

**BOARD OF DIRECTORS
MEETING**

Board of Supervisors Chambers
700 H Street - Suite 1450
Sacramento, California



AGENDA

Thursday

March 28, 2024

9:00 AM

DIRECTORS

Chair
Patrick Kennedy

Vice-Chair
Sarah Aquino

Bret Daniels
Rich Desmond
Sue Frost
Eric Guerra

Patrick Hume
Caity Maple
Kevin Papineau
Sergio Robles

Phil Serna
Karina Talamantes
Donald Terry
Mai Vang

ANNOUNCEMENTS

Members of the public may participate in the meeting in-person, by video conference via Zoom, conference line, and by submitting written comments electronically by email at boardclerk@airquality.org.

Comments submitted will be delivered to the Board of Directors by staff. Public comments regarding matters under the jurisdiction of the Board of Directors will be acknowledged by the Chairperson during the meeting. Public comments will be accepted live until the adjournment of the meeting, distributed to the Board of Directors, and included in the record.

Submit public comments via email to: boardclerk@airquality.org

Zoom Meeting Link:

<https://us06web.zoom.us/j/87314130035?pwd=pTxA45BE35JssyS9bsq2AAvu2Zgaab.1>

Meeting ID: 873 1413 0035

Passcode: 101299

Call In Number

(669) 900-6833

(408) 638-0968

Teleconference Locations:

7333 North Fresno Street, Fresno, CA 93720

CALL TO ORDER/ROLL CALL

PLEDGE OF ALLEGIANCE

BOARD CLERK ANNOUNCEMENTS

BROWN ACT

SPECIAL PRESENTATIONS

1. Congresswoman Matsui will Address the Board of Directors to Discuss the Region's Clean Air and Carbon Reduction Priorities and Opportunities

CONSENT CALENDAR

2. February 22, 2024 Board of Directors Meeting Minutes
Recommendation: Approve the February 22, 2024 Board of Director Meeting Minutes.
3. Conflict of Interest Code 2024 Amendment
Recommendation: Adopt a resolution to amend the District's Conflict of Interest Code.
4. FY23/24 Budgeted Position Amendment - Authorize the Addition of 4.2 Full-Time Positions to the Approved Budgeted Positions
Recommendation: Adopt a resolution to amend the FY23/24 Sacramento Metropolitan Air Quality Management District Budgeted Positions increasing the authorized positions from 97.6 to 101.8 Full Time Equivalents.
5. Emission Reduction Credits from the Community Bank for Sacramento Rendering Company - Loan Number C24-1001
Recommendation: Adopt a resolution transferring a total of 3,598.8 pounds of nitrogen oxides (NOx) per year from the Community Bank to Sacramento Rendering Company for two years.
6. Contract for Air Quality Forecasting Services
Recommendation: Authorize the Executive Director/Air Pollution Control Officer to execute a three-year contract for air quality forecasting related services in an amount not to exceed \$570,000 with the option to extend the contract beyond the initial three-year term for two separate one-year extensions in an amount not to exceed \$190,000 for each additional year, and make minor revisions to the contract, in consultation with the District Counsel and within the funding limits, that may be necessary to fully implement its intent.
7. Appointment of Hearing Board Professional Engineer Member
Recommendation: Pass a motion appointing Earl Withycombe to the Hearing Board as the professional engineer member for a 3-year term beginning March 29, 2024, and ending March 28, 2027.
8. Revision to the State Implementation Plan to Incorporate Reasonably Available Control Technology for Major Sources of Nitrogen Oxides
Recommendation: Determine that the adoption of revisions to the State Implementation Plan (SIP) to satisfy Reasonably Available Control Technology (RACT) for Major Sources of nitrogen oxides (NOx) is exempt from the California Environmental Quality Act (CEQA); 2) adopt a resolution approving the SIP revision, and 3) direct Staff to forward the SIP revision and all necessary supporting documents to the California Air Resources Board (CARB) for submittal to the U.S. Environmental Protection Agency (EPA).

PUBLIC HEARINGS

9. Revision to the State Implementation Plan to Incorporate Reasonably Available Control Technology for Major Sources of Nitrogen Oxides (public hearing to be cancelled unless timely requested)
Recommendation: Conduct a public hearing for the adoption of revisions to the State Implementation Plan (SIP) to satisfy Reasonably Available Control Technology (RACT) for Major Sources of nitrogen oxides (NOx); and 1) determine that the adoption of the SIP revisions is exempt from the California Environmental Quality Act (CEQA); 2) adopt a resolution approving the SIP revision; 3) direct Staff to forward the SIP revision and all necessary supporting documents to the California Air Resources

Board (CARB) for submittal to the U.S. Environmental Protection Agency (EPA). If no hearing is requested, the Board may take these actions through the Consent Calendar.

DISCUSSION CALENDAR

10. Appointment of a CalPERS Retiree as Extra Help to Transition Administrative Operations to the New Director of Administrative Services

Recommendation: Adopt a resolution to appoint Jamille Moens as an extra help retired annuitant to transition administrative operations to the newly appointed Director of Administrative Services under the California Public Employees' Retirement System (CalPERS) exception to the 180-day wait period, per Government Code § 7522.56 and § 21224.

11. Transportation Incentive Grants to Folsom Cordova Unified School District for Three Zero-Emission School Buses

Recommendation: Authorize the Executive Director/Air Pollution Control Officer to execute an agreement with Folsom Cordova Unified School District in an amount not to exceed \$1,200,000 under the Low Emission Vehicle Incentive Program for three zero-emission school buses, and make minor revisions to the contract, in consultation with the District Counsel and within the funding limits, that may be necessary to fully implement its intent.

12. Climate Pollution Reduction Grants Program Overview and Phase II Grant Application

Recommendation: Adopt a resolution authorizing the Executive Director/Air Pollution Control Officer, in consultation with District Counsel, to 1) submit an application to the Climate Pollution Reduction Grants (CPRG) Implementation Grants program for an amount currently estimated at between \$70 and \$100 million, not to exceed \$100 million; 2) execute agreements with the Sacramento Area Council of Governments (SACOG) and Yolo County as subrecipients of the grant to aid in the implementation of the Built Environment and Natural and Working Lands measures, respectively; and, 3) receive and file the Capital Region Climate Priorities Plan.

BOARD IDEAS, COMMENTS AND AB 1234 REPORTS

PUBLIC COMMENT

ADJOURN

Agenda Revision: This agenda may be revised. A final agenda will be posted on the website (www.airquality.org) and at the meeting site 72 hours in advance of the meeting. Materials submitted within 72 hours of the meeting and after distribution of the agenda packets will be made available on the Sac Metro Air District website subject to staff's ability to post the documents prior to the meeting. The order of the agenda items are listed for reference and may be taken in any order deemed appropriate by the Board of Directors. The agenda provides a general description and staff recommendation; however, the Board of Directors may take action other than what is recommended.

Testimony: The Board of Directors welcomes and encourages participation in Board meetings. When it appears there are several members of the public wishing to address the Board on a specific item, at the outset of the item the Chair of the Board will announce the maximum amount of time that will be allowed for presentation of the testimony. Matters under the jurisdiction of the Board and not on the posted agenda may be addressed by the general public immediately prior to the close of the meeting. The Board limits testimony on matters not on the agenda to five minutes per person and not more than 15 minutes for a particular subject.

Meeting Broadcast: The meeting is videotaped in its entirety and will be cablecast without interruption on Metro Cable 14, the Government Affairs Channel and will be webcast at <https://metro14live.saccounty.gov>. This morning's meeting is being cablecast live and will be rebroadcast on Saturday, March 30, 2024 at 2:00pm on Channel 14.

Closed Captioning: Metro Cable now provides closed captioning of the Sac Metro Air District Board meetings for the deaf and hard of

hearing community. The captioning will be available on both the live and playback broadcasts on the Metro Cable television channel (Channel 14).

Assisted Listening: Assisted listening devices are available for use by the public. Please see the Clerk of the Board for further information.

Board Action: The Board of Directors may take action on any of the items listed on this agenda.

Information: Full staff reports are available for public review on the District's website (www.airquality.org), including all attachments and exhibits, or for public inspection at the District's office at 777 12th Street, Suite 300, Sacramento, CA. Copies of items prepared by staff and distributed for the first time at the meeting will be available at the back of the meeting room or may be obtained from the Board Clerk. Copies of items that were not prepared by staff may be obtained after the meeting from the Clerk. Materials related to an item on this Agenda submitted to Sac Metro Air District after distribution of the agenda packet are available for public inspection in the Clerk of the Board's office during normal business hours. For information regarding this agenda, please contact Salina Martinez, Clerk of the Sac Metro Air District Board of Directors, at 279-207-1164.

Meeting Date: 3/28/2024
Report Type: CONSENT CALENDAR
Report ID: 2024-0328-2.



Title: February 22, 2024 Board of Directors Meeting Minutes

Recommendation: Approve the February 22, 2024 Board of Director Meeting Minutes.

Rationale for Recommendation: Minutes serve as the official record of the actions that occurred at board or committee meetings. It is the Board of Directors practice to approve the meeting minutes at subsequent Board meeting.

All approved Board resolutions from the meeting are attached.

Contact: Salina Martinez, Administrative Supervisor/ Clerk of the Board, 279-207-1164

Presentation: No

ATTACHMENTS:

Attachment A: February 22, 2024 BOD Meeting Minutes
Resolution No. 2024-003 California Surplus Land Act
Resolution No. 2024-004 Temporary Appointment of a CalPERS Retiree

Approvals/Acknowledgements

Executive Director or Designee: Alberto Ayala, Report Approved 3/21/2024

District Counsel or Designee: Kathrine Pittard, Approved as to Form 3/14/2024



MINUTES

BOARD OF DIRECTORS
Sacramento Metropolitan Air Quality Management District
700 H Street, Suite 1450
Sacramento, California

Thursday

February 22, 2024

9:00 AM

DIRECTORS

Chair
Patrick Kennedy

Vice-Chair
Sarah Aquino

Bret Daniels
Rich Desmond
Sue Frost
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Caity Maple
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Meeting ID: 873 1413 0035

Passcode: 101299

Call In Number

(669) 900-6833

(408) 638-0968

Teleconference Locations:

Folsom City Hall, 50 Natoma St., Folsom, CA 95630

Rancho Cordova City Hall, 2729 Prospect Park Dr., Rancho Cordova, CA 95670

CALL TO ORDER/ROLL CALL

Meeting was called to order.

Directors Present: Sarah Aquino, Bret Daniels, Rich Desmond, Patrick Hume, Patrick Kennedy, Caity Maple, Kevin Papineau, Sergio Robles, Phil Serna, Karina Talamantes, and Donald Terry.

Directors Absent: Sue Frost, Eric Guerra, and Mai Vang.

PLEDGE OF ALLEGIANCE

CONSENT CALENDAR

ACTION:

Rich Desmond Moved /Donald Terry Seconded

Ayes: Sarah Aquino, Bret Daniels, Rich Desmond, Patrick Hume, Patrick Kennedy, Caity Maple, Kevin Papineau, Sergio Robles, Phil Serna, and Donald Terry.

Abstain: Karina Talamantes

Absent: Sue Frost, Eric Guerra, and Mai Vang.

1. January 25, 2024 Board of Directors Meeting Minutes

Recommendation: Approve the January 25, 2024 Board of Director Meeting Minutes.

Approved

2. November 9, 2023 Special Joint Board of Directors Meeting Minutes

Recommendation: Approve the November 9, 2023 Special Joint Board of Directors Meeting minutes.

Approved

3. Contract Authority for Comprehensive Climate Action Plan and Status Report

Recommendation: Authorize the Executive Director/APCO to execute a three-year contract with the successful respondent to the Sac Metro Air District (District) competitive request for proposals for the development of a Comprehensive Climate Action Plan and Status Report consistent with the requirements of the Climate Pollution Reduction Grant program for an amount not to exceed \$361,900, and make minor revisions to the contract, in consultation with District Counsel and within the funding limits, that may be necessary to fully implement its intent.

Authorized

4. Designation of District Headquarters for Agency Use Under the California Surplus Land Act

Recommendation: Adopt a resolution designating the District headquarters for "Agency's Use", thereby exempting the sale from the provisions of the California Surplus Land Act eliminating the requirement to offer the property as surplus land to affordable housing organizations or related entities before making it available for sale on the open market.

Resolution No. 2024-003

DISCUSSION CALENDAR

5. City of Sacramento Incentive Contract and Other Opportunities for Investments in Electrification and the Clean Energy Transition

Recommendation: Authorize the Executive Director/Air Pollution Control Officer to execute agreements under the Low Emission Vehicle Incentive Program with the City of Sacramento for an amount not to exceed to \$3,000,000 for the purchase and installation of electric vehicle chargers associated with the City of Sacramento's EV Blueprint Project, and; receive and file a report on the next incentive solicitation totaling over \$15,000,000 for various investments in electrification and the clean energy transition including commercial lawn and garden equipment, zero-emission infrastructure, off-road, on-road, and micro-transit vehicles.

Raef Porter, Transportation and Climate Change Division, gave a presentation on the City of Sacramento Incentive Contract and Other Opportunities for Investments in Electrification and the Clean Energy Transition.

Authorized

ACTION:

Karina Talamantes Moved /Caity Maple Seconded

Ayes: Sarah Aquino, Bret Daniels, Rich Desmond, Patrick Hume, Patrick Kennedy, Caity Maple, Kevin Papineau, Sergio Robles, Phil Serna, Karina Talamantes, and Donald Terry.

Absent: Sue Frost, Eric Guerra, and Mai Vang.

6. New National Ambient Air Quality Standard for Particulate Matter

Recommendation: Receive and file an update on the new National Ambient Air Quality Standard for annual PM2.5 concentration.

Katherine Chin-Chiu, Monitoring, Planning, and Rules Development Division, gave a presentation on New National Ambient Air Quality Standard for Particulate Matter.

Received and filed

7. Temporary Appointment of a CalPERS Retiree as Interim Director of Administrative Services

Recommendation: Adopt a resolution to appoint Jamille Moens as a retired annuitant on an interim basis to the District's vacant position of Director of Administrative Services under the California Public Employees' Retirement System (CalPERS) exception to the 180-day wait period, per Government Code § 7522.56 and § 21221(h).

Denise Booth, Administrative Service Division, gave a presentation on Temporary Appointment of a CalPERS Retiree as Interim Director of Administrative Services.

Resolution No. 2024-004

ACTION:

Patrick Kennedy Moved /Patrick Hume Seconded

Ayes: Sarah Aquino, Bret Daniels, Rich Desmond, Patrick Hume, Patrick Kennedy, Caity Maple, Kevin Papineau, Sergio Robles, Phil Serna, Karina Talamantes, and Donald Terry.

Absent: Sue Frost, Eric Guerra, and Mai Vang.

8. Appointment of Board Members to the Budget and Personnel Committee of the Board

Recommendation: Pass a motion selecting and appointing two Board members in addition to the Chair, Vice Chair and Past Chair to the Budget and Personnel Committee.

Motion passed appointing Sergio Robles to the Budget and Personnel Committee. The committee members consist of Chair Kennedy, Vice Chair Sarah Aquino, Eric Guerra, Donald Terry, and Sergio Robles.

ACTION:

Patrick Kennedy Moved /Bret Daniels Seconded

Ayes: Sarah Aquino, Bret Daniels, Patrick Hume, Patrick Kennedy, Caity Maple, Kevin Papineau, Sergio Robles, Phil Serna, Karina Talamantes, and Donald Terry.

Absent: Rich Desmond, Sue Frost, Eric Guerra, and Mai Vang.

9. Hearing Board Vacancies Notifications

Recommendation: Receive and file an informational report notifying the Board that both the Medical and Engineering Profession positions of the Hearing Board are vacant as of January 23, 2024.

Kathy Pittard, District Counsel, gave an update on the Hearing Board Vacancies Notifications.

Received and filed

AIR POLLUTION CONTROL OFFICER'S REPORT

10. Air Pollution Control Officer Presentation

Recommendation: Receive and file a presentation from the Air Pollution Control Officer, including the following topics: Facilities Update; Capitol-to-Capitol; In the Community - Lunar New Year Celebration; and US EPA Regional Administrator Visit to Sacramento.

Alberto Ayala, Executive Director/Air Pollution Control Officer gave a presentation.

Received and filed

BOARD IDEAS, COMMENTS AND AB 1234 REPORTS

PUBLIC COMMENT

ADJOURN

RESOLUTION NO. 2024 – 003

Adopted by the Sacramento Metropolitan Air Quality Management District
Board of Directors

DESIGNATION OF DISTRICT HEADQUARTERS FOR AGENCY USE UNDER THE CALIFORNIA SURPLUS LAND ACT

BACKGROUND:

- A. Sales of property by local agencies may be subject to the California Surplus Land Act (SLA).
- B. The SLA, with oversight responsibility by the California Department of Housing and Community Development (HCD), requires local agencies in California, including cities, counties, and special districts, to offer “surplus” land to affordable housing developers, local governments, and certain types of public entities before selling to private developers, unless specific exemptions apply.
- C. With the full support and guidance of the Board of Directors, the District has initiated the sale of its current Administrative Headquarters while actively identifying a more suitably sized location, and therefore assessed the applicability of the SLA.
- D. The Administrative Headquarters at 777 12th Street in Sacramento, California, including the land and building, is owned by the District and directly supports the agency's core functions as the current headquarters, and the revenue generated from renting office space is utilized to fund the building and its operation.
- E. Based on the use of the Headquarters building and the intended future use of the sale proceeds, the District, in consultation with HCD, has determined that the future sale of its current Administrative Headquarters is exempt from the SLA requirement to offer the land to certain agencies prior to proceeding with the sale.
- F. To ensure qualification for the exemption, the HCD has recommended that the District Board of Directors adopt a resolution declaring that the land is for agency use and that its use directly furthers the express purpose of the agency's work or operations under Government Code Section 54221(c)(1).

BASED ON THE FACTS SET FORTH IN THE BACKGROUND, THE BOARD OF DIRECTORS RESOLVES AS FOLLOWS:

- Section 1. The land and building at 777 12th Street in Sacramento, California, is owned by the District and directly furthers the express purpose of agency work and operations because it serves as the current agency headquarters and proceeds for the rental of office space are used to finance the building and maintain the District offices.
- Section 2. The proceeds from selling the property at 777 12th Street, Sacramento, California, will be used to acquire or lease another property supporting the agency's goals, with any extra funds earmarked for future rent and/or continuity of essential District operations.

ON A MOTION by Director Rich Desmond, seconded by Director Donald Terry, the foregoing resolution was passed and adopted by the Board of Directors of the Sacramento Metropolitan Air Quality Management District on February 22, 2024, by the following vote:

Ayes: Sarah Aquino, Bret Daniels, Rich Desmond, Patrick Kennedy, Kevin Papineau, Sergio Robles, Phil Serna, and Donald Terry.

Noes:

Abstain: Karina Talamantes

Absent: Sue Frost, Eric Guerra, Patrick Hume, Caity Maple, and Mai Vang.

ATTEST:

Salina Martinez

Digitally signed by: Salina Martinez

DN: CN = Salina Martinez email =

smartinez@airquality.org C = AD O = Sac

Metro Air District

Date: 2024.02.22 15:22:48 -08'00'

Clerk, Board of Directors

Sacramento Metropolitan Air Quality Management District

RESOLUTION NO. 2024 – 004

Adopted by the Sacramento Metropolitan Air Quality Management District
Board of Directors

AUTHORIZATION FOR 180-DAY WAIT PERIOD EXCEPTION FOR CALPERS RETIREE GOVERNMENT CODE SECTIONS 7522.56 & 21221(h)

BACKGROUND:

- A. In compliance with Government Code section (G.C. §) 7522.56 of the Public Employees' Retirement Law, the Sacramento Metropolitan Air Quality Management District Board of Directors (Board) must provide CalPERS this certification resolution when hiring a retiree before 180 days have passed since their retirement date.
- B. Jamille Moens, CalPERS ID #2613332835, will retire from the Sacramento Metropolitan Air Quality Management District (District) in the position of Director of Administrative Services, effective February 24, 2024.
- C. G.C. § 7522.56 requires that post-retirement employment commence no earlier than 180 days after the retirement date, which is August 24, 2024, without this certification resolution.
- D. G.C. § 7522.56 provides that this exception to the 180-day wait period will not apply if the retiree accepts any retirement-related incentive.
- E. The Board, District, and Jamille Moens certify that Jamille Moens has not and will not receive a Golden Handshake or any other retirement-related incentive.
- F. An appointment under G.C. § 21221(h) states the retiree may be appointed on an interim basis during recruitment for a permanent appointment if the position requires specialized skills.
- G. The Director of Administrative Services requires specialized skills in overseeing budget preparation and personnel, as well as several large scale technological programmatic updates and the sale and relocation of the District's primary offices.
- H. The Executive Director / Air Pollution Control Officer executed a contract with an executive search firm in September 2023 for the recruitment of the Director of Administrative Services, which remains underway.
- I. The Board of Directors hereby appoints Jamille Moens as an interim appointment retired annuitant to the vacant position of Director of Administrative Services for the District under G.C. § 21221(h), effective March 4, 2024.
- J. This G.C. § 21221(h) appointment will only be made once and therefore will end on September 3, 2024.
- K. The entire employment agreement, contract, or appointment document between Jamille Moens and the District has been reviewed by this body and is attached as Exhibit A.
- L. No matters, issues, terms, or conditions related to this employment and appointment have been or will be placed on a consent calendar.

- M. The employment will be limited to 960 hours per fiscal year.
- N. The compensation paid to retirees cannot be less than the minimum nor exceed the maximum monthly base salary paid to other employees performing comparable duties, divided by 173.333 to equal the hourly rate.
- O. The minimum base salary for this position is \$12,144.96 (hourly equivalent is \$69.80) and the maximum is \$16,274.93 (hourly equivalent is \$93.53).
- P. The hourly rate paid to Jamille Moens will be \$93.53, which is the same rate currently paid for this position.
- Q. Jamille Moens has not and will not receive any other benefit, incentive, compensation in lieu of benefit or other form of compensation in addition to this hourly pay rate.

BASED ON THE FACTS SET FORTH IN THE BACKGROUND, THE BOARD OF DIRECTORS RESOLVES AS FOLLOWS:

Section 1. The Board of Directors hereby certifies the nature of the employment of Jamille Moens as described herein and detailed in the attached offer letter and that this appointment is necessary to fill the critically needed position of Director of Administrative Services for the District by March 4, 2024, because the position requires specialized skills and expert oversight and leadership for the daily operations of the Administrative Services Division and advanced knowledge and expertise for continued progress toward key projects and initiatives.

Section 2. Exhibit A is attached to and part of this resolution.

ON A MOTION by Director Patrick Kennedy, seconded by Director Patrick Hume, the foregoing resolution was passed and adopted by the Board of Directors of the Sacramento Metropolitan Air Quality Management District on February 22, 2024, by the following vote:

Ayes: Sarah Aquino, Bret Daniels, Rich Desmond, Patrick Hume, Patrick Kennedy, Caity Maple, Kevin Papineau, Sergio Robles, Phil Serna, Karina Talamantes, and Donald Terry.

Noes:

Abstain:

Absent: Sue Frost, Eric Guerra, and Mai Vang.

ATTEST:

Salina Martinez

Digitally signed by: Salina Martinez

DN: CN = Salina Martinez email = smartinez@airquality.

org C = AD O = Sac Metro Air District

Date: 2024.02.22 15:22:07 -08'00'

Clerk, Board of Directors

Sacramento Metropolitan Air Quality Management District



Exhibit A

Sent via email
jmoens@airquality.org

February 22, 2024

Jamille Moens
Sac Metro Air District
777 12th Street, Ste 300
Sacramento CA 95814

RE: Interim Employment Offer

Dear Jamille,

The Sacramento Metropolitan Air Quality Management District is offering you a temporary position of Interim Director of Administrative Services, as a retired annuitant while the recruitment to fill the regular position is underway.

Vacant interim employees do not receive any District benefit programs, including commute pay. This does not include any benefit mandated by state or federal law.

As a retired annuitant you are permitted to work up to 960 hours per fiscal year. Please refer to "A Guide to CalPERS Employment After Retirement" for additional requirements and details, located here:
<https://www.calpers.ca.gov/docs/forms-publications/employment-after-retirement.pdf>

The rate of pay being offered to you is \$93.53 per hour. The effective date of your employment is March 4, 2024, or the date on which CalPERS certifies the appointment, whichever is later, and will last no more than six (6) months.

Feel free to contact me if you have any questions.

Thank you,

Denise Booth
Human Resources Officer

By signing below, I accept this offer of employment, certify that I have not received unemployment insurance payments for prior retired annuitant work for any CalPERS employer within twelve (12) months prior to this appointment date, and agree to comply with the CalPERS requirements related to post-retirement employment.

Jamille Moens

Date

Meeting Date: 3/28/2024
Report Type: CONSENT CALENDAR
Report ID: 2024-0328-3.



Title: Conflict of Interest Code 2024 Amendment

Recommendation: Adopt a resolution to amend the District's Conflict of Interest Code.

Rationale for Recommendation: The District's Conflict of Interest Code (Code) establishes which District elected officials and employees are required to submit an annual Form 700 Statement of Economic Interest and under which disclosure categories they are required to file. The Board recently approved an administrative change to the District's Classification Plan, changing the classification title for Division Manager to Director. In addition, in July of 2023, the District renamed two of its operating divisions. Lastly, there is an error in the title of the Transportation and Climate Change Division. The position title change, renaming of two divisions, and correcting the title of one division requires that the District amend, by Board Resolution, the Code to reflect the changes.

The District is required to submit notice to the Clerk of the Board of Sacramento County Supervisors (County Supervisors) when it intends to amend the Code, which the District did in a notice to the County Clerk in February 2024. If the Board approves the resolution amending the Code, it will be submitted to the County Board of Supervisors for final approval. The amended Code is attached as Exhibit 1.

Contact: Salina Martinez, Administrative Supervisor/ Clerk of the Board, 279-207-1164

Presentation: No

ATTACHMENTS:

Resolution: 2024 Conflict of Interest Code Amendment
Exhibit 1: Conflict of Interest Code (Amended March 28, 2024)
Attachment A: Conflict of Interest Code Tracked Changes (Amended March 28, 2024)

Approvals/Acknowledgements

Executive Director or Designee: Alberto Ayala, Report Approved 3/22/2024

District Counsel or Designee: Kathrine Pittard, Approved as to Form 3/14/2024

Discussion / Justification: At the January 25, 2024, Board of Directors meeting, the Board approved an administrative update to the Sac Metro Air District's classification plan changing the title of Division Manager to Director. The title of Director more accurately reflects the level and responsibilities associated with the position, and therefore the Board approved the title change.

Effective July 1, 2023, the District changed the title of two divisions. The Stationary Sources Divisions was changed to Engineering and Compliance Division and the Program Coordination Division was changed to Monitoring, Planning, and Rules Division.

In reviewing the Code, an error in one of the division titles was discovered and needs correcting. The Technology and Climate Change Division is incorrect and should instead be Transportation and Climate Change.

Staff is recommending changes to the designated positions table in the Code as shown in Attachment A, reflecting the updated position titles and division names.

Financial Considerations: Amending the Conflict of Interest Code is an administrative action and has no financial impact to the District.

RESOLUTION NO. 2024 – XXXX

Adopted by the Sacramento Metropolitan Air Quality Management District
Board of Directors

Conflict of Interest Code Amendment

BACKGROUND:

- A. As required by the Political Reform Act (Gov. Code, § 81000 et seq.), the District has adopted a Conflict of Interest Code (Code), which designates positions required to file a Statement of Economic Interests Form 700 and assigns disclosure categories specifying the types of interests to be reported.
- B. The District is required to submit a notice, when there is a change of the Code, to the Clerk of the Board of Sacramento County Supervisors indicating whether an amendment to the Code is needed, which was done in February 2024 providing notice of intent to amend the Code.
- C. On January 25, 2024, The Board of Directors approved the title change of Division Manager to Director.
- D. The Stationary Sources Division is now known as Engineering and Compliance Division and the Program Coordination Division is now known as Monitoring, Planning and Rules Division.
- E. The Transportation and Climate Change Division is incorrectly listed as Technology and Climate Change.

BASED ON THE FACTS SET FORTH IN THE BACKGROUND, THE BOARD OF DIRECTORS RESOLVES AS FOLLOWS:

- Section 1. The District's Conflict of Interest Code, attached as Exhibit 1, is approved, as amended, reflecting the changes indicated in item C-E above.
- Section 2. The amended Conflict of Interest Code will be submitted for review and final approval to the Sacramento County Board of Supervisors, the code reviewing body for the District, and will become effective upon the date of their approval.
- Section 3. The attached Exhibit 1 is part of this resolution.

ON A MOTION by Director _____, seconded by Director _____, the foregoing resolution was passed and adopted by the Board of Directors of the Sacramento Metropolitan Air Quality Management District on March 28, 2024, by the following vote:

Ayes:

Noes:

Abstain:

Absent:

ATTEST:

Clerk, Board of Directors
Sacramento Metropolitan Air Quality Management District

Sacramento Metropolitan Air Quality Management District
Conflict of Interest Code
(Amended March 28, 2024)

Exhibit 1

The Political Reform Act (California Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 California Code of Regulations Section 18730) that contains the terms of a standard conflict of interest code, which can be incorporated by reference in an agency's code. After public notice and hearing, the standard code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the disclosure categories and designated positions below shall constitute the Conflict of Interest Code of the Sacramento Metropolitan Air Quality Management District (District).

Individuals holding designated positions shall file their statements of economic interests with the Clerk of the County of Sacramento Board of Supervisors, which will make the statements available for public inspection and reproduction.

DISCLOSURE CATEGORIES

Employees must complete ALL applicable schedules of Form 700. This may include reporting interests in real property and/or interests, investments, sources of income (including receipt of loans, gifts, and travel payments), and positions held in business entities (including businesses, governmental and non-profit agencies).

In general, employees are exempt from reporting their primary residence and their position with the District. However, employees should refer to the instructions for Form 700 to ensure full compliance with reporting requirements.

1. Full Disclosure (Elected Officials, Management)

All investments, business positions in business entities, and sources of income (including receipt of gifts, loans, and travel payments) and real property located in or within two miles of Sacramento County, California, e.g., rental property income >\$2,000.

2. Regulatory/Permits

Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source is subject to the District's regulatory, permit, or enforcement authority; and real property located in or within two miles of Sacramento County, California, e.g., rental property income >\$2,000.

3. Grant Funding

Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source is of the type to receive grants or other funding from or through the District.

4. Procurement Decisions - Agency-Wide Authority

Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source provides services, e.g., leased facilities, products, equipment, vehicles, machinery, training or consulting, of the *type utilized by the District*.

5. Procurement Decisions - Limited Authority

Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source provides services, e.g., leased facilities, products, equipment, vehicles, machinery, training or consulting, of the *type utilized by the position's Division/Section*.

DESIGNATED POSITIONS

The positions listed below make or participate in the making of, decisions that may foreseeably have a material effect on financial interests. The employees and officers filling these positions will disclose interests and investments in the disclosure categories identified below.

POSITION TITLE	DISCLOSURE CATEGORY				
	1	2	3	4	5
	Full Disclosure	Regulatory / Permits	Grant Funding	Procurement Agency Wide	Procurement Limited
ELECTED OFFICIALS					
Director, Board of Directors	X				
Officer, Hearing Board	X				
EXECUTIVE OFFICE, DISTRICT COUNSEL & MANAGEMENT					
Executive Director / Air Pollution Control	X				
District Counsel	X				
Director	X				
Program Manager	X				
Administrative Services Program Manager				X	
Controller			X	X	
Information Systems Manager				X	
ADMINISTRATIVE SERVICES DIVISION					
Program Supervisor					X
Human Resources Officer					X
Administrative Supervisor / Clerk of the Board					X
Communications and Marketing Specialist					X
TRANSPORTATION & CLIMATE CHANGE DIVISION					
Program Supervisor			X		X
Air Quality Engineer			X		
Air Quality Planner/Analyst			X		
ENGINEERING & COMPLIANCE DIVISION					
Program Supervisor		X	X		X
Air Quality Engineer		X			
Air Quality Specialist		X			
MONITORING, PLANNING & RULES DIVISION					
Program Supervisor		X	X		X
Air Quality Engineer			X		
Air Quality Planner/Analyst			X		
Air Quality Specialist			X		
Statistician			X		
CONSULTANTS*					

**Consultants must disclose according to the broadest disclosure category in the code subject to the following limitations: The Air Pollution Control Officer may determine in writing that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to comply fully with the disclosure requirements described in this section. This determination will include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The Air Pollution Control Officer's determination is a public record and will be retained for public inspection in the same manner and location as this conflict-of-interest code.*

Sacramento Metropolitan Air Quality Management District
Conflict of Interest Code
(Amended ~~March 23, 2023~~ March 28, 2024)

The Political Reform Act (California Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 California Code of Regulations Section 18730) that contains the terms of a standard conflict of interest code, which can be incorporated by reference in an agency's code. After public notice and hearing, the standard code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the disclosure categories and designated positions below shall constitute the Conflict of Interest Code of the Sacramento Metropolitan Air Quality Management District (District).

Individuals holding designated positions shall file their statements of economic interests with the Clerk of the County of Sacramento Board of Supervisors, which will make the statements available for public inspection and reproduction.

DISCLOSURE CATEGORIES

Employees must complete ALL applicable schedules of Form 700. This may include reporting interests in real property and/or interests, investments, sources of income (including receipt of loans, gifts, and travel payments), and positions held in business entities (including businesses, governmental and non-profit agencies).

In general, employees are exempt from reporting their primary residence and their position with the District. However, employees should refer to the instructions for Form 700 to ensure full compliance with reporting requirements.

1. Full Disclosure (Elected Officials, Management)

All investments, business positions in business entities, and sources of income (including receipt of gifts, loans, and travel payments) and real property located in or within two miles of Sacramento County, California, e.g., rental property income >\$2,000.

2. Regulatory/Permits

Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source is subject to the District's regulatory, permit, or enforcement authority; and real property located in or within two miles of Sacramento County, California, e.g., rental property income >\$2,000.

3. Grant Funding

Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source is of the type to receive grants or other funding from or through the District.

4. Procurement Decisions - Agency-Wide Authority

Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source provides services, e.g., leased facilities, products, equipment, vehicles, machinery, training or consulting, of the *type utilized by the District*.

5. Procurement Decisions - Limited Authority

Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source provides services, e.g., leased facilities, products, equipment, vehicles, machinery, training or consulting, of the *type utilized by the position's Division/Section*.

DESIGNATED POSITIONS

The positions listed below make or participate in the making of, decisions that may foreseeably have a material effect on financial interests. The employees and officers filling these positions will disclose interests and investments in the disclosure categories identified below.

POSITION TITLE	DISCLOSURE CATEGORY				
	1	2	3	4	5
	Full Disclosure	Regulatory / Permits	Grant Funding	Procurement Agency Wide	Procurement Limited
ELECTED OFFICIALS					
Director, Board of Directors	X				
Officer, Hearing Board	X				
EXECUTIVE OFFICE, DISTRICT COUNSEL & MANAGEMENT					
Executive Director / Air Pollution Control	X				
District Counsel	X				
Division Manager Director	X				
Program Manager	X				
Administrative Services Program Manager				X	
Controller			X	X	
Information Systems Manager				X	
ADMINISTRATIVE SERVICES DIVISION					
Program Supervisor					X
Human Resources Officer					X
Administrative Supervisor / Clerk of the Board					X
Communications and Marketing Specialist					X
TECHNOLOGY TRANSPORTATION & CLIMATE CHANGE DIVISION					
Program Supervisor			X		X
Air Quality Engineer			X		
Air Quality Planner/Analyst			X		
STATIONARY SOURCES ENGINEERING & COMPLIANCE DIVISION					
Program Supervisor		X	X		X
Air Quality Engineer		X			
Air Quality Specialist		X			
PROGRAM COORDINATION MONITORING, PLANNING & RULES DIVISION					
Program Supervisor		X	X		X
Air Quality Engineer			X		
Air Quality Planner/Analyst			X		
Air Quality Specialist			X		
Statistician			X		
CONSULTANTS*					

*Consultants must disclose according to the broadest disclosure category in the code subject to the following limitations: The Air Pollution Control Officer may determine in writing that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to comply fully with the disclosure requirements described in this section. This determination will include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The Air Pollution Control Officer's determination is a public record and will be retained for public inspection in the same manner and location as this conflict-of-interest code.

Meeting Date: 3/28/2024
Report Type: CONSENT CALENDAR
Report ID: 2024-0328-4.



Title: FY23/24 Budgeted Position Amendment - Authorize the Addition of 4.2 Full-Time Positions to the Approved Budgeted Positions

Recommendation: Adopt a resolution to amend the FY23/24 Sacramento Metropolitan Air Quality Management District Budgeted Positions increasing the authorized positions from 97.6 to 101.8 Full Time Equivalents.

Rationale for Recommendation: The Board authorizes a schedule of all regular and limited-term positions as part of the annual budget process and requests for additional positions or changes must be presented to the Board for approval. Various District programs are creating the need for additional staff in the upcoming year and will be included in the FY24/25 Proposed Budget. A brief description of the programs is included in this report. However, certain program priorities, namely the implementation of the Community Emission Reduction Plan (CERP) and the new AiriA Software Solution, require immediate action, prompting the request to proceed with some positions at mid-year.

This action is to amend the FY23/24 Budgeted Positions only, not increase the overall district budget. The objective is to be able to initiate recruitment for these positions so they will be onboard and ready to go just prior to the fiscal year-end. Employee expenses are expected to be nominal in the current fiscal year and can be absorbed in the FY23/24 Approved Budget.

Contact: Patricia Kepner, Controller, 279-207-1134

Presentation: No

ATTACHMENTS:

Resolution - Budgeted Positions Amendment
Exhibit 1 - Approved Positions as Amended

Approvals/Acknowledgements

Executive Director or Designee: Alberto Ayala, Report Approved 3/22/2024

District Counsel or Designee: Kathrine Pittard, Approved as to Form 3/22/2024

Discussion / Justification:
CERP Program

In 2017, Governor Brown signed Assembly Bill 617 (C. Garcia, Chapter 136, Statutes of 2017) directing the development of a new State community-focused program to reduce local exposure to air pollution and to preserve public health in the most vulnerable and marginalized communities. In 2018, the California Air Resources Board (CARB) selected the South Sacramento/Florin Community to be a part of the State's program to develop a community air monitoring plan (CAMP) to better understand the local air pollution issues. The District has been implementing the CAMP in collaboration with a steering committee composed of people who live, work at, or own a business in, or represent an organization within the community.

The next phase of AB617 implementation is to transition into a CERP community. The District received a state

grant with revenue totaling \$6.6M to continue to implement the CAMP and AB 617 legislation mandates, and develop the CERP, community-centered emission and pollution exposure reduction strategies. This is a significant program development requiring support across the district with planning currently underway.

The District's community is the last of the 19 communities statewide to transition to a CERP. It is a major undertaking with a very strict timeline for implementation. The CERP team will be cross-divisional and requires allocation of existing staff, new staff, and consultants to complete the project. The following is a timeline of the CERP designation process and project initiation. Work is currently underway, and the goal is to be geared up ready to go as soon as possible to ensure the District meets the timeline. The Community Steering Committee's (CSC) vote to move to a CERP is anticipated in the very near future, launching the state designation process.



In addition to consultants, the following staffing is planned to support the CERP project:

- Community Air Protection (CAP) – Two and a half (2.5) existing resources assigned to the newly created CAP unit leading the CAMP/CERP work.
- Transportation and Climate Change Division (TCC) – Two (2) new FTE, one in transportation and the other in planning in TCC.
- Engineering and Compliance Division (ECD) – One (1) new FTE, one resource to backfill work in ECD, while the equivalent of one resource from existing staff is assigned to support the CERP.
- Administrative Services Division (ASD) – One (1) new FTE, one new resource to join the Communications Office and funding to contract for administrative assistance for the equivalency of ~0.5 FTE in ASD
- Monitoring, Planning and Rules Division (MPR) – One (1) existing resource assigned to support the CERP in MPR, with a plan to contract backfill work as needed.

Only a subset of the resources identified for this program are being requested at this time, the Communications and Marketing Specialist in ASD and the Air Quality Specialist in ECD. The other positions will be included in the FY24/25 Proposed Budget and will be discussed in more detail at the Budget and Personnel Committee meeting scheduled to follow the Board of Directors meeting on March 28, 2024.

AiriA Software Implementation

The District has been implementing AiriA, a new operating system to replace multiple existing systems. The Permitting and Billing modules of the new solution are targeted to go-live July 1, 2024, with extensive training scheduled for June 2024.

There are two new resources in ECD that are being requested. The justification for these resources is below. There will be a significant advantage to approving these positions now to enable their onboarding in time to participate in this critical AiriA training.

Restoring Service Levels and Staffing New Programs In Engineering and Compliance Division (ECD)

Despite rising work and program demands, staffing levels have remained relatively flat over the past decade and a hiring freeze from 2019 to 2022 further exacerbated workload issues. As a result, the ECD team has had to reduce service levels and often prioritize urgent matters over essential program areas leading to delays in permit processing and completing other important program work. Additionally, current staffing levels do not account for new programs and expanded duties introduced in recent years, including Annual Reporting under the Criteria and Toxics Regulation (CTR), AB 617 community air protection efforts, Oil and Gas program, and the agricultural burn program. To manage the increased workload, some program duties have been reduced, including the frequency of compliance inspections.

Moreover, during the past decade, there has been a notable rise in permit application requirements, including expanded duties such as Best Available Control Technology (BACT) determinations and Health Risk Assessments. This has led to a 20-30% increase in the time required to finalize individual permits, contributing to a backlog and reduced service levels for stationary sources. To meet these challenges, and perform the upcoming CERP workload, more resources are needed.

Climate Pollution Reduction Grant (CPRG) and Clean Cars for All (CC4A) Program

The District, on behalf of the seven-county Sacramento region, submitted its Capital Region Climate Priorities Plan under the U.S. Environmental Protection Agency's CPRG program. The District led the climate planning process, which guarantees the region's opportunity to compete for future CPRG implementation grants that could bring millions of dollars in funding over the next six years for projects identified in the Plan. The District intends to submit the region's application for phase two implementation funding by April 1. CPRG, CERP, the Targeted Airshed Grant, and additional CAP Incentive funds require additional grant administration support.

In addition, the growth of the CC4A program is exceeding existing staff capacity. TCC has strategically realigned work to process the CC4A incentive grants more efficiently by consolidating administrative duties. To this end, additional administrative resources will be needed while eliminating an engineering position.

Proposed Staffing

As mentioned earlier, several positions will be requested in the FY24/25 Proposed Budget, and staff will be seeking input from the Board Budget and Personnel Committee this month. To address urgent priorities such as implementing the CERP, restoring service levels, meeting additional program requirements, and efficiently training new staff on the AiriA solution, mid-year authorization for specific full-time positions is being requested. This will allow the District to start recruiting and onboarding key resources promptly. The remaining positions needed will be included and detailed in the FY24/25 Proposed Budget. Here's a complete overview of the staffing strategy.

	FY23/24 Approved	FY23/24 Proposed Amendment	FY24/25 Proposed Budget
FTE	97.6	101.8	105.8
Classifications		Comms Specialist (1) AQ Engineer (2) AQ Specialist (1.2)	Office Assistant (2) AQ Engineer (-1) AQ Specialist/Planner (2) Accountant (1) AQ Engineer (1) Limited-Term to Regular – no FTE impact

Below is a description of the positions being proposed for the FY23/24 Budget Amendment.

Communications and Marketing Specialist: The addition of a second Communications and Marketing Specialist to the Communications Office is needed prior to the adoption of the FY 24/25 Budget to build capacity to help support communications, outreach and education for the CERP/CAP, while continuing with its existing responsibilities to support all the remaining district programs.

Air Quality Engineer: The addition of two new engineers in ECD will enable staff to properly support the Annual Reporting program, meet new state requirements under the Criteria and Toxics Reporting Regulation, and address permitting tasks more promptly while minimizing compliance issues caused by delays. This will also free up supervisory staff who are currently handling much of the current Annual Reporting work.

Air Quality Specialist: The increase in work hours for an existing staff member, from .6 to .8 FTE, plus the addition of one Air Quality Specialist in ECD will bolster compliance program efforts including improved service levels, increased inspection frequency at permitted facilities, and enable the section to handle additional responsibilities associated with new programs like Annual Reporting.

Financial Considerations: It is expected that recruitment of these positions will take some time and any expenses incurred in the current fiscal year related to these positions can be absorbed in the FY23/24 budget. Funding for all 4.2 FTE will be included in the FY24/25 Proposed Budget. Multiple funding sources will be used to cover the budgeted positions expenses, including Stationary Sources fee revenue and CERP/CAP grant funding.

RESOLUTION NO. 2024 – XXXX

Adopted by the Sacramento Metropolitan Air Quality Management District
Board of Directors

AMEND FY2023-24 BUDGETED POSITIONS

BACKGROUND:

- A. On May 25, 2023, the Sacramento Metropolitan Air Quality Management District Board of Directors (Board) approved the Fiscal Year 2023/24 Budget.
- B. The Board authorizes a schedule of all regular and limited-term positions as part of the annual budget process; requests for additional positions or changes must be presented to the Board for approval.
- C. The District received a two-year grant with revenue totaling \$6.6M to develop the Community Emission Reduction Plan (CERP), which will require significant resources.
- D. In recent years, the Engineering and Compliance Division (ECD) program demands have grown while keeping staffing levels below historic norms for fiscal prudence, which has led to prioritizing urgent matters and new programs over essential obligations resulting in impacts such as increased backlogs and reductions in compliance inspections.
- E. The urgency for a mid-year budget amendment is driven by a need to have positions filled in time for new staff to 1) launch the CERP project timely, 2) restore critical service levels and meet Annual Reporting deadlines, and 3) participate in division-wide training in June for the July launch of the District's new permit operating system, AiriA.
- F. To address these program priorities, approval of the following FTEs is being requested to commence the recruitment process and onboard key resources in a timely manner:
 - a. One (1) new Communications and Marketing Specialist in the Administrative Services Division.
 - b. Two (2) new Air Quality Engineers, one (1) new Air Quality Specialist, and an increase of an existing Air Quality Specialist from 0.6 to 0.8 FTE in ECD.

BASED ON THE FACTS SET FORTH IN THE BACKGROUND, THE BOARD OF DIRECTORS RESOLVES AS FOLLOWS:

- Section 1. Effective with the adoption of this resolution, the Fiscal Year 2023/24 Sacramento Metropolitan Air Quality Management District Budget is amended to increase the authorized positions from 97.6 to 101.8 Full Time Equivalents.
- Section 2. The Positions by Classification and Positions by Operating Division schedules in Section 7 - Organizational Overview, of the Approved Fiscal Year 23/24 Budget (Exhibit 1) are hereby amended to reflect the changes indicated in Section 1 above.
- Section 3. Exhibit 1 is attached to and incorporated into this Resolution.

ON A MOTION by Director _____, seconded by Director _____, the foregoing resolution was passed and adopted by the Board of Directors of the Sacramento Metropolitan Air Quality Management District on March 28, 2024, by the following vote:

Ayes:

Noes:

Abstain:

Absent:

ATTEST:

Clerk, Board of Directors
Sacramento Metropolitan Air Quality Management District

Positions by Classification

Classification	FY22/23 Amended	FY23/24 Approved	Change	FY23/24 Amended
AUTHORIZED				
Regular				
Admin Supervisor/Clerk of Board	1.0	1.0		1.0
Administrative Specialist	4.0	4.0		4.0
Air Pollution Control Officer	1.0	1.0		1.0
Air Quality Engineer	19.0	19.0	2.0	21.0
Air Quality Instrument Specialist	3.0	3.0		3.0
Air Quality Planner/Analyst	10.0	10.0		10.0
Air Quality Specialist	21.6	21.6	1.2	22.8
Communication & Marketing Specialist	1.0	1.0	1.0	2.0
Controller	1.0	1.0		1.0
District Counsel	1.0	1.0		1.0
Division Manager	4.0	4.0		4.0
Financial Analyst	1.0	1.0		1.0
Human Resource Technician	1.0	1.0		1.0
Human Resources Officer	1.0	1.0		1.0
Information Systems Analyst	3.0	3.0		3.0
Information Systems Manager	1.0	1.0		1.0
Legal Assistant	1.0	1.0		1.0
Office Assistant	3.0	3.0		3.0
Program Manager	5.0	5.0		5.0
Program Supervisor	12.0	12.0		12.0
Senior Accountant	1.0	1.0		1.0
Statistician	1.0	1.0		1.0
Limited Term				
Air Quality Engineer/Specialist/Planner	1.0	1.0		1.0
Information Systems Analyst	-	0.0		-
AUTHORIZED Total	97.6	97.6	4.2	101.8

Positions by Division

Classification	ASD	DC	EXEC	MPR	ECD	TCC	Total FTE
AUTHORIZED							
Regular							
Admin Supervisor/Clerk of Board	1.0	-	-	-	-	-	1.0
Administrative Specialist	4.0	-	-	-	-	-	4.0
Air Pollution Control Officer	-	-	1.0	-	-	-	1.0
Air Quality Engineer	-	-	-	4.0	11.0	6.0	21.0
Air Quality Instrument Specialist	-	-	-	3.0	-	-	3.0
Air Quality Planner/Analyst	-	-	-	3.0	-	7.0	10.0
Air Quality Specialist	-	-	-	5.0	13.8	4.0	22.8
Communication & Marketing Specialist	2.0	-	-	-	-	-	2.0
Controller	1.0	-	-	-	-	-	1.0
District Counsel	-	1.0	-	-	-	-	1.0
Division Manager	1.0	-	-	1.0	1.0	1.0	4.0
Financial Analyst	1.0	-	-	-	-	-	1.0
Human Resource Technician	1.0	-	-	-	-	-	1.0
Human Resources Officer	1.0	-	-	-	-	-	1.0
Information Systems Analyst	3.0	-	-	-	-	-	3.0
Information Systems Manager	1.0	-	-	-	-	-	1.0
Legal Assistant	-	1.0	-	-	-	-	1.0
Office Assistant	3.0	-	-	-	-	-	3.0
Program Manager	1.0	-	-	1.0	2.0	1.0	5.0
Program Supervisor	1.0	-	-	3.0	5.0	3.0	12.0
Senior Accountant	1.0	-	-	-	-	-	1.0
Statistician	-	-	-	1.0	-	-	1.0
Limited Term							
Air Quality Engineer/Specialist/Planner	-	-	-	-	-	1.0	1.0
Information Systems Analyst	-	-	-	-	-	-	-
AUTHORIZED Total	22.0	2.0	1.0	21.0	32.8	23.0	101.8

Meeting Date: 3/28/2024
Report Type: CONSENT CALENDAR
Report ID: 2024-0328-5.



Title: Emission Reduction Credits from the Community Bank for Sacramento Rendering Company - Loan Number C24-1001

Recommendation: Adopt a resolution transferring a total of 3,598.8 pounds of nitrogen oxides (NOx) per year from the Community Bank to Sacramento Rendering Company for two years.

Rationale for Recommendation: Sacramento Rendering Company (SRC) had an emission reduction credit (ERC) loan from the Community Bank to offset emissions from their natural gas-fired boiler located at 11350 Kiefer Blvd., Sacramento, CA. The loan expired on September 30, 2023. SRC now requests to lease NOx ERCs from the Community Bank for an additional two years to continue meeting the alternative compliance requirements of Rule 107 – Alternative Compliance – and the emission limits of Rule 411 – NOx from Boilers, Process Heaters and Steam Generators. Rule 205 – Community Bank and Priority Reserve Bank – requires that certain requests for ERCs from the Community Bank be approved by the Board.

Staff reviewed the ERC loan request and made two findings: (1) NOx reduction technologies that are cleaner than what is proposed by the applicant are readily available, so a limited term loan is recommended to provide the applicant additional time to upgrade the existing equipment, and (2) the loan request will not impact the health of the bank.

Staff recommends the approval of this two-year loan request.

Contact: Kevin J. Williams, Ph.D., Program Supervisor, Monitoring, Planning and Rules Division, 279-207-1156

Presentation: No

ATTACHMENTS:

Resolution - Sacramento Rendering Company ERC Request

Approvals/Acknowledgements

Executive Director or Designee: Alberto Ayala, Report Approved 3/21/2024

District Counsel or Designee: Kathrine Pittard, Approved as to Form 3/14/2024

Discussion / Justification:

SRC is a rendering and recycling company that services the food handling, processing, farming, husbandry, and manufacturing industries. SRC had a five-year loan of NOx ERCs from the Community Bank for a 44.8 mmBtu/hr natural gas-fired backup boiler (ERC loan C18-1001) that expired on September 30, 2023. SRC is now requesting a new ERC loan to continue using alternative compliance for the existing boiler. The boiler once operated under the low fuel usage exemption threshold in Rule 411, but exceeded the allowable fuel usage in calendar year 2017 and was no longer eligible for the low usage exemption. Subsequently, SRC had to demonstrate compliance with a NOx limit of 9 ppmv @ 3% oxygen and chose to use the alternative compliance option. SRC has applied to the District for an Authority to Construct (A/C) No. 27605 to continue to operate the boiler.

Rule 205 – Community Bank and Priority Reserve Bank – requires that loans of ERCs from the Community Bank be approved by the Board when the amount of the loan request is greater than 900 pounds per quarter or the term of the loan is greater than five years. SRC is requesting another two years in addition to the original loan, for a total term of seven years. To approve a loan request, the Board must consider the extent to which cleaner innovative technologies have been used to minimize the credits needed, and the Board may deny the loan or add conditions to protect the health of the bank. Staff’s findings on cleaner technology and the health of the bank are discussed below:

- **Use of Clean Technology:** The existing natural gas-fired boiler does not employ low-NOx burners that could be used to meet the emission standards of Rule 411 and does not meet the District’s Best Available Control Technology (BACT) standards for new boilers of this type and size. The boiler was originally permitted in 1997 and is approximately 27 years old. SRC has been using alternative compliance for this boiler since it exceeded the low fuel usage exemption threshold in 2017. Staff recommends the Board approve a limited term ERC loan, which will allow SRC to continue operation while working either to retrofit the existing boiler with low-NOx burners that meet the emission standards in Rule 411 or to replace the boiler with a new boiler that meets BACT standards. Two years is an appropriate amount of time to complete the required engineering, procurement, installation and permitting.
- **Health of the Bank:** SRC has requested to lease 3,598.8 pounds per year of NOx credits for two years from the Community Bank. The current NOx balance in the Community Bank is 42,912 pounds per year. The new NOx balance in the Community Bank will be 39,353 pounds per year if the Board approves the loan to SRC. The ERC loan request will not significantly impact the health of the bank.

To qualify for approval at today’s meeting, Rule 205 requires the permit action be completed by February 7, 2024. The permit action was subject to public review and a final A/C permit was prepared on January 12, 2024, pending approval of this credit loan request. No comments were received. Rule 205 authorizes loans to be active at the beginning of the next calendar quarter, April 1, 2024.

Staff recommends the approval of the following two-year ERC loan request:

Nitrogen Oxides (NOx) Emission Reduction Credits Needed					
Permit Number	Pounds per Calendar Quarter				Pounds per Year
	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	
A/C 27605	899.7	899.7	899.7	899.7	3,598.8

Financial Considerations: Staff’s time is required to renew and update each loan from the Community Bank and the Priority Reserve Bank. This cost is recovered through: (1) the annual loan renewal fee paid by the facilities that have loans from the District Banks as required by Section 313 of Rule 205, and (2) the hourly rate required for withdrawing credits from the District credit bank as required by Section 315 of Rule 301 – Permit Fees - Stationary Source. Therefore, the loan request is not expected to result in any additional costs to the District.

Environmental Review: The California Environmental Quality Act (CEQA) requires state and local agencies to identify the significant adverse environmental impacts of their actions and to avoid or mitigate those impacts to the extent feasible. The first step in the process is to determine if the project is exempt from CEQA.

The State CEQA Guidelines (SCG) provide that “Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.” (SCG §15061(b)(3)).

This project consists of the District continuing to lease ERCs to SRC to replace emission offsets for an existing operation. It will not result in a physical or operational change to the facility or an emissions increase. Therefore, the project is exempt from CEQA because there is no possibility that the project will have a significant effect on

the environment.

In addition, SCG §15301, Existing Facilities, exempts from CEQA the “operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use.” SMAQMD’s action to extend the ERC loan will not result in any changes at the facility.

Upon approval of the project, the District will issue the ERC loan and file a Notice of Exemption with the Sacramento County Clerk.

RESOLUTION NO. 2024 – XXXX

Adopted by the Sacramento Metropolitan Air Quality Management District
Board of Directors

EMISSION REDUCTON CREDITS FROM THE COMMUNITY BANK FOR SACRAMENTO RENDERING COMPANY – LOAN NUMBER C24-1001

BACKGROUND:

- A. The Board of Directors of the Sacramento Metropolitan Air Quality Management District (Board) adopted Rule 205, COMMUNITY BANK AND PRIORITY RESERVE BANK.
- B. Pursuant to Rule 205, Section 203, the Community Bank is a depository of certified emission reduction credits (ERCs), which may be loaned for compliance with Rule 411, NOX FROM BOILERS, PROCESS HEATERS AND STEAM GENERATORS.
- C. Sacramento Rendering Company (SRC) is a rendering and recycling company that services the food handling, processing, farming, husbandry, and manufacturing industries, and uses boilers for its rendering and recycling process. The existing backup boiler does not meet the NOx emissions limits in Rule 411, NOX FROM BOILERS, PROCESS HEATERS AND STEAM GENERATORS.
- D. Since October 1, 2018, SRC has used the alternative compliance option, authorized by Rule 107, ALTERNATIVE COMPLIANCE, with ERCs from the Community Bank to offset the excess emissions from the boiler.
- E. SRC's original Loan Number C18-1001 from the Community Bank, with a term of five years, expired on September 30, 2023.
- F. SRC has requested a new, two-year ERC loan to continue using alternative compliance for the boiler.
- G. Rule 205, Section 310 requires loan applications to the Community Bank for amounts greater than 900 pounds per quarter or longer than five years to be approved by the Board prior to disbursement. Approval of the current request will extend the total loan life beyond five years.
- H. Pursuant to Rule 205, Section 310, the Board considered the impact of the loan on the health of the bank and the extent to which cleaner innovative technologies have been used to minimize the credits needed. The boiler, originally permitted in 1997, does not employ technology that could be used to meet the NOx emission limits of Rule 411. A two-year ERC loan will provide SRC with sufficient time to retrofit or replace the existing boiler to comply with Rule 411.
- I. The California Environmental Quality Act (CEQA) Guidelines, Section 15061(b)(3), provides that "where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA." In addition, CEQA Guidelines Section 15301, Existing Facilities, exempts from CEQA the "operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination."

J. Rule 205, Section 310.4, authorizes the loan to be active at the beginning of the next calendar quarter, April 1, 2024.

BASED ON THE FACTS SET FORTH IN THE BACKGROUND, THE BOARD OF DIRECTORS RESOLVES AS FOLLOWS:

Section 1. The approval of the loan is exempt from CEQA.

Section 2. The Board authorizes and directs the loan of the following NOx emission reduction credits from the Community Bank to Sacramento Rendering Company for two years:

Permit Number	Loan Number	Pollutant	ERCs from the Community Bank (lbs/qlr)			
			1 st qlr	2 nd qlr	3 rd qlr	4 th qlr
A/C 27605	C24-1001	NOx	899.7	899.7	899.7	899.7

Section 3. Loan number C24-1001 is effective as of April 1, 2024.

ON A MOTION by Director _____, seconded by Director _____, the foregoing resolution was passed and adopted by the Board of Directors of the Sacramento Metropolitan Air Quality Management District on March 28, 2024, by the following vote:

Ayes:

Noes:

Abstain:

Absent:

ATTEST:

Clerk, Board of Directors
Sacramento Metropolitan Air Quality Management District

Meeting Date: 3/28/2024
Report Type: CONSENT CALENDAR
Report ID: 2024-0328-6.

Title: Contract for Air Quality Forecasting Services

Recommendation: Authorize the Executive Director/Air Pollution Control Officer to execute a three-year contract for air quality forecasting related services in an amount not to exceed \$570,000 with the option to extend the contract beyond the initial three-year term for two separate one-year extensions in an amount not to exceed \$190,000 for each additional year, and make minor revisions to the contract, in consultation with the District Counsel and within the funding limits, that may be necessary to fully implement its intent.

Rationale for Recommendation: The District's Purchasing Policies require Board approval for non-incentive contracts exceeding \$200,000, therefore, this contract requires Board approval. The current contract with Sonoma Technology Inc. (STI) expires March 31, 2024. The District released a competitive request for proposals (RFP) on January 29, 2024 to solicit bids from qualified entities to provide air quality forecasting services for the Spare The Air campaign and Check Before You Burn program. The District is currently reviewing the RFP submittals which will conclude prior to the expiration of the existing contract but after the March 2024 Board meeting. Authorizing the Executive Director/Air Pollution Control Officer to enter into contract will allow a seamless transition between contracts for ozone and particulate matter (PM) forecasting, Air Alert operations, scientific consulting and website maintenance, which are essential to the region's Spare The Air campaign and Sacramento County's Check Before You Burn program.

Contact: Mark Loutzenhiser, Director, Monitoring, Planning and Rules Division, 916-261-6414

Presentation: No

Approvals/Acknowledgements

Executive Director or Designee: Alberto Ayala, Report Approved 3/21/2024

District Counsel or Designee: Kathrine Pittard, Approved as to Form 3/14/2024

Discussion / Justification: The District has previously contracted for ozone and PM forecasting, mapping, Air Alert operations, scientific consulting and website hosting/maintenance. The work helps the District implement the regional Spare The Air campaign and Sacramento County's Check Before You Burn program. In addition, the contractor provides information regarding wildfire smoke impacts, assists with the electronic dissemination of health information to the public and provides exceptional event data and analysis.

The District is currently concluding the RFP for a new service provider. This action will authorize the Executive Director/Air Pollution Control Officer to enter into a new contract with the selected vendor consistent with past contracts and in consultation with District Counsel. Authorization will allow continuity to provide the necessary services for successful implementation of the Spare The Air campaign and the Check Before You Burn program, which informs the public of smoke impacts.

Financial Considerations: The initial three-year contract will not exceed \$570,000 (\$190,000 per year). Each one year extension, beyond the initial three-year term, will include an additional \$190,000. Funds are budgeted for the current FY 2023/24 and for FY 2024/25. Continuation of the contract beyond these fiscal years will be subject to the availability of sufficient funds in the budget adopted for the applicable fiscal year.

Meeting Date: 3/28/2024
Report Type: CONSENT CALENDAR
Report ID: 2024-0328-7.



Title: Appointment of Hearing Board Professional Engineer Member

Recommendation: Pass a motion appointing Earl Withycombe to the Hearing Board as the professional engineer member for a 3-year term beginning March 29, 2024, and ending March 28, 2027.

Rationale for Recommendation: Section 40800 of the California Health and Safety Code requires that the Board of Directors establish and maintain a hearing board. The hearing board consists of five members: one attorney, one professional engineer, one medical professional, and two members of the general public. Each member is appointed by the Board of Directors for a three-year term.

A Hearing Board Nomination Committee was established to assist in the process of nominating finalists for Board consideration by the full board to serve on the Hearing Board. For the current vacancy, only one candidate submitted an application. Therefore, staff are forwarding the application directly to the full board for approval.

Contact: Virginia Muller, Clerk of the Hearing Board (279) 207-1138

Presentation: No

ATTACHMENTS:

Attachment A: Earl Withycombe Resume & Professional Engineer License

Approvals/Acknowledgements

Executive Director or Designee: Alberto Ayala, Report Approved 3/21/2024

District Counsel or Designee: Kathrine Pittard, Approved as to Form 3/19/2024

Discussion / Justification: Mr. Withycombe is familiar with Air Quality rules and regulations. He served as an Air Resources Engineer for the California Air Resources Board from 2006 to 2022. Prior to working at CARB he worked for Sierra Research first as a Senior Engineer then Partner from 1988 to 2006, conducting air impact and permitting analysis.

The term for the professional engineer member of the Hearing Board will commence upon Board approval beginning March 29, 2024, and ending March 28, 2027.

The Hearing Board Member of the Medical Profession is still vacant and the District is actively recruiting for the Public Service Opportunity.

Résumé

Earl Withycombe

Education

1970, B.S., Aeronautical Engineering, Massachusetts Institute of Technology, Cambridge, Massachusetts

1989, Certificate in the Management of Hazardous Materials, University of California, Davis, California

Professional Experience

8/06 to 12/22 Air Resources Engineer
California Air Resources Board

Served as the planning liaison to the South Coast Air Quality Management District, facilitating coordination between ARB and the District in the development of the 2007 8-hour ozone and PM_{2.5} State Implementation Plan for the South Coast Air Basin. Served as the planning liaison to the Sacramento Metropolitan region, the Mountain Counties Air Basin, and Eastern Kern County. Provided technical oversight to windblown dust issues at Owens Lake, Mono Lake, and the Salton Sea. Served as a member of the Oceano Dunes State Vehicle Recreation Area Scientific Advisory Group, and as a member of the Salton Sea Task Force's Science and Air Quality Committees. Conducted technical analysis in support of air quality planning activities including control measure benefit quantification, emission inventory refinement, air quality impact assessment, and control technology research.

5/93 to 6/06 Partner
Sierra Research

4/88 to 5/93 Senior Engineer
Sierra Research

Worked as a partner and project manager in a consulting firm specializing in air quality analysis and management. Experience included management of regulatory development and project evaluation services for governmental clients; management of process, control, and instrumentation design; emission and impact evaluation; and compliance strategy services for private clients. Technical contributions included air quality modeling, combustion modeling, control equipment design and analysis, ambient air quality analysis, ambient and stack sampling project design, screening risk assessment, permit development, and particulate matter and fugitive dust emission factor development services for a variety of projects, including those related to power production,

cogeneration, industrial boilers, geothermal activities, mineral extraction and processing, lumber production, toxic waste treatment, fugitive dust, and Superfund remediation. Advocacy services included permit negotiation, technical briefing and presentation, expert witness testimony, legal support, rulemaking representation, regulatory interpretation, and technical reporting for a variety of public and private clients.

7/83 to 4/88

Managing Partner, Sierra Air Consultants

Founded and managed a small consulting firm specializing in air quality impact analysis. Directed the development of permit applications and provided air quality troubleshooting services to a number of wood processing clients. Analyzed the environmental impacts of several energy projects for environmental and governmental clients. Managed all fiscal and administrative functions for the partnership.

7/75 to 4/88

Air Basin Engineer
Mountain Counties Air Basin,
Lake Tahoe Air Basin

Established and managed a consulting practice providing exclusive and comprehensive technical services to an association of nine county air pollution control districts in the Sierra Nevada region of California. During vacancies in administrative positions, assumed the responsibilities of program management for interim periods in several Districts in the Air Basin. Drafted numerous amendments to the air basin plan in implementing federal and state mandates and responding to new local problems. Developed annual budgets for a number of districts.

Developed ozone nonattainment plans for El Dorado and Mariposa Counties. Drafted and implemented the first local Prevention of Significant Deterioration program in rural California. Analyzed compliance with emission limits and ambient air quality standards for all major and many minor new and modified source applications within the nine county region. Developed comprehensive stationary and area source emission inventories for the Mountain Counties Air Basin (1977) and for the Lake Tahoe Ozone Nonattainment Plan (1981). Designed air quality monitoring networks throughout the Air Basin, including systems to measure the impacts of controlled wildland vegetative burning and residential wood combustion. Developed toxic pollutant test burn plans for the experimental incineration of toxic wastes in cement kilns, rotary kilns, and starved air incinerators. Designed a testing program and developed district regulations for the assessment and control of asbestos emissions from unpaved roads and parking lots. Certified all test plans and oversaw all stationary source testing in the Air Basin.

Served as the Co-Chairman of the CAPCOA-ARB New Source Review Rule Committee that developed the 1982 CAPCOA NSR rule which served for many years as a model regulation for the permitting of new sources by districts. Drafted and successfully lobbied several legislative bills amending the relationship between districts and the California Air Resources Board and authorizing experimental programs seeking innovative solutions to air quality problems. Drafted language and lobbied for passage of

AB 3374 (1986), the second Calderon landfill testing bill, which refocused priorities on active landfills and adopted more cost effective monitoring protocols for small rural landfills.

11/86 to 4/87 Air Pollution Control Officer
Northern Sierra Air Quality Management District

Designed and managed the process for unifying three county air pollution control districts into a multi-county agency to increase program service levels while reducing administrative costs. During agency formation, served as agency administrator and organized basic fiscal, regulatory, enforcement, legal and legislative programs. Designed and enacted a stationary source permit fee proposal that dramatically increased program revenues. Developed the first district wildland vegetation management burning regulation and permit fee program in the state.

1/79 to 4/86 Member and Chairman
Sierra County Board of Supervisors

Served two terms as a member and three years as Chairman of the Board of Supervisors of Sierra County. Chaired the Board's Finance, Personnel, and Health & Welfare Committees. Served as the de facto county administrator coordinating multi-department responses to legislation mandates and community problems. Drafted and enacted numerous ordinances, resolutions, and Board orders in the areas of general administration, health, personnel management, human services, finance, and public safety. Served seven years as the Chairman of the County Board of Equalization. Together with the County Auditor, supervised the development of annual county budgets and fiscal policy. Served as the County's labor negotiator for six years. Represented the County on numerous inter- and intra-county boards, commissions, and councils. Served two years on the Executive Committee of the County Supervisors Association of California. Drafted and sponsored several bills streamlining state statutes related to unique rural concerns. Coauthored and led the successful lobbying effort to secure passage of SB 1691 (1983) which established the state's first locally administered groundwater management districts.

8/73 to 1/75 Air Pollution Control Officer
County of Sierra

Served as the program manager of a rural county air pollution control district. Developed and implemented compliance plans for two timber processing facilities. Managed the accounting, budget, reporting, permit review, and air quality monitoring functions of the agency. Developed the technical justification for formation of the Mountain Counties Air Basin to supplant the mountain portions of the Sacramento and San Joaquin Valley Air Basins. Drafted major portions of the first Air Basin Plan and related regulations.

Credentials, Memberships, and Awards

Qualified Environmental Professional, Air Pollution; Institute of Professional
Environmental Practice

Registered Civil Engineer, California

Member, Air and Waste Management Association

Outstanding Individual, 1994 Summer Smog Season Campaign, Partners for Clean Air,
Sacramento, California

Clean Air Award, American Lung Association of Sacramento-Emigrant Trails, 1996

Environmentalist of the Year Award, Environmental Council of Sacramento, 1997

Pottenger Award for Volunteer Service, American Lung Association of California, 2002

STATE BOARD OF REGISTRATION
FOR PROFESSIONAL ENGINEERS

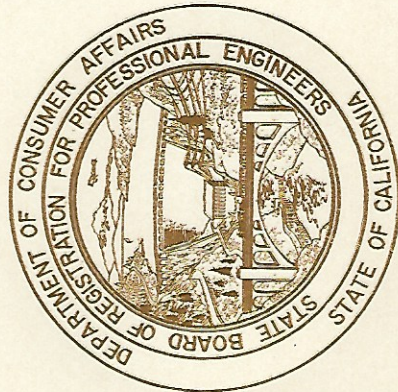


THIS IS TO CERTIFY THAT PURSUANT
TO THE PROVISIONS OF CHAPTER 7, DIVISION 3 OF THE BUSINESS AND PROFESSIONS CODE

EARL WITHYCOMBE, II

IS DULY REGISTERED AS A
PROFESSIONAL ENGINEER
IN
CIVIL ENGINEERING

IN THE STATE OF CALIFORNIA, AND IS ENTITLED TO ALL THE RIGHTS AND
PRIVILEGES CONFERRED IN SAID CODE



WITNESS OUR HAND AND SEAL

CERTIFICATE

No. 29837

THIS 12 TH DAY OF JULY 1978

STATE BOARD OF REGISTRATION
FOR PROFESSIONAL ENGINEERS

SECRETARY

PRESIDENT

THIS CERTIFICATE IS THE PROPERTY OF THE STATE OF CALIFORNIA AND IN THE EVENT OF ITS SUSPENSION, REVOCATION OR
INVALIDATION FOR ANY REASON IT MUST UPON DEMAND BE RETURNED TO THE STATE BOARD OF REGISTRATION FOR PROFESSIONAL ENGINEERS

Meeting Date: 3/28/2024
Report Type: CONSENT CALENDAR
Report ID: 2024-0328-8.



Title: Revision to the State Implementation Plan to Incorporate Reasonably Available Control Technology for Major Sources of Nitrogen Oxides

Recommendation: Determine that the adoption of revisions to the State Implementation Plan (SIP) to satisfy Reasonably Available Control Technology (RACT) for Major Sources of nitrogen oxides (NOx) is exempt from the California Environmental Quality Act (CEQA); 2) adopt a resolution approving the SIP revision, and 3) direct Staff to forward the SIP revision and all necessary supporting documents to the California Air Resources Board (CARB) for submittal to the U.S. Environmental Protection Agency (EPA).

Rationale for Recommendation: EPA has determined that three District rules do not fully satisfy Clean Air Act (CAA) requirements for RACT at major stationary sources of NOx. To avoid EPA promulgation of a Federal Implementation Plan (FIP), the District must submit, and EPA must approve, revisions to the SIP to correct the deficiencies by September 30, 2024. The proposed SIP revision will correct the RACT deficiencies and, upon approval by EPA, avoid the imposition of a FIP and further actions.

Contact: Kevin J. Williams, Ph.D., Program Supervisor, Monitoring, Planning and Rules, (279) 207-1156

Presentation: No

ATTACHMENTS:

Resolution
Exhibit A: SIP Revision
Attachment A: Evidence of Public Notice

Approvals/Acknowledgements

Executive Director or Designee: Alberto Ayala, Report Approved 3/21/2024

District Counsel or Designee: Kathrine Pittard, Approved as to Form 3/13/2024

Discussion / Justification: The District is part of the Sacramento Federal Ozone Nonattainment Area (SFNA), which is designated as a “severe” nonattainment area for the 1997 and 2008 federal 8-hour ozone standards, and a “serious” nonattainment area of the 2015 8-hour ozone standard. Section 182 of the CAA mandates that areas classified as “moderate” or worse implement RACT for all major stationary sources of volatile organic compounds (VOC) and NOx. RACT must be incorporated in the SIP.

The planning requirements for the 2008 ozone standard required the District to demonstrate RACT for certain source categories and all major stationary sources of VOC and NOx. In February 2017, EPA issued a finding that several nonattainment areas across the country, including the District, had failed to submit their RACT demonstrations, known as “RACT SIPs.” Subsequently, the Board adopted a RACT SIP in March 2017.

EPA's 2017 finding required them to approve RACT submissions by February 2019 or promulgate FIPs. EPA never took action to approve the District's RACT SIP and also did not promulgate a FIP. The agency's inaction was challenged in court and a consent decree now requires it to approve the RACT SIP by September 30, 2024, or promulgate a FIP.

In June 2023, EPA partially approved and partially disapproved the District's RACT SIP. The partial disapproval was for RACT at major stationary sources of NOx. In EPA's evaluation, they noted that three District rules that limit NOx emissions include temporary exemptions from NOx emissions limits during periods of startup and shutdown; therefore, the rules don't conform to current EPA guidance for RACT rules.

The local permits to operate for NOx emission units at major stationary sources of NOx include daily mass emission limits that apply to all operation, including emissions during startup and shutdown periods. Staff is proposing to submit those permit conditions for SIP approval.

In a separate action, EPA also requires that all records should be on file and not just upon request. To address this requirement, staff is proposing to include mandatory reporting conditions with the SIP submittal. The reporting conditions are identical to those already required by the sources' federal Title V operating permits.

Summary of Plan / Rule / Amendment: Staff is proposing to submit the local permits to operate for inclusion in the SIP. If approved by EPA, daily mass emission limits for NOx, related conditions necessary for enforcement, and mandatory reporting requirements will become federally enforceable. If approved by EPA, these permit conditions will become federally enforceable. All unrelated permit conditions will be redacted and will not be included in the SIP.

Staff's proposal will correct the RACT deficiencies and, upon approval by EPA, satisfy the RACT requirements.

Financial Considerations: There are six major stationary sources of NOx included in this proposed SIP revision. The sources are already required to comply with the permit conditions under their local and Title V permits. The sources will not incur additional compliance costs.

Emissions Impact: No sources will be required to make any changes to equipment or operation. There will be no impact on emissions.

Economic Impact: The adoption of this SIP revision will not impact regional economy.

Public Outreach/Comments:

Staff conducted meetings with representatives of each of the affected sources to make them aware of the proposed SIP revision. The necessity of the SIP submittal and the details of the permit conditions to be included were discussed. The affected sources made no requests to change staff's proposal.

The noticing for this hearing included:

- A notice posted on the District website, with links to the Statement of Reasons and redacted permits to operate
- Email notices to:
 - The California Air Resources Board and EPA
 - All persons who have requested notices for plans, rulemaking, and general interest

Consistent with public notice requirements for SIP revisions, the notice stated that a public hearing has been tentatively scheduled and will be cancelled if no request for hearing to be held is received by the District by 10:00 a.m. on March 27, 2024. The notice also stated that an announcement of a cancellation will be made on March 27, 2024, at 3:00 p.m. by posting a notice of a cancellation on the District's web site and on the billboard at the entrance to the District office, and by sending an email to all those who received the public notice.

Environmental Review: 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).

RESOLUTION NO. 2024 – XXXX

Adopted by the Sacramento Metropolitan Air Quality Management District
Board of Directors

REVISION TO THE SIP TO INCORPORATE REASONABLY AVAILABLE CONTROL TECHNOLOGY FOR MAJOR SOURCES OF NOx

BACKGROUND:

- A. Sections 182(b)(2)(C) and 182(f) of the federal Clean Air Act require states and districts in areas classified as “moderate” ozone nonattainment or worse to revise their State Implementation Plans to require Reasonably Available Control Technology (RACT) for all major stationary sources of nitrogen oxides (NOx).
- B. The Sacramento Metropolitan Air Quality Management District (“District”) is within an area classified as a “severe” nonattainment area for both the 1997 and 2008 primary National Ambient Air Quality Standards (NAAQS) for ozone and “serious” nonattainment for the 2015 primary NAAQS for ozone.
- C. There are six major stationary sources of NOx in the District operating boilers, gas turbines and gas fired ovens: Sacramento Municipal Utility District Financing Authority (SMUD FA) Campbell Power Plant; SMUD FA Carson Power Plant; SMUD FA Cosumnes Power Plant; SMUD FA Procter and Gamble Power Plant; Mitsubishi Chemical Carbon Fiber and Composites, Inc.; and UC Davis Medical Center.
- D. There are no limitations in the State Implementation Plan (SIP) for NOx emissions during startup and shutdown for boilers, gas turbines and gas fired ovens.
- E. Local permits to operate for boilers, gas turbines and gas fired ovens at the major stationary sources of NOx contain limits on the daily mass emissions of NOx, including emissions during periods of startup and shutdown.
- F. The Board of Directors of the Sacramento Metropolitan Air Quality Management District (Board) has determined the District will meet the requirements of Clean Air Act Sections 182(b)(2)(C) and 182(f) by submitting to the U.S. Environmental Protection Agency (EPA) a revision to the SIP that includes conditions of the permits to operate that limit the daily NOx mass emissions and the associated source testing, test methods, monitoring, reporting, and recordkeeping requirements for boilers, gas turbines and gas fired ovens at the six major stationary sources of NOx.
- G. The District published a notice in accordance with federal Clean Air Act Section 111(l) and 40 CFR 51.102, providing a 30-day period to request a public hearing, inviting public comment on the proposed SIP revision, and providing a 30-day period to submit written comments.
- H. The Board conducted a public hearing and considered public comment on the proposed SIP revision.
- I. The Board evaluated the proposed SIP revision to determine whether it is exempt from the California Environmental Quality Act (CEQA) 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).

BASED ON THE FACTS SET FORTH IN THE BACKGROUND, THE BOARD OF DIRECTORS RESOLVES AS FOLLOWS:

- Section 1. The SIP revision is exempt from CEQA.
- Section 2. Approves the SIP revision, as shown in the attached Exhibit A.
- Section 3. Directs Staff to forward the SIP revision and all necessary supporting documents to the California Air Resources Board for submittal to U.S. EPA as a revision to the California State Implementation Plan.
- Section 4. Exhibit A is attached to and incorporated into this Resolution.

ON A MOTION by Director _____, seconded by Director _____, the foregoing resolution was passed and adopted by the Board of Directors of the Sacramento Metropolitan Air Quality Management District on March 28, 2024, by the following vote:

Ayes:

Noes:

Abstain:

Absent:

ATTEST:

Clerk, Board of Directors
Sacramento Metropolitan Air Quality Management District

**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

Prepared by: Pedro Vega
Air Quality Engineer

Reviewed by: Kevin J. Williams, Ph.D.
Program Supervisor

Janice Lam Snyder, M.S.
Program Manager

Approved by: Mark Loutzenhiser
Division Manager

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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 ozone¹, 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,

¹ "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.”² 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).³ 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, 2024.⁴

² 44 Federal Register (FR) 53762, September 17, 1979.

³ 88 FR 9158, February 3, 2017.

⁴ 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.⁵ 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.⁶ In response to this decision, EPA issued a Final Action rule (The "2015 Guidance"), which revised direction regarding emissions during SSM periods.⁷ 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.⁸ 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

⁵ 88 FR 42248, June 30, 2023.

⁶ Sierra Club v. Johnson, 551 F.3d 1019 (D.C. Cir. 2008).

⁷ 80 FR 33839, June 12, 2015.

⁸ 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.⁹ 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.¹⁰ 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 304.¹¹

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.

⁹ 87 FR 67617, November 9, 2022.

¹⁰ 88 FR 29827, May 9, 2023.

¹¹ 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.

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 O₂ if using a CEMS
- Perform periodic source testing for NOx and O₂
- 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

Company Name	Permit to Operate (PO) No.	Permit Conditions to be Included in SIP
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 20217 20218 20219	1, 9 (B), 15, 17 (D), 18, 20 (C), 23

Table 2: Gas Turbine Permits to Operate

Company Name	Permit to Operate (PO) No.	Permit Conditions to be Included in SIP
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 (27116 duct burner)	1, 10, 19 (A, B), 20 (C), 21 (M), 22, 27 (D), 29
SMUD Procter & Gamble Power Plant	27141 (27132 duct burner)	1, 9, 15 (A, B), 16 (C), 17 (M), 18, 21 (E), 23
	27142 (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 (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

Company Name	Permit to Operate (PO) No.	Permit Conditions to be Included in SIP
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).

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.^{12,13} 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.

¹² Clean Air Act §110.

¹³ Title 40 Code of Federal Regulations §51.102.

APPENDIX A – BOILER PERMITS TO OPERATE

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

SACRAMENTO METROPOLITAN



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

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PERMIT NO.: 27154

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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EMISSIONS LIMITATIONS

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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 (lb/day)
NOx	21.1

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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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_x, 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

EMISSIONS TESTING

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

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

Frequency	Information to be Recorded

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

Frequency	Information to be Recorded
Daily	P. The boiler's natural gas fuel consumption (MMCF/day) Q. Total daily NOx emissions from the boiler (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: Jan 30, April 30, July 30, and Oct 30	A. Whenever the CEM system is inoperative except for zero and span checks. i. Date and time of non-operation of the CEM system. ii. Nature of the CEM system repairs or adjustments. B. Whenever an emission occurs as measured by the required CEM system that is in excess of any emission limitation. i. Magnitude of the emission which has been determined to be in excess. ii. Date and time of the commencement and completion of each period of excess emissions. iii. Periods of excess emissions due to start-up, shutdown and malfunction must be specifically identified. iv. The nature and cause of any malfunction (if known). v. The corrective action taken or preventive measures adopted. C. If there were no excess emissions during a reporting quarter. i. A report must be submitted indicating that there were no excess emissions.

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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]

**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 83rd 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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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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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**

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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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: Jan 30, April 30, July 30, and Oct 30.	A. Whenever the continuous emissions monitoring system is inoperative except for zero and span checks: i. Date and time of non-operation of the continuous emission monitoring system. ii. Nature of the continuous emission monitoring system repairs or adjustments. B. Whenever an emission occurs as measured by the required continuous emissions monitoring system that is in excess of any emission limitation: i. Magnitude of the emission which has been determined to be in excess. ii. Date and time of the commencement and completion of each period of excess emissions. iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified. iv. The nature and cause of any malfunction (if known).

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

Frequency	Information to be Reported
	<p>v. The corrective action taken or preventive measures adopted.</p> <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>

17.

18.

777 12TH STREET, STE 300
SACRAMENTO, CA 95814-1908

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(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**

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PERMIT NO.: 27140

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

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 83RD 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.

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

BY: Brian F Krebs

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PERMIT NO.: 27144

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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EMISSIONS LIMITATIONS

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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 (lb/day)
NOx	23.0

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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EQUIPMENT OPERATION

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

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]

777 12TH STREET, STE 300
SACRAMENTO, CA 95814-1908

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

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

PAGE 10 OF 10 PAGES

PERMIT NO.: 27144

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

PO 27338 – (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
27338	BOILER, MAKE: CLEAVER BROOKS, MODEL: CBI 200-150-150, SERIAL NO.: OL103578, 6.124 MMBTU/HR CAPACITY, NATURAL GAS FIRED, SERVING INDUSTRIAL PROCESSES.

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

PAGE 1 OF 7 PAGES

PERMIT NO.: 27338

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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EMISSIONS LIMITATIONS

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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		

REVOCABLE AND NON-TRANSFERABLE

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.

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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

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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 _x 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 _x 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 _x 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 _x 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

PAGE 1 OF 8 PAGES

PERMIT NO.: 20216, 20217, 20218, & 20219

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

2.

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EMISSIONS LIMITATIONS

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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 must be tested once every calendar year beginning in 2008 to verify compliance The test must conform to the following test conditions and time schedule:

- 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



PERMIT TO OPERATE

ISSUED TO: UCD MEDICAL CENTER

EQUIPMENT LOCATION: 4840 SECOND AVENUE, SACRAMENTO, CA 95817

PERMIT NO.	EQUIPMENT DESCRIPTION
17549	GAS TURBINE, 24 MW GENERAL ELECTRIC LM 2500 COMBINED CYCLE TYPE WITH WATER INJECTION, 260 MM BTU/HR RATED HEAT CAPACITY, 82,000 LBS/HR STEAM OUTPUT, EQUIPPED WITH COOLING TOWERS (4), TOWER ENGINEERING, 9,500 GPM/CELL

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: 01-26-2006 (P/O 17549)
DATE ISSUED: 11-04-1999 (P/O 10909 & 10910)
DATE REVISED: 02-23-2024
DATE EXPIRES: 01-16-2025 (UNLESS RENEWED)

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

BY: Brian F Krebs

PAGE 1 OF 7 PAGES

PERMIT NO.: 17549

REVOCABLE AND NON-TRANSFERABLE

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

3.

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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) (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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16. UCDMC 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. UCDMC 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.)

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

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

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

- [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 January 30 April 30 July 30 September 30 For the previous calendar quarter	Whenever the continuous emission monitoring system (CEMS) is inoperative except for zero and span checks: A. Date and time of non-operation of the CEMS. 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: A. Magnitude of the emission which has been determined to be in excess. B. Date and time of the commencement and completion of each period of excess emissions C. Periods of excess emissions due to start-up, shutdown, and malfunction shall be specifically identified. D. The nature and cause of any malfunction (if known). 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]

**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

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PERMIT NO.: 25800

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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5.

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 lb/day				
		Gas Turbine 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_x) 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

[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 Submit the report by: January 30 April 30 July 30 October 30 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"> i. Date and time of non-operation of the continuous emission monitoring system. ii. Nature of the continuous emission monitoring system repairs or adjustments. <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"> i. Magnitude of the emission which has been determined to be in excess. ii. Date and time of the commencement and completion of each period of excess emissions. iii. Periods of excess emissions due to start-up, shut-down, short-term excursion and malfunction must be specifically identified. iv. The nature and cause of any malfunction (if known). v. The corrective action taken or preventive measures adopted. <p>C. If there were no excess emissions for a calendar quarter:</p> <ul style="list-style-type: none"> i. A report must be submitted indicating that there were no excess emissions.

**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_x 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]

**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

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PERMIT NO.: 25801

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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5.

EMISSION LIMITATIONS

6.

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

7.

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 lb/day				
	Gas Turbine No. 2				
NOx	580.4				

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

10.

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

11.

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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_x) 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

[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 Submit the report by: January 30 April 30 July 30 October 30 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"> i. Date and time of non-operation of the continuous emission monitoring system. ii. Nature of the continuous emission monitoring system repairs or adjustments. <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"> i. Magnitude of the emission which has been determined to be in excess. ii. Date and time of the commencement and completion of each period of excess emissions. iii. Periods of excess emissions due to start-up, shut-down, short-term excursion and malfunction must be specifically identified. iv. The nature and cause of any malfunction (if known). v. The corrective action taken or preventive measures adopted. <p>C. If there were no excess emissions for a calendar quarter:</p> <ul style="list-style-type: none"> i. A report must be submitted indicating that there were no excess emissions.

**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_x 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]

**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 47TH 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

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PERMIT NO.: 27116, 27118

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

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 lb/day		
NOx	384.5		

11.

**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_x and O₂, 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	<p>M. NOx daily mass emissions from all equipment <u>separately</u> (lb/day):</p> <p>i. gas turbine and duct burner (for separate reporting the gas turbine and duct burner emission are combined).</p>

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
<p>Quarterly</p> <p>Submitted by:</p> <p>Jan 30</p> <p>Apr 30</p> <p>Jul 30</p> <p>Oct 30</p> <p>for the previous calendar quarter</p>	<p>A. Whenever the continuous emissions monitoring system is inoperative except for 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 emissions monitoring system 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 emissions.</p> <p>iii. Periods of excess emissions due to startup, shutdown 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 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**

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27. The permittee must perform a _____ NOx _____ 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 METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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PERMIT NO.: 27116, 27118

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

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 83RD 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

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PERMIT NO.: 27132, 27141

REVOCABLE AND NON-TRANSFERABLE

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**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 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_x and O₂, 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: Jan 30, April 30, July 30, and 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">i. Date and time of non-operation of the continuous emission monitoring system.ii. Nature of the continuous emission monitoring system repairs or adjustments. <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">i. Magnitude of the emission which has been determined to be in excess.ii. Date and time of the commencement and completion of each period of excess emissions.iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.iv. The nature and cause of any malfunction (if known).v. The corrective action taken or preventive measures adopted. <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**

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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

Board of Directors Regular Meeting - March 28, 2024 - 165

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**

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PERMIT NO.: 27132,

27141

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

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 83RD 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

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PERMIT NO.: 27133, 27142

REVOCABLE AND NON-TRANSFERABLE

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**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 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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14.

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_x and O₂, 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: Jan 30, April 30, July 30, and 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">i. Date and time of non-operation of the continuous emission monitoring system.ii. Nature of the continuous emission monitoring system repairs or adjustments. <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">i. Magnitude of the emission which has been determined to be in excess.ii. Date and time of the commencement and completion of each period of excess emissions.iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.iv. The nature and cause of any malfunction (if known).v. The corrective action taken or preventive measures adopted. <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**

Board of Directors Regular Meeting - March 28, 2024 - 178

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)

SACRAMENTO METROPOLITAN



PERMIT TO OPERATE

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

EQUIPMENT LOCATION: 5000 83RD 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

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PERMIT NO.: 27143

REVOCABLE AND NON-TRANSFERABLE

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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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EMISSIONS LIMITATIONS

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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 Turbine Lb/day
NOx	120.3

10.

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

11.

12.

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 m

ith 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: Jan 30, April 30, July 30, and 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">i. Date and time of non-operation of the continuous emission monitoring system.ii. Nature of the continuous emission monitoring system repairs or adjustments. <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">i. Magnitude of the emission which has been determined to be in excess.ii. Date and time of the commencement and completion of each period of excess emissions.iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.iv. The nature and cause of any malfunction (if known).v. The corrective action taken or preventive measures adopted. <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.

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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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PERMIT NO.:

27143

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

Board of Directors Regular Meeting - March 28, 2024 - 190

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

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PERMIT NO.: 27151 27153

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

**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 And Duct Burner 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_x and O₂, 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 Condition No. 9 .

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

Frequency	Information to be Reported
	<ul style="list-style-type: none"> i. Magnitude of the emission which has been determined to be in excess. ii. Date and time of the commencement and completion of each period of excess emissions. iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified. iv. The nature and cause of any malfunction (if known). v. The corrective action taken or preventive measures adopted. <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>

24. The permittee must perform a NOx 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**

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**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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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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PERMIT NO.: 27151 27153

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

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

PAGE 1 OF 12 PAGES

PERMIT NO.: 27156

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

**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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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 Turbine 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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19.

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_x and O₂, 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: Jan 30, April 30, July 30, and 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">i. Date and time of non-operation of the continuous emission monitoring system.ii. Nature of the continuous emission monitoring system repairs or adjustments. <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">i. Magnitude of the emission which has been determined to be in excess.ii. Date and time of the commencement and completion of each period of excess emissions.iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.iv. The nature and cause of any malfunction (if known).v. The corrective action taken or preventive measures adopted. <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**

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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

EMISSION TESTING REQUIREMENTS

26. The permittee must perform a NO_x 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 88TH 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

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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

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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_x 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]

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**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 88TH 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

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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

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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_x 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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**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 88TH 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

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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.

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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_x 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 12TH STREET, STE. 300
SACRAMENTO, CA 95814-1908

(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 88TH 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_x) 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

PAGE 1 OF 7 PAGES

PERMIT NO.: 27336

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

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					

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

(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.

15.

16.

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

17

18

19

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]

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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

PAGE 7 OF 7 PAGES

PERMIT NO.: 27336

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

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

PAGE 1 OF 6 PAGES

PERMIT NO.: 27337

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

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					

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

(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.

15.

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

16.

17.

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.

PAGE 5 OF 6 PAGES

PERMIT NO.: 27337

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

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]

AFFIDAVIT

Sacramento Metropolitan Air
Quality Management District
777 12th Street, Third Floor,
Sacramento, CA 95814

**DECLARATION OF
PUBLICATION**
(C.C.P. 2015.5)

COUNTY OF SACRAMENTO,
STATE OF CALIFORNIA

I am a resident of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the below entitled matter. I am an Information Technology Technician employed at the Sacramento Metropolitan Air Quality Management District.

The text below is a screen shot that was posted on the District's website, www.airquality.org, on February 27, 2024.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct and that this declaration was executed at Sacramento, California on March 6, 2024.

 Date: 2024.03.07
07:24:05 -08'00'

Her, Sheng
Information Technology Technician



The screenshot shows the website of the Sacramento Metropolitan Air Quality Management District. The header includes the district's name and a navigation menu with links to Air Quality & Health, Residents, Businesses, How Do It, Meetings, and About Us. A search bar and social media icons are also present.

The main content area displays a "News & Notices Details" page for a "Notice of Proposed Adoption and Tentative Public Hearing: Revision to the State Implementation Plan - Reasonably Available Control Technology (RACT) Permits for Major Stationary Sources of Nitrogen Oxides". The notice is dated March 28, 2024, at 9:00 a.m., and is located in Room 1450 of the County Administration Building at 700 H Street, Sacramento, California 95814.

The notice text states that the Board of Directors of the District will consider the adoption of a revision to the District's portion of California's State Implementation Plan (SIP) on March 28, 2024, to satisfy federal Clean Air Act requirements for Reasonably Available Control Technology (RACT). The plan revision would incorporate into the SIP specific permit conditions for six major stationary sources of nitrogen oxides (NOx). If adopted, the plan revision will be submitted to the U.S. Environmental Protection Agency (EPA) for approval. This notice, the public hearing, and the proposed SIP revision are intended to satisfy the requirements of Clean Air Act Sections 110 and 182 and Title 40 of the Code of Federal Regulations, Part 51.

The notice also mentions that Clean Air Act Sections 182(b)(2)(C) and 182(f) require the District to implement Reasonably Available Control Technology (RACT) for major stationary sources of NOx. RACT must be incorporated into the SIP. Current District rules that control NOx emissions from boilers, gas turbines, and gas-fired ovens do not conform to the most recent EPA guidance on startup, shutdown, and maintenance (SSM) exemptions and mandatory reporting. Staff is proposing a SIP revision that will incorporate local District permits to operate (PTOs) containing conditions that satisfy RACT requirements for SSM exemptions and add mandatory reporting requirements that conform to EPA guidance. Compliance with the permit conditions is already required. Incorporating these conditions into the SIP will make them federally enforceable. This action will not result in changes to equipment or operation.

The six major stationary sources of NOx included in this proposal are: four Sacramento Municipal District Financing Authority power plants (Campbell, Carson, Procter and Gamble, and Cosumnes); Mitsubishi Chemical Carbon Fiber and Composites; and UC Davis Medical Center.

The public may review and provide comments on the proposed action. Copies of this notice, the Statement of Reasons, and the proposed SIP revision are posted on the District website (www.airquality.org). A paper copy of the materials can be viewed at the District office, purchased for a cost of 25¢ per page plus mailing costs, or downloaded from the links below.

The screenshot also shows a sidebar menu with links to "About Us", "News & Notices", "Board of Directors", "Hearing Board", "Office of the Executive Director", "Office of the District Counsel", "Budget & Finance", "Employment", "Contracting Opportunities", "Contact Us", "Other Air Quality District Contacts", "Events", "FAQ", "News & Notices", and "Staff Directory".

Meeting Date: 3/28/2024
Report Type: PUBLIC HEARINGS
Report ID: 2024-0328-9.

Title: Revision to the State Implementation Plan to Incorporate Reasonably Available Control Technology for Major Sources of Nitrogen Oxides (public hearing to be cancelled unless timely requested)

Recommendation: Conduct a public hearing for the adoption of revisions to the State Implementation Plan (SIP) to satisfy Reasonably Available Control Technology (RACT) for Major Sources of nitrogen oxides (NOx); and 1) determine that the adoption of the SIP revisions is exempt from the California Environmental Quality Act (CEQA); 2) adopt a resolution approving the SIP revision; 3) direct Staff to forward the SIP revision and all necessary supporting documents to the California Air Resources Board (CARB) for submittal to the U.S. Environmental Protection Agency (EPA). If no hearing is requested, the Board may take these actions through the Consent Calendar.

Rationale for Recommendation: EPA has determined that three District rules do not fully satisfy Clean Air Act (CAA) requirements for RACT at major stationary sources of NOx. To avoid EPA promulgation of a Federal Implementation Plan (FIP), the District must submit, and EPA must approve, revisions to the SIP to correct the deficiencies by September 30, 2024.

The proposed SIP revision will correct the RACT deficiencies and, upon approval by EPA, avoid the imposition of a FIP and further actions.

Contact: Kevin J. Williams, Ph.D., Program Supervisor, Monitoring, Planning and Rules, (279) 207-1156

Presentation: Yes

ATTACHMENTS:

Resolution

Exhibit A - SIP Revision

Attachment A - Evidence of Public Notice

Presentation - Revision to the State Implementation Plan: Incorporate Reasonably Available Control Technology for Major Sources of NOx

Approvals/Acknowledgements

Executive Director or Designee: Alberto Ayala, Report Approved 3/21/2024

District Counsel or Designee: Kathrine Pittard, Approved as to Form 3/13/2024

Discussion / Justification: The District is part of the Sacramento Federal Ozone Nonattainment Area (SFNA), which is designated as a “severe” nonattainment area for the 1997 and 2008 federal 8-hour ozone standards, and a “serious” nonattainment area of the 2015 8-hour ozone standard. Section 182 of the CAA mandates that areas classified as “moderate” or worse implement RACT for all major stationary sources of volatile organic compounds (VOC) and NOx. RACT must be incorporated in the SIP.

The planning requirements for the 2008 ozone standard required the District to demonstrate RACT for certain source categories and all major stationary sources of VOC and NOx. In February 2017, EPA issued a finding that several nonattainment areas across the country, including the District, had failed to submit their RACT demonstrations, known as “RACT SIPs.” Subsequently, the Board adopted a RACT SIP in March 2017.

EPA's 2017 finding required them to approve RACT submissions by February 2019 or promulgate FIPs. EPA never took action to approve the District's RACT SIP and also did not promulgate a FIP. The agency's inaction was challenged in court and a consent decree now requires it to approve the RACT SIP by September 30, 2024, or promulgate a FIP.

In June 2023, EPA partially approved and partially disapproved the District's RACT SIP. The partial disapproval was for RACT at major stationary sources of NOx. In EPA's evaluation, they noted that three District rules that limit NOx emissions include temporary exemptions from NOx emissions limits during periods of startup and shutdown; therefore, the rules don't conform to current EPA guidance for RACT rules.

The local permits to operate for NOx emission units at major stationary sources of NOx include daily mass emission limits that apply to all operation, including emissions during startup and shutdown periods. Staff is proposing to submit those permit conditions for SIP approval.

In a separate action, EPA also requires that all records should be on file and not just upon request. To address this requirement, staff is proposing to include mandatory reporting conditions with the SIP submittal. The reporting conditions are identical to those already required by the sources' federal Title V operating permits.

Summary of Plan / Rule / Amendment: Staff is proposing to submit the local permits to operate for inclusion in the SIP. If approved by EPA, daily mass emission limits for NOx, related conditions necessary for enforcement, and mandatory reporting requirements will become federally enforceable. If approved by EPA, these permit conditions will become federally enforceable. All unrelated permit conditions will be redacted and will not be included in the SIP.

Staff's proposal will correct the RACT deficiencies and, upon approval by EPA satisfy the RACT requirements.

Financial Considerations: There are six major stationary sources of NOx included in this proposed SIP revision. The sources are already required to comply with the permit conditions under their local and Title V permits. The sources will not incur additional compliance costs.

Emissions Impact: No sources will be required to make any changes to equipment or operation. There will be no impact on emissions.

Economic Impact: The adoption of this SIP revision will not impact regional economy.

Public Outreach/Comments:

Staff conducted meetings with representatives of each of the affected sources to make them aware of the proposed SIP revision. The necessity of the SIP submittal and the details of the permit conditions to be included were discussed. The affected sources made no requests to change staff's proposal.

The noticing for this hearing included:

- A notice posted on the District website, with links to the Statement of Reasons and redacted permits to operate
- Email notices to:
 - The California Air Resources Board and EPA
 - All persons who have requested notices for plans, rulemaking, and general interest

Consistent with public notice requirements for SIP revisions, the notice stated that today's public hearing has been tentatively scheduled and will be cancelled if no request for hearing to be held is received by the District by 10:00 a.m. on March 27, 2024. The notice also stated that an announcement of a cancellation will be made on March 27, 2024, at 3:00 p.m. by posting a notice of a cancellation on the District's web site and on the billboard at the entrance to the District office, and by sending an email to all those who received the public notice.

Environmental Review: 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).

RESOLUTION NO. 2024 – XXXX

Adopted by the Sacramento Metropolitan Air Quality Management District
Board of Directors

REVISION TO THE SIP TO INCORPORATE REASONABLY AVAILABLE CONTROL TECHNOLOGY FOR MAJOR SOURCES OF NOx

BACKGROUND:

- A. Sections 182(b)(2)(C) and 182(f) of the federal Clean Air Act require states and districts in areas classified as “moderate” ozone nonattainment or worse to revise their State Implementation Plans to require Reasonably Available Control Technology (RACT) for all major stationary sources of nitrogen oxides (NOx).
- B. The Sacramento Metropolitan Air Quality Management District (“District”) is within an area classified as a “severe” nonattainment area for both the 1997 and 2008 primary National Ambient Air Quality Standards (NAAQS) for ozone and “serious” nonattainment for the 2015 primary NAAQS for ozone.
- C. There are six major stationary sources of NOx in the District operating boilers, gas turbines and gas fired ovens: Sacramento Municipal Utility District Financing Authority (SMUD FA) Campbell Power Plant; SMUD FA Carson Power Plant; SMUD FA Cosumnes Power Plant; SMUD FA Procter and Gamble Power Plant; Mitsubishi Chemical Carbon Fiber and Composites, Inc.; and UC Davis Medical Center.
- D. There are no limitations in the State Implementation Plan (SIP) for NOx emissions during startup and shutdown for boilers, gas turbines and gas fired ovens.
- E. Local permits to operate for boilers, gas turbines and gas fired ovens at the major stationary sources of NOx contain limits on the daily mass emissions of NOx, including emissions during periods of startup and shutdown.
- F. The Board of Directors of the Sacramento Metropolitan Air Quality Management District (Board) has determined the District will meet the requirements of Clean Air Act Sections 182(b)(2)(C) and 182(f) by submitting to the U.S. Environmental Protection Agency (EPA) a revision to the SIP that includes conditions of the permits to operate that limit the daily NOx mass emissions and the associated source testing, test methods, monitoring, reporting, and recordkeeping requirements for boilers, gas turbines and gas fired ovens at the six major stationary sources of NOx.
- G. The District published a notice in accordance with federal Clean Air Act Section 111(l) and 40 CFR 51.102, providing a 30-day period to request a public hearing, inviting public comment on the proposed SIP revision, and providing a 30-day period to submit written comments.
- H. The Board conducted a public hearing and considered public comment on the proposed SIP revision.
- I. The Board evaluated the proposed SIP revision to determine whether it is exempt from the California Environmental Quality Act (CEQA) 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).

BASED ON THE FACTS SET FORTH IN THE BACKGROUND, THE BOARD OF DIRECTORS RESOLVES AS FOLLOWS:

- Section 1. The SIP revision is exempt from CEQA.
- Section 2. Approves the SIP revision, as shown in the attached Exhibit A.
- Section 3. Directs Staff to forward the SIP revision and all necessary supporting documents to the California Air Resources Board for submittal to U.S. EPA as a revision to the California State Implementation Plan.
- Section 4. Exhibit A is attached to and incorporated into this Resolution.

ON A MOTION by Director _____, seconded by Director _____, the foregoing resolution was passed and adopted by the Board of Directors of the Sacramento Metropolitan Air Quality Management District on March 28, 2024, by the following vote:

Ayes:

Noes:

Abstain:

Absent:

ATTEST:

Clerk, Board of Directors
Sacramento Metropolitan Air Quality Management District

**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

Prepared by: Pedro Vega
Air Quality Engineer

Reviewed by: Kevin J. Williams, Ph.D.
Program Supervisor

Janice Lam Snyder, M.S.
Program Manager

Approved by: Mark Loutzenhiser
Division Manager

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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 ozone¹, 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,

¹ "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.”² 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).³ 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, 2024.⁴

² 44 Federal Register (FR) 53762, September 17, 1979.

³ 88 FR 9158, February 3, 2017.

⁴ 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.⁵ 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.⁶ In response to this decision, EPA issued a Final Action rule (The "2015 Guidance"), which revised direction regarding emissions during SSM periods.⁷ 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.⁸ 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

⁵ 88 FR 42248, June 30, 2023.

⁶ Sierra Club v. Johnson, 551 F.3d 1019 (D.C. Cir. 2008).

⁷ 80 FR 33839, June 12, 2015.

⁸ 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.⁹ 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.¹⁰ 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 304.¹¹

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.

⁹ 87 FR 67617, November 9, 2022.

¹⁰ 88 FR 29827, May 9, 2023.

¹¹ 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.

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 O₂ if using a CEMS
- Perform periodic source testing for NOx and O₂
- 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

Company Name	Permit to Operate (PO) No.	Permit Conditions to be Included in SIP
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 20217 20218 20219	1, 9 (B), 15, 17 (D), 18, 20 (C), 23

Table 2: Gas Turbine Permits to Operate

Company Name	Permit to Operate (PO) No.	Permit Conditions to be Included in SIP
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 (27116 duct burner)	1, 10, 19 (A, B), 20 (C), 21 (M), 22, 27 (D), 29
SMUD Procter & Gamble Power Plant	27141 (27132 duct burner)	1, 9, 15 (A, B), 16 (C), 17 (M), 18, 21 (E), 23
	27142 (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 (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

Company Name	Permit to Operate (PO) No.	Permit Conditions to be Included in SIP
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).

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.^{12,13} 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.

¹² Clean Air Act §110.

¹³ Title 40 Code of Federal Regulations §51.102.

APPENDIX A – BOILER PERMITS TO OPERATE

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

SACRAMENTO METROPOLITAN



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

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PERMIT NO.: 27154

REVOCABLE AND NON-TRANSFERABLE

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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EMISSIONS LIMITATIONS

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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 (lb/day)
NOx	21.1

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

14.

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 NOx, 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

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

Frequency	Information to be Recorded
Daily	P. The boiler's natural gas fuel consumption (MMCF/day) Q. Total daily NOx emissions from the boiler (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: Jan 30, April 30, July 30, and Oct 30	A. Whenever the CEM system is inoperative except for zero and span checks. i. Date and time of non-operation of the CEM system. ii. Nature of the CEM system repairs or adjustments. B. Whenever an emission occurs as measured by the required CEM system that is in excess of any emission limitation. i. Magnitude of the emission which has been determined to be in excess. ii. Date and time of the commencement and completion of each period of excess emissions. iii. Periods of excess emissions due to start-up, shutdown and malfunction must be specifically identified. iv. The nature and cause of any malfunction (if known). v. The corrective action taken or preventive measures adopted. C. If there were no excess emissions during a reporting quarter. i. A report must be submitted indicating that there were no excess emissions.

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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]

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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

SACRAMENTO METROPOLITAN



AIR QUALITY
MANAGEMENT DISTRICT

PERMIT TO OPERATE

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

EQUIPMENT LOCATION: 5000 83rd 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
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

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PERMIT NO.: 27140

REVOCABLE AND NON-TRANSFERABLE

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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EMISSIONS LIMITATIONS

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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**

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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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: Jan 30, April 30, July 30, and Oct 30.	A. Whenever the continuous emissions monitoring system is inoperative except for zero and span checks: i. Date and time of non-operation of the continuous emission monitoring system. ii. Nature of the continuous emission monitoring system repairs or adjustments. B. Whenever an emission occurs as measured by the required continuous emissions monitoring system that is in excess of any emission limitation: i. Magnitude of the emission which has been determined to be in excess. ii. Date and time of the commencement and completion of each period of excess emissions. iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified. iv. The nature and cause of any malfunction (if known).

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

Frequency	Information to be Reported
	<p>v. The corrective action taken or preventive measures adopted.</p> <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>

17.

18.

777 12TH STREET, STE 300
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(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**

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PERMIT NO.: 27140

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

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 83RD 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

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PERMIT NO.: 27144

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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EMISSIONS LIMITATIONS

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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 (lb/day)
NOx	23.0

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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EQUIPMENT OPERATION

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

22.

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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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(800) 880-9025

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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PERMIT NO.: 27144

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

PO 27338 – (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
27338	BOILER, MAKE: CLEAVER BROOKS, MODEL: CBI 200-150-150, SERIAL NO.: OL103578, 6.124 MMBTU/HR CAPACITY, NATURAL GAS FIRED, SERVING INDUSTRIAL PROCESSES.

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

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PERMIT NO.: 27338

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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EMISSIONS LIMITATIONS

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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]

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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]

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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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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 _x 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 _x 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 _x 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 _x 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

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PERMIT NO.: 20216, 20217, 20218, & 20219

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

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 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 must be tested once every calendar year beginning in 2008 to verify compliance The test must conform to the following test conditions and time schedule:

- 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



PERMIT TO OPERATE

ISSUED TO: UCD MEDICAL CENTER

EQUIPMENT LOCATION: 4840 SECOND AVENUE, SACRAMENTO, CA 95817

PERMIT NO.	EQUIPMENT DESCRIPTION
17549	GAS TURBINE, 24 MW GENERAL ELECTRIC LM 2500 COMBINED CYCLE TYPE WITH WATER INJECTION, 260 MM BTU/HR RATED HEAT CAPACITY, 82,000 LBS/HR STEAM OUTPUT, EQUIPPED WITH COOLING TOWERS (4), TOWER ENGINEERING, 9,500 GPM/CELL

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: 01-26-2006 (P/O 17549)
DATE ISSUED: 11-04-1999 (P/O 10909 & 10910)
DATE REVISED: 02-23-2024
DATE EXPIRES: 01-16-2025 (UNLESS RENEWED)

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

BY: Brian F Krebs

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PERMIT NO.: 17549

REVOCABLE AND NON-TRANSFERABLE

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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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) (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. UCDMC 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. UCDMC 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. UCDMC 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 NO_x 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 January 30 April 30 July 30 September 30 For the previous calendar quarter	Whenever the continuous emission monitoring system (CEMS) is inoperative except for zero and span checks: A. Date and time of non-operation of the CEMS. 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: A. Magnitude of the emission which has been determined to be in excess. B. Date and time of the commencement and completion of each period of excess emissions C. Periods of excess emissions due to start-up, shutdown, and malfunction shall be specifically identified. D. The nature and cause of any malfunction (if known). 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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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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PERMIT NO.: 17549

REVOCABLE AND NON-TRANSFERABLE

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

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PERMIT NO.: 25800

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

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 lb/day				
		Gas Turbine No. 3			
NOx		580.4			

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

10.

**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_x) 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

[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 Submit the report by: January 30 April 30 July 30 October 30 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"> i. Date and time of non-operation of the continuous emission monitoring system. ii. Nature of the continuous emission monitoring system repairs or adjustments. <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"> i. Magnitude of the emission which has been determined to be in excess. ii. Date and time of the commencement and completion of each period of excess emissions. iii. Periods of excess emissions due to start-up, shut-down, short-term excursion and malfunction must be specifically identified. iv. The nature and cause of any malfunction (if known). v. The corrective action taken or preventive measures adopted. <p>C. If there were no excess emissions for a calendar quarter:</p> <ul style="list-style-type: none"> i. A report must be submitted indicating that there were no excess emissions.

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

20.

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22.

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

EMISSION TESTING REQUIREMENTS

23. The permittee must perform a NO_x 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 12TH STREET, 3RD FLOOR
SACRAMENTO, CA 95814-1908

(916) 874-4800
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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

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PERMIT NO.: 25801

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

SACRAMENTO METROPOLITAN
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EMISSION LIMITATIONS

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**SACRAMENTO METROPOLITAN
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SACRAMENTO METROPOLITAN
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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 lb/day				
	Gas Turbine No. 2				
NOx	580.4				

**SACRAMENTO METROPOLITAN
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**SACRAMENTO METROPOLITAN
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SACRAMENTO METROPOLITAN
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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_x) 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

[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 Submit the report by: January 30 April 30 July 30 October 30 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"> i. Date and time of non-operation of the continuous emission monitoring system. ii. Nature of the continuous emission monitoring system repairs or adjustments. <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"> i. Magnitude of the emission which has been determined to be in excess. ii. Date and time of the commencement and completion of each period of excess emissions. iii. Periods of excess emissions due to start-up, shut-down, short-term excursion and malfunction must be specifically identified. iv. The nature and cause of any malfunction (if known). v. The corrective action taken or preventive measures adopted. <p>C. If there were no excess emissions for a calendar quarter:</p> <ul style="list-style-type: none"> i. A report must be submitted indicating that there were no excess emissions.

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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SACRAMENTO METROPOLITAN
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EMISSION TESTING REQUIREMENTS

23. The permittee must perform a NO_x 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 12TH STREET, 3RD FLOOR
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**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 47TH 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

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PERMIT NO.: 27116, 27118

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

SACRAMENTO METROPOLITAN
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EMISSIONS LIMITATIONS

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**SACRAMENTO METROPOLITAN
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SACRAMENTO METROPOLITAN
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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 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_x and O₂, 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): 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 Submitted by: Jan 30 Apr 30 Jul 30 Oct 30 for the previous calendar quarter	A. Whenever the continuous emissions monitoring system is inoperative except for zero and span checks: i. Date and time of non-operation of the continuous emission monitoring system. ii. Nature of the continuous emission monitoring system repairs or adjustments. B. Whenever an emission occurs as measured by the required continuous emissions monitoring system that is in excess of any emission limitation: i. Magnitude of the emission which has been determined to be in excess. ii. Date and time of the commencement and completion of each period of excess emissions. iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified. iv. The nature and cause of any malfunction (if known). v. The corrective action taken or preventive measures adopted. 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
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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

26.

EMISSION TESTING REQUIREMENTS

27. The permittee must perform a NO_x 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]

777 12TH STREET, STE 300
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(800) 880-9025

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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

SACRAMENTO METROPOLITAN



PERMIT TO OPERATE

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

EQUIPMENT LOCATION: 5000 83RD 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

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PERMIT NO.: 27132, 27141

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

**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 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_x and O₂, 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: Jan 30, April 30, July 30, and 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">i. Date and time of non-operation of the continuous emission monitoring system.ii. Nature of the continuous emission monitoring system repairs or adjustments. <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">i. Magnitude of the emission which has been determined to be in excess.ii. Date and time of the commencement and completion of each period of excess emissions.iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.iv. The nature and cause of any malfunction (if known).v. The corrective action taken or preventive measures adopted. <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**

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777 12TH STREET, STE 300
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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

Board of Directors Regular Meeting - March 28, 2024 - 393

SACRAMENTO METROPOLITAN
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- 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**

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 83RD 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

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PERMIT NO.: 27133, 27142

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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EMISSIONS LIMITATIONS

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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 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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14.

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_x and O₂, 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: Jan 30, April 30, July 30, and 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">i. Date and time of non-operation of the continuous emission monitoring system.ii. Nature of the continuous emission monitoring system repairs or adjustments. <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">i. Magnitude of the emission which has been determined to be in excess.ii. Date and time of the commencement and completion of each period of excess emissions.iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.iv. The nature and cause of any malfunction (if known).v. The corrective action taken or preventive measures adopted. <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**

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777 12TH STREET, STE 300
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(279) 207-1122
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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

Board of Directors Regular Meeting - March 28, 2024 - 406

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)

SACRAMENTO METROPOLITAN



PERMIT TO OPERATE

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

EQUIPMENT LOCATION: 5000 83RD 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

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PERMIT NO.: 27143

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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EMISSIONS LIMITATIONS

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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 Turbine 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 NO_x and O₂, the CEMS must meet 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: Jan 30, April 30, July 30, and 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">i. Date and time of non-operation of the continuous emission monitoring system.ii. Nature of the continuous emission monitoring system repairs or adjustments. <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">i. Magnitude of the emission which has been determined to be in excess.ii. Date and time of the commencement and completion of each period of excess emissions.iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.iv. The nature and cause of any malfunction (if known).v. The corrective action taken or preventive measures adopted. <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**

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AIR QUALITY MANAGEMENT DISTRICT**

Board of Directors Regular Meeting - March 28, 2024 - 418

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)

SACRAMENTO METROPOLITAN



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

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PERMIT NO.: 27151 27153

REVOCABLE AND NON-TRANSFERABLE

SPL-V1

**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 And Duct Burner lb/day		
NOx		134.8		

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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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**SACRAMENTO METROPOLITAN
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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_x and O₂, 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 Condition No. 9 .

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: Jan 30, April 30, July 30, and Oct 30	A. Whenever the continuous emissions monitoring system is inoperative except for zero and span checks: i. Date and time of non-operation of the continuous emission monitoring system. ii. Nature of the continuous emission monitoring system repairs or adjustments. 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">i. Magnitude of the emission which has been determined to be in excess.ii. Date and time of the commencement and completion of each period of excess emissions.iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.iv. The nature and cause of any malfunction (if known).v. The corrective action taken or preventive measures adopted. <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_x 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
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**SACRAMENTO METROPOLITAN
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PERMIT NO.: 27151 27153

REVOCABLE AND NON-TRANSFERABLE

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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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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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PERMIT NO.: 27151 27153

REVOCABLE AND NON-TRANSFERABLE

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

SACRAMENTO METROPOLITAN



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

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PERMIT NO.: 27156

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**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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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 Turbine 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_x and O₂, 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: Jan 30, April 30, July 30, and 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">i. Date and time of non-operation of the continuous emission monitoring system.ii. Nature of the continuous emission monitoring system repairs or adjustments. <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">i. Magnitude of the emission which has been determined to be in excess.ii. Date and time of the commencement and completion of each period of excess emissions.iii. Periods of excess emissions due to startup, shutdown and malfunction must be specifically identified.iv. The nature and cause of any malfunction (if known).v. The corrective action taken or preventive measures adopted. <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**

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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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AIR QUALITY MANAGEMENT DISTRICT**

EMISSION TESTING REQUIREMENTS

26. The permittee must perform a NO_x 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 88TH 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

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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

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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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_x 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]

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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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**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 88TH 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

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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

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

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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_x 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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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

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PERMIT NO.: 24613

REVOCABLE AND NON-TRANSFERABLE

PO 24614 – (Mitsubishi Chemical Carbon Fiber & Composites)



PERMIT TO OPERATE

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

EQUIPMENT LOCATION: 5900 88TH 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_x 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 12TH STREET, STE. 300
SACRAMENTO, CA 95814-1908

(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 88TH 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_x) 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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(279) 207-1122
(800) 880-9025

**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

PAGE 1 OF 7 PAGES

PERMIT NO.: 27336

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

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					

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

(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.

15.

16.

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

17

18

19

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]

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**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

PAGE 7 OF 7 PAGES

PERMIT NO.: 27336

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

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

PAGE 1 OF 6 PAGES

PERMIT NO.: 27337

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

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					

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

(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.

15.

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

16.

17.

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.

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PERMIT NO.: 27337

REVOCABLE AND NON-TRANSFERABLE

BLR-V0

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]

AFFIDAVIT

Sacramento Metropolitan Air
Quality Management District
777 12th Street, Third Floor,
Sacramento, CA 95814

**DECLARATION OF
PUBLICATION**
(C.C.P. 2015.5)

COUNTY OF SACRAMENTO,
STATE OF CALIFORNIA

I am a resident of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the below entitled matter. I am an Information Technology Technician employed at the Sacramento Metropolitan Air Quality Management District.

The text below is a screen shot that was posted on the District's website, www.airquality.org, on February 27, 2024.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct and that this declaration was executed at Sacramento, California on March 6, 2024.

 Date: 2024.03.07
07:24:05 -08'00'

Her, Sheng
Information Technology Technician



The screenshot shows the website of the Sacramento Metropolitan Air Quality Management District. The header includes the district's name and a navigation menu with links for Air Quality & Health, Residents, Businesses, How Do It, Meetings, and About Us. A search bar and social media icons are also present.

The main content area displays a "News & Notices Details" page for a "Notice of Proposed Adoption and Tentative Public Hearing: Revision to the State Implementation Plan - Reasonably Available Control Technology (RACT) Permits for Major Stationary Sources of Nitrogen Oxides". The notice is dated March 28, 2024, at 9:00 a.m., and is located in Room 1450 of the County Administration Building at 700 H Street, Sacramento, California 95814.

The notice text states that the Board of Directors of the District will consider the adoption of a revision to the District's portion of California's State Implementation Plan (SIP) on March 28, 2024, to satisfy federal Clean Air Act requirements for Reasonably Available Control Technology (RACT). The plan revision would incorporate into the SIP specific permit conditions for six major stationary sources of nitrogen oxides (NOx). If adopted, the plan revision will be submitted to the U.S. Environmental Protection Agency (EPA) for approval. This notice, the public hearing, and the proposed SIP revision are intended to satisfy the requirements of Clean Air Act Sections 110 and 182 and Title 40 of the Code of Federal Regulations, Part 51.

The notice also mentions that Clean Air Act Sections 182(b)(2)(C) and 182(f) require the District to implement Reasonably Available Control Technology (RACT) for major stationary sources of NOx. RACT must be incorporated into the SIP. Current District rules that control NOx emissions from boilers, gas turbines, and gas-fired ovens do not conform to the most recent EPA guidance on startup, shutdown, and maintenance (SSM) exemptions and mandatory reporting. Staff is proposing a SIP revision that will incorporate local District permits to operate (PDOs) containing conditions that satisfy RACT requirements for SSM exemptions and add mandatory reporting requirements that conform to EPA guidance. Compliance with the permit conditions is already required. Incorporating these conditions into the SIP will make them federally enforceable. This action will not result in changes to equipment or operation.

The six major stationary sources of NOx included in this proposal are: four Sacramento Municipal District Financing Authority power plants (Campbell, Carson, Procter and Gamble, and Cosumnes); Mitsubishi Chemical Carbon Fiber and Composites; and UC Davis Medical Center.

The public may review and provide comments on the proposed action. Copies of this notice, the Statement of Reasons, and the proposed SIP revision are posted on the District website (www.airquality.org). A paper copy of the materials can be viewed at the District office, purchased for a cost of 25¢ per page plus mailing costs, or downloaded from the links below.

The screenshot also shows a sidebar menu with links for "About Us", "News & Notices", "Board of Directors", "Hearing Board", "Office of the Executive Director", "Office of the District Counsel", "Budget & Finance", "Employment", "Contracting Opportunities", "Contact Us", "Other Air Quality District Contacts", "Events", "FAQ", "News & Notices", and "Staff Directory".

Revision to the State Implementation Plan (SIP): Incorporate Reasonably Available Control Technology for Major Sources of NO_x

Kevin J. Williams, Ph.D.
Board Meeting, March 28, 2024

Federal Clean Air Requirement

Sacramento Federal Nonattainment Area is classified as severe nonattainment for ozone

One requirement under this designation is Reasonable Available Control Technology (RACT) for all major sources of VOC and NOx

Due to recent court action against EPA all major source permits must include emissions during startup, shutdown and maintenance

Current rules and permits have an exemption from testing during these situations and has been identified as a deficiency in our submittal

Corrective Action

District, in consultation with affected sources, has removed the exemption and specifies existing daily limits are in effect for all operation

Mandatory reporting requirements were also added to the permits. These requirements already exist in their Title V permits

Today's action will authorize the submittal to CARB and EPA for inclusion in the SIP correcting the existing RACT deficiency

Affected Sources:

Mitsubishi Chemical Carbon Fiber & Composites

SMUD Power Plants (4)

UC Davis Medical Center

Recommendations

1. Conduct a public hearing
2. Determine adoption of the SIP revision is exempt from CEQA
3. Approve resolution adopting SIP revision
4. Direct Staff to forward to CARB for submission to EPA

Meeting Date: 3/28/2024
Report Type: DISCUSSION / INFORMATION
Report ID: 2024-0328-10.

Title: Appointment of a CalPERS Retiree as Extra Help to Transition Administrative Operations to the New Director of Administrative Services

Recommendation: Adopt a resolution to appoint Jamille Moens as an extra help retired annuitant to transition administrative operations to the newly appointed Director of Administrative Services under the California Public Employees' Retirement System (CalPERS) exception to the 180-day wait period, per Government Code § 7522.56 and § 21224.

Rationale for Recommendation: CalPERS retirees are typically subject to a 180-day wait period before engaging in post-retirement work. However, Government Code Sections 7522.56 and 21224 provide an exception to this rule, allowing for the appointment of retirees on an extra help basis to fill a critical need.

Ms. Moens' retired annuitant appointment as the District's Interim Director of Administrative Services ended on March 22, 2024. The regular position of Director of Administrative Services has been filled and the new Director, Megan Shepard, began on March 25, 2024. Given the critical nature of this position and the various ongoing administrative initiatives within the organization, it is imperative to appoint Ms. Moens as retired annuitant in an extra help capacity for a limited duration to ensure an effective transition in leadership for the organization.

The Director of Administrative Services plays a pivotal role in the organization, overseeing numerous essential functions and providing guidance on key initiatives such as the implementation of a sophisticated permitting and billing system, conducting a comprehensive classification and compensation study, facilitating efforts to relocate to a new District headquarters, and development of the FY2024/25 Proposed Budget, among others. The interim appointment of Ms. Moens will allow the District to maintain the momentum of these critical projects, ensure seamless operations, and facilitate a smooth transition of knowledge and leadership to Ms. Shepard.

To proceed with this interim appointment, the Board must adopt a resolution certifying the necessity of Ms. Moens' employment and acknowledging that her appointment is crucial to filling a critical need within the organization before the expiration of the 180-day wait period.

Contact: Denise Booth, Human Resources Officer, 279-207-1175

Presentation: Yes

ATTACHMENTS:

Resolution - Authorization for 180-day Wait Period Exception
Exhibit A - Extra Help Offer Letter Jamille Moens

Approvals/Acknowledgements

Executive Director or Designee: Alberto Ayala, Report Approved 3/22/2024

District Counsel or Designee: Kathrine Pittard, Approved as to Form 3/22/2024

RESOLUTION NO. 2024 – XXXX

Adopted by the Sacramento Metropolitan Air Quality Management District
Board of Directors

AUTHORIZATION FOR 180-DAY WAIT PERIOD EXCEPTION FOR CALPERS RETIREE GOVERNMENT CODE SECTIONS 7522.56 & 21224

BACKGROUND:

- A. In compliance with Government Code section (G.C. §) 7522.56 of the Public Employees' Retirement Law, the Sacramento Metropolitan Air Quality Management District Board of Directors (Board) must provide CalPERS this certification resolution when hiring a retiree before 180 days have passed since their retirement date.
- B. Jamille Moens, CalPERS ID #2613332835, retired from the Sacramento Metropolitan Air Quality Management District (District) in the position of Director of Administrative Services, effective February 24, 2024.
- C. G.C. § 7522.56 requires that post-retirement employment commence no earlier than 180 days after the retirement date, which is August 24, 2024, without this certification resolution.
- D. G.C. § 7522.56 provides that this exception to the 180-day wait period will not apply if the retiree accepts any retirement-related incentive.
- E. The Board, District, and Jamille Moens certify that Jamille Moens has not and will not receive a Golden Handshake or any other retirement-related incentive.
- F. An appointment under G.C. § 21224 states the retiree may be appointed on an extra help basis.
- G. The Board of Directors hereby appoints Jamille Moens as an extra help retired annuitant to transition operations to the newly appointed Director of Administrative Services for the District under G.C. § 21224, effective April 1, 2024.
- H. This extra help appointment will end no later than May 31, 2024.
- I. The entire employment agreement, contract, or appointment document between Jamille Moens and the District has been reviewed by this body and is attached as Exhibit A.
- J. No matters, issues, terms, or conditions related to this employment and appointment have been or will be placed on a consent calendar.
- K. Employment, as a retired annuitant, will be limited to 960 hours per fiscal year.
- L. The compensation paid to retirees cannot be less than the minimum nor exceed the maximum monthly base salary paid to other employees performing comparable duties, divided by 173.333 to equal the hourly rate.

- M. The minimum base salary for this position is \$12,144.96 (hourly equivalent is \$69.80) and the maximum is \$16,274.93 (hourly equivalent is \$93.53).
- N. The hourly rate paid to Jamille Moens will be \$93.53.
- O. Jamille Moens has not and will not receive any other benefit, incentive, compensation in lieu of benefit or other form of compensation in addition to this hourly pay rate.

BASED ON THE FACTS SET FORTH IN THE BACKGROUND, THE BOARD OF DIRECTORS RESOLVES AS FOLLOWS:

Section 1. The Board of Directors hereby certifies the nature of the employment of Jamille Moens as described herein and detailed in the attached offer letter, and that this extra-help appointment is deemed essential to facilitate a seamless transition for the new Director of Administrative Services and ensure continued progress toward key projects and initiatives, as it requires specialized skills, expertise, and advanced knowledge.

Section 2. Exhibit A is attached to and part of this resolution.

ON A MOTION by Director _____, seconded by Director _____, the foregoing resolution was passed and adopted by the Board of Directors of the Sacramento Metropolitan Air Quality Management District on March 28, 2024, by the following vote:

Ayes:

Noes:

Abstain:

Absent:

ATTEST:

Clerk, Board of Directors

Sacramento Metropolitan Air Quality Management District



Sent via email
jmoens@airquality.org

March 28, 2024

Jamille Moens
Sac Metro Air District
777 12th Street, Ste 300
Sacramento CA 95814

RE: Extra Help Employment Offer

Dear Jamille,

The Sacramento Metropolitan Air Quality Management District is offering you a temporary position of extra help to transition administrative operations to the newly appointed Director of Administrative Services, as a retired annuitant.

Extra help employees do not receive any District benefits, including commute pay. This does not include any benefit mandated by state or federal law.

As a retired annuitant you are permitted to work up to 960 hours per fiscal year. Please refer to "A Guide to CalPERS Employment After Retirement" for additional requirements and details, located here: <https://www.calpers.ca.gov/docs/forms-publications/employment-after-retirement.pdf>

The rate of pay being offered to you is \$93.53 per hour. The effective date of your employment is April 1, 2024, or the date on which CalPERS certifies the appointment, whichever is later, and will end no later than May 31, 2024.

Feel free to contact me if you have any questions.

Thank you,

Denise Booth
Human Resources Officer

By signing below, I accept this offer of employment, certify that I have not received unemployment insurance payments for prior retired annuitant work for any CalPERS employer within twelve (12) months prior to this appointment date, and agree to comply with the CalPERS requirements related to post-retirement employment.

Jamille Moens

Date

777 12th Street, Ste. 300 • Sacramento, CA 95814

Tel: 279-207-1122 • Toll Free: 800-880-9025

AirQuality.org

Meeting Date: 3/28/2024
Report Type: DISCUSSION / INFORMATION
Report ID: 2024-0328-11.

Title: Transportation Incentive Grants to Folsom Cordova Unified School District for Three Zero-Emission School Buses

Recommendation: Authorize the Executive Director/Air Pollution Control Officer to execute an agreement with Folsom Cordova Unified School District in an amount not to exceed \$1,200,000 under the Low Emission Vehicle Incentive Program for three zero-emission school buses, and make minor revisions to the contract, in consultation with the District Counsel and within the funding limits, that may be necessary to fully implement its intent.

Rationale for Recommendation: The District's purchasing policy requires Board approval when an incentive contract exceeds \$1,000,000. Staff received an application from the Folsom Cordova Unified School District that will exceed the \$1,000,000 threshold. Funding this project will help promote advanced technology in the Sacramento region and deploy zero-emission vehicles in communities impacted by local air pollution. Additionally, staff will provide the Board of Directors an update of the status of zero-emission school buses operating in the region.

Contact: Michael Neuenburg, Program Supervisor, Transportation & Climate Change, (916) 531-1119

Presentation: Yes

ATTACHMENTS:

Presentation: Transportation Incentive Grants to Folsom Cordova Unified School District for Three Zero-Emission School Buses

Approvals/Acknowledgements

Executive Director or Designee: Alberto Ayala, Report Approved 3/22/2024

District Counsel or Designee: Kathrine Pittard, Approved as to Form 3/22/2024

Discussion / Justification: The District is processing applications from solicitations for incentive grants to partially offset the cost of replacing combustion engines with lower emission equipment. Folsom Cordova Unified School District applied to replace three school buses with three new zero-emission battery-electric school buses in partnership with the *Clean Mobility in Schools* program during the District's Fall 2022 - Spring 2023 Community Air Grant solicitation. The application was ranked favorably as the project will benefit the community with green technology.

Financial Considerations: The total estimated project cost for three battery-electric school buses is \$1,249,990. The corresponding District incentive award is anticipated to be up to but not exceed \$1,200,000; the State program guidelines allow zero-emission buses to be funded at \$400,000 each. The applicant is responsible for the balance of project costs exceeding the District award amount.

This project will be funded from the Carl Moyer Grant Program, the Community Air Protection Funding Program, and/or the Department of Motor Vehicles Surcharge depending on final review. There is sufficient funding in the budget to fund this project.

SACRAMENTO METROPOLITAN



Sac Metro Air District Board Meeting

Transportation Incentive Grants to Folsom Cordova
Unified School District for Three Zero-Emission
School Buses

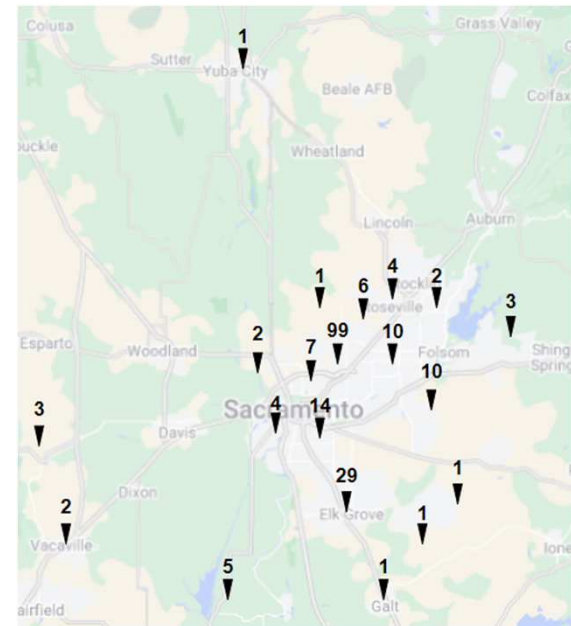
March 28th, 2024

Presenter: Raef Porter

Sacramento Regional EV School Buses

- Priority to help school districts switch over to zero emission fleets
- Invested over \$51M towards zero emission school buses and supporting infrastructure
- Benefited 20 school districts
- Over 200 EV school applications buses, with most of those either contracted or paid

Regional School Districts



SACRAMENTO METROPOLITAN



Folsom Cordova Unified School District

- Folsom Cordova Unified School District to receive three new EV school buses
- Buses will be routed in disadvantaged and low-income communities
- Project supports the zero emission transition
- Requesting \$1.2M in District incentive funds to support project



SACRAMENTO METROPOLITAN



Board Action:

Authorize the Executive Director/Air Pollution Control Officer to execute agreement under the Low Emission Vehicle Incentive Program with Folsom Cordova Unified School District for an amount not to exceed \$1,200,000, and make minor revisions to the contract, in consultation with the District Counsel and within funding limits, that may be necessary to fully implement its intent.

Meeting Date: 3/28/2024
Report Type: DISCUSSION / INFORMATION
Report ID: 2024-0328-12.

Title: Climate Pollution Reduction Grants Program Overview and Phase II Grant Application

Recommendation: Adopt a resolution authorizing the Executive Director/Air Pollution Control Officer, in consultation with District Counsel, to 1) submit an application to the Climate Pollution Reduction Grants (CPRG) Implementation Grants program for an amount currently estimated at between \$70 and \$100 million, not to exceed \$100 million; 2) execute agreements with the Sacramento Area Council of Governments (SACOG) and Yolo County as subrecipients of the grant to aid in the implementation of the Built Environment and Natural and Working Lands measures, respectively; and, 3) receive and file the Capital Region Climate Priorities Plan.

Rationale for Recommendation:

The Capital Region Climate Priorities Plan, available here, is the first major deliverable of Phase I of the CPRG Program. For Phase II of the CPRG, the United States Environmental Protection Agency (EPA) is providing the opportunity to compete for a portion of \$4.6 billion in new climate funding. The Sac Metro Air District would apply as a lead applicant for the seven-county Sacramento region to implement key measures of the Capital Region Climate Priorities Plan (plan) and would rely on the expertise of SACOG and Yolo County by entering agreements with both as subrecipients to implement certain elements of the plan.

Contact: Brianna Moland, Air Quality Planner Analyst, Transportation & Climate Change, 916-317-0821

Presentation: Yes

ATTACHMENTS:

Resolution - CPRG Phase II Implementation Grant

Presentation - Climate Pollution Reduction Grants Program Overview and Phase II Grant Application

Approvals/Acknowledgements

Executive Director or Designee: Alberto Ayala, Report Approved 3/22/2024

District Counsel or Designee: Kathrine Pittard, Approved as to Form 3/14/2024

Discussion / Justification: The Sac Metro Air District led in the development of the Capital Region Climate Priorities Plan under the Environmental Protection Agency's CPRG program for the seven-county Sacramento region. The Plan includes a greenhouse gas inventory, greenhouse gas reduction measures, results from community engagement activities, funding information, identification of low-income and disadvantaged communities and benefits that would flow to those communities from implementing the plan. EPA has determined that the plan contains all required elements to apply for Phase II CPRG funding.

As the current lead of the CPRG Steering Committee, the Sac Metro Air District is well positioned to build on the regional momentum from creating the plan into a grant application which will fund implementation for parts of the plan. The Sac Metro Air District will lead the Transportation element. Key partners with implementation expertise will handle elements traditionally outside of Sac Metro Air District programs: SACOG for the Built Environment and Yolo County for Natural and Working Lands.

Financial Considerations: The Sac Metro Air District is negotiating a final value with project partners and

anticipates applying for implementation grant funding estimated between \$70 and \$100 million, not to exceed \$100 million.

Emissions Impact: The Capital Region Climate Priorities Plan includes 24 greenhouse gas reduction measures. Implementation of these measures could potentially reduce greenhouse gas emissions by 2.6 million metric tons of carbon dioxide equivalent per year by 2030.

The Phase II Implementation Grant, titled *Going Beyond Green: Cultivating Community, Connections, and Crops*, will move forward several of these measures.

Public Outreach/Comments: The Capital Region Climate Priorities Plan includes the results from community outreach and engagement activities conducted during the development of the plan.

RESOLUTION NO. 2024 – XXXX

Adopted by the Sacramento Metropolitan Air Quality Management District
Board of Directors

Climate Pollution Reduction Grants Program Phase II Implementation Grant

BACKGROUND:

- A. On July 19, 2023, the Sac Metro Air District entered into an agreement with the US Environmental Protection Agency (EPA) to be the lead agency for the Climate Pollution Reduction Grants (CPRG) program for the seven-county Sacramento region, requiring the submission of a priority climate action plan, a comprehensive climate action plan, and a status report.
- B. On March 1, 2024, the *Capital Region Climate Priorities Plan*, which outlined three major reduction categories and twenty-four emission reduction measures was submitted to EPA.
- C. Measures within this plan are eligible to compete for funding from the EPA's CPRG Implementation Grants program.
- D. The Sac Metro Air District, in partnership with the regional CPRG steering committee and implementing agencies, drafted *Going Beyond Green: Cultivating Community, Connections, and Crops*, a three-pronged implementation plan focusing on mobility hubs, infill development, and sustainable farming practices that sequester carbon.
- E. The plan protects agricultural lands on the regional periphery, reduces sprawl and vehicle miles traveled, and increases zero-emission mode share in locally nominated areas with strong redevelopment potential.
- F. The plan would ensure locally appropriate and tangible climate action in the region's seven counties, leveraging the expertise of agencies with proven track records in these areas.
- G. For Phase II of the CPRG, the United States Environmental Protection Agency (EPA) is providing the opportunity to compete for a portion of \$4.6 billion in new climate funding.
- H. The Sac Metro Air District would apply as a lead applicant for the seven-county Sacramento region to implement key measures of the Capital Region Climate Priorities Plan (plan) and would rely on the expertise of SACOG and Yolo County by entering agreements with both as subrecipients to implement certain elements of the plan.

BASED ON THE FACTS SET FORTH IN THE BACKGROUND, THE BOARD OF DIRECTORS RESOLVES AS FOLLOWS:

- Section 1. The Executive Director/Air Pollution Control Officer, in consultation with District Counsel, is authorized to submit an application on behalf of the Sac Metro Air District to the CPRG Implementation Grants program in an amount not to exceed \$100 million.
- Section 2. The Executive Director/Air Pollution Control Officer, in consultation with District Counsel, is authorized to execute agreements with SACOG and Yolo County as subrecipients of the grant to aid in the implementation of the Built Environment and Natural and Working Lands measures, respectively.
- Section 3. The Executive Director/Air Pollution Control Officer, in consultation with District Counsel, is authorized to approve any subsequent minor changes to the

agreement with SACOG and Yolo County that may be required during the performance of the agreement.

ON A MOTION by Director _____, seconded by Director _____, the foregoing resolution was passed and adopted by the Board of Directors of the Sacramento Metropolitan Air Quality Management District on March 28, 2024, by the following vote:

Ayes:

Noes:

Abstain:

Absent:

ATTEST:

Clerk, Board of Directors
Sacramento Metropolitan Air Quality Management District

Climate Pollution Reduction Grants Program Overview and Phase II Grant Application

Board Meeting
March 28, 2024

Brianna Moland, Climate Coordinator – Sac Metro Air District
Raef Porter, Program Manager – Sac Metro Air District
Kristen Wraithwall, Sustainability Manager – Yolo County
Garett Ballard-Rosa, Green Means Go Program Manager – SACOG

SACRAMENTO METROPOLITAN



CPRG Overview

- **Phase 1: Planning grants** to develop climate pollution reduction strategies
 - GHG Inventory
 - Public Outreach
 - GHG Reduction Measures
- **Phase 2: Implementation grants** to help put plans from Phase 1 into action
 - Focus on implementation ready projects
 - Must be a measure in Phase 1
 - Grant applications due April 1, 2024

Grant Deliverables



Priority Climate Action Plan (PCAP)

- Due **March 1, 2024**
- GHG inventory
- GHG measures that reduce emissions
- LIDAC benefits analysis
- Stakeholder engagement



Comprehensive Climate Action Plan (CCAP)

- Due in **2025**
- GHG emissions projections
- GHG reduction targets
- Benefits analysis
- Funding and cost information
- Workforce planning analysis



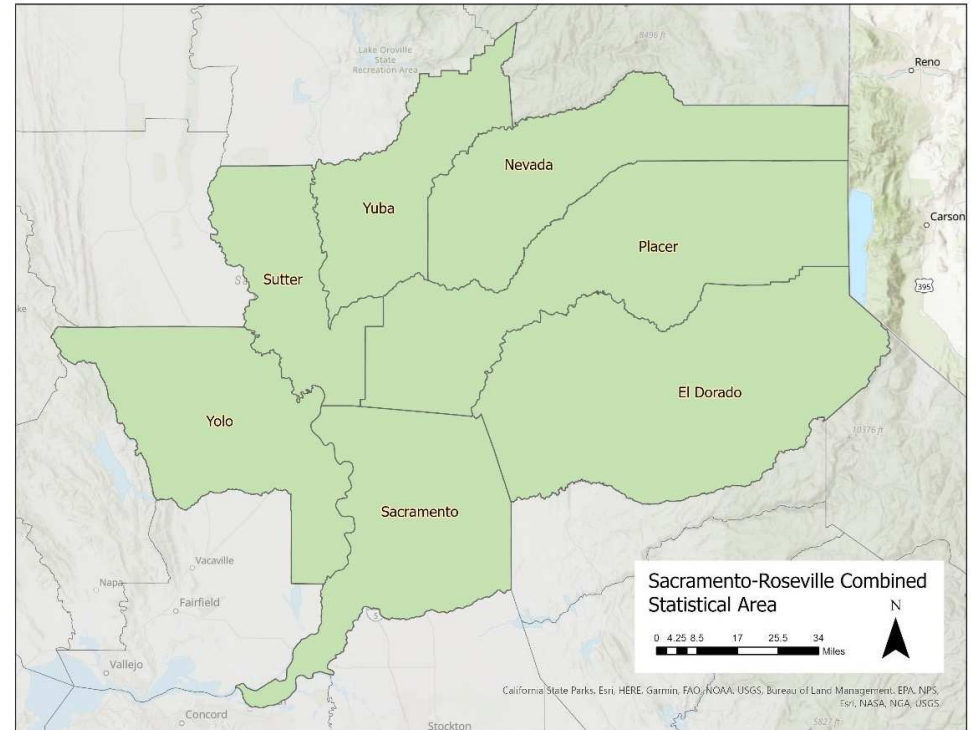
Status Report

- Due in **2027**
- Status of GHG reduction measures
- Status of benefits analysis
- Next steps

SACRAMENTO REGION CPRG STEERING COMMITTEE

Lead Agency/Chair – Sac Metro Air District

City of Auburn	Placer Air Pollution Control District
City of Citrus Heights	Placer County
City of Davis	Placer County Transportation Planning Agency
City of Elk Grove	Roseville Electric Utility
City of Folsom	Sacramento Area Council of Governments
City of Grass Valley	Sacramento County
City of Rancho Cordova	Sacramento Municipal Utility District
City of Roseville	Sacramento Regional Transit District
City of Sacramento	Sutter County
City of South Lake Tahoe	Town of Truckee
City of Woodland	Yocha Dehe Wintun Nation
El Dorado Air Quality Management District	Yolo County
El Dorado County	Yolo-Solano County Air Quality Management District
Nevada County	Yuba County
Nevada County Transportation Commission	



Seven counties



Metro Planning
Orgs



Local utilities



Multiple cities



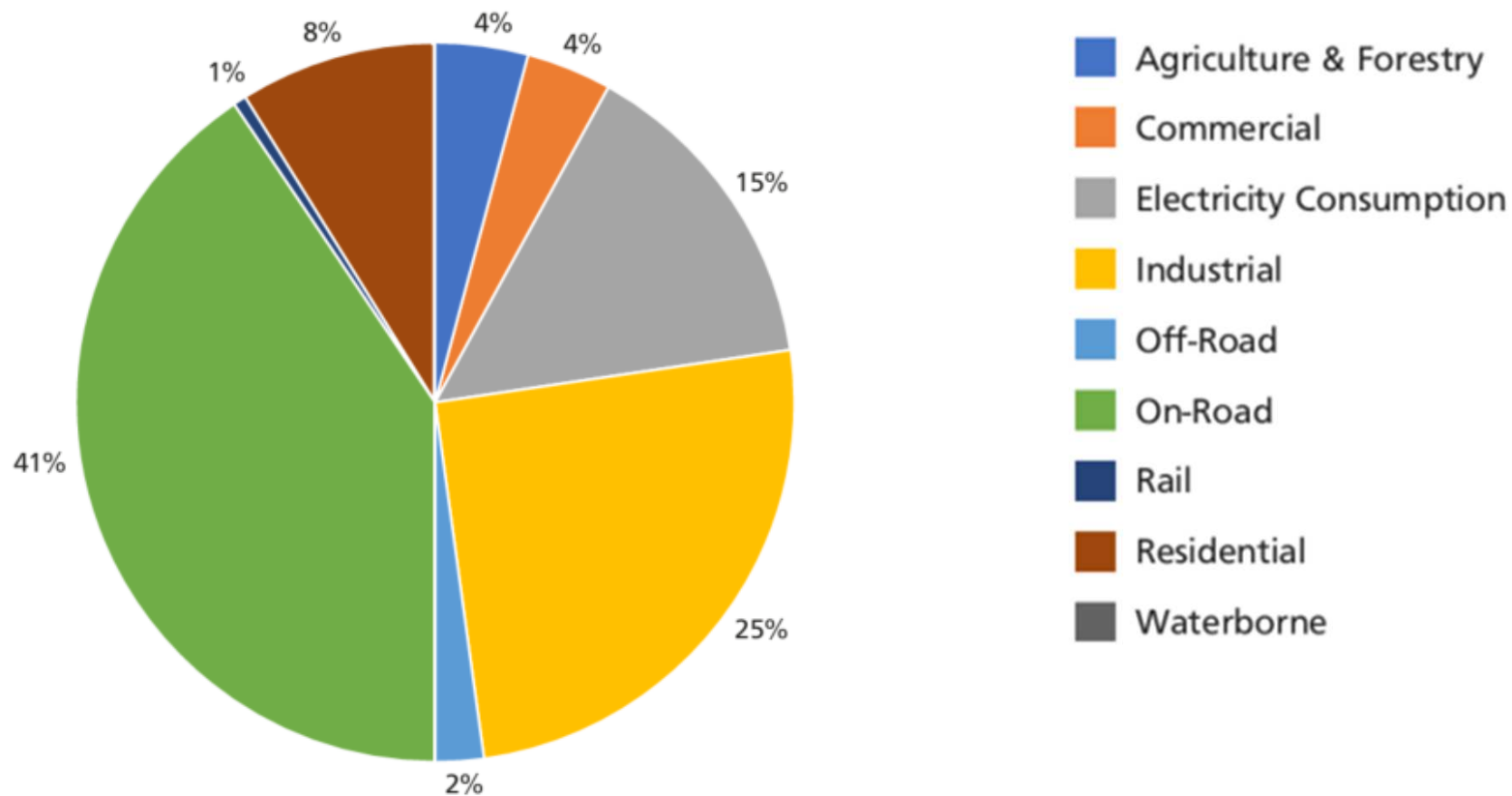
Tribal partners



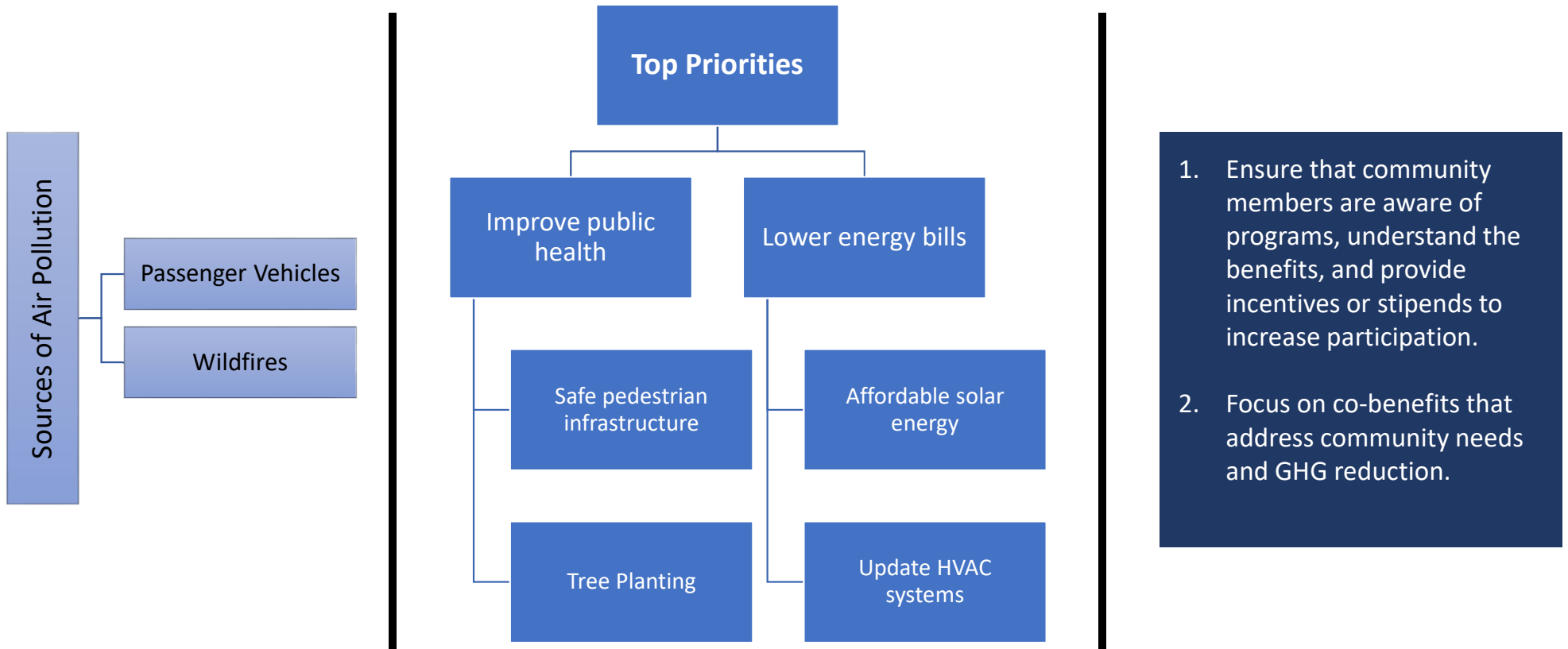
Local air
districts

GHG Inventory for Seven-County Region

2019 Sacramento-Roseville CSA GHG Emissions



Summary of Outreach Results



Development of GHG Reduction Measures

24 measures identified. Each includes:

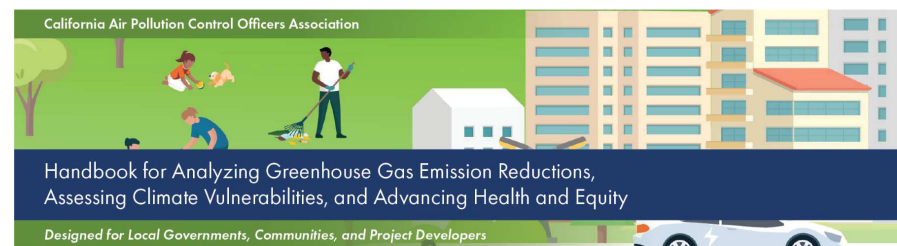
- Mitigation potential (MT CO₂e/yr)
- Scale of implementation
- Authority to implement
- Co-benefits
- Climate resiliency and health and equity considerations

Leveraged existing tools: CAPCOA Handbook

Measure Categories

BUILT ENVIRONMENT	TRANSPORTATION	NATURAL AND WORKING LANDS
Infill Development	Reduce Vehicle Miles Traveled	Carbon Sequestration
Building Decarbonization	Vehicle and Equipment Decarbonization	Forest Management
Energy Resiliency		Equipment Decarbonization
Waste Management		

CAPCOA Handbook



Built Environment Measures

BUILT ENVIRONMENT

Infill Development

Building Decarbonization

Energy Resiliency

Waste Management

Measure Number	Measure Name	Sector
Measure BE-1	Land Use Improvements	Transportation
Measure BE-2	Building Energy Efficiency Improvements	Energy
Measure BE-3	Increase Use of Renewable Energy in New and Existing Buildings	Energy
Measure BE-4	Building Decarbonization/Electrification	Energy
Measure BE-5	Construction and Landscape Equipment Emissions Reduction	Energy
Measure BE-6	Install Cool Pavement	Energy
Measure BE-7	Reduce Solid Waste	Waste Management
Measure BE-8	Reduce Water Utility Emissions	Water
Measure BE-9	Reduce Wastewater Emissions	Waste Management
Measure BE-10	Require Edible Food Recovery Program Partnerships with Food Generators	Waste Management

Built Environment Measures:

- Improve building energy efficiency
- Reduce waste
- Increase renewable energy use
- Increase residential density

Measure BE-1 Land Use Improvements

Land Use Improvements Measure BE-1



GHG Mitigation Potential
286,356 MT CO₂e/yr by 2030

Co-Benefits



Climate Resilience

Living near jobs, schools, supermarkets, and medical care facilities improves connectivity between destinations and provides greater options for modes of travel resulting in better air quality from less passenger vehicle use and traffic.

Measure Description

This measure focuses on reducing VMT by increasing residential density through infill housing and mixed-use development. Reducing the distance that people must travel to get to goods and services and reducing the number of trips by single-occupancy vehicles leads to reductions in GHG emissions.

Increase Residential Density: Requires new residential developments to achieve a higher density than the average U.S. residential density. Increased density allows people greater options for modes of travel and results in shorter and fewer vehicle trips.

Infill Development: Encourages infill housing development programs that allow residents to live closer to downtown areas, increasing access to jobs and activities. Developing more housing closer to downtown areas leads to VMT and GHG reductions.

Subsector

Land Use; Transportation

Scale of Application by 2030

- Increase residential density by 20% across the region.
- Reduce approximately 150 million VMT per year through infill development.

Authority to Implement

- **Legislation, Rules, and Policy:** California vests land use authority with local jurisdictions, provided state requirements for comprehensive planning and housing needs are met. However, VMT are considered transportation and environmental impacts in California by SB 743 (Steinberg, 2013). Directing growth and investment into communities with high access and low VMT, along with constructing the necessary public infrastructure to support such growth, are actions supported by state housing, transportation, air quality, and climate goals.
- **Incentives:** California regions must achieve VMT reduction targets as required by SB 375 (Steinberg, 2008) or lose access to certain state transportation funding. Regulatory streamlining is also available for projects consistent with qualified climate action plans and certain infill development. Metropolitan planning organizations (MPOs) and regional transportation planning agencies (RTPAs) also have authority to direct flexible funding into projects that support infill development.

Monitoring and Reporting

Annual reporting by local jurisdictions and quadrennial transportation modeling by MPOs and RTPAs will track this measure.

GHG Reductions Quantification Summary

The methodology for estimating emission reductions is based on the guidelines in the CAPCOA Handbook (measure T-1)¹ and the CAPCOA Handbook Update (measure T-55).² The majority of the GHG reductions are achieved through the increase in residential density and the associated VMT reductions. Emissions for passenger cars and passenger trucks for the region were modeled using CARB's vehicle Emissions Factor Model (EMFAC)³ and applying the percentage of GHG reductions estimated as a result of the measure. Calculations for infill development are based on the estimated annual VMT reduction in 2030 as provided by SACOG from the Green Means Go program.⁴ The GHG reductions are calculated based on the estimated VMT reductions and the light-duty vehicle fleet emission factors from EMFAC2021.⁵ For additional details on inputs and assumptions for this specific analysis in the Sacramento-Roseville CSA, see Appendix C. Annual emission reductions below represent the implementation of this measure across the Sacramento-Roseville CSA and attainment of the scale of application by 2030.

Table BE-1. Potential Emissions Reductions from Measure BE-1 across the Sacramento-Roseville CSA

Measure Breakdown	Metric Tons CO ₂ e/Year
Increase Residential Density	240,933
Infill Development	45,423
Total Reduction	286,356

Health and Equity Considerations

Building residential units in areas with a mix of shops and businesses within easy walking distance provides substantial population health benefits. People who live in areas with high residential density and access to goods and services are likely to be more physically active than residents of neighborhoods in which homes are separated from commercial areas. Residents tend to have lower rates of obesity, type 2 diabetes, high blood pressure and other chronic medical problems. Living in compact areas with greater accessibility can also provide residents better access to health-promoting goods and services.

REFERENCES

- ¹ CAPCOA, 2021. Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. https://www.airquality.org/ClimateChange/Documents/Final%20Handbook_A8434.pdf
- ² Sac Metro Air District, 2023. 2021 CAPCOA Handbook Update Task 1.2 Deliverable: Develop process and summaries for up to 10 quantification measures (Draft). Provided by Sac Metro Air District December 22, 2023.
- ³ CARB, 2021. California Air Resources Board's EMFAC Model (v1.0.2) Emissions Inventory. Available online at: <https://arb.ca.gov/emfac/>
- ⁴ Sacramento Area Council of Governments (SACOG), 2024. Green Means Go Calculation and Methodology. Provided by Sac Metro Air District January 28, 2024.
- ⁵ Creatore, MI et al. 2016. Association of Neighborhood Walkability With Change in Overweight, Obesity, and Diabetes. *J Am Med Assoc* 315(20):2211-2220. Doi: 10.1001/jama.2016.5898. Available: <https://jamanetwork.com/journals/jama/fullarticle/2524191>. Accessed: December 2024.
- ⁶ Ewing R et al. 2003. Relationship Between Urban Sprawl and Physical Activity, Obesity, and Morbidity. *Am J Health Promotion* 18(1):47-57. Available: <https://pubmed.ncbi.nlm.nih.gov/13677962/>. Accessed: January 2024.
- ⁷ Frank L et al. 2006. Many Pathways from Land Use to Health: Associations between Neighborhood Walkability and Active Transportation, Body Mass Index, and Air Quality. *J Amer Planning* 72(1):75-87. Available: <https://www.tandfonline.com/doi/abs/10.1080/019449606008976725>. Accessed: December 2024.
- ⁸ Fuzhong L et al. 2008. Built Environment, Adiposity, and Physical Activity in Adults Aged 50-75. *Am J Prev Med* 35(1):38-46. doi: 10.1016/j.amepre.2008.03.021. Available: <https://pubmed.ncbi.nlm.nih.gov/18541175/>. Accessed: January 2024.
- ⁹ Fuzhong L et al. 2009. Built environment and changes in blood pressure in middle-aged and older adults. *Prev Med* 48(2009):237-241. Available: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2775535/>. Accessed: January 2024.
- ¹⁰ Sturm R and Cohen DA. 2004. Suburban sprawl and physical and mental health. *Public Health* 118(7):488-496. Available: <https://doi.org/10.1016/j.puhe.2004.02.007>. Accessed: January 2024.

Transportation Measures

TRANSPORTATION

Reduce Vehicle Miles Traveled

Vehicle and Equipment
Decarbonization

Measure Number	Measure Name	Sector
Measure TR-1	ZEV Adoption and Charging Infrastructure	Transportation
Measure TR-2	Public Transit Improvements	Transportation
Measure TR-3	Provide Bus Rapid Transit	Transportation
Measure TR-4	Roadway Improvements for Multi-Modal Use and Access	Transportation
Measure TR-5	Transportation Demand Management Program	Transportation
Measure TR-6	Active Modes of Transportation for Youth	Transportation
Measure TR-7	Establish a School Bus Program	Transportation
Measure TR-8	Electric Bikeshare	Transportation

Transportation Measures:

- Improve public transit
- Encourage rideshare
- Promote electric and cleaner fuel vehicle adoption

Natural and Working Lands Measures

NATURAL AND WORKING LANDS

Carbon Sequestration

Forest Management

Equipment Decarbonization

Measure Number	Measure Name	Sector
Measure NW-1	Wildfire Resilience and Management	Natural and Working Lands
Measure NW-2	Biomass Energy	Energy
Measure NW-3	Increase Tree Canopy	Natural and Working Lands
Measure NW-4	Carbon Sequestration Program/Carbon Farming	Natural and Working Lands
Measure NW-5	GHG Local Offset Program	Natural and Working Lands
Measure NW-6	Natural & Working Lands Equipment Emissions Reduction	Natural and Working Lands

Natural and Working Lands Measures:

- Conserve land that sequesters carbon
- Promote healthy soils and forests to minimize the likelihood of severe or catastrophic wildfire

CPRG Implementation Grants

Program Goals



- Implement ambitious measures with significant GHG reductions by 2030



- Pursue substantial community benefits in lower income and disadvantaged communities



- Complement other funding sources to maximize reductions and community benefits



Pursue innovative programs that are replicable

Working Groups

Measure Category	Working Groups
Built Environment	Infill Development
	Building Electrification
Transportation	Active Modes
	Public Fleet Zero-Emission Vehicles and Transit
Natural and Working Lands	Forest Treatments and Biomass
	Carbon Farming

1. Developed list of priority projects
2. Determined a lead for each group
3. Evaluated priority projects against Phase 2 criteria

Going Beyond Green: Cultivating Community, Connections, and Crops

Green Means Go – Approximately \$40 million

- Green Zones = areas that move toward low or zero emissions
 - Prioritizes infill development through infrastructure development
 - Reduces VMT

Smart Mobility Hub Development – Approximately \$40 million

- Converts remaining VMT to eVMT
 - Increases ZEVs and charging infrastructure

Carbon Farming – Approximately \$14 million

- Reduces impacts on natural and working lands
 - Supports infill development by making agricultural lands economically viable
 - Improves soil and sequesters carbon

CPRG Carbon Farming Partnership

SMAQMD Board Meeting
March 28, 2024

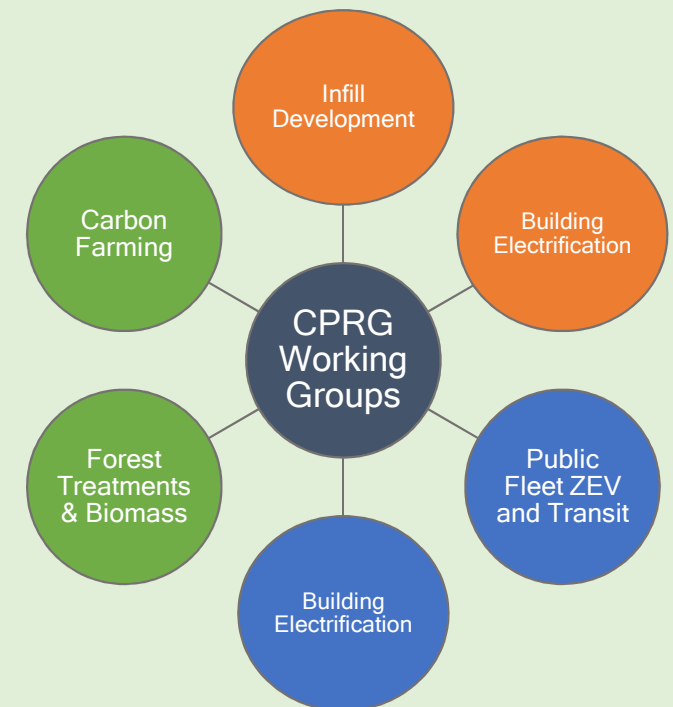
Kristen Wraithwall
Sustainability Manager
County of Yolo





CPRG AS A FRAMEWORK FOR REGIONAL COLLABORATION

- CPRG Working Groups served as a foundation for:
 - Building cross-jurisdictional partnerships;
 - Identifying shared GHG reduction priorities;
 - Developing program/project concepts.
- Opportunities moving forward:
 - Potential to mobilize and pursue funding;
 - Continue to foster regional climate action;
 - Take project concepts from idea to implementation.



CARBON FARMING PARTNERSHIP

Key Proposal Elements



Identify Priority Carbon Farming Practices at the Local Level to Maximize Sequestration & Co-Benefits



Develop Technical Assistance for Carbon Farm Planning



Create a One-Stop-Shop Funding Application to Accelerate Implementation and GHG Reduction



Deploy Technical Assistance for Project Development and Monitoring

YOLO COUNTY AS NATURAL AND WORKING LANDS LEAD



- Board-Adopted Goal: Net-Negative Emissions by 2030
- More than 85% of land use dedicated to Natural and Working Lands
- Effective Model for Carbon Farming Partnership:
 - Top County climate priority; strong buy-in from County leadership;
 - History of successful County-funded pilot programs in the NWL Space;
 - Strong regional relationships;
 - Staff/partner expertise in carbon farming program deployment.



THANK YOU!

QUESTIONS?

Kristen Wraithwall
Sustainability Manager

kristen.wraithwall@yolocounty.org



CPRG Carbon
Farming Partnership



Green Means Go

SACRAMENTO REGION'S INTERGOVERNMENTAL APPROACH TO ACCELERATE INFILL DEVELOPMENT

SMAQMD BOARD MEETING

MARCH 28, 2024

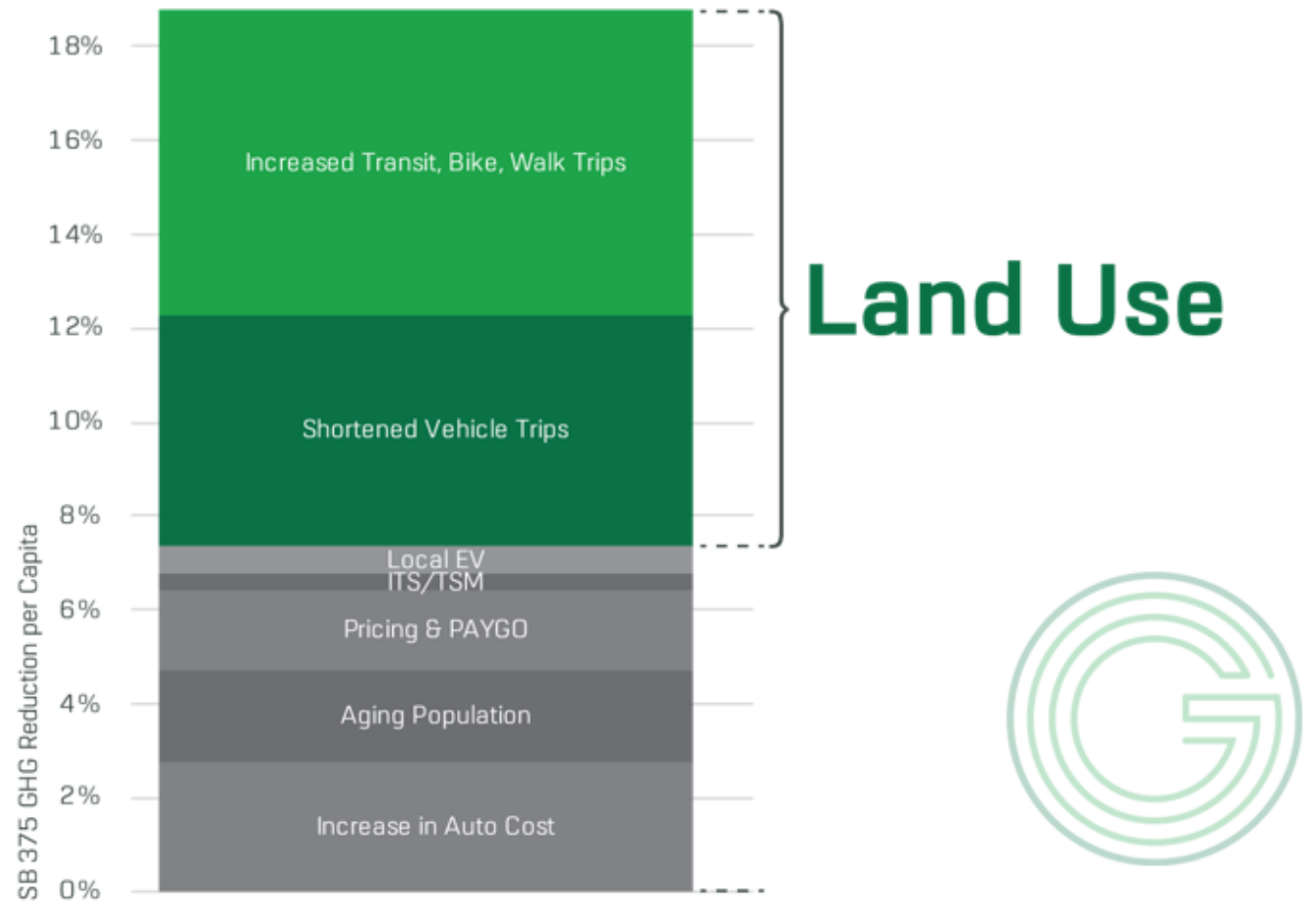
GARETT BALLARD-ROSA:
GREEN MEANS GO PROGRAM MANAGER



Green Means Go Place-Based Investment Strategy to Accelerate:



Key Factors Contributing to 19% GHG Reduction

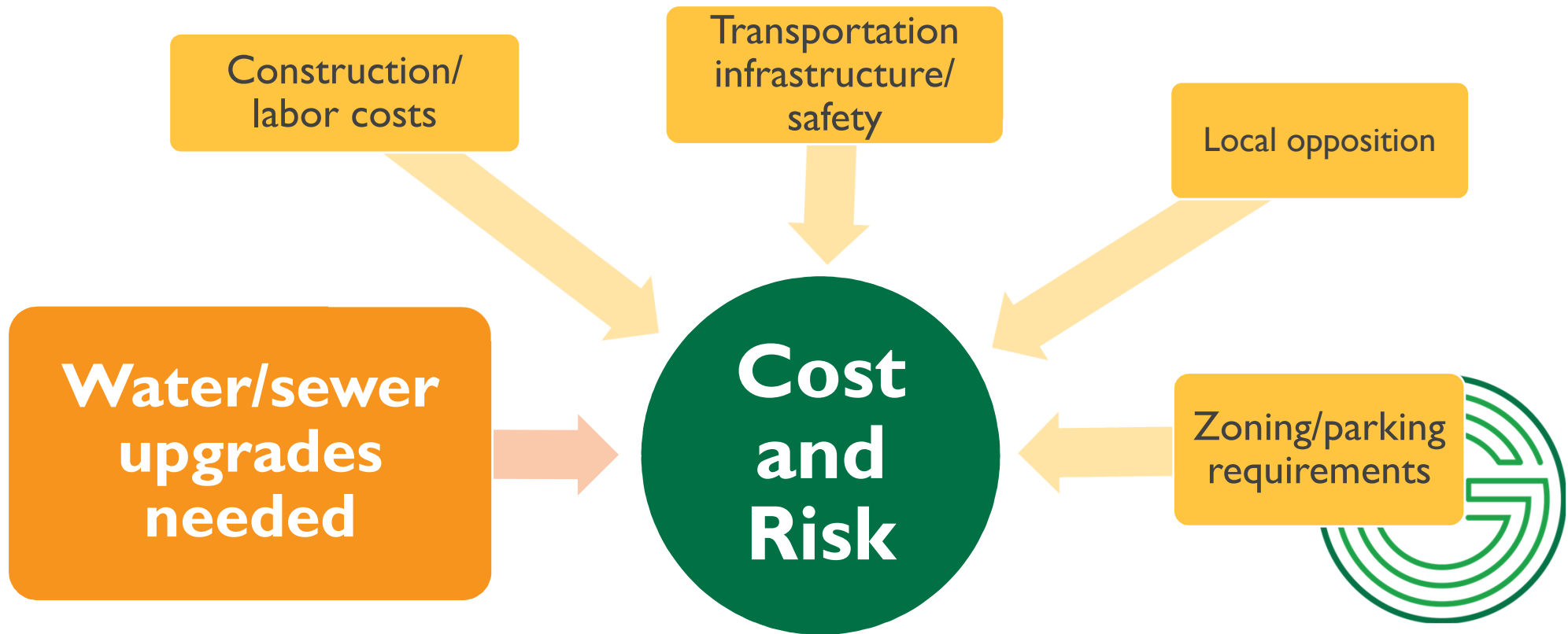


Green Means Go

- Supported by each jurisdiction in region
- 26 (of 28) have adopted Green Zones
- Leverages 1st round of Green Means Go funding



Barriers to Infill



CPRG Grant Component

- Next wave of capital project investments
- Backbone (sewer/water) infrastructure activates housing production
- In infill areas with travel choices, mix of land uses, and access to neighborhood services



Transportation Working Groups

Board Meeting
March 28, 2024

Raef Porter
Program Manager
Transportation and Climate Change

SACRAMENTO METROPOLITAN



AIR QUALITY
MANAGEMENT DISTRICT



CPRG – Transportation Working Groups

- Two Focuses
 - Zero Emission Vehicles
 - Active Transportation
- Multiple meetings to identify shovel ready projects
- Criteria to limit transportation focus
 - Competitiveness
 - Availability of other funding programs
 - Existing match/leverage funds

CPRG – Transportation Working Groups: Mobility Hubs

- TR-1: Zero Emission Vehicles
- More than 20 project ideas identified
- Focus on public fleets, transit, and publicly accessible charging



Measure Breakdown	Metric Tons CO ₂ e/Year
Use of Cleaner-Fuel Vehicles (15% BEVs)	700,942
Use of Cleaner-Fuel Vehicles (15% PHEVs)	467,728
Provide EV Charging Infrastructure	10,502
Total Reduction	1,179,172

SACRAMENTO METROPOLITAN



CPRG – Transportation Working Groups: Mobility Hubs

- TR-2: Improve Public Transit
- Approximately 10 projects identified
- Focus on transit hubs and transit shelters



Measure Breakdown	Metric Tons CO ₂ e/Year
Expanded Transit Network Coverage or Hours	24,844
Increase Transit Service Frequency	5,957
Provide Transit Shelters (Bus Shelters and Real-Time Arrival Information)	819.7
Provide Transit Shelters (Bus Shelters Only)	414.4
Total Reduction	31,215 – 31,621

CPRG – Transportation Working Groups: Mobility Hubs



- TR-5: Transportation Demand Management
- Three projects identified
- Projects include microtransit, carshare, and accessibility

Scenario	Measure Breakdown	Metric Tons CO ₂ e/Year
Option A	Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring)	222,477
Option B	Implement Commute Trip Reduction Program (Voluntary)	34,227
Remaining Programs	Provide Ridesharing Program	27,200
	Implement Subsidized or Discounted Transit Program	1,590
Total Reduction		34,227 – 222,477

Priority Action Categories & Implementation Projects

Built Environment

Infill Development

- BE-1

Approximately
\$40 million

Transportation

Mobility Hubs

- TR-1
- TR-2
- TR-5

Approximately
\$40 million

Natural and Working Lands

Carbon Farming

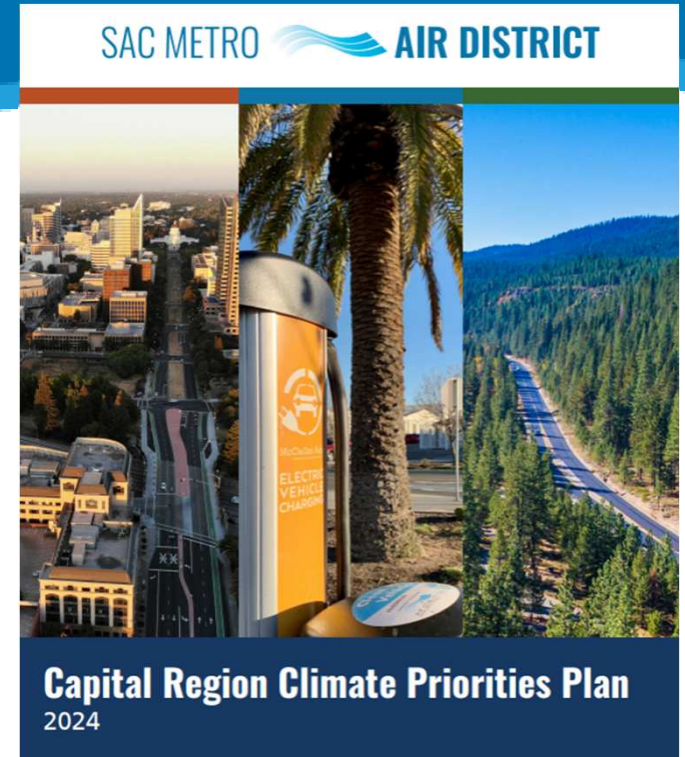
- NW-4

Approximately
\$14 million

- Build on Existing Efforts
 - SACOG's Green Means Go
 - Sac Metro Air District's Mobility Hubs
 - Yolo County's Carbon Farming Partnership

Comprehensive Climate Action Plan

- Deeper dive into co-benefits
- Continued emphasis on low-income and disadvantaged communities
- Additional climate measures
 - Electric bikeshare → Provide electric bicycle charging
 - Biomass to energy → Non-combustion projects with bioproducts
 - Grid resilience → Partnership with SMUD
- More robust analysis on workforce development



SACRAMENTO METROPOLITAN



Today's Action

- Receive and file Capital Region Climate Priorities Plan
- Adopt resolution allowing APCO to submit Going Beyond Green as a Phase II Grant, and if awarded, enter into contracts to implement the project