SYNTHETIC MINOR OPERATING PERMIT
ENGINEERING EVALUATION REPORT
GOOGLE, INC.
PLANT NUMBER 15982
APPLICATION NUMBER 24781

1600 Amphitheater Pkwy
Mountain View, CA 94043

BACKGROUND

Google, Inc. (Google) is subject to the requirements of Title V of the Federal Clean Air Act, Part 70 of Volume 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. Google is a major facility because it has the PTE ("potential to emit") more than 100 tons per year of nitrogen oxides (NOx). Major facilities that are willing to accept federally enforceable permit conditions that limit emissions to less than Title V thresholds can apply for a Synthetic Minor Operating Permit. Based on previous year usage data, it is estimated that actual emissions of NOx at Google are well below major facility thresholds. Therefore, Google has elected to apply for a Synthetic Minor Operating Permit (SMOP).

This permit will establish federally enforceable permit conditions to limit the facility to major facility thresholds. Synthetic Minor permits must have practically enforceable limits and conditions that ensure that emissions never exceed major facility thresholds.

Google is a facility that develops internet search engine and associated software. Google bought many properties in the Shoreline area of Mountain View recently. Google's purchases included 3 landfill gas fired IC engines that were originally owned and operated by ALZA Corporation as three separate facilities. Initially, most of them were permitted as individual plants. Because many of the newly owned properties by Google are contiguous, they are combined under Plant number 15982. Google owned 23 emergency diesel engine generator sets and 3 landfill gas fired IC engines when the SMOP application was submitted. Google has recently sold one of the landfill gas fired engines, S-20, which was removed from the site on May 15, 2013, and three emergency diesel engine generator sets, S-12, S-16, and S-31, which were removed from the site. Google also added four emergency engine generator sets recently.

POTENTIAL TO EMIT

Google has 24 emergency diesel engine generator sets, 2 landfill gas fired IC engines as permitted sources, and 1 exempt emergency diesel engine generator set.

Google has estimated the PTE of regulated air pollutants for all permitted sources at the facility. Emissions from standby diesel engines were estimated using USEPA AP-42 emission factors (Chapters 3.3 and 3.4) and operating hours at 500 hours per year[1]. Emissions from the landfill

[1] Based on EPA memorandum of September 6, 1995 titled "Calculating Potential to Emit (PTE) for Emergency Generators.

gas fired engines were estimated using source test emission data (summary of the source test results are available upon request), and operating hours of 8760 hours per year each for S-29 and S-30. Existing BAAQMD Condition ID# 21627 requires annual NOx source test. Details of these estimates are available upon request. These estimates are summarized below in Table 1.

Table 1. Potential to Emit of Regulated Air Pollutants – Facility Wide

	Criteria Pollutants					
	NO_x Emissions	CO Emissions	SO_2 Emissions	POC Emissions	NPOC Emissions	PM_{10} Emissions
Sources	**(tons/yr)**	**(tons/yr)**	**(tons/yr)**	**(tons/yr)**	**(tons/yr)**	**(tons/yr)**
Emergency Diesel Engine Generators	97.71	22.17	2.45	3.72	0.0	1.71
Landfill Gas Fired IC Engines	9.07	37.65	0.32	4.44	0.0	0.0
Total	**106.79**	**59.81**	**2.77**	**8.16**	**0.0**	**1.71**

Google has estimated the PTE of hazardous air pollutants for all permitted sources at the facility. Emissions from standby diesel engines were estimated using USEPA AP-42 emission factors (Chapters 3.3 and 3.4) and operating hours at 500 hours per year. Emissions from the landfill gas fired engines were estimated using source test emission data (summary of the source test results are available upon request), and operating hours of 8760 hours per year each for S-29 and S-30. Details of these estimates are available upon request. These estimates are summarized below in Table 2. Diesel particulate is not defined as a hazardous air pollutant for the purposes of the Federal Clean Air Act.

Table 2. Potential to Emit of Hazardous Air Pollutants – Facility Wide

Air Toxics	Diesel Engine Generators	Landfill Gas Fired IC Engines	Total Emissions (tons/yr)
Acetaldehyde	1.39E-03	0.0	1.39E-03
Acrolein	2.13E-04	0.0	2.13E-04
Benzene	8.83E-03	3.79E-02	4.67E-02
1,3 Butadiene	5.83E-05	0.0	5.83E-05
1,2 Dibromoethane	0.0	4.55E-04	4.55E-04
Dichlorobenzene	0.0	4.55E-04	4.55E-04
Formaldehyde	2.52E-03	1.095	1.1
Hydrogen Sulfide	0.0	2.29E-03	2.29E-03
Naphthalene	1.37E-03	0.0	1.37E-03
Tetrachloroethylene	0.0	4.58E-04	4.58E-04
Toluene	3.3E-03	14.78E-03	1.81E-02
Trichloroethylene	0.0	4.56E-04	4.56E-04
Vinyl Chloride	0.0	4.66E-04	4.66E-04
Xylenes	2.27E-03	0.0	2.27E-03
		Total Emissions (tons/yr)	**1.17**

Using 40 CFR Part 98, Subpart C, Tables C-1 and C-2 emission factors and operating hours at 500 hours per year for each diesel engine and 8760 hours per year for each landfill gas fired engine, Google has estimated the PTE of GHG for all permitted sources at the facility. Details of these estimates are available upon request. These estimates are summarized below in Table 3.

Table 3. Potential to Emit of GHG – Facility Wide

Source	GHG (mtCO2e/year)	GHG (tCO2e/year)
Emergency Diesel Engine Generators	1,797.73	1,975.52
Landfill Gas fired IC Engines	21,767.71	23,920.56
TOTAL	**23,565.44**	**25,896.08**

As demonstrated above, Google's PTE of any regulated air pollutant is below major facility threshold (95 tons/year) except for NOx, Google's PTE of any single hazardous air pollutant is below major facility threshold (9 tons/year), Google's PTE of any combination of hazardous air pollutants is below major facility threshold (23 tons/year), and Google's PTE of GHG is below 100,000 tCO2e/yr.

SYNTHETIC MINOR OPERATING PERMIT

In order to be eligible for a synthetic minor permit, a site must either have a maximum potential to emit that is less than each Title V emission threshold (less than 95 tons/year of NO_x, CO, POC, PM_{10}, and SO_2, less than 9 tons/year of any single hazardous air pollutant (HAP), and less than 23 tons/year of all HAPs combined) or must accept conditions limiting the site to less than these emissions thresholds (Regulation 2-6-423). In addition, EPA has recently adopted a Title V permitting threshold for GHG emissions that became effective for all sites on July 1, 2011. Any site that has the potential to emit more than 100,000 tons/year of GHG (expressed as CO_2 equivalent) will be deemed a major facility and required to obtain a Title V permit. To be eligible for a Synthetic Minor Operating Permit for GHG emissions, the facility must accept conditions limiting its GHG emissions to 90% of the Title V emission threshold, or 90,000 tons/year on a CO_2 equivalent basis, pursuant to Regulation 2-6-423.2.2.

Google has proposed federally enforceable emission limitations such that NOx emissions will be less than 95 tons/yr. Compliance with this limit will be demonstrated on a rolling monthly basis by an emission calculation procedure that applies a throughput to an established emission factor to each source.

DETERMINATION OF EMISSIONS

Google's emissions of NOx arise from the combustion of diesel in diesel fired engines, and landfill gas in landfill gas fired engines.

Landfill gas fired engines

Google will use the existing gas meters at each to measure the throughput of landfill gas used by each landfill gas fired engine. Google has non-resettable totalizing meters to each of its landfill

gas fired engines. Therefore, facility-wide landfill gas usage in landfill gas fired engines will be determined based on individual fuel meter data. Existing BAAQMD Condition ID# 21627, part 3, requires the fuel meters.

Existing BAAQMD Condition 21627, part 12, requires an annual source test for NOx. Google will use the annual source test to determine the emission factors for NOx at each landfill gas engine.

Diesel fired engines

Google will use either its fuel meters or its hour meters to measure throughput of diesel fuel used by diesel fuel fired engines. If diesel fuel usage and engine load are not measured but run time is recorded, Google shall assume an engine operated at full load and maximum fuel use rate its entire run time. Alternatively, to measure diesel fuel usage, Google shall monitor diesel fuel inventory for all diesel fuel tanks at its facility on a semiannual or more frequent basis; to estimate fuel usage between the last inventory monitoring activity and the next one, Google may prorate the diesel fuel usage from the reading of the last inventory monitoring activity.

SYNTHETIC MINOR OPERATING PERMIT CONDITIONS

Synthetic Minor Operating Permit Conditions (Condition # 25653) will be added as follows in accordance with BAAQMD Regulation 2, Rule 6, Section 423.2, District Procedures for Synthetic Minor Operating Permits: Permit Content to avoid designation as a Title V facility.

The Synthetic Minor Permit also relies on parts of BAAQMD Condition ID# 21627. The condition is shown below the proposed Synthetic Minor Condition. The Synthetic Minor Condition will refer to parts 3 and 12 of Condition 21627.

SYNTHETIC MINOR OPERATING PERMIT

Condition #25653

Google, Inc.
Mountain View, CA 94043
Application #24781
Site #B5982

Google, Inc., Site #B5982, has a synthetic minor operating permit. This operating permit covers all sources at the facility, including exempt sources.

S-1, Emergency Diesel Generator (1600 Amph. Parkway, Bldg 43), 605 hp
S-2, Emergency Diesel Generator (1600 Amph. Parkway, Bldg 41), 380 hp
S-3, Emergency Diesel Generator (1600 Amph. Parkway, Bldg 41), 605
S-4, Emergency Diesel Generator (at 1500 Plymouth Street), 170 hp
S-5, Emergency Diesel Generator (1500 Salado Dr.), 755 hp
S-6, Emergency Diesel Generator (1625 Charleston Rd), 750 hp
S-7, Emergency Diesel Generator (2000 Charleston Rd), 755 hp

S-8, Emergency Diesel Generator (1950 Charleston Rd), 830 hp
S-9, Emergency Diesel Generator (1400 Crittenden, Bldg 30), 207 hp
S-10, Emergency Diesel Generator (1500 Crittenden, Bldg 33), 755 hp
S-11, Emergency Diesel Generator(1200 Crittenden Lane), 207 hp
S-13, Emergency Diesel Generator (2081 Stierlin Ct.- Bdlg 11), 1502 hp
S-14, Emergency Diesel Generator (2081 Stierlin Ct. - Bldg 11), 1502 hp
S-15, Emergency Diesel Generator (1300 Crittenden Lane), 207 hp
S-17, Emergency Diesel Generator (900 Alta Avenue), 764 hp
S-18, Emergency Diesel Generator (1400 Crittenden), 900 hp
S-19, Emergency Diesel Generator (1400 Crittenden), 900 hp
S-21, 500KW Standby Generator (2015 Stierlin Court), 764 hp
S-26, 150 kw Emergency Generator (1010 Joaquin Road), 230 hp
S-29, LFG Fired IC Engine Genset (1708 Shoreline), 1341 hp
S-30, LFG Fired IC Engine Genset (2000 Charleston Rd), 1341 hp
S-32, Emergency Diesel Generator Set (1708 N Shoreline Blvd), 2937 hp
S-33, Emergency Diesel Generator Set (1225 Charleston Road), 175 hp
S-34, Emergency Diesel Generator Set (1708 N. Shoreline Blvd), 619 hp
S-35, Emergency Standby Diesel Generator Set (2017 Stierlin Ct), 364 hp
S-36, Emergency Diesel Generator Set (1215 Charleston Road), 37.5 hp (exempt)
S-37, Emergency Diesel Generator Set (1350 Shorebird Wy), 450 hp

The following conditions establish the federally enforceable permit terms to ensure that this plant is classified as a Synthetic Minor Facility under BAAQMD Regulation 2, Rule 6, Major Facility Review; and ensure that it is not subject to the permitting requirements of Title V of the Federal Clean Air Act as amended in 1990 and 40 CFR Part 70. All applications submitted by the applicant and all modifications to the plant's equipment after issuance of the synthetic minor permit must be evaluated to ensure that the facility will not exceed the synthetic minor general limits below and that sufficient monitoring, recordkeeping, and reporting requirements are imposed to ensure enforceability of the limits.

Any revision to a condition establishing this plant's status as a Synthetic Minor Facility or any new permit term that would limit emissions of a new or modified source for the purpose of maintaining the facility as a synthetic minor, must undergo the procedures pursuant to Regulation 2, Rule 6, section 423. The basis for the synthetic minor conditions is an emission limit for regulated air pollutants of 95 tons per year, an emission limit of 90,000 tons per year for greenhouse gases (on a CO2 equivalent or CO2e basis), an emission limit for a single HAP (hazardous air pollutant) of 9 tons per year, and an emission limit for a combination of HAPs of 23 tons per year.

Synthetic Minor Conditions:

1. The owner/operator shall in no event emit from this site exceeding any of the emission limits listed below.

NOx	95 tons/year
CO	95 tons/year
POC	95 tons/year
PM10	95 tons/year
SO2	95 tons/year
Any Single HAP	9 tons/year
Combination of HAPs	23 tons/year
CO2e	90,000 tons/year

The facility has successfully demonstrated that the facility wide potential to emit CO, POC, PM10, SO2 and HAPs are below the Title V emissions thresholds. However, the potential to emit NOx is above Title V emissions threshold and is subject to additional monitoring under the synthetic minor operating permit. The owner/operator shall ensure that the total emissions of NOx from all combustion equipment at the facility (including exempt sources and abatement devices) shall not exceed 95 tons, totaled over any consecutive twelve month period. (basis: Regulation 2-6-423.2)

2. The owner/operator shall demonstrate compliance with the emission limit for NOx as outlined below:

    a. Combustion Sources Fired by Landfill Gas: the owner/operator shall use hours of operation, bhp, and emission factor of 0.33 g/bhp-hr (Ref: source test report of 8/5/2010 test) for S-29 and 0.36 g/bhp-hr (Ref: source test report of 7/28/2011 test) for S-30 or the emission factors from the most current source test reports to calculate NOx emissions.
    b. Combustion Sources Fired by Diesel Fuel: the owner/operator shall use hours of operation, bhp, and emission factor of 0.031 lb/bhp-hr (Ref: US EPA AP-42, Table 3.3-1 & 3.3-2 for diesel engines 250 hp-600 hp) and 0.024 lb/bhp-hr (Ref: US EPA AP-42, Tables 3.4-1 to 3.4-4 for diesel engines >600 hp) to calculate NOx emissions.

Emissions of NOx from each source or source group shall be calculated and recorded on a monthly basis. Annual emissions shall be summarized on a rolling 12-month basis. All records required by the Synthetic Minor Operating Permit shall be kept on site and be available for inspection by BAAQMD personnel for at least 5 years from the date that a record was made. (basis: Regulation 2-6-423.2)

3. The owner/operator shall develop and maintain monitoring tables to clearly demonstrate compliance with the NOx Synthetic Minor Operating Permit limits on a rolling 12-month basis beginning with the first calendar month after the issuance of the Synthetic Minor Operating Permit. All monitoring tables shall be updated as applicable when equipment is added to or removed from the facility. The facility has the authority under the Synthetic Minor Operating Permit to make additions and deletions to equipment in the approved monitoring tables with prior approval of the BAAQMD provided that approved emissions factors and monitoring methodologies are followed. The BAAQMD has the authority at any time to require modifications to the monitoring tables as deemed necessary to improve the accuracy or clarity of monitored data. A copy of the monitoring tables and NOx emission calculation report demonstrating compliance with the NOx Synthetic Minor Operating Permit Limits shall be submitted to the District's Compliance & Enforcement Division on an annual basis. (basis: Regulation 2-6-423.2)

4. The requirement for fuel meters for Sources S29 and S30, Landfill Gas Engines, in BAAQMD Condition 21627, part 3, and the requirement for annual source testing for NOx in BAAQMD Condition 21627, part 12, are part of this synthetic minor condition. (basis: Regulation 2-6-503)

Condition 21627

For: S-29, and S-30: LFG Fired IC Engine Gensets

1. The IC Engine Gensets (S-29, and S-30) shall be fired exclusively on landfill gas delivered from the City of Mountain View's Shoreline Landfills. (Basis: Cumulative Increase)
2. The landfill gas throughput to each LFG-Fired IC Engine shall not exceed 247,295,000 std cubic feet (expressed as 40% methane) during any consecutive 12-month period. (Basis: Cumulative Increase)
3. District approved flow meters, to measure the total fuel gas flow rate into each IC Engine, shall be installed prior to any operation and shall be maintained in good working condition. (Basis: Regulation 8-34-508 and Cumulative Increase)
4. The concentration of total reduced sulfur compounds in the landfill gas burned shall not exceed 150 ppmv, expressed as H2S. (Basis: BACT and Cumulative Increase)
5. Nitrogen Oxide (NOx) emissions from each IC Engine shall not exceed an exhaust concentration level of 37 ppmv of NOx, corrected to 15% O2, dry basis, unless the Permit Holder demonstrates that NOx emissions will not exceed 0.6 grams of NOx (calculated as NO2) per brake horse-power-hour at a higher exhaust concentration level. (Basis: BACT and Cumulative Increase)
6. Carbon Monoxide (CO) emissions from each IC Engine shall not exceed an exhaust concentration level of 256 ppmv of CO, corrected to 15% O2, dry basis, unless the Permit Holder demonstrates that CO emissions will not exceed 2.5 grams of CO per brake-horsepower-hour at a higher exhaust concentration level. (Basis: BACT and Cumulative Increase)

7. The IC Engine shall comply with either the non-methane organic compound (NMOC) destruction efficiency requirements or the NMOC outlet concentration limit specified in Regulation 8-34-301.4. (Basis: Regulation 8-34-301.4, BACT, and Cumulative Increase).
8. To demonstrate compliance with Part 7 on an on-going basis, the average cylinder temperature in each of the IC Engines shall be maintained at a minimum of 538 degrees C, averaged over any 3-hour period. Each of the twenty cylinders in each engine shall be equipped with a thermocouple that continuously monitors the temperature of that cylinder. No more than four of the twenty engine cylinder thermocouples may be inoperable at any one time. The average temperature of these cylinders shall be computed and recorded at least once every fifteen minutes. This 15-minute average cylinder temperature data shall be used to compute and record the rolling 3-hour average cylinder temperature that is subject to the minimum limit specified above. (Basis: Regulation 8-34-509)
9. Formaldehyde emissions from each LFG-Fired IC Engine shall not exceed 0.57 pounds per hour per engine. (Basis: Regulation 2-5-302.3)
10. For each IC engine that is subject to Regulation 9-8-302, other than low usage engines that qualify for the Regulation 9-8-111.3 exemption from Regulation 9-8-302, the Permit Holder shall conduct the quarterly monitoring required by Regulation 9-8-503 during any quarter in which a source test is not performed. This quarterly monitoring for NOx, CO, and O2 concentrations in the engine exhaust shall be conducted using a portable analyzer in accordance with the requirements of Regulation 9-8-503. (Basis: Regulation 9-8-503)
11. For each IC engine, the Permit Holder shall conduct the following inspection, maintenance, and repairs in accordance with 40 CFR Part 63.6603(a) and Table 2d.11. The Permit Holder shall begin conducting these requirements by no later than October 19, 2013. (Basis: 40 CFR Part 63.6603(a) and Table 2d.11)
    a. Change oil and filter every 1,440 hours of operation or annually, whichever comes first;
    b. Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first; and
    c. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.
12. In order to demonstrate compliance with Parts 5, 6, 7, and 9 above and Regulations 8-34-301.4, 9-8-302.1, and 9-8-302.3, the Permit Holder shall ensure that a District approved source test is conducted on each IC Engine Genset annually. Annual source testing is not required for any engine that operated for less than 100 hours during the previous 12 month period. However, if an engine has not been tested in over 12 months and it resumes operating for more than 100 hours during a 12 month period, then a compliance demonstration source test shall be conducted on that engine within 60 days of the date that the engine exceeded 100 hours per year of operation. The Source Test Section of the District shall be contacted to obtain approval of the source test procedures at least 14 days in advance of each source test. The Source Test Section shall be notified of the scheduled test date at least 7 days in advance of each source test. The source test report shall be submitted to the Compliance and Enforcement Division within 60 days of the test date. The annual source tests shall determine or report the following data. (Basis:

BACT, Cumulative Increase, and Regulations 2-5-302, 8-34-301.4, 8-34-412, 9-8-302.1, and 9-8-302.3)

a. landfill gas flow rate to the IC Engine at standard conditions (FF, sdcfm);
b. concentrations (dry basis) of carbon dioxide (CO2), nitrogen (N2), oxygen (O2), methane (CH4), and non-methane organic compounds (NMOC) in the landfill gas burned by the IC Engine;
c. exhaust gas flow rate from the IC Engine, dry basis (Q, sdcfm);
d. concentrations (dry basis) of NOx, CO, CH4, NMOC, and O2 in the exhaust gas from the IC Engine;
e. concentration (dry basis) of formaldehyde in the exhaust from the IC Engine (Cf in ppmv, dry) and formaldehyde emission rate (FER) in units of pounds of formaldehyde emitted per hour;
f. CH4 and NMOC destruction efficiencies achieved by the IC Engine;
g. average engine cylinder temperature during the test period; and
h. power produced by each genset during the test period (kW) and bhp for each engine during the test period, calculated in accordance with District approved procedures.

13. In order to demonstrate compliance with Part 4 above and the AB-2588 Air Toxics Hot Spots Act, the Permit Holder shall ensure that a landfill characterization analysis is conducted at least once every four years concurrent with an annual source test. The landfill gas shall be analyzed for each of the organic and sulfur compounds listed below. The Source Test Section of the District shall be contacted to obtain approval of the source test procedures and analysis methods at least 14 days in advance of each source test. The Source Test Section shall be notified of the scheduled test date at least 7 days in advance of each source test. The laboratory report shall be submitted to the Compliance and Enforcement Division along with the source test report required by Part 10, within 60 days of the test date. (Basis: BACT, Cumulative Increase, Regulation 2-5-302, and AB-2588 Air Toxics Hot Spots Act)

Organic Compounds
acrylonitrile
benzene
carbon tetrachloride
chlorobenzene
benzyl chloride
chloroethane
chloroform
1,4 dichlorobenzene
ethyl benzene
ethylene dibromide
ethylene dichloride
ethylidene dichloride
hexane
isopropyl alcohol
methyl alcohol
methyl ethyl ketone
methylene chloride
MTBE

perchloroethylene
styrene
1,1,2,2 tetrachloroethane
toluene
1,1,1 trichloroethane
trichloroethylene
vinyl chloride
vinylidene chloride
xylenes

Sulfur Compounds
carbon disulfide
carbonyl sulfide
dimethyl sulfide
ethyl mercaptan
hydrogen sulfide
methyl mercaptan

14. The Permit Holder shall maintain the following records in a District approved logbook. All records shall be kept on site and shall be made available to the District staff upon request. All records shall be retained for at least 5 years from the date of entry. (Basis: BACT, Cumulative Increase, AB-2588 Air Toxics Hot Spots Act, and Regulations 2-5-302, 8-34-501.2, 501.4, 501.10, 501.11, and 501.12, 9-8-502, 9-8-530, and 40 CFR Part 63.6655)
    a. Dates and times of all start-ups and shutdowns for each IC Engine, the reason for each shutdown, and the total operating hours per month for each engine;
    b. On a monthly basis, record the total landfill gas flow rate to each IC Engine (corrected to standard conditions and 40% methane) for the month and for the previous 12-month period. Show any calculations needed to report the flow rate measured pursuant to Part 3 in units of standard cubic feet at 40% methane;
    c. On a monthly basis, identify any time periods when the average engine cylinder temperature was less than the Part 8 limit, discuss the reasons for or causes of each temperature excursion, and describe all actions taken to correct this excursion and to prevent future violations of the Part 8 temperature limit.
    d. Maintain records of all monitoring results, compliance demonstration test results, and laboratory analyses.
    e. If, after April 1, 2007, a qualifying CO test demonstrates that CO emissions from the IC Engine are greater than the Part 6 CO limit, then the Permit Holder shall begin keeping maintenance and repair records for the IC Engine. These maintenance and repair records shall include a description of each maintenance or repair activity that was conducted, the date(s) when the each maintenance or repair was conducted, the total engine downtime required to complete the maintenance or repair, and the engine operating time since the last maintenance or repair activity was conducted.
    f. Any engine being operated as a low usage engine that is exempt from the quarterly monitoring and annual source testing requirements of Parts 10 and 12 shall be equipped with a non-resettable totalizing meter that measures hours of operation or fuel usage.

g. By no later than October 19, 2013, the Permit Holder shall record the date and operating hours at which the Part 11 inspection and maintenance events are conducted on each engine. On a monthly basis, the Permit Holder shall calculate and record the operating hours since the last inspection and maintenance event for each engine.

PUBLIC COMMENT

In accordance with SIP Regulations 2-6-423.3 and 2-6-423.4, the BAAQMD's preliminary decision to issue a Synthetic Minor Operating Permit to Plant #15982 is subject to a 30-day public comment period and a 30-day EPA review period. A Notice Inviting Written Public Comment was published in the Mercury News newspaper on November 28, 2013. The BAAQMD also sent a notification of its preliminary decision to EPA Region IX and ARB. The comment period ended on January 3, 2014.

RECOMMENDATION

The BAAQMD is proposing to issue a Synthetic Minor Operating Permit to Plant #15982. In accordance with SIP Regulations 2-6-423.3 and 2-6-423.4, this preliminary decision is subject to a 30-day public comment period and a 30-day EPA review period. At the conclusion of the comment period, the BAAQMD will make a final decision on this matter after considering any comments received.

By: Signed
Dharam Singh, PE
Air Quality Engineer

Date: 11-14-13