

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

**STATEMENT OF REASONS**

**State Implementation Plan Submittal**

**Reasonably Available Control Technology (RACT) Permits for Major Stationary Sources  
of Nitrogen Oxides**

**February 26, 2024**

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## JUSTIFICATION FOR STATE IMPLEMENTATION PLAN SUBMITTAL

### Introduction

Ground level ozone is a secondary pollutant formed from photochemical reactions of nitrogen oxides (NOx) and volatile organic compounds (VOC) in the presence of sunlight. Ozone is a strong irritant that adversely affects human health and damages crops and other environmental resources. As documented by the U.S. Environmental Protection Agency (EPA) in the most recent science assessment for ozone<sup>1</sup>, both short-term and long-term exposure to ozone can irritate and damage the human respiratory system, resulting in:

- increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing;
- decreased lung function;
- aggravated asthma;
- development of chronic bronchitis;
- irregular heartbeat;
- nonfatal heart attacks,

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<sup>1</sup> “Integrated Science Assessment (ISA) for Ozone and Related Photochemical Oxidants”, U.S. EPA, April 2020.

- premature death in people with heart or lung disease; and
- increased risk of cardiovascular and cerebrovascular events in post-menopausal women.

The Sacramento Metropolitan Air Quality Management District (District) is the agency with primary responsibility for achieving and maintaining clean air standards in Sacramento County. The District is within the Sacramento Federal Ozone Nonattainment Area (SFNA), which is currently designated as nonattainment for the 1979 1-hour and 1997, 2008, and 2015 8-hour ozone National Ambient Air Quality Standards (NAAQS). For the 1997 and 2008 standards, the area is classified as severe nonattainment. For the 2015 standard, the area is currently classified as serious; however, the air districts of the SFNA have recently requested a voluntarily bump up to a severe nonattainment classification because additional time is needed to meet the standard. EPA is expected to take action to reclassify the SFNA in a final rule.

### **Reasonably Available Control Technology (RACT) Requirements for Ozone Nonattainment Areas**

Federal Clean Air Act (CAA) sections 182(b)(2)(C) and 182(f) require states and districts in ozone nonattainment areas classified as “moderate” or worse to implement Reasonably Available Control Technology (RACT) for all major stationary sources of VOC and NOx. EPA defines RACT as “the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility.”<sup>2</sup> RACT must be incorporated into the State Implementation Plan (SIP), either through an EPA-approved rule or through a source-specific RACT determination that is included on a permit and approved by EPA. The District submitted to EPA a document, known as the “RACT SIP,” in 2017. This document was required as part of the implementation of the 2008 ozone NAAQS, and its purpose was to demonstrate that District rules for certain emission categories and major stationary sources of VOC and NOx meet RACT standards.

### **EPA Action on the District’s RACT SIP for the 2008 Ozone NAAQS**

On February 3, 2017, EPA found that multiple states and districts, including the Sacramento nonattainment area districts, failed to timely submit SIP revisions as required to satisfy federal requirements for the 2008 ozone NAAQS (Failure to Submit finding).<sup>3</sup> This finding, effective March 6, 2017, triggered a 24-month deadline for EPA to receive and approve the required SIP submittals or to promulgate a Federal Implementation Plan (FIP). A FIP is an implementation plan developed for a state or district by EPA when a required SIP element is not submitted, or when EPA disapproves a SIP submittal and the affected area fails to timely cure the deficiencies. The District adopted its RACT SIP on March 23, 2017, and submitted it to EPA on May 5, 2017; however, EPA did not take action on the District’s RACT SIP (as well as those of several other states and districts) by the 24-month FIP deadline of March 6, 2019. Consequently, on June 7, 2022, a complaint was filed against EPA, which entered into a consent decree with the plaintiffs. On April 5, 2023, EPA promulgated notice of the proposed consent decree that established a new deadline for EPA to sign a notice of final rulemaking regarding NOx RACT for Major Sources in the District’s RACT SIP by September 29, 2024.<sup>4</sup>

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<sup>2</sup> 44 Federal Register (FR) 53762, September 17, 1979.

<sup>3</sup> 88 FR 9158, February 3, 2017.

<sup>4</sup> 88 FR 20166, April 5, 2023.

After reviewing the District's RACT SIP submittal for the 2008 ozone NAAQS, EPA promulgated a final rule on June 30, 2023, which partially approved and partially disapproved the District's RACT SIP.<sup>5</sup> The partial disapproval was based on EPA's finding that the District had failed to implement RACT for major sources of NOx because of startup and shutdown exemptions in three District rules: Rule 411, NOx from Boilers, Process Heaters, and Steam Generators; Rule 413, Stationary Gas Turbines; and Rule 419, NOx from Miscellaneous Combustion Units. Although Rules 411, 413, and 419 apply to both major and non-major sources, CAA RACT requirements apply only to major sources.

The final EPA rule became effective on July 31, 2023. Sanctions clocks have started but will be stopped if the District submits, and EPA approves, a SIP revision to correct the deficiencies. The first sanction, which would occur at 18 months, is an emission offset sanction that would increase the emission offset ratio to 2:1. The second sanction, a highway fund sanction, would occur at 24 months. If the highway fund sanction were to take effect, our region would lose funds for transportation projects that have not already been obligated by the Federal Highway Administration by the date the highway sanctions are imposed. Projects that have already received approval to proceed and had funds obligated may proceed. In addition, EPA must promulgate a FIP unless the SIP revisions are approved within 24 months.

### **Startup, Shutdown, and Malfunction (SSM) Exemption Guidance**

Startup, Shutdown, and Malfunction (SSM) exemptions in regulations temporarily relieve sources from compliance with emissions limits during defined, temporary time periods in which equipment is not operating in a manner representing normal, steady state operation. Several lawsuits have challenged the legality of SSM exemptions in EPA regulations under the Clean Air Act. In 2008, the D.C. Circuit Court of Appeals granted a petition filed by the Sierra Club for judicial review of regulatory SSM provisions, and the court vacated SSM exemptions that were included in EPA regulations at the time.<sup>6</sup> In response to this decision, EPA issued a Final Action rule (The "2015 Guidance"), which revised direction regarding emissions during SSM periods.<sup>7</sup> EPA also initiated SIP calls, a rulemaking action requiring state and local air agencies to address any SSM-related deficiencies in their SIPs. The 2015 Guidance followed the recommendations from the Sierra Club petition and required the restrictions on emissions of major sources to be continuous.

The 2015 Guidance was challenged in the D.C. Circuit Court of Appeals over the subsequent SIP calls initiated by the action.<sup>8</sup> In 2017, EPA requested that the pending litigation around the 2015 Guidance be held in abeyance to allow for comment and review from the incoming presidential administration. On October 9, 2020, EPA issued a guidance memorandum ("2020 Guidance") stating that SSM exemptions may be permissible in SIPs under certain circumstances, provided that the SIP meets the general requirements in CAA Section 110 to attain and maintain the NAAQS. However, on September 30, 2021, the 2020 Guidance was withdrawn, and the 2015 Guidance reinstated. The requirement to correct SSM-related deficiencies is again in effect.

### **EPA Action on Reporting Requirements in Colorado RACT Rules**

On November 9, 2022, EPA proposed approval of RACT rules submitted by the state of Colorado

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<sup>5</sup> 88 FR 42248, June 30, 2023.

<sup>6</sup> *Sierra Club v. Johnson*, 551 F.3d 1019 (D.C. Cir. 2008).

<sup>7</sup> 80 FR 33839, June 12, 2015.

<sup>8</sup> *Environ. Comm. Fl. Elec. Power v. EPA, et al.*, No. 15-1239 (D.C. Cir.), and consolidated cases.

for combustion equipment at major stationary sources of NOx.<sup>9</sup> EPA received comments on the proposed action concerning the ability of citizens to enforce the rules, as required by the Clean Air Act. On May 9, 2023, EPA issued a final rule with limited approval/limited disapproval of the RACT rules.<sup>10</sup> EPA's reasons for the limited disapproval are stated below.

[The rules] require facilities to maintain records necessary to establish compliance with these rules for a certain period of time and to make them available to the state on request. But if there is no requirement for these records to be submitted to the state absent a request, then unless the state requests the compliance records and then makes them publicly available, no parties other than the state or the EPA under its CAA section 114 authority will have practical access to the basic information necessary to determine compliance by the regulated entities under these rules. This undermines citizens' ability to participate in the enforcement of the SIP as allowed by CAA section 304.<sup>11</sup>

To address the reporting requirements, all permits the District staff proposes to submit for SIP approval have conditions requiring the submission of reports of all required monitoring at least once every six months. The reports must also identify all instances of deviations. These reporting conditions mirror requirements that are already included in the sources' federal Title V permits.

#### **Rule 411, NOx from Boilers, Process Heaters, and Steam Generators**

Rule 411 limits NOx emissions from the operation of boilers, process heaters, and steam generators. The District's RACT SIP relied on this rule to implement RACT at major sources of NOx in the District. EPA found that although the emissions limits in Rule 411 meet RACT levels, startup and shutdown exemptions in section 501 of the rule were not consistent with the 2015 SSM guidance, which prevented the rule from fully implementing RACT for major stationary sources of NOx.

There are currently four major stationary sources of NOx in the District operating eight boilers subject to Rule 411. In addition to Rule 411, the District regulates these emission units through local Permits to Operate. To conform with the 2015 Guidance, staff is proposing to submit for SIP approval certain conditions of the local Permits to Operate that establish limits on the daily mass emissions of NOx, including emissions during periods of startup and shutdown. In addition, requirements for mandatory monitoring reports will be included. Upon approval by EPA, these permits will fulfill RACT requirements for the 2017 RACT SIP.

#### **Rule 413, Stationary Gas Turbines**

Rule 413 limits NOx emissions from the operation of stationary gas turbines. The District's RACT SIP relied on this rule to implement RACT at major sources of NOx in the District. Although Rule 413 contains NOx emission limits that meet RACT stringency requirements, EPA has determined that section 113 of the rule contains startup and shutdown exemptions that contravene the 2015 Guidance, which prevented the rule from fully implementing RACT for major stationary sources of NOx.

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<sup>9</sup> 87 FR 67617, November 9, 2022.

<sup>10</sup> 88 FR 29827, May 9, 2023.

<sup>11</sup> Ibid.

Five major stationary sources of NOx in the District operate a total of nine gas turbines. Four of the turbines are equipped with duct burners, which fire natural gas into the turbine exhaust to produce additional steam in combined cycle operation. NOx from a gas turbine and its associated duct burners is emitted as a combined exhaust, so the NOx emissions limits apply to both. In addition to Rule 413, the District regulates these emission units through local Permits to Operate. To conform with the 2015 Guidance, staff is proposing to submit for SIP approval certain conditions of the local Permits to Operate that establish limits on the daily mass emissions of NOx, including emissions during periods of startup and shutdown. In addition, requirements for mandatory monitoring reports will be included. Upon approval by EPA, these permits will fulfill RACT requirements for the 2017 RACT SIP.

### **Rule 419, NOx from Miscellaneous Combustion Units**

Rule 419 limits NOx emissions from the operation of Miscellaneous Combustion Units. Unlike Rules 411 and 413, which had previously been approved by EPA into the SIP, Rule 419 is a relatively new rule upon which EPA has not yet acted. The District's RACT SIP relied on this rule, when approved by EPA, to implement RACT at major sources of NOx in the District where miscellaneous combustion units are located. EPA determined that startup and shutdown exemptions in section 501 of the rule were not consistent with the 2015 SSM guidance, and EPA determined that approval of Rule 419 would not fully implement RACT.

One major stationary source in the District operates six natural gas-fired ovens covered by Rule 419. In addition to Rule 419, the District regulates these emission units through local Permits to Operate. To conform with the 2015 Guidance, staff is proposing to submit for SIP approval certain conditions of the local Permits to Operate that establish limits on the daily emissions of NOx, including emissions during periods of startup and shutdown. In addition, requirements for mandatory monitoring reports will be included. Upon approval by EPA, these permits will fulfill RACT requirements for the 2017 RACT SIP.

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## **SUMMARY OF SIP SUBMITTAL**

### **Permit Conditions Summary**

Staff is proposing to submit for SIP approval the conditions of the local Permits to Operate that pertain to daily NOx mass emission limits (including emissions during periods of startup and shutdown), monitoring and reporting, source testing, and recordkeeping requirements. The establishment of NOx limits considers the different types of control methods employed by the related equipment. For example, large gas turbines with sophisticated combustions controls and selective catalytic reduction (SCR), a post-combustion control, may require a startup period of up to four hours for the system to stabilize before achieving its final steady-state NOx emission level.

All of the gas turbines included in this proposed SIP submittal are equipped with SCR. The daily NOx mass emission limits were established allowing for a single startup and a single shutdown period per day, with steady-state operation throughout the remainder of the operating day. This allows for the operation of the turbines within manufacturer specifications while allowing a reasonable compliance margin. Total daily NOx emissions must be monitored and reported by Continuous Emissions Monitoring Systems (CEMS).

The large boilers that utilize post-combustion controls and have CEMS also have daily NOx mass emissions limits that account for startup and shutdown emissions, with the total daily NOx emissions monitored and reported by CEMS. The small boilers and ovens that do not have post-combustion controls have daily NOx mass emissions limits based on maximum fuel input for 24 hours per day. Startup and shutdown periods for these units are relatively short and excess emissions during these periods are considered minimal. Compliance with NOx emissions limits for these units is determined through periodic source testing.

Below is a summary of the types of permit conditions included in the local permits that will be submitted to satisfy RACT. The specific permits and conditions for each rule are listed in Tables 1, 2, and 3.

- Operate and maintain equipment according to manufacturer’s guidelines
- Limit daily mass emissions of NOx to specified levels, including emissions during periods of startup and shutdown
- For units that are equipped with CEMS, comply with EPA Performance Standards for CEMS
- Monitor the concentrations of NOx and O<sub>2</sub> if using a CEMS
- Perform periodic source testing for NOx and O<sub>2</sub>
- Operate a non-resetting totalizing fuel meter, and record the daily or quarterly fuel usage
- Record the exhaust gas flowrate
- Record the daily mass emissions of NOx
- Create and maintain on-site records of daily mass emissions of NOx
- Certify and submit required monitoring reports at least every 6 months to the District’s Air Pollution Control Officer (APCO)

**Table 1: Boiler Permits to Operate**

| <b>Company Name</b>                           | <b>Permit to Operate (PO) No.</b> | <b>Permit Conditions to be Included in SIP</b>                 |
|---|-----------------------------------|--|
| SMUD Carson Power Plant                       | 27154                             | 1, 10 (Table 2), 15, 16, 17 (D), 18 (P, Q), 19, 24             |
| SMUD Proctor & Gamble Power Plant             | 27140                             | 1, 8, 13, 14, 15 (I), 16, 19 (D), 20 (A, C), 22                |
|   | 27144                             | 1, 10 (Table 1), 16, 17, 18 (D), 19 (A, C), 20 (J), 21, 24, 26 |
| Mitsubishi Chemical Carbon Fiber & Composites | 27338                             | 2, 9 (B), 11, 16 (D), 17 (A, C), 24, 27                        |
| UC Davis Medical Center                       | 20216                             | 1, 9 (B), 15, 17 (D), 18, 20 (C), 23                           |
|   | 20217                             |  |
|   | 20218                             |  |
|   | 20219                             |  |

**Table 2: Gas Turbine Permits to Operate**

| <b>Company Name</b>               | <b>Permit to Operate (PO) No.</b> | <b>Permit Conditions to be Included in SIP</b>   |
|-----------------------------------|-----------------------------------|--|
| UC Davis Medical Center           | 17549                             | 1, 7 (C), 16 (A, B), 17, 18 (D), 19 (P), 20, 22  |
| SMUD Cosumnes Power Plant         | 25800                             | 1, 9, 16 (A, B), 17 (B), 18 (T), 19, 23 (D), 25  |
|                                   | 25801                             | 1, 9, 16 (A, B), 17 (B), 18 (T), 19, 23 (D), 25  |
| SMUD Campbell Power Plant         | 27118<br>(27116 duct burner)      | 1, 10, 19 (A, B), 20 (C), 21 (M), 22, 27 (D), 29 |
| SMUD Procter & Gamble Power Plant | 27141<br>(27132 duct burner)      | 1, 9, 15 (A, B), 16 (C), 17 (M), 18, 21 (E), 23  |
|                                   | 27142<br>(27133 duct burner)      | 1, 9, 15 (A, B), 16 (C), 17 (M), 18, 21 (E), 23  |
|                                   | 27143                             | 1, 9, 13 (A, B), 14 (B), 15 (L), 16, 19 (E), 21  |
| SMUD Carson Power Plant           | 27151<br>(27153 duct burner)      | 1, 9, 20 (A, B), 22 (Q), 23, 24 (E), 28          |
|                                   | 27156                             | 1, 11, 20 (A, B), 22 (N), 23, 26 (E), 28         |

**Table 3: Gas-Fired Oven Permits to Operate**

| <b>Company Name</b>                           | <b>Permit to Operate (PO) No.</b> | <b>Permit Conditions to be Included in SIP</b>        |
|---|-----------------------------------|---|
| Mitsubishi Chemical Carbon Fiber & Composites | 24611                             | 2, 8 (A), 9 (B), 14 (D), 15 (A, C), 16 (B, C), 20, 23 |
|   | 24613                             | 2, 8 (A), 9 (B), 14 (D), 15 (A, C), 16 (B, C), 20, 23 |
|   | 24614                             | 2, 8 (A), 9 (B), 14 (D), 15 (A, C), 16 (B, C), 20, 23 |
|   | 25925                             | 2, 8 (A), 9 (B), 14 (D), 15 (A, C), 17 (B, C), 21, 24 |
|   | 27336                             | 2, 8 (A), 9 (B), 12 (D), 13 (A, C), 20, 23            |
|   | 27337                             | 2, 8 (A), 9 (B), 12 (D), 13 (A, C), 19, 22            |

**ENVIRONMENTAL COMPLIANCE**

California Public Resources Code Section 21159(a) requires the District to perform an environmental analysis of the reasonably foreseeable methods of compliance when adopting a performance standard. The proposed action will make existing RACT standards federally enforceable through the California SIP. Because each of the major stationary sources included in this action are already required to comply with the relevant conditions of the District Permits to



Operate for their equipment, the District is establishing no new requirements, and no change in equipment or operation will result from this action. Therefore, staff has concluded that no environmental impacts will be caused by compliance with the proposed action.

Staff finds that the proposed action to incorporate the Permits to Operate into the SIP is exempt from the California Environmental Quality Act as an action by a regulatory agency for the protection of the environment (Class 8 Categorical Exemption, Section 15308, State CEQA Guidelines) and because it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment (Section 15061(b)(3), State CEQA Guidelines).

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## **CONCLUSION**

Staff is proposing to submit for SIP approval the conditions of the local Permits to Operate that pertain to NOx emission limits and the associated source testing, test methods, monitoring, reporting, and recordkeeping requirements. All the listed permits establish daily mass limits on NOx emissions from all operations, including emissions during periods of startup and shutdown. SIP approval of the relevant permit requirements will establish federally enforceable, continuous compliance requirements that meet requirements the RACT requirements Clean Air Act Sections 182(b)(2)(C) and 182(f) and conform with EPA's 2015 Guidance.

Before the Permits to Operate can be submitted for approval by EPA, the proposed action must go through the same public review requirements as any other SIP submittal and be approved by the District's Board of Directors.<sup>12,13</sup> Once approved by EPA, the permits will become part of California's State Implementation Plan at Title 40 of the Code of Federal Regulations (CFR) Part 52, Section 52.220.

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<sup>12</sup> Clean Air Act §110.

<sup>13</sup> Title 40 Code of Federal Regulations §51.102.

**APPENDIX A – BOILER PERMITS TO OPERATE**

PO 27154 – (SMUD Financing Authority DBA Carson Power Plant)



# PERMIT TO OPERATE

**ISSUED TO: SACRAMENTO MUNICIPAL UTILITY DISTRICT FINANCING  
AUTHORITY DBA CARSON POWER PLANT**

**EQUIPMENT LOCATION: 8580 LAGUNA STATION RD., ELK GROVE, CA 95758**

| PERMIT NO. | EQUIPMENT DESCRIPTION   |
|------------|---|
| 27154      | BOILER, MAKE: CLEAVER BROOKS, MODEL: LD-94-R,H, SERIAL NUMBER: W-3548, 100 MMBTU/HR CAPACITY WITH 4.9 MMBTU/HR PILOT BURNER, NATURAL GAS FIRED. |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

1. The equipment must be properly maintained and operated in accordance with the information submitted with the application and the manufacturer's recommendations at all times.  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**
- 2.

**DATE ISSUED:** 04-29-2022  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 11-01-2024 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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**EMISSIONS LIMITATIONS**

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10. The emissions from the boiler must not exceed the following limits:  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.2]**

Table 2

| Pollutant | Daily Emission Limits<br>(lb/day) |
|-----------|-----------------------------------|
|           |                                   |
| NOx       | 21.1                              |
|           |                                   |
|           |                                   |
|           |                                   |
|           |                                   |

SACRAMENTO METROPOLITAN  
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15. The permittee must operate a continuous emission monitoring system (CEMS) that has been approved by the SMAQMD Air Pollution Control Officer, for the boiler emissions.

A. The CEMS must monitor and record concentrations of NO<sub>x</sub>,            and oxygen.

B. The CEMS must comply with the U.S. EPA Performance Specifications (40 CFR 60, Appendix B, Performance Specifications 2, 3 and 4).

**[Basis: SMAQMD Rule 201, Section 405 and Rule 202]**

16. The permittee must operate a continuous parameter monitoring system that has been approved by the SMAQMD Air Pollution Control Officer that either measures, or calculates and records the following.

**[Basis: SMAQMD Rule 201, Section 405 and Rule 202]**

| Parameter to be Monitored      | Units                  |
|--------------------------------|------------------------|
| Fuel consumption of the boiler | MMCF/hr of natural gas |
|                                |                        |
|                                |                        |



## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

### EMISSIONS TESTING

17. A NOx source test and a CEMS accuracy (RATA) test of the auxiliary boiler must be performed once every calendar year.

D. The Source Test Report must be submitted to the SMAQMD Air Pollution Control Officer within 60 days from the completion of the source test(s).

**[Basis: SMAQMD Rule 201, Section 405]**

### RECORD KEEPING & REPORTING

18. The following records must be continuously maintained on-site for the most recent five year period and must be made available to the SMAQMD Air Pollution Control Officer upon request. Quarterly and yearly records must be made available for inspection within 30 days of the end of the reporting period.

**[Basis: SMAQMD Rule 201, Section 405 and Rule 202]**

| Frequency | Information to be Recorded |
|-----------|----------------------------|
|           |                            |
|           |                            |

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| Frequency | Information to be Recorded  |
|-----------|---|
|           |   |
| Daily     | P. The boiler's natural gas fuel consumption (MMCF/day)<br>Q. Total daily NOx emissions from the boiler<br>(including startups and shutdowns) (lb/day). |
|           |   |
|           |   |
|           |   |

19. Submit to the SMAQMD Air Pollution Control Officer a written report which contains the following information.  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202]**

| Frequency   | Information to be Submitted  |
|---|--|
| Quarterly by:<br>Jan 30,<br>April 30,<br>July 30, and<br>Oct 30 | A. Whenever the CEM system is inoperative except for zero and span checks. <ol style="list-style-type: none"> <li>i. Date and time of non-operation of the CEM system.</li> <li>ii. Nature of the CEM system repairs or adjustments.</li> </ol> B. Whenever an emission occurs as measured by the required CEM system that is in excess of any emission limitation. <ol style="list-style-type: none"> <li>i. Magnitude of the emission which has been determined to be in excess.</li> <li>ii. Date and time of the commencement and completion of each period of excess emissions.</li> <li>iii. Periods of excess emissions due to start-up, shutdown and malfunction must be specifically identified.</li> <li>iv. The nature and cause of any malfunction (if known).</li> <li>v. The corrective action taken or preventive measures adopted.</li> </ol> C. If there were no excess emissions during a reporting quarter. <ol style="list-style-type: none"> <li>i. A report must be submitted indicating that there were no excess emissions.</li> </ol> |

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**24. MONITORING REPORTS**

- A. The permittee shall submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring.
- B. The reporting periods for this permit shall be for the six month periods January 1 through June 30 and July 1 through December 31. The reports shall be submitted by July 30 and January 30 of each year respectively.
- C. All instances of deviations from Title V permit conditions must be clearly identified in such reports. All required reports must be certified by the responsible official and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[Basis: SMAQMD Rule 207 Section 501.1]**

777 12<sup>TH</sup> STREET, STE. 300  
SACRAMENTO, CA 95814-1908

(279) 207-1122  
(800) 880-9025

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

PO 27140 – (SMUD Financing Authority DBA Proctor & Gamble Power Plant)



# PERMIT TO OPERATE

**ISSUED TO: SACRAMENTO MUNICIPAL UTILITY DISTRICT FINANCING  
AUTHORITY DBA PROCTER AND GAMBLE POWER PLANT**

**EQUIPMENT LOCATION: 5000 83<sup>rd</sup> St., SACRAMENTO, CA 95826**

| PERMIT NO. | EQUIPMENT DESCRIPTION  |
|------------|--|
| 27140      | BOILER, BABCOCK & WILCOX, MODEL FM103-88, 90,000 LB/HR STEAM, 108.7 MMBTU/HR, NATURAL GAS FIRED, WITH A TODD ULTRA LOW NOX RAPID MIX BURNER SYSTEM |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

1. The equipment must be properly maintained and operated in accordance with the information submitted with the application.

**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**

**DATE ISSUED:** 02-25-2022  
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ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs



## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

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### EMISSIONS LIMITATIONS

7.

8. Emissions from the boiler must not exceed the following limits averaged over a three hour period.  
**[Basis: SMAQMD Rule 201 Section 405 and Rule 202 Section 408.2]**

| Pollutant | Maximum Allowable Emissions |  |        |
|-----------|-----------------------------|--|--------|
|           |                             |  | Lb/day |
|           |                             |  |        |
| NOx       |                             |  | 27.6   |
|           |                             |  |        |
|           |                             |  |        |
|           |                             |  |        |

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

9.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

10.

11.

12.

**MONITORING SYSTEMS**

13. The permittee must operate a continuous emission monitoring (CEM) system that has been approved by the SMAQMD Air Pollution Control Officer for the boiler.

A. The CEM system must monitor and record nitrogen oxides and oxygen.

B. The CEM system must comply with EPA performance specifications (Title 40 Code of Federal Regulations, Part 60 Appendix B, Performance Specifications 2, 3, and 4).

**[Basis: SMAQMD Rule 201 Section 405 and 40 CFR Part 60]**

14 The permittee must operate a continuous monitoring system that has been approved by the Air Pollution Control Officer that either measures or calculates and records the following.

**[Basis: SMAQMD Rule 201, Section 405 and Rule 202]**

| Parameter to be monitored      | Units                   |
|--------------------------------|-------------------------|
| Fuel consumption of the boiler | MMBTU/hr of natural gas |

**RECORD KEEPING & REPORTING**

15. The permittee must continuously maintain onsite the following records for the most recent five year period and must make such records available to the SMAQMD Air Pollution Control Officer upon request. Quarterly and yearly records as specified in the table below must be made available for inspection within 30 days of the end of the reporting period.

**[Basis: SMAQMD Rules 201 and 202, and 40 CFR Part 60.334 (j)(1)(iii)(B), 60.334(j)(2)(iii), Part 60.334 (h)(1), Part 60.334(i)(3), Part 60.335(b)(10), 40 CFR Part 75.66(c), and Part 75 Appendix D]**

| Frequency | Information to be recorded |
|-----------|----------------------------|
|           |                            |

## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

| Frequency | Information to be recorded                       |
|-----------|--|
|           |  |
|           |  |
| Daily     | I. The boiler NOx daily mass emissions (lb/day). |
|           |  |
|           |  |

16. Submit to the SMAQMD Air Pollution Control Officer a written report which contains the following information.  
**[Basis: SMAQMD Rules 201 and 202, and 40 CFR Part 60.334 (j)(5)]**

| Frequency  | Information to be Reported   |
|--|--|
| Quarterly by:<br>Jan 30,<br>April 30,<br>July 30, and<br>Oct 30. | A. Whenever the continuous emissions monitoring system is inoperative except for zero and span checks: <ol style="list-style-type: none"> <li>i. Date and time of non-operation of the continuous emission monitoring system.</li> <li>ii. Nature of the continuous emission monitoring system repairs or adjustments.</li> </ol> B. Whenever an emission occurs as measured by the required continuous emissions monitoring system that is in excess of any emission limitation: <ol style="list-style-type: none"> <li>i. Magnitude of the emission which has been determined to be in excess.</li> <li>ii. Date and time of the commencement and completion of each period of excess emissions.</li> <li>iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.</li> <li>iv. The nature and cause of any malfunction (if known).</li> </ol> |

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

| Frequency | Information to be Reported  |
|-----------|---|
|           | v. The corrective action taken or preventive measures adopted.<br>C. If there are no excess emissions or the continuous monitoring system has not been inoperative, repaired or adjusted for a calendar quarter, a report must be submitted stating such information. |

17.

18.

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(279) 207-1122  
(800) 880-9025

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

**EMISSIONS TESTING**

19. Emissions of nitrogen oxides oxygen and CEM must be tested once every calendar year to verify compliance with **Condition No. 8.**

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

- D. Submit the source test report to the Air Pollution Control Officer within 60 days from the completion of the test(s).

**[Basis: SMAQMD Rule 201, Section 303.2 and Rule 411, Sections 404.1]**

20. Emission testing must be performed in accordance with the following test methods:
- A. Oxides of Nitrogen – ARB Method 100 or EPA Method 7E.
  - C. Stack Gas Oxygen – ARB Method 100 or EPA Method 3A.

**[Basis: SMAQMD Rule 411, Section 501]**

**REPORTING**

21.

**22. Monitoring Reports**

- A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.
- B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 following each reporting period respectively.
- C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[SMAQMD Rule 207 Section 501.1]**



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**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

PO 27144 – (SMUD Financing Authority DBA Proctor & Gamble Power Plant)



# PERMIT TO OPERATE

**ISSUED TO: SACRAMENTO MUNICIPAL UTILITY DISTRICT FINANCING  
AUTHORITY DBA PROCTER AND GAMBLE POWER PLANT**

**EQUIPMENT LOCATION: 5000 83<sup>RD</sup> STREET, SACRAMENTO, CA 95826**

| PERMIT NO. | EQUIPMENT DESCRIPTION   |
|------------|---|
| 27144      | BOILER UNIT 1B, MAKE: CLEAVER BROOKS, MODEL: LD-94-R,H, SERIAL NUMBER: W-3549, 108.7 MMBTU/HR CAPACITY WITH 4.9 MMBTU/HR PILOT BURNER, NATURAL GAS FIRED. |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

1. The equipment must be properly maintained and operated in accordance with the information submitted with the application and the manufacturer's recommendations at all times.  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**
- 2.

**DATE ISSUED:** 02-25-2022  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 11-01-2024 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

3.

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7.

**EMISSIONS LIMITATIONS**

8.

9.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

10. Emissions of NOx from the boiler, including startups and shutdowns,  
must not exceed the following limits:  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202]**

Table 1

| Pollutant | Emission Limits<br>(lb/day) |
|-----------|-----------------------------|
|           |                             |
| NOx       | 23.0                        |
|           |                             |
|           |                             |
|           |                             |
|           |                             |

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

11.

12.

**EQUIPMENT OPERATION**

13.

14.

15.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

16. The permittee must operate a continuous emission monitoring system (CEMS) that has been approved by the SMAQMD Air Pollution Control Officer, for the boiler emissions.
- A. The CEM system must monitor and record concentrations of NO<sub>x</sub> and oxygen.
  - B. The CEM system must comply with the U.S. EPA Performance Specifications (40 CFR 60, Appendix B, Performance Specifications 2, 3 and 4).
- [Basis: SMAQMD Rule 201, Section 405 and Rule 202]**

17. The permittee must operate a continuous parameter monitoring system that has been approved by the SMAQMD Air Pollution Control Officer that either measures, or calculates and records the following.
- [Basis: SMAQMD Rule 201, Section 405 and Rule 202]**

| Parameter to be Monitored      | Units                  |
|--------------------------------|------------------------|
| Fuel consumption of the boiler | MMCF/hr of natural gas |

**EMISSIONS TESTING**

18. Emissions of nitrogen oxides and oxygen and CEM accuracy must be tested once every calendar year to verify compliance.
- D. Submit the source test report to the Air Pollution Control Officer within 60 days from the completion of the test(s).

**[Basis: SMAQMD Rule 201, Section 303.2 and Rule 411, Sections 404.1]**

**SACRAMENTO METROPOLITAN  
 AIR QUALITY MANAGEMENT DISTRICT**

19. Emission testing must be performed in accordance with the following test methods:

- A. Oxides of Nitrogen – ARB Method 100 or EPA Method 7E.
- C. Stack Gas Oxygen – ARB Method 100 or EPA Method 3A.

**[Basis: SMAQMD Rule 411, Section 501]**

**RECORDKEEPING & REPORTING**

20. The following record must be continuously maintained on-site for the most recent five year period and must be made available to the SMAQMD Air Pollution Control Officer upon request. Quarterly and yearly records must be made available for inspection within 30 days of the end of the reporting period.

**[Basis: SMAQMD Rule 201, Section 405 and Rule 202]**

| Frequency | Information to be Record                               |
|-----------|--|
|           |  |
|           |  |
| Daily     | J. Total daily NOx emissions from the boiler (lb/day). |
|           |  |
|           |  |
|           |  |

21. Submit to the SMAQMD Air Pollution Control Officer a written report which contains the following information.

**[Basis: SMAQMD Rule 201, Section 405 and Rule 202]**



## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

| Frequency  | Information to be Submitted  |
|--|--|
| Quarterly by:<br>Jan 30,<br>April 30,<br>July 30, and<br>Oct 30. | <ul style="list-style-type: none"><li>A. Whenever the CEM system is inoperative except for zero and span checks.<ul style="list-style-type: none"><li>i. Date and time of non-operation of the CEM system.</li><li>ii. Nature of the CEM system repairs or adjustments.</li></ul></li><li>B. Whenever an emission occurs as measured by the required CEM system that is in excess of any emission limitation.<ul style="list-style-type: none"><li>i. Magnitude of the emission which has been determined to be in excess.</li><li>ii. Date and time of the commencement and completion of each period of excess emissions.</li><li>iii. Periods of excess emissions due to start-up, shutdown and malfunction must be specifically identified.</li><li>iv. The nature and cause of any malfunction (if known).</li><li>v. The corrective action taken or preventive measures adopted.</li></ul></li><li>C. If there were no excess emissions during a reporting quarter.<ul style="list-style-type: none"><li>i. A report must be submitted indicating that there were no excess emissions.</li></ul></li></ul> |

22.

23.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

24. Emission test reports must be maintained on-site for a continuous 5-year period and must be made available to the Air Pollution Control Officer upon request.

**[Basis: SMAQMD Rule 411, Section 502]**

25.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

**26. Monitoring Reports**

- A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.
- B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 following each reporting period respectively.
- C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[SMAQMD Rule 207 Section 501.1]**

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(279) 207-1122  
(800) 880-9025

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

PO 27338 – (Mitsubishi Chemical Carbon Fiber & Composites)



SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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6.

**EMISSIONS LIMITATIONS**

7.

8.

9. The emissions from the boiler must not exceed the following limits:  
**[Basis: SMAQMD Rule 201, Section 405; Rule 202, Section 408; and Rule 214, Section 408]**

| Pollutant |  | Emission Limits (B) |  |  |
|-----------|--|---------------------|--|--|
|           |  | (lb/day)            |  |  |
|           |  |                     |  |  |
| NOx       |  | 1.6                 |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |

## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

(B) Emissions are based on the boiler operating at maximum capacity at 0.006124 MMcf/hour, 24 hours/day

### EQUIPMENT OPERATION

10.

11. The boiler must be equipped with a non-resetting totalizing fuel meter to ensure compliance with Condition No . 9 . The totalizing function of the meter must have the ability to read up to at least 100 million cubic feet before the indicator rolls over.

**[Basis: SMAQMD Rule 201, Section 405]**

12.

13.

14.

15.

### EMISSIONS TESTING

16. Emissions of nitrogen oxides and oxygen must be tested in 2018 and biennially thereafter to verify compliance



SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

D. Submit the source test report to the Air Pollution Control Officer within 60 days from the completion of the test(s.)

**[Basis: SMAQMD Rule 411, Section 403 and 404 and Rule 201, Section 303.2]**

17. Emission testing must be performed in accordance with the following test methods:

A. Oxides of Nitrogen – ARB Method 100 or EPA Method 7E.

C. Stack Gas Oxygen – ARB Method 100 or EPA Method 3A.

**[Basis: SMAQMD Rule 411, Section 501]**

18.

19.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

20

21

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

22.

23.

**RECORDKEEPING**

24. The following records must be continuously maintained on-site for the most recent five year period and must be made available to the Air Pollution Control Officer upon request. Records, as specified below, must be made available for inspection within 30 days from the end of the quarter.

**[Basis: SMAQMD Rule 201, Section 405]**

| Frequency | Information to be Recorded                                     |
|-----------|--|
| Quarterly | Total amount of fuel usage for the boiler (cubic feet/quarter) |

25.

26.

**GENERAL REPORTING**

27. A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.

B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 of each year respectively.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[Basis: SMAQMD Rule 207, Section 501.1]**

POs 20216, 20217, 20218, 20219 – (UC Davis Medical Center)

SACRAMENTO METROPOLITAN



# PERMIT TO OPERATE

**ISSUED TO: UCD MEDICAL CENTER**

**EQUIPMENT LOCATION: 4840 SECOND AVENUE, SACRAMENTO, CA 95817**

| PERMIT NO. | EQUIPMENT DESCRIPTION   |
|------------|---|
| 20216      | BOILER NO. 1, MAKE: JOHNSTON BOILER COMPANY, MODEL: PFTA750-4LG-150S, SERIAL NO.: 9357-04, RATED HEAT INPUT: 31.5 MMBTU/HR, PRIMARY FUEL: NATURAL GAS, EMERGENCY USE FUEL: DIESEL NO. 2, EQUIPPED WITH INDUSTRIAL COMBUSTION NT ULTRA LOW-NO <sub>x</sub> BURNER, APPLICATION: SPACE HEATING. |
| 20217      | BOILER NO. 2, MAKE: JOHNSTON BOILER COMPANY, MODEL: PFTA750-4LG-150S, SERIAL NO.: 9357-03, RATED HEAT INPUT: 31.5 MMBTU/HR, PRIMARY FUEL: NATURAL GAS, EMERGENCY USE FUEL: DIESEL NO.2, EQUIPPED WITH INDUSTRIAL COMBUSTION NT ULTRA LOW-NO <sub>x</sub> BURNER, APPLICATION: SPACE HEATING.  |
| 20218      | BOILER NO. 3, MAKE: JOHNSTON BOILER COMPANY, MODEL: PFTA750-4LG-150S, SERIAL NO.: 9357-02, RATED HEAT INPUT: 31.5 MMBTU/HR, PRIMARY FUEL: NATURAL GAS, EMERGENCY USE FUEL: DIESEL NO.2, EQUIPPED WITH INDUSTRIAL COMBUSTION NT ULTRA LOW-NO <sub>x</sub> BURNER, APPLICATION: SPACE HEATING.  |
| 20219      | BOILER NO. 4, MAKE: JOHNSTON BOILER COMPANY, MODEL: PFTA750-4LG-150S, SERIAL NO.: 9357-01, RATED HEAT INPUT: 31.5 MMBTU/HR, PRIMARY FUEL: NATURAL GAS, EMERGENCY USE FUEL: DIESEL NO.2, EQUIPPED WITH INDUSTRIAL COMBUSTION NT ULTRA LOW-NO <sub>x</sub> BURNER, APPLICATION: SPACE HEATING.  |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

1. The equipment must be properly maintained and operated in accordance with the information submitted with the application and the manufacturer's recommendations at all times.

**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**

**DATE ISSUED:** 04-09-2008

ALBERTO AYALA, PH.D., M.S.E.

**DATE REVISED:** 02-23-2024

AIR POLLUTION CONTROL OFFICER

**DATE EXPIRES:** 01-16-2025 (UNLESS RENEWED)

BY: Brian F Krebs

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

2.

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5.

**EMISSIONS LIMITATIONS**

6.

7.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

8.

9. The emissions from each boiler, when combusting natural gas fuel, must not exceed the following limits:  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 411, Section 301]**

| Pollutant | Emission Limits (B) |  |  |
|-----------|---------------------|--|--|
|           | lb/day              |  |  |
|           |                     |  |  |
| NOx       | 8.2                 |  |  |
|           |                     |  |  |
|           |                     |  |  |
|           |                     |  |  |
|           |                     |  |  |

(B) Emissions are based on operating at a maximum capacity of 31.5 MMBtu/hr, 24 hours/day



SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

15. A continuous monitoring system that either measures or calculates the fuel consumption of the boilers (fuel usage of all four boilers combined) must be operational whenever the boilers are combusting fuel.

**[Basis: SMAQMD Rule 201, Section 405]**

16.

### EMISSIONS TESTING

17. For each boiler firing on natural gas only, emissions of nitrogen oxides once every calendar year beginning in 2008 to verify compliance to the following test conditions and time schedule:

must be tested  
The test must conform

D. Submit the source test report to the Air Pollution Control Officer within 60 days from the completion of the test(s).

**[Basis: SMAQMD Rule 201, Section 303.2 and Rule 411, Sections 404.1]**

18. Emission testing must be performed in accordance with the following test methods:

A. Oxides of Nitrogen – ARB Method 100 or EPA Method 7E.

C. Stack Gas Oxygen – ARB Method 100 or EPA Method 3A.

**[Basis: SMAQMD Rule 411, Section 501]**

### RECORD KEEPING & REPORTING

19.

20. The following records must be continuously maintained on-site for the most recent five-year period and must be made available to the Air Pollution Control Officer upon request. Annual records as specified in the table below must be made available for inspection within 30 days following the end of the year.

**[Basis: SMAQMD Rule 201, Section 405]**

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

| Frequency | Information to be Recorded  |
|-----------|---|
|           |   |
|           |   |
| Daily     | C. Total amount of natural gas fuel used by all four boilers combined. (MMBtu/hour) |
|           |   |
|           |   |

21.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

22.

**GENERAL REPORTING**

23. A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.
- B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 of each year respectively.
- C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[Basis: SMAQMD Rule 207, Section 501.1]**

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

**APPENDIX B – GAS TURBINE PERMITS TO OPERATE**

PO 17549 – (UC Davis Medical Center)





SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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5.

**EMISSIONS LIMITATIONS**

6.

7. Emissions from the gas turbine must not exceed the following limits:  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 301]**

| Pollutant | Emission Limits |  |                       |  |  |
|-----------|-----------------|--|-----------------------|--|--|
|           |                 |  | Daily (C)<br>(lb/day) |  |  |
|           |                 |  |                       |  |  |
| NOx       |                 |  | 115.2                 |  |  |
|           |                 |  |                       |  |  |
|           |                 |  |                       |  |  |
|           |                 |  |                       |  |  |
|           |                 |  |                       |  |  |
|           |                 |  |                       |  |  |

(C) Based on operating at 260 mmbtu/hr maximum capacity and 24 hours/day.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

15.

**MONITORING SYSTEMS**

16. UCDCM shall maintain an Air Pollution Control Officer approved in-stack continuous emission monitoring system (CEMS) in the exhaust of the gas turbine.

A. The CEMS shall monitor and record nitrogen oxides, and either oxygen or carbon dioxide concentrations. UCDCM shall demonstrate that compliance with the applicable emission concentrations can be achieved through the monitoring of carbon dioxide to the satisfaction of the Air Pollution Control Officer before monitoring of carbon dioxide can be used in this capacity.

B. The CEMS shall comply with the EPA performance specifications (Title 40, Code of Federal Regulations, Part 60, Appendix B, Performance Specifications 2, 3, and 4.)

**[Basis: 40 CFR 60, Subpart GG and 40 CFR 60, Appendix B]**

17. UCDCM shall operate continuous monitoring systems that have been approved by the Air Pollution Control Officer that either measure or calculate and record the following.

**[Basis: SMAQMD Rule 201, Section 405]**

| Parameter to be Monitored               | Units |
|---|-------|
| Exhaust gas flowrate of the gas turbine | sdcfm |
|   |       |

**COMPLIANCE TESTING REQUIREMENTS**

18. A NOx source test of the gas turbine shall be performed each calendar year.

D. The source test results shall be submitted to the Air Pollution Control Officer within 60 days from the completion of the source test(s).

**[Basis: SMAQMD Rule 201, Section 405]**

## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

### RECORD KEEPING & REPORTING

19. The following records must be continuously maintained on-site for the most recent five-year period and must be made available to the Air Pollution Control Officer upon request. Hourly and daily records shall be made available the following day.

**[Basis: SMAQMD Rule 201, Section 405 and 40 CFR 60, Subpart GG]**

| Frequency | Information to be Recorded                         |
|-----------|--|
|           |  |
|           |  |
| Daily     | P. Total NOx emissions as described in Condition 8 |

## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

20. Submit to the Air Pollution Control Officer by the following dates a written report that contains the following information.

**[Basis: 40 CFR 60, Subpart GG]**

| Frequency   | Information to be Submitted   |
|---|---|
| Quarterly by<br>January 30<br>April 30<br>July 30<br>September 30<br><br>For the previous<br>calendar quarter | Whenever the continuous emission monitoring system (CEMS) is inoperative except for zero and span checks:<br>A. Date and time of non-operation of the CEMS.<br>B. Nature of the CEMS repairs, adjustments, or periodic maintenance.   |
|   | Whenever an emission occurs as measured by the required continuous monitoring equipment that is in excess of any emission limitation:<br>A. Magnitude of the emission which has been determined to be in excess.<br>B. Date and time of the commencement and completion of each period of excess emissions<br>C. Periods of excess emissions due to start-up, shutdown, and malfunction shall be specifically identified.<br>D. The nature and cause of any malfunction (if known).<br>E. The corrective action taken or preventive measures adopted. |
|   | If there were no excess emissions for a quarter, a report shall be submitted indicating that there were no excess emissions.  |

21.

22. A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.

B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 of each year respectively.

C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[Basis: SMAQMD Rule 207, Section 501.1]**

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(800) 880-9025

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

PO 25800 – (SMUD Financing Authority DBA Cosumnes Power Plant)



# PERMIT TO OPERATE

**ISSUED TO: SACRAMENTO MUNICIPAL UTILITY DISTRICT FINANCING AUTHORITY (SFA) – COSUMNES POWER PLANT**

**EQUIPMENT LOCATION: 14295A CLAY EAST RD. HERALD, CA 95638**

| PERMIT NO. | EQUIPMENT DESCRIPTION   |
|------------|---|
| 25800      | GAS TURBINE, NO. 3, GENERAL ELECTRIC, MODEL 7FA, COMBINED CYCLE, 2,200 MMBTU/HR. FUELED BY NATURAL GAS/DIGESTER GAS |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

1. The equipment must be properly maintained and operated in accordance with the information submitted with the application and the manufacturer's recommendations at all times.  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**

2.

**DATE ISSUED:** 07-19-2019  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 02-13-2025 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs



SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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**EMISSION LIMITATIONS**

6.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

8.

9. Emissions from the following equipment must not exceed the following emission limits, **including** periods containing startups, shutdowns or short term excursions

**[Basis: SMAQMD Rule 202, Section 408.2, Section 408.2]**

| Pollutant | Maximum Allowable Emissions<br>lb/day |                      |  |  |  |
|-----------|---------------------------------------|----------------------|--|--|--|
|           |                                       | Gas Turbine<br>No. 3 |  |  |  |
|           |                                       |                      |  |  |  |
| NOx       |                                       | 580.4                |  |  |  |
|           |                                       |                      |  |  |  |

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

15.

**MONITORING REQUIREMENTS**

16. The owner/operator must operate a continuous emission monitoring (CEM) system for the turbine's emissions that has been approved by the SMAQMD Air Pollution Control Officer.
- A. The CEM system must monitor and record nitrogen oxides (NO<sub>x</sub>) and oxygen (O<sub>2</sub>).
- B. For NO<sub>x</sub> and O<sub>2</sub>, the CEMS must comply with U.S. EPA Performance Specifications in 40 CFR 75 Appendix A

**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.2]**

17. The owner/operator must operate a continuous parameter monitoring system that has been approved by the SMAQMD Air Pollution Control Officer that either measures or calculates and records the following:  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.2, Rule 413, Section 303.3]**

| Parameter to be Monitored           | Units          |
|-------------------------------------|----------------|
|                                     |                |
| B. Exhaust gas flow rate of turbine | kscfh or lb/hr |

## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

### **RECORDKEEPING AND REPORTING REQUIREMENTS**

18. The following records must be continuously maintained on site for the most recent five-year period and must be made available to the SMAQMD Air Pollution Control Officer upon request. Quarterly records must be made available for inspection within 30 days of the end of the reporting period.

**[Basis: SMAQMD Rules Rule 201, Section 405, 40 CFR Part 75.66(c), and Part 75 Appendix D]**

| Frequency | Information to be Recorded |
|-----------|----------------------------|
|           |                            |

SACRAMENTO METROPOLITAN  
 AIR QUALITY MANAGEMENT DISTRICT

| Frequency | Information to be Recorded         |
|-----------|------------------------------------|
|           |                                    |
| Daily     | T. Total NOx daily mass emissions. |
|           |                                    |

19. A written report which contains the following information for each calendar quarter must be submitted to the SMAQMD Air Pollution Control Officer.

**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.2, and 40 CFR Part 60.4375 , and 40 CFR Part 60.4380]**

| Frequency   | Information to be Submitted   |
|---|---|
| Quarterly<br><br>Submit the report by:<br><br>January 30<br>April 30<br>July 30<br>October 30<br><br>for the previous calendar quarter. | <p>A. All CEMS downtime (i.e., whenever inoperative excluding periods of monitor zero and span checks):</p> <ul style="list-style-type: none"> <li>i. Date and time of non-operation of the continuous emission monitoring system.</li> <li>ii. Nature of the continuous emission monitoring system repairs or adjustments.</li> </ul> <p>B. Whenever an emission occurs as measured by the required continuous monitoring equipment that is in excess of any emission limitation:</p> <ul style="list-style-type: none"> <li>i. Magnitude of the emission which has been determined to be in excess.</li> <li>ii. Date and time of the commencement and completion of each period of excess emissions.</li> <li>iii. Periods of excess emissions due to start-up, shut-down, short-term excursion and malfunction must be specifically identified.</li> <li>iv. The nature and cause of any malfunction (if known).</li> <li>v. The corrective action taken or preventive measures adopted.</li> </ul> <p>C. If there were no excess emissions for a calendar quarter:</p> <ul style="list-style-type: none"> <li>i. A report must be submitted indicating that there were no excess emissions.</li> </ul> |



SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

### EMISSION TESTING REQUIREMENTS

23. The permittee must perform a NO<sub>x</sub> source test and CEM accuracy (RATA) test of the gas turbine once each calendar year (no more than 14 calendar months following the previous performance test).

D. Submit the source test report to the SMAQMD Air Pollution Control Officer within 60 days after the completion of the source test(s).

**[Basis: SMAQMD Rule 201, Section 405,40 CFR Part 60.4400, 40 CFR Part 60.4415, and 40 CFR Part 60.4375]**

24.

### 25. Monitoring Reports

A. The permittee shall submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring.  
i. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.

B. The reporting periods for this permit shall be January 01 through June 30 and July 01 through December 31. The reports shall be submitted by July 30 and January 30 following each reporting period respectively.

C. All required reports must be certified by the responsible official and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[Basis: SMAQMD Rule 207 Section 501.1]**

777 12<sup>TH</sup> STREET, 3<sup>RD</sup> FLOOR  
SACRAMENTO, CA 95814-1908

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**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

PO 25801 – (SMUD Financing Authority DBA Cosumnes Power Plant)



# PERMIT TO OPERATE

**ISSUED TO: SACRAMENTO MUNICIPAL UTILITY DISTRICT FINANCING AUTHORITY (SFA) – COSUMNES POWER PLANT**

**EQUIPMENT LOCATION: 14295A CLAY EAST RD. HERALD, CA 95638**

| PERMIT NO. | EQUIPMENT DESCRIPTION   |
|------------|---|
| 25801      | GAS TURBINE, NO. 2, GENERAL ELECTRIC, MODEL 7FA, COMBINED CYCLE, 2,200 MMBTU/HR. FUELED BY NATURAL GAS/DIGESTER GAS |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

1. The equipment must be properly maintained and operated in accordance with the information submitted with the application and the manufacturer's recommendations at all times.  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**

2.

**DATE ISSUED:** 07-19-2019  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 02-13-2025 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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**EMISSION LIMITATIONS**

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

8.

9. Emissions from the following equipment must not exceed the following emission limits, **including** periods containing startups, shutdowns or short term excursions

**[Basis: SMAQMD Rule 202, Section 408.2, Section 408.2]**

| Pollutant | Maximum Allowable Emissions<br>lb/day |  |  |  |  |
|-----------|---------------------------------------|--|--|--|--|
|           | Gas Turbine<br>No. 2                  |  |  |  |  |
|           |                                       |  |  |  |  |
| NOx       | 580.4                                 |  |  |  |  |
|           |                                       |  |  |  |  |



SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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**MONITORING REQUIREMENTS**

16. The owner/operator must operate a continuous emission monitoring (CEM) system for the turbine's emissions that has been approved by the SMAQMD Air Pollution Control Officer.
- A. The CEM system must monitor and record nitrogen oxides (NO<sub>x</sub>) and oxygen (O<sub>2</sub>).
  - B. For NO<sub>x</sub> and O<sub>2</sub>, the CEMS must comply with U.S. EPA Performance Specifications in 40 CFR 75 Appendix A

**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.2]**

17. The owner/operator must operate a continuous parameter monitoring system that has been approved by the SMAQMD Air Pollution Control Officer that either measures or calculates and records the following:  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.2, Rule 413, Section 303.3]**

| Parameter to be Monitored           | Units          |
|-------------------------------------|----------------|
|                                     |                |
| B. Exhaust gas flow rate of turbine | kscfh or lb/hr |

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

**RECORDKEEPING AND REPORTING REQUIREMENTS**

18. The following records must be continuously maintained on site for the most recent five-year period and must be made available to the SMAQMD Air Pollution Control Officer upon request. Quarterly records must be made available for inspection within 30 days of the end of the reporting period.

**[Basis: SMAQMD Rules Rule 201, Section 405, 40 CFR Part 75.66(c), and Part 75 Appendix D]**

| Frequency | Information to be Recorded |
|-----------|----------------------------|
|           |                            |

SACRAMENTO METROPOLITAN  
 AIR QUALITY MANAGEMENT DISTRICT

| Frequency | Information to be Recorded             |
|-----------|--|
|           | emissions from the combustion turbine. |
| Daily     | T. Total NOx daily mass emissions.     |

19. A written report which contains the following information for each calendar quarter must be submitted to the SMAQMD Air Pollution Control Officer.

**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.2, and 40 CFR Part 60.4375 , and 40 CFR Part 60.4380]**

| Frequency   | Information to be Submitted   |
|---|---|
| Quarterly<br><br>Submit the report by:<br><br>January 30<br>April 30<br>July 30<br>October 30<br><br>for the previous calendar quarter. | <p>A. All CEMS downtime (i.e., whenever inoperative excluding periods of monitor zero and span checks):</p> <ul style="list-style-type: none"> <li>i. Date and time of non-operation of the continuous emission monitoring system.</li> <li>ii. Nature of the continuous emission monitoring system repairs or adjustments.</li> </ul> <p>B. Whenever an emission occurs as measured by the required continuous monitoring equipment that is in excess of any emission limitation:</p> <ul style="list-style-type: none"> <li>i. Magnitude of the emission which has been determined to be in excess.</li> <li>ii. Date and time of the commencement and completion of each period of excess emissions.</li> <li>iii. Periods of excess emissions due to start-up, shut-down, short-term excursion and malfunction must be specifically identified.</li> <li>iv. The nature and cause of any malfunction (if known).</li> <li>v. The corrective action taken or preventive measures adopted.</li> </ul> <p>C. If there were no excess emissions for a calendar quarter:</p> <ul style="list-style-type: none"> <li>i. A report must be submitted indicating that there were no excess emissions.</li> </ul> |

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

**EMISSION TESTING REQUIREMENTS**

23. The permittee must perform a NO<sub>x</sub> source test and CEM accuracy (RATA) test of the gas turbine once each calendar year (no more than 14 calendar months following the previous performance test).

D. Submit the source test report to the SMAQMD Air Pollution Control Officer within 60 days after the completion of the source test(s).

**[Basis: SMAQMD Rule 201, Section 405,40 CFR Part 60.4400, 40 CFR Part 60.4415, and 40 CFR Part 60.4375]**

24.

**25. Monitoring Reports**

A. The permittee shall submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring.  
i. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.

B. The reporting periods for this permit shall be January 01 through June 30 and July 01 through December 31. The reports shall be submitted by July 30 and January 30 following each reporting period respectively.

C. All required reports must be certified by the responsible official and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[Basis: SMAQMD Rule 207 Section 501.1]**

777 12<sup>TH</sup> STREET, 3<sup>RD</sup> FLOOR  
SACRAMENTO, CA 95814-1908

(916) 874-4800  
FAX (916) 874-4899

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**



POs 27118, 27116 – (SMUD Financing Authority DBA Campbell Power Plant)



# PERMIT TO OPERATE

**ISSUED TO: SACRAMENTO MUNICIPAL UTILITY DISTRICT FINANCING  
AUTHORITY DBA CAMPBELL POWER PLANT**

**EQUIPMENT LOCATION: 3215 47<sup>TH</sup> AVE., SACRAMENTO, CA 95825**

| PERMIT NO. | EQUIPMENT DESCRIPTION  |
|------------|--|
| 27118      | GAS TURBINE, SIEMENS, MODEL V84.2, COMBINED CYCLE, 1,410 MMBTU/HOUR, NATURAL GAS FUELED WITH A WET COMPRESSION INJECTION SYSTEM. |
| 27116      | DUCT BURNER, 200 MMBTU/HOUR, NATURAL GAS FUELED.   |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

1. The equipment must be properly maintained and operated in accordance with the information submitted with the application and the manufacturer's recommendations at all times.  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**
- 2.

**DATE ISSUED:** 01-14-2022  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 11-01-2024 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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**EMISSIONS LIMITATIONS**

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**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

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## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

10. Emissions from the following equipment must not exceed the following limits, including periods containing start-ups, shutdowns and short term excursions

**[Basis: SMAQMD Rule 202]**

| Pollutant | Maximum Allowable Emissions           |  |  |
|-----------|---------------------------------------|--|--|
|           | Gas Turbine and Duct Burner<br>lb/day |  |  |
|           |                                       |  |  |
| NOx       | 384.5                                 |  |  |
|           |                                       |  |  |
|           |                                       |  |  |
|           |                                       |  |  |
|           |                                       |  |  |

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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**MONITORING REQUIREMENTS**

19. The permittee must operate a continuous emission monitoring system that has been approved by the SMAQMD Air Pollution Control Officer for the gas turbine and duct burner.
- A. The continuous emission monitoring (CEM) system must monitor and record nitrogen oxides and oxygen.
  - B. For NO<sub>x</sub> and O<sub>2</sub>, the CEM system must comply with U.S. EPA Performance Specifications in 40 CFR 75 Appendix A.

**[Basis: SMAQMD Rule 201 Section 405]**

**SACRAMENTO METROPOLITAN  
 AIR QUALITY MANAGEMENT DISTRICT**

20. The permittee must operate a continuous parameter monitoring system that has been approved by the SMAQMD Air Pollution Control Officer that either measures or calculates and records the following:  
**[Basis: SMAQMD Rule 201, Rule 202 Rule 413, Section 303.3 and 40 CFR Part 60.334(i)(2)(i)]**

| Parameter to be Monitored   | Units          |
|---|----------------|
|   |                |
|   |                |
| C. Exhaust gas flow rate of the combined cycle gas turbine and the duct burner. | kscfh or lb/hr |

**RECORDKEEPING AND REPORTING REQUIREMENTS**

21. The permittee must continuously maintain onsite the following records for the most recent five year period and must make such records available to the SMAQMD Air Pollution Control Officer upon request. Quarterly records as specified in the table below must be made available for inspection within 30 days of the end of the quarter.  
**[Basis: SMAQMD Rules 201 and 202, and 40 CFR Part 60.334 (j)(1)(iii)(B), 60.334(j)(2)(iii), Part 60.334 (h)(1), Part 60.334(i)(3), Part 60.335(b)(10), 40 CFR Part 75.66(c), and Part 75 Appendix D]**

| Frequency | Information to be recorded |
|-----------|----------------------------|
|           |                            |
|           |                            |



## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

| Frequency | Information to be recorded   |
|-----------|--|
|           |  |
| Daily     | M. NOx daily mass emissions from all equipment <u>separately</u> (lb/day):<br>i. gas turbine and duct burner (for separate reporting the gas turbine and duct burner emission are combined). |
|           |  |

22. Submit to the SMAQMD Air Pollution Control Officer a written report which contains the following information.  
**[Basis: SMAQMD Rules 201 and 202, and 40 CFR Part 60.334 (j)(5)]**

| Frequency   | Information to be Reported   |
|---|--|
| Quarterly<br><br>Submitted by:<br><br>Jan 30<br>Apr 30<br>Jul 30<br>Oct 30<br><br>for the previous calendar quarter | A. Whenever the continuous emissions monitoring system is inoperative except for zero and span checks:<br>i. Date and time of non-operation of the continuous emission monitoring system.<br>ii. Nature of the continuous emission monitoring system repairs or adjustments.<br>B. Whenever an emission occurs as measured by the required continuous emissions monitoring system that is in excess of any emission limitation:<br>i. Magnitude of the emission which has been determined to be in excess.<br>ii. Date and time of the commencement and completion of each period of excess emissions.<br>iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.<br>iv. The nature and cause of any malfunction (if known).<br>v. The corrective action taken or preventive measures adopted.<br>C. If there are no excess emissions or the continuous monitoring system has not been inoperative, repaired or adjusted for a calendar quarter, a report must be submitted stating such information. |

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

26.

**EMISSION TESTING REQUIREMENTS**

27. The permittee must perform a NO<sub>x</sub> source test and CEM accuracy (RATA) test of the gas turbine and duct burner once each calendar year.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

- D. Submit the Source Test Report to the SMAQMD Air Pollution Control Officer within 60 days after the completion of the source test(s).

**[Basis: SMAQMD Rule 201, Section 405]**

**REPORTING**

28.

**29. Monitoring Reports**

- A. The permittee shall submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring.
- i. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.
- B. The reporting periods for this permit shall be January 01 through June 30 and July 01 through December 31. The reports shall be submitted by July 30 and January 30 following each reporting period respectively.
- C. All required reports must be certified by the responsible official and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[SMAQMD Rule No. 207 Section 501.1]**

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SACRAMENTO, CA 95814-1908

(279) 207-1122  
(800) 880-9025

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

POs 27141, 27132 – (SMUD Financing Authority DBA Proctor & Gamble Power Plant)



# PERMIT TO OPERATE

**ISSUED TO: SACRAMENTO MUNICIPAL UTILITY DISTRICT FINANCING  
AUTHORITY DBA PROCTER AND GAMBLE POWER PLANT**

**EQUIPMENT LOCATION: 5000 83<sup>RD</sup> STREET, SACRAMENTO, CA 95826**

| PERMIT NO. | EQUIPMENT DESCRIPTION   |
|------------|---|
| 27141      | GAS TURBINE, UNIT 1A, COMBINED CYCLE, GENERAL ELECTRIC, LM6000PC SPRINT/EFS, 500 MMBTU/HR, NOMINAL 50 MW OUTPUT, NATURAL GAS FIRED. |
| 27132      | DUCT BURNER UNIT 1A, HEAT RECOVERY STEAM GENERATOR, 83.2 MMBTU/HR, NATURAL GAS FIRED.   |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

1. The equipment must be properly maintained and operated in accordance with the information submitted with the application.

**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**

**DATE ISSUED:** 02-25-2022  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 11-01-2024 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

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**EMISSIONS LIMITATIONS**

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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9. The combined emissions from the turbine and duct burner, including start-ups and shutdowns, must not exceed the following limits:

**[Basis: SMAQMD Rule 202, Section 405]**

| Pollutant | Maximum Allowable Emissions<br>Turbine and Duct Burner Combined |
|-----------|---|
|           | Lb/day  |
|           |   |
| NOx       | 144.9   |
|           |   |
|           |   |
|           |   |

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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**MONITORING REQUIREMENTS**

15. The permittee must operate a continuous emission monitoring system (CEMS) that has been approved by the SMAQMD Air Pollution Control Officer for the turbine and duct burner.
- A. The CEMS must monitor and record nitrogen oxides and oxygen
  - B. For NO<sub>x</sub> and O<sub>2</sub>, the CEMS must comply with US EPA performance specifications in 40 CFR 75 Appendix A.

**[Basis: SMAQMD Rule 201 Section 405 and 40 CFR Part 60]**

**SACRAMENTO METROPOLITAN  
 AIR QUALITY MANAGEMENT DISTRICT**

16. The permittee must operate a continuous parameter monitoring system that has been approved by the SMAQMD Air Pollution Control Officer that either measures or calculates and records the following:  
**[Basis: SMAQMD Rule 201, Rule 202, Rule 413, Section 303.3 and 40 CFR Part 60.334(i)(2)(i)]**

| Parameter to be Monitored                                | Units          |
|--|----------------|
|  |                |
|  |                |
| C. Exhaust gas flow rate of the turbine and duct burner. | KSCFH or lb/hr |

**RECORDKEEPING AND REPORTING REQUIREMENTS**

17. The permittee must continuously maintain onsite the following records for the most recent five year period and must make such records available to the SMAQMD Air Pollution Control Officer upon request. Quarterly and yearly records as specified in the table below must be made available for inspection within 30 days of the end of the reporting period.  
**[Basis: SMAQMD Rules 201 and 202, and 40 CFR Part 60.334 (j)(1)(iii)(B), 60.334(j)(2)(iii), Part 60.334 (h)(1), Part 60.334(i)(3), Part 60.335(b)(10), 40 CFR Part 75.66(c), and Part 75 Appendix D]**

| Frequency | Information to be recorded                                      |
|-----------|---|
|           |   |
|           |   |
| Daily     | M. Turbine and Duct Burner's NOx daily mass emissions (lb/day). |
|           |   |

## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

18. Submit to the SMAQMD Air Pollution Control Officer a written report which contains the following information.  
**[Basis: SMAQMD Rules 201 and 202, and 40 CFR Part 60.334 (j)(5)]**

| Frequency  | Information to be Reported   |
|--|--|
| Quarterly by:<br>Jan 30,<br>April 30,<br>July 30, and<br>Oct 30. | <p>A. Whenever the continuous emissions monitoring system is inoperative except for zero and span checks:</p> <ul style="list-style-type: none"><li>i. Date and time of non-operation of the continuous emission monitoring system.</li><li>ii. Nature of the continuous emission monitoring system repairs or adjustments.</li></ul> <p>B. Whenever an emission occurs as measured by the required continuous emissions monitoring system that is in excess of any emission limitation:</p> <ul style="list-style-type: none"><li>i. Magnitude of the emission which has been determined to be in excess.</li><li>ii. Date and time of the commencement and completion of each period of excess emissions.</li><li>iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.</li><li>iv. The nature and cause of any malfunction (if known).</li><li>v. The corrective action taken or preventive measures adopted.</li></ul> <p>C. If there are no excess emissions or the continuous monitoring system has not been inoperative, repaired or adjusted for a calendar quarter, a report must be submitted stating such information.</p> |

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

19.

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**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

**EMISSION TESTING REQUIREMENTS**

21. The permittee must perform a NO<sub>x</sub> source test and CEM accuracy (RATA) test of the turbine once each calendar year.



SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

E. Submit the Source Test Report to the SMAQMD Air Pollution Control Officer within 60 days after the completion of the source test(s).

**[Basis: SMAQMD Rule 201, Section 405]**

**REPORTING**

22.

**23. Monitoring Reports**

- A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.
- B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 following each reporting period respectively.
- C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[SMAQMD Rule 207 Section 501.1]**

777 12<sup>TH</sup> STREET, STE 300  
SACRAMENTO, CA 95814-1908

(279) 207-1122  
(800) 880-9025

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

POs 27142, 27133 – (SMUD Financing Authority DBA Proctor & Gamble Power Plant)



# PERMIT TO OPERATE

**ISSUED TO: SACRAMENTO MUNICIPAL UTILITY DISTRICT FINANCING  
AUTHORITY DBA PROCTER AND GAMBLE POWER PLANT**

**EQUIPMENT LOCATION: 5000 83<sup>RD</sup> STREET, SACRAMENTO, CA 95826**

| PERMIT NO. | EQUIPMENT DESCRIPTION   |
|------------|---|
| 27142      | GAS TURBINE, UNIT 1B, COMBINED CYCLE, GENERAL ELECTRIC, LM6000PC SPRINT/EFS, 500 MMBTU/HR, NOMINAL 50 MW OUTPUT, NATURAL GAS FIRED. |
| 27133      | DUCT BURNER UNIT 1B, HEAT RECOVERY STEAM GENERATOR, 83.2 MMBTU/HR, NATURAL GAS FIRED.   |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

1. The equipment must be properly maintained and operated in accordance with the information submitted with the application.

**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**

**DATE ISSUED:** 02-25-2022  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 11-01-2024 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

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**EMISSIONS LIMITATIONS**

7.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

8.

9. The combined emissions from the turbine and duct burner, including start-ups and shutdowns, must not exceed the following limits:

| Pollutant | Maximum Allowable Emissions<br>Turbine and Duct Burner Combined |
|-----------|---|
|           | Lb/day  |
|           |   |
| NOx       | 144.9   |
|           |   |
|           |   |
|           |   |

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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**MONITORING REQUIREMENTS**

15. The permittee must operate a continuous emission monitoring system that has been approved by the SMAQMD Air Pollution Control Officer for the turbine and duct burner.
- A. The continuous emission monitoring (CEM) system must monitor and record nitrogen oxides and oxygen
  - B. For NO<sub>x</sub> and O<sub>2</sub>, the CEMS must comply with US EPA performance specifications in 40 CFR 75 Appendix A.

**[Basis: SMAQMD Rule 201 Section 405 and 40 CFR Part 60]**



**SACRAMENTO METROPOLITAN  
 AIR QUALITY MANAGEMENT DISTRICT**

16. The permittee must operate a continuous parameter monitoring system that has been approved by the SMAQMD Air Pollution Control Officer that either measures or calculates and records the following:  
**[Basis: SMAQMD Rule 201, Rule 202, Rule 413, Section 303.3 and 40 CFR Part 60.334(i)(2)(i)]**

| Parameter to be Monitored                                | Units          |
|--|----------------|
|  |                |
|  |                |
| C. Exhaust gas flow rate of the turbine and duct burner. | KSCFH or lb/hr |

**RECORDKEEPING AND REPORTING REQUIREMENTS**

17. The permittee must continuously maintain onsite the following records for the most recent five year period and must make such records available to the SMAQMD Air Pollution Control Officer upon request. Monthly, quarterly and yearly records as specified in the table below must be made available for inspection within 30 days of the end of the reporting period.  
**[Basis: SMAQMD Rules 201 and 202, and 40 CFR Part 60.334 (j)(1)(iii)(B), 60.334(j)(2)(iii), Part 60.334 (h)(1), Part 60.334(i)(3), Part 60.335(b)(10), 40 CFR Part 75.66(c), and Part 75 Appendix D]**

| Frequency | Information to be recorded                                      |
|-----------|---|
|           |   |
|           |   |
| Daily     | M. Turbine and Duct Burner's NOx daily mass emissions (lb/day). |
|           |   |

## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

18. Submit to the SMAQMD Air Pollution Control Officer a written report which contains the following information.  
**[Basis: SMAQMD Rules 201 and 202, and 40 CFR Part 60.334 (j)(5)]**

| Frequency  | Information to be Reported   |
|--|--|
| Quarterly by:<br>Jan 30,<br>April 30,<br>July 30, and<br>Oct 30. | <p>A. Whenever the continuous emissions monitoring system is inoperative except for zero and span checks:</p> <ul style="list-style-type: none"><li>i. Date and time of non-operation of the continuous emission monitoring system.</li><li>ii. Nature of the continuous emission monitoring system repairs or adjustments.</li></ul> <p>B. Whenever an emission occurs as measured by the required continuous emissions monitoring system that is in excess of any emission limitation:</p> <ul style="list-style-type: none"><li>i. Magnitude of the emission which has been determined to be in excess.</li><li>ii. Date and time of the commencement and completion of each period of excess emissions.</li><li>iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.</li><li>iv. The nature and cause of any malfunction (if known).</li><li>v. The corrective action taken or preventive measures adopted.</li></ul> <p>C. If there are no excess emissions or the continuous monitoring system has not been inoperative, repaired or adjusted for a calendar quarter, a report must be submitted stating such information.</p> |

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

19.

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(279) 207-1122  
(800) 880-9025

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

**EMISSION TESTING REQUIREMENTS**

21. The permittee must perform a NO<sub>x</sub> source test and CEM accuracy (RATA) test of the turbine once each calendar year.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

E. Submit the Source Test Report to the SMAQMD Air Pollution Control Officer within 60 days after the completion of the source test(s).

**[Basis: SMAQMD Rule 201, Section 405]**

**REPORTING**

22.

**23. Monitoring Reports**

- A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.
- B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 following each reporting period respectively.
- C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[SMAQMD Rule 207 Section 501.1]**

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**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

PO 27143 – (SMUD Financing Authority DBA Proctor & Gamble Power Plant)





# PERMIT TO OPERATE

**ISSUED TO: SACRAMENTO MUNICIPAL UTILITY DISTRICT FINANCING  
AUTHORITY DBA PROCTER AND GAMBLE POWER PLANT**

**EQUIPMENT LOCATION: 5000 83<sup>RD</sup> STREET, SACRAMENTO, CA 95826**

| PERMIT NO. | EQUIPMENT DESCRIPTION   |
|------------|---|
| 27143      | GAS TURBINE, UNIT 1C, SIMPLE CYCLE, GENERAL ELECTRIC, LM6000PC SPRINT/EFS, 500 MMBTU/HR, NOMINAL 50 MW OUTPUT, NATURAL GAS FIRED. |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

1. The equipment must be properly maintained and operated in accordance with the information submitted with the application.  
[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]

2.

**DATE ISSUED:** 02-25-2022  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 11-01-2024 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

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**EMISSIONS LIMITATIONS**

7.

8.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

9. The emissions from the turbine including start-ups and shutdowns, must not exceed the following limits:

| Pollutant | Maximum Allowable Emissions<br>Turbine<br>Lb/day |
|-----------|--|
|           |  |
| NOx       | 120.3  |
|           |  |
|           |  |
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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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**SACRAMENTO METROPOLITAN  
 AIR QUALITY MANAGEMENT DISTRICT**

**MONITORING REQUIREMENTS**

13. The permittee must operate a continuous emission monitoring system (CEMS) that has been approved by the SMAQMD Air Pollution Control Officer for the turbine.
- A. The CEMS must monitor and record nitrogen oxides \_\_\_\_\_ and oxygen \_\_\_\_\_
  - B. For NOx and O2, the CEMS must \_\_\_\_\_ with US EPA performance specifications in 40 CFR 75 Appendix A.

**[Basis: SMAQMD Rule 201 Section 405 and 40 CFR Part 60]**

14. The permittee must operate a continuous parameter monitoring system that has been approved by the SMAQMD Air Pollution Control Officer that either measures or calculates and records the following:

**[Basis: SMAQMD Rule 201, Rule 202 Rule 413, Section 303.3 and 40 CFR Part 60.334(i)(2)(i)]**

| Parameter to be Monitored           | Units          |
|-------------------------------------|----------------|
|                                     |                |
| B. Exhaust flow rate of the turbine | KSCFH OR lb/hr |

**RECORDKEEPING AND REPORTING REQUIREMENTS**

15. The permittee must continuously maintain onsite the following records for the most recent five year period and must make such records available to the SMAQMD Air Pollution Control Officer upon request. Quarterly records as specified in the table below must be made available for inspection within 30 days of the end of the reporting period.

**[Basis: SMAQMD Rules 201 and 202, and 40 CFR Part 60.334 (j)(1)(iii)(B), 60.334(j)(2)(iii), Part 60.334 (h)(1), Part 60.334(i)(3), Part 60.335(b)(10), 40 CFR Part 75.66(c), and Part 75 Appendix D]**

| Frequency | Information to be recorded |
|-----------|----------------------------|
|           |                            |
|           |                            |

**SACRAMENTO METROPOLITAN  
 AIR QUALITY MANAGEMENT DISTRICT**

| Frequency | Information to be recorded                             |
|-----------|--|
|           |  |
| Daily     | L. Turbine's NOx and CO daily mass emissions (lb/day). |
|           |  |

16. Submit to the SMAQMD Air Pollution Control Officer a written report which contains the following information.  
**[Basis: SMAQMD Rules 201 and 202, and 40 CFR Part 60.334 (j)(5)]**

| Frequency  | Information to be Reported  |
|--|---|
| Quarterly by:<br>Jan 30,<br>April 30,<br>July 30, and<br>Oct 30. | <p>A. Whenever the continuous emissions monitoring system is inoperative except for zero and span checks:</p> <ul style="list-style-type: none"> <li>i. Date and time of non-operation of the continuous emission monitoring system.</li> <li>ii. Nature of the continuous emission monitoring system repairs or adjustments.</li> </ul> <p>B. Whenever an emission occurs as measured by the required continuous emissions monitoring system that is in excess of any emission limitation:</p> <ul style="list-style-type: none"> <li>i. Magnitude of the emission which has been determined to be in excess.</li> <li>ii. Date and time of the commencement and completion of each period of excess emissions.</li> <li>iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.</li> <li>iv. The nature and cause of any malfunction (if known).</li> <li>v. The corrective action taken or preventive measures adopted.</li> </ul> <p>C. If there are no excess emissions or the continuous monitoring system has not been inoperative, repaired or adjusted for a calendar quarter, a report must be submitted stating such information.</p> |

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

17.

18.

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SACRAMENTO, CA 95814-1908

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(800) 880-9025

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**



**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

**EMISSION TESTING REQUIREMENTS**

19. The permittee must perform a NO<sub>x</sub> source test and CEM accuracy (RATA) test of the turbine once each calendar year.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

E. Submit the Source Test Report to the SMAQMD Air Pollution Control Officer within 60 days after the completion of the source test(s).

**[Basis: SMAQMD Rule 201, Section 405]**

**REPORTING**

20.

**21. Monitoring Reports**

- A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.
- B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 following each reporting period respectively.
- C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[SMAQMD Rule 207 Section 501.1]**

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**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

POs 27151, 27153 – (SMUD Financing Authority DBA Carson Power Plant)



# PERMIT TO OPERATE

**ISSUED TO: SACRAMENTO MUNICIPAL UTILITY DISTRICT FINANCING  
AUTHORITY DBA CARSON POWER PLANT**

**EQUIPMENT LOCATION: 8580 LAGUNA STATION RD., ELK GROVE, CA 95758**

| PERMIT NO. | EQUIPMENT DESCRIPTION  |
|------------|--|
| 27151      | GAS TURBINE, BASE LOAD, GENERAL ELECTRIC, LM6000PC SPRINT/EFS, 500 MMBTU/HR, COMBINED CYCLE, NOMINAL 50 MW OUTPUT, NATURAL GAS AND DIGESTER GAS FIRED. |
| 27153      | DUCT BURNER, HEAT RECOVERY STEAM GENERATOR, 99.9 MMBTU/HR NATURAL GAS AND DIGESTER GAS FIRED.  |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

1. The equipment must be properly maintained and operated in accordance with the manufacturer's recommendations at all times.  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**
- 2.

**DATE ISSUED:** 04-29-2022  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 11-01-2024 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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**EMISSIONS LIMITATIONS**

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

9. Emissions from the following equipment must not exceed the following limits.  
**[Basis: SMAQMD Rule 201 Section 405 and 202 Section 301]**

| POLLUTANT | Emission Limits |   |  |  |
|-----------|-----------------|---|--|--|
|           |                 | Combined Cycle Gas Turbine<br>And Duct Burner<br>lb/day |  |  |
|           |                 |   |  |  |
| NOx       |                 | 134.8   |  |  |
|           |                 |   |  |  |
|           |                 |   |  |  |
|           |                 |   |  |  |

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**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

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**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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**MONITORING REQUIREMENTS**

20. The permittee must operate a continuous emission monitoring system (CEMS) that has been approved by the SMAQMD Air Pollution Control Officer for the turbine.
- A. The CEMS must monitor and record nitrogen oxides and oxygen.
  - B. For NO<sub>x</sub> and O<sub>2</sub>, the CEMS must comply with US EPA performance specifications in 40 CFR 75 Appendix A.

**[Basis: SMAQMD Rule 201 Section 405]**

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

21.

**RECORDKEEPING AND REPORTING REQUIREMENTS**

22. The permittee must continuously maintain onsite the following records for the most recent five year period and must make such records available to the SMAQMD Air Pollution Control Officer upon request. Monthly, quarterly and yearly records as specified in the table below must be made available for inspection within 30 days of the end of the reporting period.

**[Basis: SMAQMD Rules 201 and 202, and 40 CFR Part 60.334 (j)(1)(iii)(B), 60.334(j)(2)(iii), Part 60.334 (h)(1), Part 60.334(i)(3), Part 60.335(b)(10), 40 CFR Part 75.66(c), and Part 75 Appendix D]**

| Frequency | Information to be recorded |
|-----------|----------------------------|
|           |                            |
|           |                            |

SACRAMENTO METROPOLITAN  
 AIR QUALITY MANAGEMENT DISTRICT

| Frequency | Information to be recorded   |
|-----------|--|
|           |  |
| Daily     | Q. NOx daily mass emissions of the combined cycle gas turbine and duct burner to verify compliance with <b>Condition No. 9</b> . |
|           |  |
|           |  |
|           |  |

23. Submit to the SMAQMD Air Pollution Control Officer a written report which contains the following information.  
**[Basis: SMAQMD Rules 201 and 202, and 40 CFR Part 60.334 (j)(5)]**

| Frequency   | Information to be Reported  |
|---|---|
| Quarterly by:<br>Jan 30,<br>April 30,<br>July 30, and<br>Oct 30 | A. Whenever the continuous emissions monitoring system is inoperative except for zero and span checks:<br>i. Date and time of non-operation of the continuous emission monitoring system.<br>ii. Nature of the continuous emission monitoring system repairs or adjustments.<br>B. Whenever an emission occurs as measured by the required continuous emissions monitoring system that is in excess of any emission limitation: |

## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

| Frequency | Information to be Reported  |
|-----------|---|
|           | <ul style="list-style-type: none"><li>i. Magnitude of the emission which has been determined to be in excess.</li><li>ii. Date and time of the commencement and completion of each period of excess emissions.</li><li>iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.</li><li>iv. The nature and cause of any malfunction (if known).</li><li>v. The corrective action taken or preventive measures adopted.</li></ul> <p>C. If there are no excess emissions or the continuous monitoring system has not been inoperative, repaired or adjusted for a calendar quarter, a report must be submitted stating such information.</p> |

### EMISSION TESTING REQUIREMENTS

24. The permittee must perform a NO<sub>x</sub> source test and CEM accuracy (RATA) test of the combined cycle turbine and duct burner once each calendar year.

E. Submit the Source Test Report to the SMAQMD Air Pollution Control Officer within 60 days after the completion of the source test(s).

**[Basis: SMAQMD Rule 201, Section 405]**

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

25.

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777 12<sup>TH</sup> STREET, STE 300  
SACRAMENTO, CA 95814-1908

(279) 207-1122  
(800) 880-9025

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

27.

**28. MONITORING REPORTS**

- A. The permittee shall submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring.
- B. The reporting periods for this permit shall be for the six month periods January 1 through June 30 and July 1 through December 31. The reports shall be submitted by July 30 and January 30 of each year respectively.
- C. All instances of deviations from Title V permit conditions must be clearly identified in such reports. All required reports must be certified by the responsible official and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[Basis: SMAQMD Rule 207 Section 501.1]**



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(800) 880-9025

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

PO 27156 – (SMUD Financing Authority DBA Carson Power Plant)



# PERMIT TO OPERATE

**ISSUED TO: SACRAMENTO MUNICIPAL UTILITY DISTRICT FINANCING  
AUTHORITY DBA CARSON POWER PLANT**

**EQUIPMENT LOCATION: 8580 LAGUNA STATION RD., ELK GROVE, CA 95758**

| PERMIT NO. | EQUIPMENT DESCRIPTION  |
|------------|--|
| 27156      | GAS TURBINE, GENERAL ELECTRIC, LM6000, 450 MMBTU/HR, SIMPLE CYLCE, NATURAL & DIGESTER GAS FIRED. |

## SUBJECT TO THE FOLLOWING CONDITIONS:

1. The equipment must be properly maintained and operated in accordance with the information submitted with the application.  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**

2.

**DATE ISSUED:** 04-29-2022  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 11-01-2024 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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**EMISSIONS LIMITATIONS**

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## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

10.

11. Emissions from the following equipment must not exceed the following limits.  
**[Basis: SMAQMD Rule 201 Section 405 and 202 Section 301]**

| POLLUTANT | Emission Limits                       |  |  |  |
|-----------|---------------------------------------|--|--|--|
|           | Simple Cycle Gas<br>Turbine<br>lb/day |  |  |  |
|           |                                       |  |  |  |
| NOx       | 175.8                                 |  |  |  |
|           |                                       |  |  |  |
|           |                                       |  |  |  |
|           |                                       |  |  |  |

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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**MONITORING REQUIREMENTS**

20. The permittee must operate a continuous emission monitoring system (CEMS) that has been approved by the SMAQMD Air Pollution Control Officer for the turbine.
- A. The CEMS must monitor and record nitrogen oxides and oxygen.
  - B. For NO<sub>x</sub> and O<sub>2</sub>, the CEMS must comply with US EPA performance specifications in 40 CFR 75 Appendix A.

**[Basis: SMAQMD Rule 201 Section 405]**

21.



## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

### RECORDKEEPING AND REPORTING REQUIREMENTS

22. The permittee must continuously maintain onsite the following records for the most recent five year period and must make such records available to the SMAQMD Air Pollution Control Officer upon request. Monthly, quarterly, and yearly records as specified in the table below must be made available for inspection within 30 days of the end of the reporting period.

**[Basis: SMAQMD Rules 201 and 202, and 40 CFR Part 60.334 (j)(1)(iii)(B), 60.334(j)(2)(iii), Part 60.334 (h)(1), Part 60.334(i)(3), Part 60.335(b)(10), 40 CFR Part 75.66(c), and Part 75 Appendix D]**

| Frequency | Information to be recorded                      |
|-----------|---|
|           |   |
|           |   |
| Daily     | N. Turbine's NOx daily mass emissions (lb/day). |
|           |   |

SACRAMENTO METROPOLITAN  
 AIR QUALITY MANAGEMENT DISTRICT

|  |  |
|--|--|
|  |  |
|  |  |
|  |  |

23. Submit to the SMAQMD Air Pollution Control Officer a written report which contains the following information.  
**[Basis: SMAQMD Rules 201 and 202, and 40 CFR Part 60.334 (j)(5)]**

| Frequency   | Information to be Reported  |
|---|---|
| Quarterly by:<br>Jan 30,<br>April 30,<br>July 30, and<br>Oct 30 | <p>A. Whenever the continuous emissions monitoring system is inoperative except for zero and span checks:</p> <ul style="list-style-type: none"> <li>i. Date and time of non-operation of the continuous emission monitoring system.</li> <li>ii. Nature of the continuous emission monitoring system repairs or adjustments.</li> </ul> <p>B. Whenever an emission occurs as measured by the required continuous emissions monitoring system that is in excess of any emission limitation:</p> <ul style="list-style-type: none"> <li>i. Magnitude of the emission which has been determined to be in excess.</li> <li>ii. Date and time of the commencement and completion of each period of excess emissions.</li> <li>iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.</li> <li>iv. The nature and cause of any malfunction (if known).</li> <li>v. The corrective action taken or preventive measures adopted.</li> </ul> <p>C. If there are no excess emissions or the continuous monitoring system has not been inoperative, repaired or adjusted for a calendar quarter, a report must be submitted stating such information.</p> |

SACRAMENTO METROPOLITAN  
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24.

25.

777 12<sup>TH</sup> STREET, STE 300  
SACRAMENTO, CA 95814-1908

(279) 207-1122  
(800) 880-9025

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

**EMISSION TESTING REQUIREMENTS**

26. The permittee must perform a NO<sub>x</sub> source test and CEM accuracy (RATA) test of the turbine once each calendar year.

E. Submit the Source Test Report to the SMAQMD Air Pollution Control Officer within 60 days after the completion of the source test(s).

**[Basis: SMAQMD Rule 201, Section 405]**

**REPORTING**

27.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

**28. MONITORING REPORTS**

- A. The permittee shall submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring.
- B. The reporting periods for this permit shall be for the six month periods January 1 through June 30 and July 1 through December 31. The reports shall be submitted by July 30 and January 30 of each year respectively.
- C. All instances of deviations from Title V permit conditions must be clearly identified in such reports. All required reports must be certified by the responsible official and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[Basis: SMAQMD Rule 207 Section 501.1]**

**APPENDIX C – GAS-FIRED OVEN PERMITS TO OPERATE**

PO 24611 – (Mitsubishi Chemical Carbon Fiber & Composites)





# PERMIT TO OPERATE

**ISSUED TO: MITSUBISHI CHEMICAL CARBON FIBER & COMPOSITES, INC.**

**EQUIPMENT LOCATION: 5900 88<sup>TH</sup> STREET, SACRAMENTO, CA 95828**

| PERMIT NO. | EQUIPMENT DESCRIPTION  |
|------------|--|
| 24611      | OXIDATION OVEN (OVEN #1), MAKE: EISENMANN, BURNER MODEL: WMG10/2-A, ZM-3LN, BURNER SERIAL NOS.: 40283428 AND 40283426, 2.39 MMBTU/HR CAPACITY, NATURAL GAS FIRED, SERVING CARBON FIBER MANUFACTURING PROCESS LINE 33 (P/O 24518), PROCESS AREA VENTED TO APC REGENERATIVE THERMAL OXIDIZER (P/O 24520 OR P/O 24521). |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

- 1.
2. The equipment must be properly maintained and operated in accordance with the information submitted with the application and the manufacturer's recommendations at all times.  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**

**DATE ISSUED:** 08-07-2019  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 10-24-2024 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

3.

4.

5.

6.

**EMISSIONS LIMITATIONS**

7.

8. The burner of the oxidation oven, when burning natural gas, must meet the following emission standards:  
**[Basis: SMAQMD Rule 202, Section 408 and Rule 419, Section 301]**

| Pollutant | Emission Standard and Work Practice |
|-----------|-------------------------------------|
| NOx       | 30 ppmvd corrected to 3% oxygen (A) |
|           |                                     |

(A) Based on SMAQMD BACT standard for this equipment category.

## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

9. Emissions from the oxidation oven must not exceed the following limits:  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408]**

| Pollutant |  | Emission Limits (B) |  |  |
|-----------|--|---------------------|--|--|
|           |  | (lb/day)            |  |  |
|           |  |                     |  |  |
| NOx       |  | 2.1                 |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |

(B) Emissions are based on 2.39 MMbtu/hr, 24 hours/day, 365 days/year

10.

11.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

12.

13.

**EMISSIONS TESTING**

14. Emissions of Nitrogen Oxides and Oxygen must be tested for the oxidation oven annually to verify compliance with Condition No. 8.

D. Submit the source test report to the Air Pollution Control Officer within 60 days from the completion of the test(s.)

**[Basis: SMAQMD Rule 419, Section 403 and Rule 201, Section 303.2]**

15. Emission testing methods must be the following:

A. Oxides of Nitrogen – ARB Method 100 or EPA Method 7E.

C. Stack gas Oxygen – ARB Method 100 or EPA Method 3A.

**[Basis: SMAQMD Rule 419, Section 501]**

16. In lieu of the test methods required by Condition No. 15, emission testing of the burners may be performed using a hand-held portable analyzer every other year starting in 2018 provided compliance with the following:

B. Notwithstanding the non-applicability of Rule 411 to the equipment, test equipment must comply with Rule 411, Attachment B. Emission readings must either be averaged over a 15 minute test period or 5 evenly spaced readings may be taken over a 15 minute test interval.

C. If the results from the portable analyzer test show that NO<sub>x</sub> emissions exceed the limits specified in Condition No. 8, the burner must be source tested no later than 60 days from the date of discovery of the exceedance.

**[Basis: SMAQMD Rule 201, Section 405]**

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

18.

19.

**RECORDKEEPING**

20. Emission test reports must be maintained on-site for the most recent five year period and must be made available to the Air Pollution Control Officer upon request.

**[Basis: SMAQMD Rule 419, Section 502.4 and Rule 201, Section 405]**

21

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

22.

**GENERAL REPORTING**

23. A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.
- B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 of each year respectively.
- C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[Basis: SMAQMD Rule 207, Section 501.1]**

777 12<sup>TH</sup> STREET, STE. 300  
SACRAMENTO, CA 95814-1908

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(800) 880-9025

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

PO 24613 – (Mitsubishi Chemical Carbon Fiber & Composites)





# PERMIT TO OPERATE

**ISSUED TO: MITSUBISHI CHEMICAL CARBON FIBER & COMPOSITES, INC.**

**EQUIPMENT LOCATION: 5900 88<sup>TH</sup> STREET, SACRAMENTO, CA 95828**

| PERMIT NO. | EQUIPMENT DESCRIPTION  |
|------------|--|
| 24613      | OXIDATION OVEN (OVEN #3), MAKE: EISENMANN, BURNER MODEL: WMG10/2-A, ZM-3LN, BURNER SERIAL NOS.: 40283425 AND 40283432, 2.39 MMBTU/HR CAPACITY, NATURAL GAS FIRED, SERVING CARBON FIBER MANUFACTURING PROCESS LINE 33 (P/O 24518), PROCESS AREA VENTED TO APC REGENERATIVE THERMAL OXIDIZER (P/O 24520 OR P/O 24521). |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

- 1.
2. The equipment must be properly maintained and operated in accordance with the information submitted with the application and the manufacturer's recommendations at all times.  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**

**DATE ISSUED:** 10-25-2019  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 10-24-2024 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

3.

4.

5.

6.

**EMISSIONS LIMITATIONS**

7.

8. The burner of the oxidation oven must meet the following emission standards:  
**[Basis: SMAQMD Rule 202, Section 408 and Rule 419, Section 301]**

| Pollutant | Emission Standard and Work Practice |
|-----------|-------------------------------------|
| NOx       | 30 ppmvd corrected to 3% oxygen (A) |
|           |                                     |

(A) Based on SMAQMD BACT standard for this equipment category.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

9. The emissions from the oxidation oven must not exceed the following limits:  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408]**

| Pollutant |  | Emission Limits (B) |  |  |
|-----------|--|---------------------|--|--|
|           |  | (lb/day)            |  |  |
|           |  |                     |  |  |
| NOx       |  | 2.1                 |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |

(B) Emissions are based on 2.39 MMbtu/hr, 24 hours/day, 365 days/year

10.

11.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

12.

13.

**EMISSIONS TESTING**

14. Emissions of Nitrogen Oxides and Oxygen must be tested for the oxidation oven annually to verify compliance with Condition No. 8.

D. Submit the source test report to the Air Pollution Control Officer within 60 days from the completion of the test(s.)

**[Basis: SMAQMD Rule 419, Section 403 and Rule 201, Section 303.2]**

15. Emission testing methods must be the following:

A. Oxides of Nitrogen – ARB Method 100 or EPA Method 7E.

C. Stack gas Oxygen – ARB Method 100 or EPA Method 3A.

**[Basis: SMAQMD Rule 419, Section 501]**

16. In lieu of the test methods required by Condition No. 15, emission testing of the burners may be performed using a hand-held portable analyzer every other year starting in 2018 provided compliance with the following:

B. Notwithstanding the non-applicability of Rule 411 to the equipment, test equipment must comply with Rule 411, Attachment B. Emission readings must either be averaged over a 15 minute test period or 5 evenly spaced readings may be taken over a 15 minute test interval.

C. If the results from the portable analyzer test show that NO<sub>x</sub> emissions exceed the limits specified in Condition No. 8, the burner must be source tested no later than 60 days from the date of discovery of the exceedance.

**[Basis: SMAQMD Rule 201, Section 405]**

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

18.

19.

**RECORDKEEPING**

20. Emission test reports must be maintained on-site for the most recent five year period and must be made available to the Air Pollution Control Officer upon request.

**[Basis: SMAQMD Rule 419, Section 502.4]**

21.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

22.

**GENERAL REPORTING**

23. A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.
- B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 of each year respectively.
- C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[Basis: SMAQMD Rule 207, Section 501.1]**

777 12<sup>TH</sup> STREET, STE. 300  
SACRAMENTO, CA 95814-1908

(279) 207-1122  
(800) 880-9025

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

PO 24614 – (Mitsubishi Chemical Carbon Fiber & Composites)





# PERMIT TO OPERATE

**ISSUED TO: MITSUBISHI CHEMICAL CARBON FIBER & COMPOSITES, INC.**

**EQUIPMENT LOCATION: 5900 88<sup>TH</sup> STREET, SACRAMENTO, CA 95828**

| PERMIT NO. | EQUIPMENT DESCRIPTION  |
|------------|--|
| 24614      | OXIDATION OVEN (OVEN #4), MAKE: EISENMANN, BURNER MODEL: WMG10/2-A, ZM-3LN, BURNER SERIAL NOS.: 40283429 AND 40283431, 2.39 MMBTU/HR CAPACITY, NATURAL GAS FIRED, SERVING CARBON FIBER MANUFACTURING PROCESS LINE 33 (P/O 24518), PROCESS AREA VENTED TO APC REGENERATIVE THERMAL OXIDIZER (P/O 24520 OR P/O 24521). |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

- 1.
2. The equipment must be properly maintained and operated in accordance with the information submitted with the application and the manufacturer's recommendations at all times.  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**

**DATE ISSUED:** 10-25-2019  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 10-24-2024 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

3.

4.

5.

6.

**EMISSIONS LIMITATIONS**

7.

8. The burner of the oxidation oven must meet the following emission standards:  
**[Basis: SMAQMD Rule 202, Section 408 and Rule 419, Section 301]**

| Pollutant | Emission Standard and Work Practice |
|-----------|-------------------------------------|
| NOx       | 30 ppmvd corrected to 3% oxygen (A) |
|           |                                     |

(A) Based on SMAQMD BACT standard for this equipment category.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

9. The emissions from the oxidation oven must not exceed the following limits:  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408]**

| Pollutant |  | Emission Limits (B) |  |  |
|-----------|--|---------------------|--|--|
|           |  | (lb/day)            |  |  |
|           |  |                     |  |  |
| NOx       |  | 2.1                 |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |

(B) Emissions are based on 2.39 MMbtu/hr, 24 hours/day, 365 days/year

10.

11.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

12.

13.

**EMISSIONS TESTING**

14. Emissions of Nitrogen Oxides and Oxygen must be tested for the oxidation oven annually to verify compliance with Condition No. 8.

D. Submit the source test report to the Air Pollution Control Officer within 60 days from the completion of the test(s.)

**[Basis: SMAQMD Rule 419, Section 403 and Rule 201, Section 303.2]**

15. Emission testing methods must be the following:

A. Oxides of Nitrogen – ARB Method 100 or EPA Method 7E.

C. Stack gas Oxygen – ARB Method 100 or EPA Method 3A.

**[Basis: SMAQMD Rule 419, Section 501]**

16. In lieu of the test methods required by Condition No. 15, emission testing of the burners may be performed using a hand-held portable analyzer every other year starting in 2018 provided compliance with the following:

B. Notwithstanding the non-applicability of Rule 411 to the equipment, test equipment must comply with Rule 411, Attachment B. Emission readings must either be averaged over a 15 minute test period or 5 evenly spaced readings may be taken over a 15 minute test interval.

C. If the results from the portable analyzer test show that NO<sub>x</sub> emissions exceed the limits specified in Condition No. 8, the burner must be source tested no later than 60 days from the date of discovery of the exceedance.

**[Basis: SMAQMD Rule 201, Section 405]**

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

18.

19.

**RECORDKEEPING**

20. Emission test reports must be maintained on-site for the most recent five year period and must be made available to the Air Pollution Control Officer upon request.

**[Basis: SMAQMD Rule 419, Section 502.4]**

21.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

22.

**GENERAL REPORTING**

23. A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.
- B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 of each year respectively.
- C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[Basis: SMAQMD Rule 207, Section 501.1]**

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(279) 207-1122  
(800) 880-9025

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

PO 25925 – (Mitsubishi Chemical Carbon Fiber & Composites)





# PERMIT TO OPERATE

**ISSUED TO: MITSUBISHI CHEMICAL CARBON FIBER & COMPOSITES, INC.**

**EQUIPMENT LOCATION: 5900 88<sup>TH</sup> STREET, SACRAMENTO, CA 95828**

| PERMIT NO. | EQUIPMENT DESCRIPTION   |
|------------|---|
| 25925      | OXIDATION OVEN (OVEN #2), MAKE: MAXON, BURNER MODEL: OPLE10SUNSC11HAS, BURNER SERIAL NOS.: 18479862-1 AND 18479862-2, 2.0 MMBTU/HR CAPACITY (EACH), NATURAL GAS FIRED, SERVING CARBON FIBER MANUFACTURING PROCESS LINE 33 (P/O 25918), PROCESS AREA VENTED TO APC REGENERATIVE THERMAL OXIDIZER (P/O 24520 OR P/O 24521). |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

- 1.
2. The equipment must be properly maintained and operated in accordance with the information submitted with the application and the manufacturer's recommendations at all times.  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**

**DATE ISSUED:** 10-29-2021  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 10-24-2024 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

3.

4.

5.

6.

**EMISSIONS LIMITATIONS**

7.

8. The burner of the oxidation oven must meet the following emission standards:  
**[Basis: SMAQMD Rule 202, Section 408 and Rule 419, Section 301]**

| Pollutant | Emission Standard and Work Practice |
|-----------|-------------------------------------|
| NOx       | 30 ppmvd corrected to 3% oxygen (A) |
|           |                                     |

(A) Based on Rule 419 and the SMAQMD BACT standard for this equipment category.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

9. The emissions from the oxidation oven must not exceed the following limits:  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408]**

| Pollutant |  | Emission Limits (B) |  |  |
|-----------|--|---------------------|--|--|
|           |  | (lb/day)            |  |  |
|           |  |                     |  |  |
| NOx       |  | 1.7                 |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |
|           |  |                     |  |  |

(B) Emissions are based on 2.0 MMbtu/hr, 24 hours/day, 365 days/year

10.

11

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

12.

13.

**EMISSIONS TESTING**

14. Emissions of nitrogen oxides (NO<sub>x</sub>) and oxygen must be tested for the oxidation oven annually to verify compliance with Condition No. 8.

D. Submit the source test report to the Air Pollution Control Officer within 60 days from the completion of the test(s.)

**[Basis: SMAQMD Rule 419, Section 403 and Rule 201, Section 303.2]**

15. Emission testing methods must be the following:

A. Oxides of Nitrogen – ARB Method 100 or EPA Method 7E.

C. Stack gas Oxygen – ARB Method 100 or EPA Method 3A.

**[Basis: SMAQMD Rule 419, Section 501]**

16.

17. In lieu of the test methods required by Condition No. 15, emission testing of the burners may be performed using a hand-held portable analyzer every other year starting in 2018 provided compliance with the following:

B. Notwithstanding the non-applicability of Rule 411 to the equipment, test equipment must comply with Rule 411, Attachment B. Emission readings must either be averaged over a 15 minute test period or 5 evenly spaced readings may be taken over a 15 minute test interval.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

C. If the results from the portable analyzer test show that NOx emissions exceed the limits specified in Condition No. 8, the burner must be source tested no later than 60 days from the date of discovery of the exceedance.

**[Basis: SMAQMD Rule 201, Section 405]**

18.

19.

20.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

**RECORDKEEPING**

21. Emission test reports must be maintained on-site for the most recent five year period and must be made available to the Air Pollution Control Officer upon request.  
**[Basis: SMAQMD Rule 419, Section 502.4]**

22.

23.

**GENERAL REPORTING**

24. A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.
- B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 of each year respectively.
- C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- [Basis: SMAQMD Rule 207, Section 501.1]**

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**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

PO 27336 – (Mitsubishi Chemical Carbon Fiber & Composites)



SACRAMENTO METROPOLITAN



# PERMIT TO OPERATE

**ISSUED TO: MITSUBISHI CHEMICAL CARBON FIBER AND COMPOSITES INC.**

**EQUIPMENT LOCATION: 5900 88TH STREET, SACRAMENTO, CA 95828**

| PERMIT NO. | EQUIPMENT DESCRIPTION  |
|------------|--|
| 27336      | OXIDATION OVEN, MAKE: DESPATCH, 2.5 MMBTU/HR CAPACITY, NATURAL GAS FIRED, SERVING CARBON FIBER MANUFACTURING LINE 31 (P/O 27754), VENTED TO APC REGENERATIVE THERMAL OXIDIZER (P/O 24204). |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

- 1.
2. The equipment must be properly maintained and operated in accordance with the information submitted with the application and the manufacturer's recommendations at all times.  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**
- 3.

**DATE ISSUED:** 12-15-2023  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 10-24-2024 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

SACRAMENTO METROPOLITAN  
 AIR QUALITY MANAGEMENT DISTRICT

4.

5.

6.

**EMISSIONS LIMITATIONS**

7.

8. The burner of the oxidation oven must meet the following emission standards:  
**[Basis: SMAQMD Rule 201, Section 405; Rule 214, Section 408; and Rule 419, Section 301]**

| Pollutant | Emission Standard and Work Practice |
|-----------|-------------------------------------|
| NOx       | 30 ppmvd corrected to 3% oxygen (A) |
|           |                                     |

(A) Based on SMAQMD BACT standard for this equipment category.

9. The emissions from the oxidation oven burner must not exceed the following limits:  
**[Basis: SMAQMD Rule 201, Section 405; Rule 202, Section 408; and Rule 214, Section 408]**

| Pollutant |  | Emission Limits (B) |  |  |  |  |
|-----------|--|---------------------|--|--|--|--|
|           |  | (lb/day)            |  |  |  |  |
|           |  |                     |  |  |  |  |
| NOx       |  | 2.2                 |  |  |  |  |
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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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(B) Emissions are based on 2,500 cf/hour; 24 hours/day

10.

11.

**EMISSIONS TESTING**

12. Emissions of nitrogen oxides and oxygen must be tested for the oxidation oven every second year starting in 2018 to verify compliance with Condition No. 8.

D. Submit the source test report to the Air Pollution Control Officer within 60 days from the completion of the test(s).

**[Basis: SMAQMD Rule 419, Section 403 and Rule 201, Section 303.2]**

13. Emission testing must be performed in accordance with the following test methods:

A. Oxides of Nitrogen – ARB Method 100 or EPA Method 7E.

C. Stack Gas Oxygen – ARB Method 100 or EPA Method 3A.

**[Basis: SMAQMD Rule 419, Section 501]**

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

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**RECORDKEEPING**

20. Emission test reports must be maintained on-site for a continuous five-year period and must be made available to the Air Pollution Control Officer upon request.

**[Basis: SMAQMD Rule 419, Section 502.4]**

21.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

22.

**GENERAL REPORTING**

23. A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.
- B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 of each year respectively.
- C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[Basis: SMAQMD Rule 207, Section 501.1]**

777 12<sup>TH</sup> STREET, STE. 300  
SACRAMENTO, CA 95814-1908

(279) 207-1122  
(800) 880-9025

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

PO 27337 – (Mitsubishi Chemical Carbon Fiber & Composites)



SACRAMENTO METROPOLITAN



# PERMIT TO OPERATE

**ISSUED TO: MITSUBISHI CHEMICAL CARBON FIBER AND COMPOSITES INC.**

**EQUIPMENT LOCATION: 5900 88TH STREET, SACRAMENTO, CA 95828**

| PERMIT NO. | EQUIPMENT DESCRIPTION  |
|------------|--|
| 27337      | OXIDATION OVEN, MAKE: DESPATCH, 2.5 MMBTU/HR CAPACITY, NATURAL GAS FIRED, SERVING CARBON FIBER MANUFACTURING LINE 31 (P/O 27754), VENTED TO APC REGENERATIVE THERMAL OXIDIZER (P/O 24204). |

## SUBJECT TO THE FOLLOWING CONDITIONS:

### GENERAL

- 1.
2. The equipment must be properly maintained and operated in accordance with the information submitted with the application and the manufacturer's recommendations at all times.  
**[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]**
- 3.

**DATE ISSUED:** 12-15-2023  
**DATE REVISED:** 02-23-2024  
**DATE EXPIRES:** 10-24-2024 (UNLESS RENEWED)

ALBERTO AYALA, PH.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

BY: Brian F Krebs

SACRAMENTO METROPOLITAN  
 AIR QUALITY MANAGEMENT DISTRICT

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6.

**EMISSIONS LIMITATIONS**

7.

8. The burner of the oxidation oven must meet the following emission standards:  
**[Basis: SMAQMD Rule 201, Section 405; Rule 214, Section 408; and Rule 419, Section 301]**

| Pollutant | Emission Standard and Work Practice |
|-----------|-------------------------------------|
| NOx       | 30 ppmvd corrected to 3% oxygen (A) |
|           |                                     |

(A) Based on SMAQMD BACT standard for this equipment category.

9. The emissions from the oxidation oven burner must not exceed the following limits:  
**[Basis: SMAQMD Rule 201, Section 405; Rule 202, Section 408; and Rule 214, Section 408]**

| Pollutant |  | Emission Limits (B) |  |  |  |  |  |
|-----------|--|---------------------|--|--|--|--|--|
|           |  | (lb/day)            |  |  |  |  |  |
| NOx       |  | 2.2                 |  |  |  |  |  |
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## SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

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(B) Emissions are based on 2,500 cf/hour; 24 hours/day

10.

11.

### EMISSIONS TESTING

12. Emissions of nitrogen oxides and oxygen must be tested for the oxidation oven every second year starting in 2018 to verify compliance with Condition No. 8.

D. Submit the source test report to the Air Pollution Control Officer within 60 days from the completion of the test(s).

**[Basis: SMAQMD Rule 419, Section 403 and Rule 201, Section 303.2]**

13. Emission testing must be performed in accordance with the following test methods:

A. Oxides of Nitrogen – ARB Method 100 or EPA Method 7E.

C. Stack Gas Oxygen – ARB Method 100 or EPA Method 3A.

**[Basis: SMAQMD Rule 419, Section 501]**

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

14.

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SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

16.

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18.

**RECORDKEEPING**

19. Emission test reports must be maintained on-site for a continuous five-year period and must be made available to the Air Pollution Control Officer upon request.

**[Basis: SMAQMD Rule 419, Section 502.4]**

20.

21.

**GENERAL REPORTING**

22. A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.

B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 of each year respectively.

SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT

C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[Basis: SMAQMD Rule 207, Section 501.1]**