

**Bay Area Air Quality Management District**

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**Permit Evaluation  
and  
Statement of Basis  
for**

**RENEWAL of  
MAJOR FACILITY REVIEW PERMIT**

**for  
GenOn Delta LLC, Pittsburg Generating Station  
Facility #A0012**

**Facility Address:**  
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Pittsburg, CA 94565

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March 2012

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Applications: 21136

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## **Permit Evaluation/Statement of Basis for Renewal of Major Facility Review Permit**

### **A. Background**

This facility is subject to the Operating Permit 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 Phase II Acid Rain facility as defined by BAAQMD Regulation 2-6-217 and because it is a “major facility” as defined by BAAQMD Regulation 2-6-212. It is an Acid Rain facility because it burns fossil fuel and serves a generator that is over 25 MW that is used to generate electricity for sale. It is a “major facility” because it has the potential to emit more than 100 tons per year of the following regulated air pollutants NO<sub>x</sub>, CO, PM<sub>10</sub>, and CO<sub>2</sub>.

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR Part 70 as contained in BAAQMD Regulation 2, Rule 6. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In addition, Phase II Acid Rain facilities must meet the requirements of Title IV of the federal Clean Air Act, Acid Rain, and the Acid Rain regulations in Parts 72 through 78 of Volume 40 of the Code of Federal Regulations. These regulations were adopted and incorporated by reference in BAAQMD Regulation 2, Rule 7, Acid Rain. The main provisions of the regulations for natural gas and distillate oil fired acid rain sources, such as the ones at this facility, are the requirement to obtain one SO<sub>2</sub> allowance for each ton of SO<sub>2</sub> that is emitted, stringent monitoring requirements for NO<sub>x</sub>, CO, CO<sub>2</sub>, and SO<sub>2</sub>, and stringent recordkeeping and reporting.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility identifier that consists of a letter and a 4-digit number. This identifier is also considered to be the identifier for the permit. The identifier for this facility is A0012.

This facility received its initial Major Facility Review permit on September 14, 1998 under Pacific Gas & Electric Company. The initial Title IV permit, which was incorporated into the Major Facility Review permit, was effective on January 1, 1998. This application is for a renewal of the Title IV and Title V permits. The standard sections of the permit have been upgraded to include new standard language used in all Title V permits. Also, various other corrections have been made to the permit. The proposed permit shows all changes to the permit in strikeout/underline format.

Mirant Delta LLC (formerly Southern Energy) took ownership of the facility from Pacific Gas & Electric Company on April 16, 1999. At that time, the Major Facility Review Permit for the

Pittsburg Power Plant facility was transferred from Pacific Gas & Electric Company to Mirant Delta, LLC.

The primary responsible official, secondary responsible official, and facility contact have changed.

All of these revisions are described below in the permit content section. The proposed permit shows all changes to the permit in strikeout/underline format.

The facility has submitted no applications since the Major Facility Review permit renewal was issued on April 15, 2005.

## **B. Facility Description**

The facility is a power plant that produces electrical power for commercial sale and distribution originally. The power plant includes three power generating units consisting of steam generating boilers, steam turbines, turbo generators and associated equipment. Boilers 5 and 6 (Units 5 and 6) were added to the plant in 1960 and 1961, respectively. Boiler 7 (Unit 7) began operating in 1972.

To comply with the Acid Rain Program, established in accordance with Title IV, PG&E installed and certified Continuous Emissions Monitoring Systems (CEMS) for all three boilers. These CEMS monitor NO<sub>x</sub> and CO emissions.

Boilers 5 through 7 at Pittsburg Power Plant are currently operating under the Advanced Technology Alternative Emission Control Plan (ATAECP) contained in BAAQMD Regulation 9-11-309. This plan specifies System wide NO<sub>x</sub> emission Rate Limits that are included in the current Major facility Review Permit for Pittsburg, Contra Costa, and Potrero Power Plants.

The 2005 plant inventory emissions were as follows:

Boilers	NO <sub>x</sub> (tons/yr)	CO (tons/yr)	SO <sub>2</sub> (tons/yr)	VOC (tons/yr)	PM (tons/yr)
S-5	211.5	751.8	11.4	31.2	56.8
S-6	213.8	695.4	10.5	28.9	52.6
S-7	457.3	688.0	10.4	28.6	52.0
Total	882.6	2135.2	32.3	88.7	161.4

The 2010 plant inventory emissions were as follows:

Boilers	NOx (tons/yr)	CO (tons/yr)	SO2 (tons/yr)	VOC (tons/yr)	PM (tons/yr)
S-5 (SCR)	32.2	138.7	2.1	4.7	10.5
S-6 (SCR)	28.3	110.0	1.7	3.8	8.3
S-7	19.7	47.5	0.7	1.6	3.6
Total	80.2	296.2	4.5	10.1	22.4

Total emission reductions between 2005 and 2010 are:

Pollutant	Emission Reduction (tons/yr)
NOx	802.4
CO	1839
SO2	27.8
VOC	78.6
PM	183.8

The emissions estimates above are based on the calculation in the District's database, which in turn are based on reported throughputs.

The facility also has miscellaneous maintenance sources, such as sandblasting, a gasoline service station, an emergency diesel generator, a paint spray operation, a solvent wipe cleaning operation, an oil-water separator, cooling towers, and a dissolved air floatation unit.

Aqueous ammonia is stored in three horizontal steel storage tanks. These tanks are sealed and pressurized; therefore ammonia emissions to the atmosphere from tank breathing and working loss are not expected.

### **C. Permit Content**

The legal and factual basis for the permit follows. The permit sections are described in the order presented in the permit.

#### **I. Standard Conditions**

This section contains administrative requirements and conditions that apply to all facilities. If the Title IV (Acid Rain) requirements for fossil-fuel fired electrical generating facilities or the accidental release (40 CFR § 68) programs apply, the section will contain a standard condition pertaining to these programs. Many of these conditions derive from 40 CFR § 70.6, Permit Content, which dictates certain standard conditions that must be placed in the permit. The language that the District has developed for many of these requirements has been adopted into the BAAQMD Manual of Procedures, Volume II, Part 3, Section 4, and therefore must appear in the permit.

The standard conditions also contain references to BAAQMD Regulation 1 and Regulation 2. These are the District's General Provisions and Permitting rules.

The facility is subject to Standard Condition I.K., Accidental Release, because of aqueous ammonia storage with 60,000 gallons capacity at 30% by weight.

**Changes to permit:**

- The amendment/adoption dates for the Administrative Requirements in I A will be updated.
- BAAQMD Regulation 2, Rule 5 New Source Review of Toxic Air Contaminants will be added to Standard Condition 1.A.
- SIP Regulation 2, Rule 6 – Permits, Major Facility Review will be added to Standard Condition 1.A.
- Standard Condition I.B.1 has been amended to state that the permit continues in force after the expiration date if a complete application has been submitted in accordance with the renewal deadlines. This is the "application shield" pursuant to BAAQMD Regulation 2-6-407.
- The reference in Standard Condition B11 will be changed from (MOP Volume II, Part 3, §4.11) to (Regulation 2-6-409.20; MOP Volume II, Part 3, §4.11).
- The reference in Standard Condition E2 will be changed from (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7) to from (Regulation 2-6-501; MOP Volume II, Part 3, §4.7)
- The reference in Standard Condition F will be changed from (BAAQMD Regulation 2-6-502; Regulation 3; MOP Volume II, Part 3, §4.7) to (BAAQMD Regulation 2-6-502; MOP Volume II, Part 3, §4.7)
- BAAQMD Regulation 2, Rule 6-307, Non-compliance, Major Facility Review will be added to Standard Conditions I B part 12.

**II. Equipment**

This section of the permit lists all permitted or significant sources. Each source is identified by an S and a number (e.g., S24).

Permitted sources are those sources that require a BAAQMD operating permit pursuant to BAAQMD Rule 2-1-302.

Significant sources are those sources that have a potential to emit of more than 2 tons of a “regulated air pollutant,” as defined in BAAQMD Rule 2-6-222, per year or 400 pounds of a “hazardous air pollutant,” as defined in BAAQMD Rule 2-6-210, per year. The facility has no exempt sources defined as “significant”.

Major Facility Review permits list all abatement (control) devices.

The equipment section is considered to be part of the facility description. It contains information that is necessary for applicability determinations, such as fuel types, contents or sizes of tanks, etc. This information is part of the factual basis of the permit.

Each of the permitted sources has previously been issued an authority to construct or a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. These permits are issued in accordance with state law and the District's regulations.

**Changes to permit:**

The SIP opacity limit for A-72, Dust Collector, has been added to show that Ringelmann 1.0 can be exceeded for only 3 min/hr.

**III. Generally Applicable Requirements**

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit. If a generally applicable requirement applies specifically to a source that is permitted or significant, the standard will also appear in Section IV and the monitoring for that requirement will appear in Sections IV and VII of the permit. Parts of this section apply to all facilities (e.g., particulate, architectural coating, odorous substance, and sandblasting standards). In addition, standards that apply to insignificant or unpermitted sources at a facility (e.g., refrigeration units that use more than 50 pounds of an ozone-depleting compound) are placed in this section.

Unpermitted sources are exempt from normal District permits pursuant to an exemption in BAAQMD Regulation 2, Rule 1. They may, however, be specifically described in a Major Facility Review permit if they are considered significant sources pursuant to the definition in BAAQMD Rule 2-6-239.

**Changes to permit:**

Language has been added to Section III to clarify that this section contains requirements that may apply to temporary sources. This provision allows contractors that have "portable" equipment permits that require them to comply with all applicable requirements to work at the facility on a temporary basis, even if the permit does not specifically list the temporary source. Examples are temporary sandblasting or soil-vapor extraction equipment.

Section III has been modified to state that SIP standards are now found on EPA's website and are not included as part of the permit.

Table III has been updated by adding the following rules and standards to conform to current practice:

- SIP Regulation 2, Rule 1-429, Federal Emissions Statement
- SIP Regulation 6, Particulate Matter and Visible Emission
- SIP Regulation 8, Rule 3, Organic Compounds – Architectural Coatings
- SIP Regulation 8, Rule 40, Organic Compound – Aeration of Contaminated Soil and Removal of Underground Storage Tank
- SIP Regulation 8, Rule 47, Organic Compound – Air Stripping and Soil Vapor Extraction Operations
- SIP Regulation 9, Rule 1, Sulfur Dioxide

The dates of adoption or approval of the rules and their "federal enforceability" status in Table III have also been updated.

#### **IV. Source-Specific Applicable Requirements**

This section of the permit lists the applicable requirements that apply to permitted or significant sources. These applicable requirements are contained in tables that pertain to one or more sources that have the same requirements. The order of the requirements is:

- District Rules
- SIP Rules (if any) are listed following the corresponding District rules. SIP rules are District rules that have been approved by EPA for inclusion in the California State Implementation Plan (SIP). SIP rules are "federally enforceable" and a "Y" (yes) indication will appear in the "Federally Enforceable" column. If the SIP rule is the current District rule, separate citation of the SIP rule is not necessary and the "Federally Enforceable" column will have a "Y" for "yes". If the SIP rule is not the current District rule, the SIP rule or the necessary portion of the SIP rule is cited separately after the District rule. The SIP portion will be federally enforceable; the non-SIP version will not be federally enforceable, unless EPA has approved it through another program
- Other District requirements, such as the Manual of Procedures, as appropriate
- Federal requirements (other than SIP provisions)
- BAAQMD permit conditions. The text of BAAQMD permit conditions is found in Section VI of the permit
- Federal permit conditions. The text of Federal permit conditions, if any, is found in Section VI of the permit

Section IV of the permit contains citations to all of the applicable requirements for particular sources. The text of the requirements is found in the regulations, which are readily available on the District's or EPA's websites, or in the permit conditions, which are found in Section VI of the permit. All monitoring requirements are cited in Section IV. Section VII is a cross-reference between the limits and monitoring requirements.

#### Complex Applicability Determinations

The facility is not subject to 112(j) of the Clean Air Act because it is not a major source of hazardous air pollutants.

#### S5 through S7, Boilers

The boilers are subject to the Acid Rain program contained in 40 CFR Parts 72 through 78 because they are utility units as defined in 40 CFR 72.2.

#### Changes to permit:

Section IV has been modified to state that SIP standards are now found on EPA's website and are not included as part of the permit.

The dates of adoption or approval of the rules and their "federal enforceability" status have been updated.

Source Specific Applicable Requirement Table II-B was split into two Tables. One for Sources S5 and S6, the other is for S7 alone because S5 and S6 have SCR units. Under current application #21136 both the Tables (Table II-A and Table II-B) have been combined. Source S-7 does not have a SCR but it can comply with all of the other regulations to which sources S-5 and S-6 are subjected.

S5 through S7, Electrical Generation Boilers:

Table IV-A has been updated to reflect new regulation adoption dates and by adding the following:

- BAAQMD Regulation 6, Rule 1, Particulate Matter and General Requirements
- SIP Regulation 6, Particulate Matter and Visible Emissions

More details are added to the citations for the following regulations.

- 40 CFR Part 72, Title IV Acid Rain Program
- 40 CFR Part 75, Code of Federal Regulation, Continuous Emissions Monitoring

The following rule is deleted from Table IV-A:

The boilers S-5 through S-7 used to be fired using diesel fuel oil during natural gas curtailment, but the facility stopped using diesel fuel oil after installing low NOx burners. The boilers are exclusively fired on natural gas. Therefore, BAAQMD Regulation 11, Rule 1, for hazardous air pollutants (Lead) is not applicable.

Table IV-B for Emergency Standby Diesel Engine Generator Set S-36, and Diesel Fire Pumps S-49, S-51 and S-53 has been updated by adding the following rules and standards:

- BAAQMD Regulation 6, Rule 1, Particulate Matter General Requirements
- SIP Regulation 6, Particulate Matter and Visible Emissions
- SIP Regulation 6, Particulate Matter and Visible Emissions
- BAAQMD Regulation 9, Rule 8, Inorganic Gaseous Pollutants – Nitrogen Oxides and Carbon Monoxide from Stationary Internal Combustion Engines
- 40 CFR Part 63, National Emissions Standards for Hazardous Air Pollutants for Source Categories, Subpart A – General Provisions
- 40 CFR Part 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)
- CCR, Title 17, Section 93115, ATCM for Stationary Compression Ignition Engines

The condition for Emergency Standby Diesel Engine Generator Set and Diesel Fire Pumps has been updated to Conditions #22820 and 22851, respectively.

Table IV-D for S-62, Oil – Water Separator and S-63 Dissolved Air Flotation Unit has been updated by adding the following rule:

- SIP Regulation 8, Rule 8, Organic Compounds, Wastewater (Oil-Water) Separator



This section will be updated after receipt of the compliance report.

## **VI. Permit Conditions**

The existing permit conditions are derived from previously issued District Authorities to Construct (A/C) or Permits to Operate (P/O). Permit conditions may also be imposed or revised as part of the annual review of the facility by the District pursuant to California Health and Safety Code (H&SC) § 42301(e), through a variance pursuant to H&SC § 42350 et seq., an order of abatement pursuant to H&SC § 42450 et seq., or as an administrative revision initiated by District staff. After issuance of the Title V permit, permit conditions will be revised using the procedures in Regulation 2, Rule 6, Major Facility Review. Permit conditions may also be derived from periodic monitoring requirements pursuant to BAAQMD Regulation 2-5-503, Monitoring.

Each permit condition is identified with a unique numerical identifier, up to five digits. Each part of the condition is also identified by a part number and each subpart is identified by a letter (for example, Condition 789, part 1a).

The regulatory basis is listed following each condition. The regulatory basis may be a rule or regulation. The District is also using the following terms for regulatory basis:

- **BACT:** This term is used for a condition imposed by the Air Pollution Control Officer (APCO) to ensure compliance with the Best Available Control Technology in Regulation 2-2-301
- **Cumulative Increase:** This term is used for a condition imposed by the APCO that limits a source's operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403
- **Offsets:** This term is used for a condition imposed by the APCO to ensure compliance with the use of offsets for the permitting of a source or with the banking of emissions from a source pursuant to Regulation 2, Rules 2 and 4
- **PSD:** This term is used for a condition imposed by the APCO to ensure compliance with a Prevention of Significant Deterioration permit issued pursuant to Regulation 2, Rule 2
- **TRMP:** This term is used for a condition imposed by the APCO to ensure compliance with limits that arise from the District's Toxic Risk Management Policy

Any changes to existing permit conditions are clearly shown in "strike-out/underline" format in the proposed permit. When the permit is issued, all "strike-out" language will be deleted and all "underline" language will be retained, subject to consideration of comments received

Condition #21654 has been replaced by condition #22820 for the Emergency Standby Diesel Engine Generator Set and by condition #22834 for the Diesel Fire Pumps.

## **VII. Applicable Limits and Compliance Monitoring Requirements**

This section of the permit is a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of monitoring, and type of monitoring. The applicable requirements for monitoring are completely contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

The District has reviewed all monitoring and has determined the existing continuous emission monitoring is adequate. For boilers equipped with SCR, the equipment needs to test for ammonia slip concentration quarterly as specified in BAAQMD Regulation 9-11-311.

The tables below contain only the limits for which there is no monitoring or inadequate monitoring in the applicable requirements. The District has examined the monitoring for other limits and has determined that monitoring is adequate to provide a reasonable assurance of compliance. Calculations for potential to emit will be provided in the discussion when no monitoring is proposed due to the size of a source.

Monitoring decisions are typically the result of a balancing of several different factors including: 1) the likelihood of a violation given the characteristics of normal operation, 2) degree of variability in the operation and in the control device, if there is one, 3) the potential severity of impact of an undetected violation, 4) the technical feasibility and probative value of indicator monitoring, 5) the economic feasibility of indicator monitoring, and 6) whether there is some other factor, such as a different regulatory restriction applicable to the same operation, that also provides some assurance of compliance with the limit in question.

These factors are the same as those historically applied by the District in developing monitoring for applicable requirements. It follows that, although Title V calls for a re-examination of all monitoring, there is a presumption that these factors have been appropriately balanced and incorporated in the District's prior rule development and/or permit issuance. It is possible that, where a rule or permit requirement has historically had no monitoring associated with it, no monitoring may still be appropriate in the Title V permit if, for instance, there is little likelihood of a violation. Compliance behavior and associated costs of compliance are determined in part by the frequency and nature of associated monitoring requirements. As a result, the District will generally revise the nature or frequency of monitoring only when it can support a conclusion that existing monitoring is inadequate.

Boilers S5 through S7;

The requirements for boilers S5 through S7 are similar. Therefore, Table VII-B has been deleted and the source S-7 has been added to Table VII-A.

S36, Diesel Emergency Generator, and S49, S51 and S53, Diesel Fire Pumps:

The operating conditions for the emergency standby diesel engine generator set and the fire pumps have been changed to meet the current ATCM and District Regulations. The reliability

related testing hours for the emergency standby diesel engine and the fire pumps has been changed from 200 hours per year to 20 hours per year and 34 hours per year respectively.

PM Sources

<b>S# &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S5 through S7, Boilers	BAAQMD Regulation 6-1-301	Ringelmann 1.0 for less than 3 min/hr	None
S5 through S7, Boilers	SIP Regulation 6-301	Ringelmann 1.0 for less than 3 min/hr	None
S5 through S7, Boilers	BAAQMD Regulation 6-1-304	Ringelmann 2.0 or greater than 40% opacity for less than 3 min/hr during tube cleaning	None
S5 through S7, Boilers	SIP Regulation 6-304	Ringelmann 2.0 or greater than 40% opacity for less than 3 min/hr during tube cleaning	None
S5 through S7, Boilers	BAAQMD Regulation 6-1-310.3	0.15 gr/dscf	None
S5 through S7, Boilers	SIP Regulation 6-310.3	0.15 gr/dscf	None
S36, EMERGENCY GENERATOR , AND S49, S51, S53, DIESEL FIRE PUMPS	BAAQMD Regulation 6-1-303.1	Ringelmann 2.0 for less than 3 min/hr	None
S36, EMERGENCY GENERATOR , AND S49, S51, S53, DIESEL FIRE PUMPS	SIP Regulation 6-303.1	Ringelmann 2.0 for less than 3 min/hr	None
S36, EMERGENCY GENERATOR , AND S49, S51, S53, DIESEL FIRE PUMPS	BAAQMD Regulation 6-1-310.1	0.15 gr/dscf	None
S36, EMERGENCY GENERATOR , AND S49, S51, S53, DIESEL FIRE PUMPS	SIP Regulation 6-310.1	0.15 gr/dscf	None
S-72 SAND BLASTING	BAAQMD Regulation 6-1-301	Ringelmann 1 for less than 3 min/hr	Differential Pressure Failure Warning System
S-72 SAND BLASTING	SIP Regulation 6-301	Ringelmann 1 for less than 3 min/hr	Differential Pressure Failure Warning System
S-72 SAND BLASTING	BAAQMD Regulation 6-1-310	NO emissions from source > 0.15 grains per dscf of gas volume	Differential Pressure Failure Warning System
S-72 SAND BLASTING	SIP Regulation 6-1-310	NO emissions from source > 0.15 grains per dscf of gas volume	Differential Pressure Failure Warning System

PM Sources

<b>S# &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
COOLING TOWERS	BAAQMD Regulation 6-1-301	Ringelmann 1.0 for less than 3 min/hr	None
COOLING TOWERS	SIP Regulation 6-301	Ringelmann 1.0 for less than 3 min/hr	None
COOLING TOWERS	BAAQMD Regulation 6-1-310	0.15 gr/dscf	None
COOLING TOWERS	BAAQMD Regulation 6-310	0.15 gr/dscf	None

**PM Discussion:**

**BAAQMD Regulation 6 “Particulate Matter and Visible Emissions”**

Visible Emissions

The Title IV Acid Rain regulation, 40 CFR 75, exempts gas-fired equipment from the requirement for opacity monitoring.

Moreover, in EPA's June 24, 1999 agreement with CAPCOA and ARB, "Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP", EPA has agreed that natural-gas-fired combustion sources do not need additional monitoring to verify compliance with Regulation 6, Visible Emissions. Therefore, no monitoring is necessary for this requirement.

Particulate Weight Limitation

BAAQMD Regulation 6-310 limits filterable particulate (FP) emissions from any source to 0.15 grains per dry standard cubic foot (gr/dscf) of exhaust volume. Section 310.3 limits filterable particulate emissions from “heat transfer operations” to 0.15 gr/dscf @ 6% O<sub>2</sub>. These are the “grain loading” standards.

S5 through S7, Boilers

S5 through S7, Boilers are subject to BAAQMD Regulation 6-310.3, 0.15 gr/dscf PM @ 6% O<sub>2</sub>. No monitoring has been imposed because the margin of compliance is high, as shown by the following calculation.

### Natural Gas

The AP-42 factor for natural gas combustion is 7.6 lb/million standard cubic feet of natural gas (MMscf).

Converting to an emission factor per MMbtu:

$$(7.6 \text{ lb/MMscf}) \times (\text{MMscf}/1,050 \text{ MMbtu}) = 0.00724 \text{ lb/MMbtu}$$

The flue gas production rate for natural gas at 0% oxygen is 8,710 dscf. At 6% oxygen, the production rate is:

$$(20.9/20.9-6) (8710 \text{ dscf}) = 12,217 \text{ dscf}$$

The calculated particulate loading is:

$$(0.00724 \text{ lb PM/MMbtu}) \times (7000 \text{ gr/lb}) / (12,217 \text{ dscf/MMbtu}) = 0.004 \text{ gr/dscf}$$

The ratio of the limit to the calculated grain loading is 37.5:1; therefore, no additional monitoring is necessary to assure compliance.

### S36, Diesel Emergency Generator, and S49, S51 and S53, Diesel Fire Pumps

In accordance with the June 24, 1999 "Periodic Monitoring Recommendations for Generally Applicable Requirements" prepared by the CAPCOA/CARB/EPA Region IX periodic monitoring workgroup, no opacity monitoring is required for diesel standby and emergency reciprocating engines. In accordance with the July 2001 "CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources," non-utility distillate-oil-fueled emergency piston-type IC engines are not required to monitor engine exhaust but must maintain records of all engine usage only.

### S-72, Sand Blasting

The description of the limit for SIP 6-301 and 6-310 has been added. The opacity is monitored using the differential pressure failure warning system.

### **Cooling Towers**

BAAQMD Regulation 6-301 limits visible emissions to no darker than 1.0 on the Ringelmann Chart (except for periods or aggregate periods less than 3 minutes in any hour). Particulate emissions from cooling towers come from dissolved solids in the cooling tower water and are therefore expected to be fairly constant and not subject to operational control.

BAAQMD Regulation 6-310 limits filterable particulate (FP) emissions from any source to 0.15 grains per dry standard cubic foot (gr/dscf) of exhaust volume. As shown in the following calculation, the worst-case grain loading from the Cooling Tower is much less than 0.15 grains per dscf. Therefore, no monitoring is required to ensure compliance with this limit for cooling towers.

Cooling water circulation rate	186,000 gpm from each tower
Drift rate	0.02% taken from AP-42, Table 13.4-1
Maximum total dissolved solids	24,000 ppm taken from AP-42, Table 13.4-2
Minimum Exhaust gas flow rate:	15,916,952 dscfm from each tower

Cooling tower drift:

$$(186,000 \text{ gal/min})(60 \text{ min/hr})(8.34 \text{ lb/gal})(0.0002) = 18,614.9 \text{ lb/hr}$$

$$\begin{aligned} \text{Max. PM10 emission rate} &= (18,614.9 \text{ lb/hr})(24,000 \text{ ppm})/10^6 \\ &= 446.7 \text{ lb/hr} \end{aligned}$$

$$\begin{aligned} \text{Grain loading} &= (446.7 \text{ lb/hr})(\text{hr}/60 \text{ min})(7000 \text{ gr/lb})/(15,916,952 \text{ dscfm}) \\ &= 0.0032 \text{ gr/dscf} \end{aligned}$$

It can be seen from above that the worst-case grain loading rate from each of the cooling tower is much less than Regulation 6-310 limit. Since the grain loading is so low, the cooling tower is not expected to have visible emissions. In addition, a search in the District's database revealed that Mirant Delta has no violation or complaints in regard to particulate emissions. Therefore, the District is satisfied that additional periodic monitoring requirements to assure compliance with Regulation 6-310 for the two cooling towers are not necessary.

### SO<sub>2</sub> Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S5 through S7, Boilers	BAAQMD 9-1-301	Ground level concentrations of SO <sub>2</sub> shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive minutes AND 0.05 ppm averaged over 24 hours	None
S5 through S7, Boilers	BAAQMD 9-1-302	300 ppm (dry)	None
S36, Emergency Diesel Generator; S49, S51 and S-53 Diesel Fire Pumps	BAAQMD 9-1-304	Liquid fuel < 0.5% wt. sulfur	None

## **SO2 Discussion:**

### BAAQMD Regulation 9-1-301

Area monitoring to demonstrate compliance with the ground level SO<sub>2</sub> concentration requirements of Regulation 9-1-301 is at the discretion of the APCO (per BAAQMD Regulation 9-1-501). This facility does not have equipment that emits large amounts of SO<sub>2</sub> and therefore is not required to have ground level monitoring by the APCO.

All facility combustion sources are subject to the SO<sub>2</sub> emission limitations in District Regulation 9, Rule 1 (ground-level concentration and emission point concentration). In EPA's June 24, 1999 agreement with CAPCOA and ARB, "Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP", EPA has agreed that natural-gas-fired combustion sources do not need additional monitoring to verify compliance with Regulation 9, Rule 1, since violations of the regulation are unlikely. Therefore, no monitoring is necessary for this requirement for S5 through S7, Boilers, which will exclusively burn natural gas.

The limit for sources that burn liquid fuel is 0.5% of sulfur by weight in fuel according to BAAQMD Regulation 9-1-304. The standard monitoring for this limit is fuel certification.

No monitoring is required because the diesel fuel now contains only 15 ppm sulfur.

#### Lead Sources:

The boilers are exclusively fired on natural gas. Therefore, there will be no lead emissions.

- The BAAQMD Regulation 11, Rule 1, for Lead has been removed from Table VII-A

### S36, Diesel Emergency Generator; S49, S51 and S53 Diesel Fire Pumps

The standby emergency reciprocating diesel engine and fire pumps use low-sulfur fuels. Also, these engines are used infrequently and therefore, are not large source of SO<sub>2</sub> emissions. All the Diesel Engines will utilize "California" diesel fuel. Therefore, monitoring is not required.

<b><u>NOx Sources</u></b>			
<b>S# &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S5 through S7, Boilers	BAAQMD 9-3-301	175 ppmv @ 3% O <sub>2</sub> , dry	CEM
S5 through S7, Boilers	BAAQMD 9-11-308	0.28 lbs/MMBtu system wide average over previous 30 days	CEM

**NOx Discussion:**

**BAAQMD Regulation 9 Rule 11**

The boilers are subject to the NOx monitoring requirement in District Regulation 1, Rule 520.1 and the NOx emission limitations in District Regulation 9, Rule 11 (Monitoring and Record Keeping Requirements). This facility has boilers with a heat input rate greater than 250 MMBtu/hr. Therefore, it is required to have Continuous Emission Monitoring (CEM) (BAAQMD Regulation 1-520.1)

<b><u>CO Sources</u></b>			
<b>S# &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S5 through S7, Boilers	BAAQMD 9-11-310.1	400 ppmv @ 3% O <sub>2</sub> , dry during steady state compliance tests	CEM
S5 through S7, Boilers	BAAQMD 9-11-310.2	1000 ppmv @ 3% O <sub>2</sub> dry during normal operation on a clock hour average	CEM

**CO Discussion:**

**BAAQMD Regulation 9 Rule 7**

The boilers are subject to the CO emission limitations in District Regulation 9, Rule 11 (Monitoring and Recordkeeping Requirements). The CO limit prescribed in BAAQMD 9-11-310 is 400 ppmv @ 3% O<sub>2</sub>. This facility has equipment that can emit large amounts of CO. Therefore, regulation requires CEM monitoring.

<b><u>POC Sources</u></b>			
<b>S# &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S-58 Service Station	BAAQMD Regulation 8-7-301.10	Installed & modified only if the system is 98% controlled or highest vapor recovery rate specified by CARB	CARB Re-Certification
S-58 Service Station	BAAQMD Regulation 8-7-301.6	Leak Free & Vapor Tight on Phase I equipment	Source Test
S-58 Service Station	BAAQMD Regulation 8-7-302.14.2	Dynamic back pressure < 0.15, 0.45, 0.95 water when measure nitrogen flow rate of 20, 60 and 100 CFH	Source Test
S-62 Oil Water Separation and S-63 Dissolved Air Flotation Unit (DAF)	BAAQMD Regulation 8-8-112	1.0 ppm critical organic compounds	Sampling
S-62 Oil Water Separation and S-63 Dissolved Air Flotation Unit (DAF)	SIP Regulation 8-8-112	1.0 ppm critical organic compounds	Sampling
S-70 Paint Spray Operation	BAAQMD Regulation 8-3-301	VOC Contain Limits Table 1	Labeling
S-70 Paint Spray Operation	BAAQMD Regulation 8-3-301	VOC Contain Limits Table 2	Labeling
S-70 Paint Spray Operation	SIP Regulation 8-3-301	content of coating less than 250 grams per liter	Labeling
S-70 Paint Spray Operation	BAAQMD Regulation 8-3-302.14	content of coating less than 250 grams per liter	Labeling
S-70 Paint Spray Operation	BAAQMD Regulation 8-3-302.2	content of coatings < specified VOC content	Labeling
S-70 Paint Spray Operation	SIP Regulation 8-3-302	content of coatings < specified VOC content	Labeling
S-70 Paint Spray Operation	BAAQMD Regulation 8-3-304	content of coatings < specified VOC content	Labeling
S-70 Paint Spray Operation	BAAQMD Regulation 8-19-302	content of air dried coating < 2.8 lb/gal	Records
S-70 Paint Spray Operation	BAAQMD Regulation 8-19-312	content of coatings < specified VOC content	Records
S-70 Paint Spray Operation	BAAQMD Permit Condition #8425 Part #1	6500 gallons in any 12 consecutive months	Records

<b><u>POC Sources</u></b>			
<b>S# &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S-70 Paint Spray Operation	BAAQMD Permit Condition #8425 Part #2	500 gallons in any 12 consecutive months	Records
S-71 Solvent Wipe Cleaning Operation	SIP 8-16-304	Trichloroethylene usage $\leq$ 3.2 gallons per day	Records
S-71 Solvent Wipe Cleaning Operation	BAAQMD Permit Condition #8427 Part #1	150 gallons in any 12 consecutive months	Records

**POC Discussion:**

**S-58, Service Station**

The Phase-II vapor recovery system shall meet Regulation 8-7-302. The dynamic back pressure should be less than or equal to 0.15, 0.45 and 0.95 inches of water when measured at nitrogen flow rate of 20, 60, and 100 CFH respectively. The dynamic back pressure is monitored through source test.

**S-62 Oil Water Separation and S-63 Dissolved Air Flotation Unit (DAF)**

The VOC emissions at S-62 are monitored through sampling. BAAQMD Regulation 8-8-112 limits the concentration of critical organic compound to less than 1.0 ppm (volume). To monitor the concentration, samples are collected on a semi-annual basis.

**S-70 Paint Spray Operation**

The VOC emissions at source S-70 (Paint Spray Operation) are monitored through monitoring and record keeping regulations.

**S-71 Solvent Wipe Cleaning Operation**

The wipe cleaning solvent usage are recorded and the emissions are monitored through the monitoring and record keeping

**VIII. Test Methods**

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements.

If a rule or permit condition requires ongoing testing, the requirement will also appear in Section IV of the permit.

**Changes to permit**

Table VIII will be changed as follows:

- BAAQMD 9-11-302.1.2 has been removed.
- BAAQMD 9-11-302.1.3 has been removed.
- BAAQMD 11-1-301 has been removed.

**IX. Revision History**

Changes in the permit since 1998 were documented.

**X. Glossary**

Additions and corrections have been made to the glossary.

**XI. Title IV Acid Rain Permit**

The Title IV Acid Rain permit is contained in the Title V permit. 40 CFR 75 requires that it contain the following elements:

- Statement of Basis
- SO<sub>2</sub> allowance allocations and NO<sub>x</sub> requirements, if any
- Any comments, notes or justifications regarding permit decisions
- The permit application (attached at the end of the Title V permit)

Changes to permit

The dates, name of BAAQMD Air Pollution Control Officer and Designated Representative have been changed. Sources 1 through 4, Boilers, have been deleted since they have been shut down. The note about changes to 40 CFR Part 73 Tables 2, 3, and 4 has been deleted since the number of allowances allocated to the remaining boiler has not been changed.

	<b>Year</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
BOILER 5 BAAQMD S-5	SO <sub>2</sub> allowances under Tables 2, 3, or 4 of 40 CFR Part 73	285*	285*	285*	285*	285*
	NO <sub>x</sub> Limit	This unit is not subject to the NO <sub>x</sub> requirements from 40 CFR Part 76 as this unit is not capable of firing on coal.				

	<b>Year</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
BOILER 7 BAAQMD S-7	SO <sub>2</sub> allowances under Tables 2, 3, or 4 of 40 CFR Part 73	740*	740*	740*	740*	740*
	NO <sub>x</sub> Limit	This unit is not subject to the NO <sub>x</sub> requirements from 40 CFR Part 76 as this unit is not capable of firing on coal.				

	<b>Year</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
	SO <sub>2</sub> allowances under Tables 2, 3, or 4 of 40 CFR Part 73	740*	740*	740*	740*	740*
BOILER 7 BAAQMD S-7	NOx Limit	This unit is not subject to the NOx requirements from 40 CFR Part 76 as this unit is not capable of firing on coal.				

**XII. Title IV Permit Application**

The Title IV Permit Application is considered part of the Title IV permit and therefore, is attached to the permit.

#### **D. Alternate Operating Scenarios:**

No alternate operating scenario has been requested for this facility.

#### **E. Permit Shield**

The District rules allow two types of permit shields. The permit shield types are defined as follows: (1) A provision in a major facility review permit that identifies and justifies specific federally enforceable regulations and standards are not applicable to a source or group of sources, or (2) A provision in a major facility review permit that identifies and justifies specific federally enforceable applicable requirements for monitoring, recordkeeping and/or reporting which are subsumed because other applicable requirements for monitoring, recordkeeping, and reporting in the permit will assure compliance with all emission limits.

The second type of permit shield is allowed by EPA's White Paper 2 for Improved Implementation of the Part 70 Operating Permits Program. The District uses the second type of permit shield for all streamlining of monitoring, recordkeeping, and reporting requirements in Major Facility Review permits. The District's program does not allow other types of streamlining in Major Facility Review permits.

This facility has no permit shields.

#### **F. Compliance Status:**

An office memorandum dated March 5, 2012, from the Director of Compliance and Enforcement to the Director of Engineering, presents a review of the compliance record of Mirant Delta (Site A0012). The Compliance and Enforcement Division staff has reviewed the records for the period from April 15, 2005 through March 5, 2012. This review was initiated as part of the District evaluation of an application by the facility for a Title V permit renewal. During the period subject to review, activities known to the District include:

- The District issued one Notice of Violation during this review period
- The District received two complaints alleging Mirant Delta as the source. The complaints were investigated by District staff and were not confirmed.
- During this review period, the facility reported seven instances of Reportable Compliance Activities (RCA). No Notices of Violation were issued in response to these RCAs.
- There are no enforcement agreements, variances or abatement orders for Mirant Delta

The District has concluded that no schedule of compliance or changed in permit terms is necessary beyond what is already contained in the facility's current Title V permit. The compliance report with further details is attached in Appendix B.

## **APPENDIX A**

### **GLOSSARY**

**ACT**

Federal Clean Air Act

**APCO**

Air Pollution Control Officer

**AP-42**

EPA's Compilation of Air Pollutant Emission Factors

**ARB**

Air Resources Board

**BAAQMD**

Bay Area Air Quality Management District

**BACT**

Best Available Control Technology

**Basis**

The underlying authority that allows the District to impose requirements.

**CAA**

The federal Clean Air Act

**CAAQS**

California Ambient Air Quality Standards

**CAPCOA**

California Air Pollution Control Officers Association

**CEQA**

California Environmental Quality Act

**CFR**

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

**CO**

Carbon Monoxide

**Cumulative Increase**

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Cumulative increase is used to determine whether threshold-based requirements are triggered.

**District**

The Bay Area Air Quality Management District

**dscf**

Dry Standard Cubic Feet

**EPA**

The federal Environmental Protection Agency.

**Excluded**

Not subject to any District regulations.

**Federally Enforceable, FE**

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (MACT), and Part 72 (Permits Regulation, Acid Rain), including limitations and conditions contained in

operating permits issued under an EPA-approved program that has been incorporated into the SIP.

**FP**

Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

**HAP**

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by 40 CFR Part 63.

**IERC**

Interchangeable Emission Reduction Credit, as defined by BAAQMD Regulation 2-9-212.

**Major Facility**

A facility with potential emissions of: (1) at least 100 tons per year of regulated air pollutants, (2) at least 10 tons per year of any single hazardous air pollutant, and/or (3) at least 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity of hazardous air pollutants as determined by the EPA administrator.

**MFR**

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Federal Clean Air Act and implemented by District Regulation 2, Rule 6.

**MOP**

The District's Manual of Procedures.

**NAAQS**

National Ambient Air Quality Standards

**NESHAPS**

National Emission Standards for Hazardous Air Pollutants. See in 40 CFR Parts 61 and 63.

**NMHC**

Non-methane Hydrocarbons (Same as NMOC)

**NMOC**

Non-methane Organic Compounds (Same as NMHC)

**NO<sub>x</sub>**

Oxides of nitrogen.

**NSPS**

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Federal Clean Air Act, and implemented by 40 CFR Part 60 and District Regulation 10.

**NSR**

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. Mandated by Title I of the Federal Clean Air Act and implemented by 40 CFR Parts 51 and 52 and District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

**Offset Requirement**

A New Source Review requirement to provide federally enforceable emission offsets for the emissions from a new or modified source. Applies to emissions of POC, NO<sub>x</sub>, PM<sub>10</sub>, and SO<sub>2</sub>.

**Phase II Acid Rain Facility**

A facility that generates electricity for sale through fossil-fuel combustion and is not exempted by 40 CFR 72 from Titles IV and V of the Clean Air Act.

**POC**

Precursor Organic Compounds

**PM**

Particulate Matter

**PM10**

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

**PSD**

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of those air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

**SIP**

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

**SO2**

Sulfur dioxide

**THC**

Total Hydrocarbons (NMHC + Methane)

**Title V**

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

**TOC**

Total Organic Compounds (NMOC + Methane, Same as THC)

**TPH**

Total Petroleum Hydrocarbons

**TRMP**

Toxic Risk Management Plan

**TSP**

Total Suspended Particulate

**VOC**

Volatile Organic Compounds

**Units of Measure:**

bhp	=	brake-horsepower
btu	=	British Thermal Unit
cfm	=	cubic feet per minute
g	=	grams
gal	=	gallon
gpm	=	gallons per minute
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m2	=	square meter
min	=	minute
mm	=	million
MMbtu	=	million btu
MMcf	=	million cubic feet
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

**APPENDIX B**  
**Compliance Report**

**COMPLIANCE & ENFORCEMENT DIVISION**

**Inter-Office Memorandum**

**March 5, 2012**

TO: JIM KARAS – DIRECTOR OF ENGINEERING *SK 3/12/12*  
FROM: BRIAN BATEMAN – DIRECTOR OF COMPLIANCE & ENFORCEMENT *BB 3/8/12*  
SUBJECT: REVIEW OF COMPLIANCE RECORD OF:

**MIRANT DELTA, LLC/ PITTSBURG POWER PLANT; SITE #A0012**

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**Background**

This review was initiated as part of the District evaluation of an application by MIRANT DELTA, LLC/ PITTSBURG POWER PLANT for a Title V Permit Renewal. It is standard practice of the Compliance and Enforcement Division to undertake a compliance record review in advance of a renewal of a Title V Permit. The purpose of this review is to ensure that any non-compliance problems identified during the prior five-year permit term have been adequately addressed, or, if non-compliance persists, that a schedule of compliance is properly incorporated into the Title V permit. In addition, the review checks for patterns of recurring violation that may be addressed by additional permit terms. Finally, the review is intended to recommend, if necessary, any additional permit conditions and limitations to improve compliance.

MIRANT DELTA, LLC/ PITTSBURG POWER PLANT is a 2,022 megawatt natural gas-fired plant, built in 1954, and expanded in the 1970's with the addition of the 700 megawatt Unit 7. MIRANT DELTA, LLC/ PITTSBURG POWER PLANT operates three large natural gas boilers. Continuous Emission Monitors are in place to measure applicable pollutants.

**Compliance Review**

**1. Violation History**

Staff reviewed MIRANT DELTA, LLC/ PITTSBURG POWER PLANT Annual Compliance Certifications from 4/15/05 to 3/5/12 and found no ongoing non-compliance and no recurring pattern of violations. During this period MIRANT DELTA, LLC/ PITTSBURG POWER PLANT received 1 notice of violation (NOV) for two infractions. This NOV was a single day occurrence and compliance was achieved the same day, as described below.

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COMPLIANCE REVIEW OF  
MIRANT DELTA, LLC; SITE #A0012  
March 5, 2012  
Page 2 of 2

NOV#	Regulation	Date Occur	# of Days	Comments	Disposition
A47854B	2-6-307	5/18/05	1	Exceeded permit conditions	Cancelled
A47854A	9-11-309	5/18/05	1	Excess NOx	Resolved

## 2. Complaint History

The District received two air pollution complaints alleging MIRANT DELTA, LLC/ PITTSBURG POWER PLANT as the source from 4/15/05 to 2/22/12. One complaint alleged excessive dust from the facility and another alleged improper asbestos removal. The complaints were investigated by District staff and were not confirmed.

## 3. Reportable Compliance Activity

Reportable Compliance Activity (RCA), also known as "Episode" reporting, is the reporting of compliance activities involving a facility as outlined in District Regulations and State Law. Reporting covers breakdown requests, indicated monitor excesses, pressure relief device releases, inoperative monitor reports and flare monitoring.

During the period, 6/26/07-3/5/12, the District received 7 notifications for RCA's. 0 NOV's were issued as a result of these RCA's.

## 4. Enforcement Agreements, Variances, or Abatement Orders

There were no enforcement agreements, variances, or abatement orders for MIRANT DELTA, LLC/ PITTSBURG POWER PLANT during the period, 4/15/05 to 3/5/12.

## Conclusion

Following its review of all available facility and District compliance records from the date of issuance of MIRANT DELTA, LLC/ PITTSBURG POWER PLANT's last Title V permit renewal until the present (4/15/05 to 3/5/12), the District's Compliance and Enforcement Division has determined that the facility was in compliance. MIRANT DELTA, LLC/ PITTSBURG POWER PLANT has demonstrated no evidence of ongoing non-compliance and no recurring pattern of violations that would warrant consideration of a Title V permit compliance schedule for this facility.

Based on this review, the District has concluded that no schedule of compliance or change in permit terms is necessary beyond what is already contained in the facility's current Title V permit.

RJS 3/5/12