)	Y
404	*Particulate Matter Concentration*	7/25/77	Approved 12/21/78, 43 FR 59489, 40 CFR 52.220(c)(42)(xiii)(A)	Y
405	*Solid Particulate Matter, Weight*	7/25/77	Approved 12/21/78, 43 FR 59489, 40 CFR 52.220(c)(42)(xiii)(A); Approved 6/14/78, 43 FR 25684, 40 CFR 52.220(c)(32)(iv)(A)	Y
406	*Specific Contaminants*	7/25/1977 (subdivision (a))	Approved, 12/21/78, 43 FR 59489, 40 CFR 52.220(c)(42)(xiii)(A)	Y
407	*Liquid and Gaseous Air Contaminants*	5/7/76	Approved 9/8/78, 43 FR 40011; 40 CFR 52.220(c)(39)(ii)(C)	Y
408	*Circumvention*	5/7/76	Approved 9/8/78, 43 FR 40011; 40 CFR 52.220(c)(39)(ii)(C); Approved 6/14/78, 43 FR 25684, 40 CFR 52.220(c)(32)(iv)(A)	Y
409	*Combustion Contaminants*	5/7/76	Approved 9/8/78; 43 FR 40011; 40 CFR 52.220(c)(39)(ii)(C); Approved 6/14/78, 43 FR 25684, 40 CFR 52.220(c)(32)(iv)(A)	Y

430	*Breakdown Provisions*	Not in SIP	Applicable Version = Amended: 12/21/94, Applicable via Title V Program interim approval 02/05/96 61 FR 4217	Y
431	*Sulfur Content of Fuels*	10/8/1976	Approved 9/8/1978, 43 FR 40011, 40 CFR 52.220(c)(37)(i)(B) and 40 CFR 52.220(c)(39)(ii)(B)	Y
442	*Usage of Solvents*	2/27/06	Approved 09/17/2007, 72 FR 52791, 40 CFR 52.220(c)(347)(i)(C)(1)	Y
900	*Standards of Performance for New Stationary Sources*	2/28/11	Delegated by USEPA	Y
1000	*National Emissions Standards from Hazardous Air Pollutants*	2/28/11	Delegated by USEPA	Y
1104	*Organic Solvent Degreasing Operations*	9/28/94	Approved: 4/30/96, 61 FR 18962, 40 CFR 52.220(c)(207)(I)(D)(2)	Y
1113	*Architectural Coatings*	4/23/12	Approved: 1/03/14, 79 FR 364, 40 CFR 52.220(c)(428)(i)(C)	Y

1115	*Metal Parts and Products Coating Operations*	4/22/96	Approved 12/23/97, 62 FR 67002, 40 CFR 52.220(c)(239)(i)(A)(2)	Y
1161	*Cement Kilns*	3/25/02	Approved 1/2/02, 67 FR 19, 40 CFR 52.220(c)(287)(i)(A)(1)	Y
1302	*NSR - Procedure*	3/25/96	Approved 11/13/1996, 61 FR 58133, 40 CFR 52.220(c)(239)(i)(A)(1)	Y
Regulation XII	*Federal Operating Permits*	*1201-1210*: 9/26/05 1200 & 1211: 2/28/11	SIP: Not SIP. Final Title V Program Approval 11/21/03 68 FR 65637; Partial Withdrawal of approval 10/15/02 67 FR 63551; Notice of Deficiency 05/22/02 67 FR 35990; Approval 12/17/01 66 FR 63503; Interim Approval 02/05/96 61 FR 4217	

Appendix B
Public Notice

Noticing Methods include the following, per District Rule 1207 (A)(1)(a) and District Rule 1302(D)(2)and(3):

- Published in newspapers of general circulation - *Riverside Press Enterprise* (Riverside County) and the *Daily Press* (San Bernardino County).
- Mailed and/or emailed to MDAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notice in this Appendix.
- Posted on the MDAQMD Website at the following link: https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting
-

NOTICE OF PRELIMINARY DETERMINATION

NOTICE IS HEREBY GIVEN THAT Blythe Energy Project located at 385 North Buck Blvd. in Blythe, California has submitted applications to renew their Federal Operating Permit (130202262) pursuant to the provisions of the Mojave Desert Air Quality Management District (MDAQMD) Regulation XII. The facility is designed to generate electric power. The facility is a Title V source for carbon monoxide. The facility has applied to renew the Federal Operating Permit.

REQUEST FOR COMMENTS Interested persons are invited to submit written comments and/or other documents regarding the terms and conditions of the proposed renewal of Blythe Energy Project's Federal Operating Permit. If you submit written comments, you may also request a public hearing on the proposed renewal of the Federal Operating Permit. To be considered, comments, documents and requests for public hearing must be submitted no later than 5:00 P.M. on October 6, 2023 to the MDAQMD, Attention: Roseana Brasington, Air Quality Engineer at the address listed below.

PETITION FOR REVIEW: Federal Operating Permits are also subject to review and approval by the United States Environmental Protection Agency (USEPA). If EPA has not objected to the proposed title V permit during its 45-day review period, the public may petition EPA to object to the proposed Title V permit within 60 days of expiration of EPA's review period. Any such petition must be based on objections that were raised with reasonable specificity during the public comment period unless the petitioner demonstrates either that it was impracticable to raise such objections within the comment period or that the grounds for the objection arose after the comment period. The petitioner shall provide a copy of such petition to the permitting authority and the permittee. EPA's website contains more information on petitions, including instructions for submitting a petition and the required content of petitions: https://www.epa.gov/title-v-operating-permits/title-v-petitions.

AVAILABILITY OF DOCUMENTS:
The proposed Federal Operating Permit, as well as the application and other supporting documentation are available for review at the MDAQMD offices, 14306 Park Avenue, Victorville, Ca 92392. In addition, these documents are available on the MDAQMD website and can be viewed at following link: https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting. Please contact Roseana Navarro-Brasington, Air Quality Engineer at the address, above, or (760) 245-1661, extension 5706, or at rnbrasington@mdaqmd.ca.gov for additional questions pertaining to this action and/or corresponding documents.
Traducción en español esta disponible por solicitud. Por favor llame: (760) 245-1661

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