

AIR QUALITY

MANAGEMENT DISTRICT

AUTHORITY TO CONSTRUCT

ISSUED BY: _____

JORGE DeGUZMAN

DATE ISSUED: TBD

DATE EXPIRES: TBD

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

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

DESCRIPTION: PERFORMANCE MODIFICATIONS TO THE TURBINES, REDUCTION OF YEARLY NOX
AND CO FACILITY LIMIT. INSTALLATION OF A CO CATALYST.

APPLICATION NO.	EQUIPMENT DESCRIPTION
A/C 25510	GAS TURBINE, NO. 2, GENERAL ELECTRIC, MODEL 7FA, COMBINED CYCLE, 1,865 MMBTU/HR. FUELED BY NATURAL GAS/DIGESTER GAS
P/O 16012	AIR POLLUTION CONTROL SELECTIVE CATALYTIC REDUCTION SYSTEM SERVING THE TURBINE UNIT 2
A/C 25511	GAS TURBINE, NO. 3, GENERAL ELECTRIC, MODEL 7FA, COMBINED CYCLE, 1,865 MMBTU/HR. FUELED BY NATURAL GAS/DIGESTER GAS
P/O 16013	AIR POLLUTION CONTROL SELECTIVE CATALYTIC REDUCTION SYSTEM SERVING THE TURBINE UNIT 3
A/C 25634	CO OXIDATION CATALYST FOR CTG NO. 2
A/C 25635	CO OXIDATION CATALYST FOR CTG NO. 3

AUTHORITY TO CONSTRUCT CONDITIONS**START-UP REQUIREMENTS**

S1. After completing the equipment installation authorized under this Authority to Construct (ATC), the permit holder must contact the Sacramento Metropolitan Air Quality Management District (SMAQMD) to arrange a start-up inspection. SMAQMD may be contacted at (916) 874-4800.

[Basis: SMAQMD Rule 201, Section 405]

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- S2. This Authority to Construct may serve as a temporary Permit to Operate provided that:
- The permit holder has notified SMAQMD that the equipment installation is complete and the facility is ready for a start-up inspection,
 - The equipment installed matches the equipment authorized in this Authority to Construct,
 - The equipment is operated in compliance with all conditions in this Authority to Construct, and
 - The equipment and its operation complies with SMAQMD, state and federal laws and regulations.
- [Basis: SMAQMD Rule 201, Section 303.1, 405]**
- S3. This Authority to Construct has been reviewed through an Enhanced New Source Review process in accordance with the procedural requirements of Section 401 through 408 of Rule 207 Title V – Federal Operating Permit Program.
[Basis: SMAQMD Rule 202, Section 404 and Rule 207 Sections 401-408]
- S4. The Sacramento Municipal Utility District Financing Authority must submit to the Air Pollution Control Officer an application to modify the Title V permit with an Administrative Title V Permit Amendment prior to commencing construction with modifications authorized by this Authority to Construct.
[Basis: SMAQMD Rule 207, Section 409]

GENERAL

- 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]
- The Air Pollution Control Officer and/or authorized representatives must be permitted to do all of the following:
 - Enter the source premises or any location at which any records required by this ATC are kept.
 - Access and copy any records required by this ATC.
 - Inspect or review any equipment, operation, or method required under this ATC.
 - Sample emissions from the source or require samples to be taken.**[Basis: SMAQMD Rule 201, Section 405]**
- This ATC does not authorize the emission of air contaminants in excess of those allowed by Division 26, Part 4, Chapter 3, of the California Health and Safety Code or the SMAQMD Rules and Regulations.
[Basis: SMAQMD Rule 201, Sections 303.1, 405]
- The facility may not discharge air contaminants or other materials that cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
[Basis: SMAQMD Rule 402, Section 301]
- A legible copy of this ATC must be maintained on the premises with the equipment.
[Basis: SMAQMD Rule 201, Section 401]

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EMISSION LIMITATIONS

6. The process must not discharge into the atmosphere any visible air contaminant other than uncombined water vapor for a period or periods aggregating more than three minutes in any one hour if the discharge is as dark or darker than Ringelmann No. 1 or is equal to or greater than 20% opacity.

[Basis: SMAQMD Rule 401, Section 301]

7. Emissions from the following equipment must not exceed the following emission limits.

[Basis: SMAQMD Rule 202 and Rule 413, Section 302.1(d), and 40 CFR Part 60. 332(a)(i)]

Pollutant	Maximum Allowable Emissions Gas Turbine No. 2 and Gas Turbine No. 3	
	VOC	A. 1.4 ppmvd at 15% O ₂ , averaged over any 3 hour period (A)
NO _x	B. 2.0 ppmvd at 15% O ₂ , averaged over any 1 hour period (A) (B)	
	C. 9.0 ppmvd at 15% O ₂ (C), the average of three runs for 15 minutes, determined by using EPA Method 20.	
	D. 30 ppmvd at 15% O ₂ , averaged over any 1 hour period (D)	
CO	E. 4.0 ppmvd at 15% O ₂ averaged over any 3 hour period (A)	

(A) **Excluding** periods containing startups or shutdowns as defined in **Condition No. 14**.

(B) **Excluding** periods containing short term excursions as defined in **Condition No. 14**.

(C) Excluding the startup, shutdown, short term excursion periods defined in **Condition No. 15**.

Compliance with the 9-ppm NO_x emission standard is determined pursuant to SMAQMD Rule 413, as amended March 24, 2005.

(D) **Applicable only** for periods containing short term excursions as defined in **Condition No. 14**.

8. Emissions from the following equipment must not exceed the following emission limits, **excluding** periods containing startups, shutdowns or short term excursions as defined in **Condition No. 14**.

[Basis: SMAQMD Rule 202]

Pollutant	Maximum Allowable Emissions lb/hour	
	Gas Turbine No. 2	Gas Turbine No. 3
VOC	3.30 (A)	3.30 (A)
NO _x	13.51 (B)	13.51 (B)
SO ₂	1.67 (C)	1.67 (C)
PM10	9.00 (D)	9.00 (D)

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Pollutant	Maximum Allowable Emissions lb/hour	
	Gas Turbine No. 2	Gas Turbine No. 3
CO	16.46 (E)	16.46 (E)

- (A) Emissions based on a turbine VOC emission factor of 0.00177 lb/MMbtu and operating at maximum capacity.
- (B) Emissions based on data submitted in the SMAQMD Rule 201 permit application and is monitored by the turbine's NOx CEM system (1 hour average).
- (C) Emissions based on a turbine aggregate usage of 2,500 scfm (92.63 MMbtu/hr) digester gas (4.626577E-3 lb SO₂/MMbtu) and 1,772.37 MMbtu/hr natural gas (7.00967E-4 lb SO₂/MMbtu)
- (D) Emissions based on a turbine PM10 emission factor of 0.00483 lb/MMbtu and operating at maximum capacity.
- (E) Emissions based on data submitted in the SMAQMD Rule 201 permit application and is monitored by the turbine's CO CEM system (3 hour average)

9. Emissions from the following equipment must not exceed the following emission limits, **including** periods containing startups, shutdowns or short term excursions as defined in **Condition No. 14**.

[Basis: SMAQMD Rule 202]

Pollutant	Maximum Allowable Emissions lb/day				
	Gas Turbine No. 2	Gas Turbine No. 3	Cooling Tower	Perlite Storage Silo Dust Collector	Total
VOC	117.3	117.3	NA	NA	234.6
NOx	523.7	523.7	NA	NA	1,047.4
SO ₂	40.1 (A)	40.1 (A)	NA	NA	71.6
PM10	216.0	216.0	9.4 (B)	0.2 (B)	441.6 (B)
CO	3,051.7	3,051.7	NA	NA	6,103.3

- (A) Facility SO₂ total equates to the total usage of the proposed natural gas/digester gas mixture. Individual turbines equate to the total usage of the digester gas and balance natural gas.
- (B) Values of PM10 reflect changes proposed in Permit 22673, cooling tower TDS change and PO 22702, perlite storage silo dust collector addition.

10. Emissions from the following equipment must not exceed the following emission limits, **including** periods containing startups, shutdowns or short term excursions as defined in **Condition No. 14**.

[Basis: SMAQMD Rule 202]

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Pollutant	Maximum Allowable Emissions							
	Quarter 1 lb/quarter		Quarter 2 lb/quarter		Quarter 3 lb/quarter		Quarter 4 lb/quarter	
	CT No. 2	CT No. 3	CT No. 2	CT No. 3	CT No. 2	CT No. 3	CT No. 2	CT No. 3
VOC	7,403	7,403	7,479	7,479	7,555	7,555	7,555	7,555
NOx	31,010	31,010	31,321	31,321	31,632	31,632	31,632	31,632
SOx	3,095	3,095	3,130	3,130	3,164	3,164	3,164	3,164
PM10	19,440	19,440	19,656	19,656	19,872	19,872	19,872	19,872
PM2.5	19,401	19,401	19,617	19,617	19,832	19,832	19,832	19,832
CO	73,965	73,965	74,343	74,343	74,722	74,722	74,722	74,722

Pollutant	Maximum Allowable Emissions Gas Turbine No. 2, Gas Turbine No. 3 Perlite Storage Silo Dust Collector and Cooling Tower Combined				
	Quarter 1 lb/quarter	Quarter 2 lb/quarter	Quarter 3 lb/quarter	Quarter 4 lb/quarter	Total tons/year
VOC	14,807	14,958	15,110	15,110	30.0
NOx	62,021	62,643	63,265	63,265	96.0
SO ₂	6,190	6,259	6,328	6,328	12.6
PM10 (A)	39,725	40,167	40,608	40,608	80.6
PM2.5 (E)	39,129	39,564	39,998	39,998	79.3
CO	147,929	148,687	149,444	149,444	123.1
GHG, CO ₂ e Natural Gas combustion (B)	466,889 Tons	472,077 Tons	477,265 Tons	477,265 Tons	1,893,495
GHG, CO ₂ e CH ₄ & N ₂ O (C)	462 Tons	467 Tons	472 Tons	472 Tons	1,873
GHG, CO ₂ e Digester	18203	18405	18607	18607 Tons	73,822

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Pollutant	Maximum Allowable Emissions Gas Turbine No. 2, Gas Turbine No. 3 Perlite Storage Silo Dust Collector and Cooling Tower Combined				
	Quarter 1 lb/quarter	Quarter 2 lb/quarter	Quarter 3 lb/quarter	Quarter 4 lb/quarter	Total tons/year
Gas combustion (D)	Tons	Tons	Tons		

- (A) Values of PM10 reflect changes proposed in applications 22673, cooling tower TDS change and 22702, perlite storage silo dust collector addition.
- (B) GHG emission factor is based on 40 CFR part 75, Appx. G, Eq G-4, assuming all fuel is natural gas. For inventory purposes only.
- (C) GHG emission factors for Methane and N2O are based on 40 CFR part 98.33 Cable C-2, Global warming potential from 40 CFR Part 98, Table A-1. For inventory purposes only.
- (D) GHG emission factors are based on 40 CFR part 75, Appx. G, Eq G-4 & 40 CFR part 98.33, Eq C-5. Calculation is based on fuel flow of 2,500 scfm of digester gas provided for inventory purposes only.
- (E) A conversion factor of 0.998 was used to convert PM10 to PM2.5 as referenced in SMAQMD document "COMMUNITY BANK AND PRIORITY RESERVE BANK PM2.5 EMISSION REDUCTION CREDIT EVALUATION" 8-9-2012, The factor of PM2.5 for the cooling tower is based on submitted data from the applicant as part of permit 22672 which showed PM2.5 is 26.6% of the total PM from the drift eliminator. PM2.5 is assumed to be equal to PM10 for the perlite storage silo. PM2.5 is for included for inventory purposes only.

EQUIPMENT OPERATION

11. The total consumption rate of digester gas by the Cosumnes Power Plant must not exceed 2,500 scfm.
[Basis: SMAQMD Rules 201, 202, and 208]
12. The digester gas used at this facility must not exceed 50 PPM of H2S, measured prior to the commingling with the natural gas.
[Basis: SMAQMD Rules 201 and 202]
13. Each combined cycle turbine must not be operated without a functioning selective catalytic reduction air pollution control system, **excluding** periods of startups and shutdowns as defined in **Condition No. 14**.
[Basis: SMAQMD Rules 201 and 202]
14. Startup, shutdown and short term excursions are defined as follows:
 - A. Startup is defined as the time period commencing with the introduction of fuel to the gas turbine and ending at the time that the 15 minute average NOx and CO concentrations do not exceed 2.0 ppmvd at 15% O2 and 4.0 ppmvd at 15% O2 respectively
 - i. In no case may the startup time period exceed 180 consecutive minutes.
 - B. Shutdown is defined as the 30 minute time period immediately prior to the termination of fuel flow to the gas turbine.
 - C. Short term excursion is defined as a 15-minute period designated by the owner/operator, that is the direct result of transient load conditions, when the 15 minute average NOx concentration exceeds 2.0

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ppmvd at 15% O₂.

- i. No more than four consecutive 15-minute periods may be designated as short term excursions.
- ii. For each gas turbine, no more than 40 15-minute periods/calendar year (10 hours/calendar year) may be designated as short term excursions.
- iii. Examples of transient load conditions include, but are not limited to the following:
 - (a) initiation/shutdown of combustion turbine inlet air cooling.
 - (b) rapid combustion turbine load changes.

[Basis: SMAQMD Rules 201 and 202]

15. For purposes of determining compliance with SMAQMD Rule 413:

- A. Startup is defined as the time period commencing with the introduction of fuel to the gas turbine and ending at the time that the 15 minute average NO_x concentration does not exceed 9.0 ppmvd at 15% O₂.
 - i. The startup period must not exceed 4 hours following a shutdown of the associated steam turbine or associated HRSG and steam piping of greater than 72 hours.
 - ii. The startup period must not exceed 3 hours following a shutdown of the associated steam turbine or associated HRSG and steam piping between 8 hours and 72 hours.
 - iii. The startup period must not exceed 1 hour following a shutdown of the associated steam turbine or associated HRSG and steam piping of less than or equal to 8 hours.
- B. The shutdown period for a gas turbine must not exceed 1 hour.
- C. A short term excursion is defined as a period of time not exceeding 6 hours and not more than four consecutive 15 minute blocks. The total of all 15 minute blocks must not exceed 10 hours per calendar year per gas turbine.

[Basis: SMAQMD Rule 413, Sections 113 and 114]

MONITORING REQUIREMENTS

16. The owner/operator must operate a continuous emission monitoring (CEM) system for each 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_x), carbon monoxide (CO) and oxygen (O₂).
 - B. For NO_x and O₂, the CEMS must comply with U.S. EPA Performance Specifications in 40 CFR 75 Appendix A.
 - C. For CO, the CEMS must comply with U.S. EPA Performance Specifications in 40 CFR 60 Appendix B Performance Specification 4.

[Basis: SMAQMD Rules 201 and 202]

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, Rule 202 Rule 413, Section 303.3 and 40 CFR Part 60.334(i)(2)(i)]

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Parameter to be Monitored	Units
A. Total Fuel consumption of each gas turbine	MMBTU/hr of natural gas and/or natural gas/digester gas combination
B. Exhaust gas flow rate of turbine	kscfh or lb/hr
C. Non-resettable totalizing hour meter	Operating hours

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 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
At all times	<ul style="list-style-type: none"> A. Permit number of each gas turbine. B. Manufacturer, model number and rating in megawatts of each gas turbine. C. Actual startup and shutdown time. D. Date and results of most recent emission test reported as ppmv at 15% O₂ and pounds per unit time. E. A summary of any emissions corrective maintenance taken. F. Malfunction in operation of each turbine. G. Measurements from the continuous emissions monitoring system and continuous parameter monitoring system. H. Continuous emission monitoring device and performance testing measurements. I. Continuous emissions monitoring system performance evaluations. J. Continuous emissions monitoring system calibration checks. K. Continuous emission monitoring system (CEMS adjustments, maintenance and downtime (i.e., any unit operating hour in which sufficient data are not obtained to validate emissions over the hour; and/or any period when a fuel sample cannot be validated), and periods of fuel sulfur content monitor downtime (i.e., any period when required sampling is not taken by its due date, or if invalid sampling results are obtained). L. For short-term excursions, as defined in Condition No. 14, record the following information: <ul style="list-style-type: none"> i. The number of consecutive 15-minute periods when the 15-minute average NO_x concentration exceeded the limits of Condition No. 7 during each short-term excursion. ii. The qualified condition(s) under which each short-term excursion occurred. iii. The maximum 1-hour average NO_x concentration during the period that includes

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Frequency	Information to be Recorded
	<p>each short-term excursion, pursuant to Condition No. 7.</p> <p>iv The cumulative total, per calendar year per gas turbine, of all 15-minute periods when the 15-minute average NOx concentration exceeded the limits of Condition No. 7.</p> <p>M. Using the methodologies specified in U.S. EPA's alternative monitoring approval letter dated October 11, 2011, the permittee must:</p> <p>i. As applicable determine the fuel sulfur content, gross caloric value, and F-factor for natural gas, digester gas, and combined fuel stream</p> <p>ii. Calculate the hourly NOx (in lb/hour), CO2 (in tons/hour), and SOx (in lb/hour) emissions from each combustion turbine.</p>
Hourly	<p>N. Each gas turbine's natural gas and digester gas fuel consumption (MMbtu/hr).</p> <p>O. Indicate when each gas turbine startup or shutdown time period occurred.</p> <p>P. Each gas turbine's VOC, NOx, SO₂, PM10 and CO hourly mass emissions.</p> <p>i. For those pollutants directly monitored (NOx and CO), the hourly mass emissions must be calculated based on concentration measurements from the CEM system required pursuant to Condition No. 16.</p> <p>ii. For those pollutants that are not directly monitored (VOC, SO₂ and PM10), the hourly mass emissions must be calculated based on SMAQMD approved emission factors contained in footnotes to the table in Condition No. 8.</p> <p>Q. Each gas turbine's NOx and CO concentration measured in ppmvd at 15% O₂.</p>
Daily	<p>R. Number of hours of operation each day for each gas turbine.</p> <p>S. Actual daily combined fuel usage, by turbine</p> <p>T. Total facility VOC, NOx, SO₂, PM10 and CO daily mass emissions.</p>
Quarterly	<p>U. Total facility VOC, NOx, SO₂, PM10 and CO quarterly mass emissions.</p>

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 Rules 201 and 202, and 40 CFR Part 60.334 (j)(5)]

Frequency	Information to be Submitted
<p>Quarterly</p> <p>Submit the report by:</p> <p>January 30</p> <p>April 30</p> <p>July 30</p>	<p>A. All CEMS downtime (i.e., whenever inoperative excluding periods of monitor zero and span checks:</p> <p>i. Date and time of non-operation of the continuous emission monitoring system.</p> <p>ii. Nature of the continuous emission monitoring system repairs or adjustments.</p> <p>B. Whenever an emission occurs as measured by the required continuous monitoring equipment that is in excess of any emission limitation:</p> <p>i. Magnitude of the emission which has been determined to be in excess.</p> <p>ii. Date and time of the commencement and completion of each period of excess</p>

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Frequency	Information to be Submitted
October 30 for the previous calendar quarter.	<p>emissions.</p> <p>iii. Periods of excess emissions due to start-up, shut-down, short-term excursion and malfunction must be specifically identified.</p> <p>iv. The nature and cause of any malfunction (if known).</p> <p>v. The corrective action taken or preventive measures adopted.</p> <p>C. If there were no excess emissions for a calendar quarter:</p> <p>i. A report must be submitted indicating that there were no excess emissions.</p>

EMISSION REDUCTION CREDIT (ERC) REQUIREMENTS

20. The permittee must surrender (and has surrendered - see **condition no. 21**) ERCs to the SMAQMD Air Pollution Control Officer to offset the following amount of emissions:

[Basis: SMAQMD Rules 202 Section 302]

Equipment - Gas Turbine No. 2 Gas Turbine No. 3 Cooling Tower & Perlite Storage Silo	Amount Of Emission Offsets For Which ERCs Are To Be Surrendered Lb/Quarter			
	QUARTER 1	QUARTER 2	QUARTER 3	QUARTER 4
VOC	14,807	14,958	15,110	15,110
NOx	62,021	62,643	63,265	63,265
PM10	39,724.6	40,166.6	40,607.6	40,607.6

21. The following ERCs have been surrendered to the SMAQMD Air Pollution Control Officer to comply with the emission offset requirements as stated in condition **no. 20**:

[Basis: SMAQMD Rules 202 Section 302]

Equipment - Gas Turbine No. 2 Gas Turbine No. 3 Cooling Tower & Perlite Storage Silo	Amount Of Emissions Offsets Provided By ERCs That Have Been Surrendered Lb/Quarter			
	Quarter 1	Quarter 2	Quarter 3	Quarter 4
VOC - See Attachment A	14,807	14,958	15,110	15,110
NOx - See Attachment B	62,021	62,643	63,265	63,265
PM10 - See Attachment C	39,724.6	40,168.3	40,608.4	40,607.7

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22. The permittee must ensure that the paved roads described in the following SMAQMD ERCs are properly maintained and repaired for the life of the Cosumnes power plant to confirm continuing PM10 emission reductions.
- A. SMAQMD ERC NO. 00767 - 0.5 mile section of Angle Road.
 - B. SMAQMD ERC NO. 00768 - 1.0 mile section of Angrave Road.
 - C. SMAQMD ERC NO. 00769 - 0.78 mile section of Beskeen Road.
 - D. SMAQMD ERC NO. 00772 - 1.40 mile section of Kiefer Boulevard.
 - E. SMAQMD ERC NO. 00773 - 0.89 mile section of Laguna Road.
 - F. SMAQMD ERC NO. 00774 - 1.0 mile section of Loll Road.
 - G. SMAQMD ERC NO. 00775 - 0.19 mile section of Magos Road.
- [Basis: SMAQMD Rules 202 Section 302]**

EMISSION TESTING REQUIREMENTS

23. The permittee must perform a VOC, NO_x, SO₂, PM₁₀, CO and Ammonia source test and CEM accuracy (RATA) test of each gas turbine once each calendar year. The SMAQMD Air Pollution Control Officer may waive the annual PM₁₀ and/or VOC source test requirement if, in the SMAQMD Air Pollution Control Officer's sole judgment, prior source test results indicate an adequate compliance margin has been maintained.
- A. Submit a source test plan to the SMAQMD Air Pollution Control Officer for approval at least 30 days before the source test is to be performed.
 - B. Notify the SMAQMD Air Pollution Control Officer at least 7 days prior to the emission testing date if the date has changed from that approved in the source test plan.
 - C. During the test(s), each gas turbine must be operated at its maximum firing capacity, defined as $\geq 90\%$ of rated heat input capacity and taking into account ambient conditions.
 - D. Submit the source test report to the SMAQMD Air Pollution Control Officer within 60 days after the completion of the source test(s).
 - E. Source testing must occur with a representative flow of digester gas into the pipeline feeding the fuel supply to the turbine being tested.
- [Basis: SMAQMD Rule 201, Section 405]**
24. The permittee must, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)
- [Basis: SMAQMD Rule 201, Section 303.1]**

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Your application for this air quality Authority to Construct was evaluated for compliance with Sacramento Metropolitan Air Quality Management District (SMAQMD), state and federal air quality rules. The following list identifies the rules that most commonly apply to the operation of your equipment. Other rules may also be applicable.

<u>SMAQMD RULE NO.</u>	<u>RULE TITLE</u>
201	GENERAL PERMIT REQUIREMENTS (8-24-06)
202	NEW SOURCE REVIEW (8-23-12)
217	PUBLIC NOTICE REQUIREMENTS FOR PERMITS (8-23-12)
401	RINGELMANN CHART (4-19-83)
402	NUISANCE (8-3-77)
404	PARTICULATE MATTER (11-20-84)
405	SPECIFIC CONTAMINANTS (12-6-78)
413	STATIONARY GAS TURBINES (04-06-95)
420	DUST AND CONDENSED FUMES (8-3-77)
<u>FEDERAL</u>	<u>FEDERAL REGULATION</u>
40 CFR 60 Subpart GG	NSPS for Stationary Gas Turbines

The conditions on this Authority to Construct reflect some, but not all, of the requirements of these rules. Because other rule requirements may apply to the operation, the permit holder should be familiar with all of the rules and related requirements. In addition, because future changes in prohibitory rules may establish more stringent requirements that may supersede the conditions listed here, the permit holder should monitor proposed rules and rule adoption actions at SMAQMD.

For further information please consult your SMAQMD rulebook or contact the SMAQMD for assistance.

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ATTACHMENT A

The following VOC ERCs have been surrendered the SMAQMD Air Pollution Control Officer to comply with the VOC emission offset requirements as stated in Condition **No. 21**:

Emission Reduction Credit Certificate No.	Face Value Of Voc Erc Certificates Surrendered Lb/Quarter				Inter-Pollutant Trading Ratio	Offset Ratio	Value Applied To The Project VOC Emission Liability Lb/Quarter			
	QTR 1	QTR 2	QTR 3	QTR 4			QTR 1	QTR 2	QTR 3	QTR 4
PCAPCD 2000-0007 (A) FORMICA CORPORATION	22211 (OF 68000)	22437 (OF 70000)	22665 (OF 70000)	22665 (OF 62000)	N/A	1.5:1	14807	14958	15110	15110
Total VOC							14807	14958	15110	15110

(A) This is a partial surrender of the total amount of the ERC certificate. The remaining VOC ERCs are surrendered for the required NOx offsets using an interpollutant trading ratio.

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ATTACHMENT B

The following NOx/VOC ERCs have been surrendered to the SMAQMD Air Pollution Control Officer to comply with the NOx emission offset requirements as stated in Condition No. 21:

Emission Reduction Credit Certificate No.	Face Value Of NOx/VOC Erc Certificates Surrendered Lb/Quarter				Inter-Pollutant Trading Ratio	Offset Ratio	Value Applied To The Project NOx Emission Liability Lb/Quarter			
	QTR 1	QTR 2	QTR 3	QTR 4			QTR 1	QTR 2	QTR 3	QTR 4
SMAQMD 00-00653 SWANSONS VOC	15985	20446	11643	24584	2.6:1	1.5:1	4099	5243	2985	6304
SMAQMD 01-00750 DONNER FURN. VOC	394	757	659	784	2.6:1	1.5:1	101	194	169	201
SMAQMD 00-00776 AG CONTAINERS VOC	680	1240	1560	520	2.6:1	1.5:1	174	318	400	133
SMAQMD 02-00777 P&G NOX	829	829	829	829	NA	1.5:1	553	553	553	553
SMAQMD 02-00823 P&G NOX	1518	1518	1518	1518	NA	1.5:1	1012	1012	1012	1012
SMAQMD 02-00826 P&G NOX	4514	4514	4514	4514	NA	1.5:1	3009	3009	3009	3009
SMAQMD 02-00827 P&G NOX	1486	1486	1486	1486	NA	1.5:1	991	991	991	991
SMAQMD 02-00836 BLUE DIAMOND VOC	1590	1545	1600	1556	2.6:1	1.5:1	408	396	410	399

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Emission Reduction Credit Certificate No.	Face Value Of NOx/VOC Erc Certificates Surrendered Lb/Quarter				Inter-Pollutant Trading Ratio	Offset Ratio	Value Applied To The Project NOx Emission Liability Lb/Quarter			
	QTR 1	QTR 2	QTR 3	QTR 4			QTR 1	QTR 2	QTR 3	QTR 4
SMAQMD 02-00838 CAMPBELL SOUP NOX	0	0	7303	0	NA	1.5:1	0	0	4869	0
SMAQMD 02-00849 BLUE DIAMOND NOX	5693	5919	6159	5489	NA	1.5:1	3795	3946	4106	3659
SMAQMD 00-00852 AG CONTAINER VOC	1314	2415	3045	984	2.6:1	1.5:1	337	619	781	252
SMAQMD 03-00867 RANCHO SECO VOC	40	40	40	40	2.6:1	1.3:1	11.8	11.8	11.8	11.8
SMAQMD 03-00869 RANCHO SECO VOC	28	28	28	28	2.6:1	1.3:1	8.3	8.3	8.3	8.3
SMAQMD 03-00873 RANCHO SECO VOC	52	52	52	52	2.6:1	1.3:1	15.4	15.4	15.4	15.4
SMAQMD 03-00875 RANCHO SECO VOC	341	125	30	134	2.6:1	1.3:1	101	37	9	40
SMAQMD 03-00881 CAMPBELL NOX	1785.7	3817.4	3028.9	0	NA	1.5	1191	2545	2019	0
SMAQMD 03-00883 P&G VOC	25000	25000	21630	25000	2.6:1	1.5:1	6410	6410	5546	6410

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Emission Reduction Credit Certificate No.	Face Value Of NOx/VOC Erc Certificates Surrendered Lb/Quarter				Inter-Pollutant Trading Ratio	Offset Ratio	Value Applied To The Project NOx Emission Liability Lb/Quarter			
	QTR 1	QTR 2	QTR 3	QTR 4			QTR 1	QTR 2	QTR 3	QTR 4
SMAQMD 03-00887 AM RIV AGGREG. VOC	250	631	1188	1013	2.6:1	1.5:1	64	162	304	260
SMAQMD 03-00887 AM RIV AGGREG. NOX	322	810	1528	1303	NA	1.5:1	215	540	1019	869
YSAQMD EC-0121 BURNS PHILP VOC	0	5	20	9	2.6:1	1.5:1	0	1	5	2
YSAQMD EC-0121 BURNS PHILP NOX	0	292	1201	500	NA	1.5:1	0	195	801	333
YSAQMD EC-0123 GENERAL MILLS NOX	765	751	1074	1007	NA	1.5:1	510	501	716	671
YSAQMD EC-0174 SPRECKLES VOC	10	230	233	243	2.6:1	1.5:1	3	59	60	62
YSAQMD EC-0174 SPRECKLES NOX	32	1271	1158	1307	NA	1.5:1	21	847	772	871
YSAQMD EC-0175 SPRECKLES VOC	21	485	491	503	2.6:1	1.5:1	5	124	126	129
YSAQMD EC-0175 SPRECKLES NOX	430	10044	10173	10410	NA	1.5:1	287	6696	6782	6940

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Emission Reduction Credit Certificate No.	Face Value Of NOx/VOC Erc Certificates Surrendered Lb/Quarter				Inter-Pollutant Trading Ratio	Offset Ratio	Value Applied To The Project NOx Emission Liability Lb/Quarter			
	QTR 1	QTR 2	QTR 3	QTR 4			QTR 1	QTR 2	QTR 3	QTR 4
YSAQMD EC-0176 SPRECKLES VOC	20	0	0	0	2.6:1	1.5:1	5	0	0	0
YSAQMD EC-0176 SPRECKLES NOX	487	0	0	0	NA	1.5:1	325	0	0	0
YSAQMD EC-0177 SPRECKLES VOC	19	397	403	421	2.6:1	1.5:1	5	102	103	108
YSAQMD EC-0177 SPRECKLES NOX	550	11844	12003	12552	NA	1.5:1	367	7896	8002	8368
YSAQMD EC-0178 SPRECKLES VOC	1	86	104	97	2.6:1	1.5:1	0	22	27	25
YSAQMD EC-0178 SPRECKLES NOX	90	6401	7780	7232	NA	1.5:1	60	4267	5186	4821
PCAPCD 2000-0007 FORMICA CORP VOC	45790	47563	47335	39335	2.6:1	1.5:1	11741	12196	12137	10086
PCAPCD 2001-17 FORMICA CORP VOC	62698	4151	48395	28959	2.6:1	1.5:1	16076	1064	12409	7425
SUBTOTAL NOX							51899	59981	75344	63970
Move 9417 lb of surplus ERCs from QTR 3 to QTR 1 (A)							+9417		-9417	
Move 2662 lb of surplus ERCs from QTR 3 to QTR 2 (A)								+2662	-2662	
Move 705 lb of surplus ERCs from QTR 4 to QTR 1 (B)							+705			-705

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Emission Reduction Credit Certificate No.	Face Value Of NOx/VOC Erc Certificates Surrendered Lb/Quarter				Inter-Pollutant Trading Ratio	Offset Ratio	Value Applied To The Project NOx Emission Liability Lb/Quarter			
	QTR 1	QTR 2	QTR 3	QTR 4			QTR 1	QTR 2	QTR 3	QTR 4
TOTAL NOX						62021	62643	63265	63265	

- (A) SMAQMD Rule 202 Section 302.3.a allows VOC and NOx ERCs created in calendar quarters 2 and 3 to be used as offsets in any calendar quarter with certain restrictions.
- (B) SMAQMD Rule 202 Section 302.3.b allows VOC and NOx ERCs created in calendar quarters 1 and 4 to be used as offsets in either of calendar quarters 1 and 4.

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ATTACHMENT C

The following PM10/SO2 ERCs have been surrendered to the SMAQMD Air Pollution Control Officer to comply with the PM10 emission offset requirements as stated in Condition **No. 21**:

Emission Reduction Credit Certificate No.	Face Value Of PM10 ERC Certificates Surrendered Lb/Quarter				Inter-Pollutant Trading Ratio	Offset Ratio	Value Applied To The Project PM10 Emission Liability Lb/Quarter			
	QTR 1	QTR 2	QTR 3	QTR 4			QTR 1	QTR 2	QTR 3	QTR 4
SMAQMD 01-00758 E G READY MIX PM10	1275	1506	1564	1448	NA	1.5:1	850.0	1004.0	1042.7	965.3
SMAQMD CERTIFICATE NUMBERS FOLLOW P&G PM10										
02-00779	1	1	1	1	NA	1.5	0.7	0.7	0.7	0.7
02-00780	2	2	2	2	NA	1.5	1.3	1.3	1.3	1.3
02-00781	0.5	0.5	0.5	0.5	NA	1.5	0.3	0.3	0.3	0.3
02-00782	0.4	0.4	0.4	0.4	NA	1.5	0.3	0.3	0.3	0.3
02-00783	6	6	6	6	NA	1.5	4.0	4.0	4.0	4.0
02-00784	48	48	48	48	NA	1.5	32.0	32.0	32.0	32.0
02-00785	2	2	2	2	NA	1.5	1.3	1.3	1.3	1.3
02-00786	4	4	4	4	NA	1.5	2.7	2.7	2.7	2.7
02-00787	0.03	0.03	0.03	0.03	NA	1.5	0.0	0.0	0.0	0.0
02-00788	80	80	80	80	NA	1.5	53.3	53.3	53.3	53.3
02-00789	0.3	0.3	0.3	0.3	NA	1.5	0.2	0.2	0.2	0.2
02-00790	7	7	7	7	NA	1.5	4.7	4.7	4.7	4.7
02-00791	31	31	31	31	NA	1.5	20.7	20.7	20.7	20.7

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Emission Reduction Credit Certificate No.	Face Value Of PM10 ERC Certificates Surrendered Lb/Quarter				Inter-Pollutant Trading Ratio	Offset Ratio	Value Applied To The Project PM10 Emission Liability Lb/Quarter			
	QTR 1	QTR 2	QTR 3	QTR 4			QTR 1	QTR 2	QTR 3	QTR 4
02-00792	1	1	1	1	NA	1.5	0.7	0.7	0.7	0.7
02-00793	0.3	0.3	0.3	0.3	NA	1.5	0.2	0.2	0.2	0.2
02-00794	35	35	35	35	NA	1.5	23.3	23.3	23.3	23.3
02-00795	199	199	199	199	NA	1.5	132.7	132.7	132.7	132.7
02-00796	186	186	186	186	NA	1.5	124.0	124.0	124.0	124.0
02-00797	2	2	2	2	NA	1.5	1.3	1.3	1.3	1.3
02-00798	0.1	0.1	0.1	0.1	NA	1.5	0.1	0.1	0.1	0.1
02-00799	2	2	2	2	NA	1.5	1.3	1.3	1.3	1.3
02-00800	1	1	1	1	NA	1.5	0.7	0.7	0.7	0.7
02-00801	208	208	208	208	NA	1.5	138.7	138.7	138.7	138.7
02-00802	1	1	1	1	NA	1.5	0.7	0.7	0.7	0.7
02-00803	35	35	35	35	NA	1.5	23.3	23.3	23.3	23.3
02-00804	28	28	28	28	NA	1.5	18.7	18.7	18.7	18.7
02-00805	105	105	105	105	NA	1.5	70.0	70.0	70.0	70.0
02-00806	58	58	58	58	NA	1.5	38.7	38.7	38.7	38.7
02-00807	162	162	162	162	NA	1.5	108.0	108.0	108.0	108.0
02-00808	13	13	13	13	NA	1.5	8.7	8.7	8.7	8.7
02-00809	2	2	2	2	NA	1.5	1.3	1.3	1.3	1.3
02-00810	121	121	121	121	NA	1.5	80.7	80.7	80.7	80.7
02-00811	235	235	235	235	NA	1.5	156.7	156.7	156.7	156.7
02-00812	99	99	99	99	NA	1.5	66.0	66.0	66.0	66.0
02-00813	193	193	193	193	NA	1.5	128.7	128.7	128.7	128.7

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Emission Reduction Credit Certificate No.	Face Value Of PM10 ERC Certificates Surrendered Lb/Quarter				Inter-Pollutant Trading Ratio	Offset Ratio	Value Applied To The Project PM10 Emission Liability Lb/Quarter			
	QTR 1	QTR 2	QTR 3	QTR 4			QTR 1	QTR 2	QTR 3	QTR 4
02-00814	2	2	2	2	NA	1.5	1.3	1.3	1.3	1.3
02-00815	0.3	0.3	0.3	0.3	NA	1.5	0.2	0.2	0.2	0.2
02-00816	186	186	186	186	NA	1.5	124.0	124.0	124.0	124.0
02-00817	26	26	26	26	NA	1.5	17.3	17.3	17.3	17.3
02-00818	30	30	30	30	NA	1.5	20.0	20.0	20.0	20.0
02-00819	0.4	0.4	0.4	0.4	NA	1.5	0.3	0.3	0.3	0.3
02-00820	3	3	3	3	NA	1.5	2.0	2.0	2.0	2.0
02-00821	48	48	48	48	NA	1.5	32.0	32.0	32.0	32.0
02-00822	104	104	104	104	NA	1.5	69.3	69.3	69.3	69.3
02-00823	7	7	7	7	NA	1.5	4.7	4.7	4.7	4.7
02-00827	261	261	261	261	NA	1.5	174.0	174.0	174.0	174.0
02-00828	238	238	238	238	NA	1.5	158.7	158.7	158.7	158.7
02-00829	253	253	253	253	NA	1.5	168.7	168.7	168.7	168.7
02-00830	19	19	19	19	NA	1.5	12.7	12.7	12.7	12.7
02-00831	503	503	503	503	NA	1.5	335.3	335.3	335.3	335.3
SMAQMD 02-00833 GRACE INDUST. PM10	135	135	135	136	NA	1.5	90.0	90.0	90.0	90.7
SMAQMD 02-00834 GRACE INDUST. PM10	1962	2116	2079	1963	NA	1.5	1308.0	1410.7	1386.0	1308.7
SMAQMD 02-00835 GRACE INDUST. PM10	1494	1338	1360	1415	NA	1.5	996.0	892.0	906.7	943.3

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Emission Reduction Credit Certificate No.	Face Value Of PM10 ERC Certificates Surrendered Lb/Quarter				Inter-Pollutant Trading Ratio	Offset Ratio	Value Applied To The Project PM10 Emission Liability Lb/Quarter			
	QTR 1	QTR 2	QTR 3	QTR 4			QTR 1	QTR 2	QTR 3	QTR 4
SMAQMD 02-00849 BLUE DIAMOND PM10	3480	3321	3433	3207	NA	1.5	2320.0	2214.0	2288.7	2138.0
SMAQMD 03-00863 GRACE INDUST. SO2	1118	0	0	1117	(B)	1.5	266.2	0.0	0.0	225.7
SMAQMD 03-00865 GRACE INDUST. SO2	861	0	0	812	(B)	1.5	205.0	0.0	0.0	164.0
SMAQMD 03-00867 RANCHO SECO										
SO2	174	0	0	174	(B)	1.2	51.8	0.0	0.0	43.9
PM10	60	60	60	60	NA	1.2	50.0	50.0	50.0	50.0
SMAQMD 03-00869 RANCHO SECO										
SO2	126	0	0	126	(B)	1.2	37.5	0.0	0.0	31.8
PM10	47	47	47	47	NA	1.2	39.2	39.2	39.2	39.2
SMAQMD 03-00871 RANCHO SECO										
SO2	260	0	0	260	(B)	1.2	77.4	0.0	0.0	65.7
PM10	129	129	129	129	1	1.2	107.5	107.5	107.5	107.5
SMAQMD 03-00873 RANCHO SECO										
SO2	260	0	0	260	(B)	1.2	77.4	0.0	0.0	65.7
PM10	122	122	122	122	NA	1.2	101.7	101.7	101.7	101.7

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Emission Reduction Credit Certificate No.	Face Value Of PM10 ERC Certificates Surrendered Lb/Quarter				Inter-Pollutant Trading Ratio	Offset Ratio	Value Applied To The Project PM10 Emission Liability Lb/Quarter			
	QTR 1	QTR 2	QTR 3	QTR 4			QTR 1	QTR 2	QTR 3	QTR 4
SMAQMD 03-00875 RANCHO SECO										
SO2	24682	0	0	8008	(B)	1.2	7345.8	0.0	0.0	2022.2
PM10	1707	626	150	672	NA	1.2	1422.5	521.7	125.0	560.0
SMAQMD 03-00877 POPPY RIDGE										
SO2	16	0	0	15	(B)	1.5	3.8	0.0	0.0	3.0
PM10	899	804	546	853	NA	1.5	599.3	536.0	364.0	568.7
SMAQMD 03-00879 POPPY RIDGE										
SO2	54	0	0	57	(B)	1.5	12.9	0.0	0.0	11.5
PM10	129	191	194	135	NA	1.5	86.0	127.3	129.3	90.0
SMAQMD 03-00881 CAMPBELL SOUP										
SO2	140.7	0	0	150.8	(B)	1.5	33.5	0.0	0.0	30.5
PM10	573.1	336.1	1858.8	656.8	NA	1.5	382.1	224.1	1239.2	437.9
SMAQMD 03-00887 AM RIV AGGREG.										
SO2	259	0	0	1050	(B)	1.5	61.7	0.0	0.0	212.1
PM10	515	1229	2143	1695	NA	1.5	343.3	819.3	1428.7	1130.0
SMAQMD 03-00885 P&G PM10										
	7719	7719	5479.7	7719	NA	1.5	5146.0	5146.0	3653.1	5146.0

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Emission Reduction Credit Certificate No.	Face Value Of PM10 ERC Certificates Surrendered Lb/Quarter				Inter-Pollutant Trading Ratio	Offset Ratio	Value Applied To The Project PM10 Emission Liability Lb/Quarter			
	QTR 1	QTR 2	QTR 3	QTR 4			QTR 1	QTR 2	QTR 3	QTR 4
SMAQMD 05-00767 ROAD PAVING PM10	1085	1491	2054	1537	NA	1.2	904.2	1242.5	1711.7	1280.8
SMAQMD 05-00768 ROAD PAVING PM10	2004	2770	3844	2871	NA	1.2	1670.0	2308.3	3203.3	2392.5
SMAQMD 05-00769 ROAD PAVING PM10	3237	4463	6172	4615	NA	1.2	2697.5	3719.2	5143.3	3845.8
SMAQMD 05-00772 ROAD PAVING PM10	5242	7247	10061	7515	NA	1.2	4368.3	6039.2	8384.2	6262.5
SMAQMD 05-00773 ROAD PAVING PM10	3316	4564	6293	4709	NA	1.2	2763.3	3803.3	5244.2	3924.2
SMAQMD 05-00774 ROAD PAVING PM10	2326	3209	4441	3320	NA	1.2	1938.3	2674.2	3700.8	2766.7
SMAQMD 05-00775 ROAD PAVING PM10	577	795	1096	821	NA	1.2	480.8	662.5	913.3	684.2
SMAQMD 01031 CHINET CO. PM10	519	524	530	530	NA	1.5	346	349	353	353
SMAQMD 11-01143 Chinet Co.	258	263	266	266	N/A	1.5	172	175	177	177
SMAQMD 11-01144 Chinet Co.	4	4	4	4	N/A	1.5	2.6	2.6	2.6	2.6

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Emission Reduction Credit Certificate No.	Face Value Of PM10 ERC Certificates Surrendered Lb/Quarter				Inter-Pollutant Trading Ratio	Offset Ratio	Value Applied To The Project PM10 Emission Liability Lb/Quarter						
	QTR 1	QTR 2	QTR 3	QTR 4			QTR 1	QTR 2	QTR 3	QTR 4			
SUBTOTAL PM10						39,723.8	36,625.4	44,151.3	40,608.5				
MOVE 3542.9 LB OF SURPLUS ERCS FROM QUARTER 3 TO QUARTER 2 (A)								3,542.9	-3,542.9				
MOVE 0.8 LB OF SURPLUS ERCS FROM QUARTER 4 TO QUARTER 1 (A)						0.8							-0.8
TOTAL PM10						39,724.6	40,168.3	40,608.4	40,607.7				
TOTAL PM10 TO COMPARE TO CONDITION NO. 20 (BECAUSE MORE ERCS WERE SURRENDERED THAN REQUIRED)						39,724.6	40,166.6	40,607.6	40,607.6				

(A) SMAQMD Rule 202 allows PM10 ERCs:

- i. Created in calendar quarters 2 and 3 to be used as offsets in either calendar quarters 2 or 3.
- ii. Created in calendar quarters 1 and 4 to be used as offsets in all calendar quarters.

(B) SO2 interpollutant trading ratio varies by quarter -

- 1st quarter = 2.8
 2nd quarter = 1.7
 3rd quarter = 1.7
 4th quarter = 3.3