TECHNICAL SUPPORT DOCUMENT

TECHNICAL INFORMATION PRESENTED IN REVIEW OF A REOPEN FOR CAUSE TO MAKE CORRECTIONS TO A PART 70 OPERATING PERMIT

SUBMITTED BY

Clark County Department of Air Quality

For

CC Landfill Energy, LLC

Part 70 Operating Permit Number: 16539
SIC Code 4931: Electric Generation
NAICS Code 221119: Other Electrical Power Generation

Clark County Department of Air Quality
Permitting Division

December, 2016

EXECUTIVE SUMMARY

CC Landfill Energy LLC (CCLE) is located within the boundaries of the Apex Waste Management site. The legal description of the source location is: portions of T18S, R63E, Section 24 in Apex Valley, County of Clark, State of Nevada. CCLE is situated in the Garnet Valley Hydrographic Basin 216. Garnet Valley is designated as attainment for all regulated air pollutants.

The source operates two 5.334 MW landfill gas turbines with Selective Catalytic Reduction (SCR) and one flare (with propane pilot fuel) for combustion of landfill gas (LFG) during the siloxane removal system regeneration cycle. The two gas turbines are subject to the regulatory requirements of 40 CFR Part 60, Subpart KKKK. The source is categorized under SIC Code 4911: Electrical Services and NAICS Code 221119: Other Electrical Power Generation. CCLE is a Major Part 70 Source for CO and is minor for PM_{10}, $PM_{2.5}$, NO_x, SO_2, VOC and HAP. The CCLE is a source of greenhouse gases (GHG). The facility potential to emit (PTE) as follows:

PM_{10}	$PM_{2.5}$	NO_x	CO	SO_2	VOC	HAP	CO_2e
13.32	**13.32**	**63.23**	**129.2**	**23.51**	**18.47**	**0.84**	99,233.14

The Clark County Department of Air Quality (Air Quality) has delegated authority to implement the requirements of the Part 70 Operating Permit (OP) program.

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I. ACRONYMS and ABBREVIATIONS

Table I-1: Acronyms and Abbreviations

Term	
Air Quality	Clark County Department of Air Quality
AQR	Clark County Air Quality Regulations
ATC	Authority to Construct
CAAA	Clean Air Act, as amended
CFR	United States Code of Federal Regulations
GHG	Green House Gases
CO	Carbon Monoxide
CTG	Combustion Turbine-Generator
EPA	United States Environmental Protection Agency
EU	Emission Unit
HAP	Hazardous Air Pollutant
HP	Horse Power
kW	kilowatt
LHV	Lower Heating Value
MMBtu	Millions of British Thermal Units
M/N	Model Number
MW	Megawatt
NAICS	North American Industry Classification System
NO_x	Nitrogen Oxides
NRS	Nevada Revised Statutes
OP	Operating Permit
PM_{10}	Particulate Matter less than 10 microns
ppm	Parts per Million
ppmvd	Parts per Million, Volumetric Dry
PTE	Potential to Emit
SCR	Selective Catalytic Reduction
scf	Standard Cubic Feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
S/N	Serial Number
SO_x	Sulfur Oxides
VOC	Volatile Organic Compound

II. SOURCE INFORMATION

A. General

Permittee	CC Landfill Energy LLC
Address (Mailing/Billing):	5429 Harding Highway, Building 500, Mays Landing, New Jersey 08330
Source Name:	CC Landfill Energy LLC
Source Address:	Apex Waste Management Center, Apex, Nevada 89165
Contact:	Ron Howley, Vice President Operations
Telephone Number:	(609) -837-8141
FAX Number:	(609) 837-8044
Hydrographic Area:	216
Township, Range, Section	T18S, R63E, Section 24
Source SIC:	4911: Electric Services
Source NAICS:	22111: Electric Power Generation

B. Description of Process

CC Landfill Energy's (CCLE) Apex Landfill Renewable Energy Generating Facility is located at the Apex Regional Landfill Waste Management Center which is owned and operated by Republic Dumpco, Inc., a subsidiary of Republic Services of Southern Nevada. CCLE leases a piece of property from Republic Services and purchases landfill gas (LFG) for combustion in turbines to produce electricity. The energy produced is sold to NV Energy to assist in meeting the 25 percent renewable energy mandate set forth by the State of Nevada (by 2025). CCLE owns, operates and maintains the facility separately from the operations at the Apex Waste Regional Landfill.

CCLE operates two (2) Solar Taurus landfill gas turbines and a John Zinc off-gas flare. CCLE is a major Part 70 source for CO and minor for PM_{10}, NO_X, SO_X, VOC and HAP.

Landfill gas is collected by Republic Services through a system of wells located throughout the Apex Waste Management Center. The collected gas is piped to CCLE facility. The LFG is passing through chillers prior to reaching the siloxane treatment skids where 60 percent of siloxane compounds are removed from the LFG. From the siloxane removal system the gas travels to the compressor skids where it is compressed for combustion in two 5.334 MW LFG turbines. The gas is combusted and the associated thermal energy is then converted into electrical energy. The exhaust gases will exit to the atmosphere after leaving the turbine and passing through a selective catalytic reduction (SCR) system for NO_X control. The two gas turbines are subject to the regulatory requirements of 40 CFR Part 60, Subpart KKKK.

CCLE uses a SCR system as the NO_X emissions control system. The original 60 percent manufacturer's guarantee for the catalyst's NO_X removal efficiency was based on an average siloxane concentration of less than 75 ppb in pretreated LFG. This maximum SCR catalyst loading rate and an influent LFG concentration of 2,000 mg/m^3 for non-methane organic compounds (NMOC), were the basis for the design of the Venture system for the siloxane removal and its efficiency. However, the LFG has higher loading rates for both siloxane and NMOC. As a result, the current NO_X removal efficiency has been set to 30 percent by control analysis triggered by a significant revision of the ATC issued on May 19, 2014.

The filters in the siloxane system are regenerated on a regular basis to ensure maximum removal of the siloxane by the system. During the regeneration process, regen gas is sent to a small flare for destruction.

C. Permitting History and Current Action

CCLE received a Part 70 OP on February 27, 2015.

Summary

This permitting action has been initiated in an effort to add clarity to permit conditions involving the sulfur content of the LFG. The variability in the concentrations of siloxane and H_2S in the LFG has led to difficulty operating both turbines. There is no federal or local requirement to establish a limit on the concentration of the sulfur compounds in the LFG as long as the turbine exhaust concentration doesn't result in the exceedance of the 0.15 lbs/MMBtu SO_2 in the exhaust gases required by 40 CFR 60.4330(1)(3). Monitoring of sulfur content of the LFG is required as a parametric monitor for the SO_2 emission limits established in the operating permit. Due to monitoring of the LFG that indicates the H_2S concentrations have exceeded 100 ppmv on a 24-hour basis, the monitoring requirement will remain unchanged, except that the 100 ppmv limit will be removed.

Detailed Discussion

Sulfur Content Revision

On April 22, 2016, Air Quality received a letter from CCLE requesting a permit modification to correct a material defect. The letter stated that "The Best Available Control Technology (BACT) analysis for sulfur dioxide ($S0_2$) emissions from the gas turbines included in CCLE's original air permit application assumed $S0_2$ emissions of 100 parts per million volume (ppmv) in exhaust stacks from two site turbines. Subsequently, CCLE's air construction permit was issued in August 2010 with a sulfur content standard of 100 ppmv in LFG flow combusted in site turbines and flare (Specific Condition No. 111.B.3.b.), rather than reflecting 100 ppmv $S0_2$ in gas turbine emissions. Since 100 ppmv sulfur in LFG is not representative of the LFG supply obtained from the adjacent Apex Landfill operated by Republic Dumpco, Inc. (Republic), CCLE is requesting that the Part 70 permit condition is corrected to reflect the original exhaust based limitation of 100 ppmv $S0_2$ rather than a 100 ppmv sulfur LFG standard."

The initial ATC application submitted on October 13, 2009 estimated the SO_2 emissions based on the fuels sulfur content with the assumption of 100% conversion of fuel sulfur to SO_2 (Attachment D and F). Therefore, the only method of estimating the SO_2 emissions identified in the application was conversion of the fuel sulfur content. Attachment F of the application is an estimation of the Turbine SO_2 emissions based on 100 ppmv sulfur in the LFG at site specific conditions. This emission estimation was prepared by the turbine manufacturer, Solar. However, it was noticed in few places in the application that the applicant used SO_2 and H_2S concentrations interchangeably, which resulted in a confusion. In order to clarify this confusion, Air Quality sent a clarification request to the source on November 19, 2009 and a response was received on December 3, 2009. According to the response, the applicant confirmed that "At this time, the CCLC model is anticipating delivery of the landfill gas at a total sulfur concentration of 100 ppm and was incorporated into the permit application as an emissions estimate". Again in the November 19, 2009 email to the source, Air Quality stated that, "The SO_2 emissions are based on the assumption that the sulfur content in the LFG is 100 ppm. This assumption cannot

be enforceable until the Republic Services apply for a permit modification for the H_2S removal process. The response from the source reiterated the use of 100 ppmv H_2S concentration in the LFG "Republic Services is anticipating submittal of a permit modification within the first quarter of 2010. CCLE and Republic Services will utilize the same total sulfur concentration once the scrubber design is confirmed".

Additionally, if the PTE is recalculated based on the 100 ppmv SO_2 in the exhaust rather than 100 ppmv H_2S in the LFG, as requested by the source, the corresponding H_2S concentration would be 1808 ppmv and the resulting PTE will be 149.2 tpy.

The original ATC had identified a short term limit (lbs/hr) and an annual limit (tons/year demonstrated through consecutive 12 month total calculations) as BACT emission limit. The operating permit did not include a short term limit because compliance to the emission limitations was demonstrated through inlet H_2S parametric monitoring and record keeping requirements.

During the period from April 2012 through May 2016, three performance tests have been completed that included testing for SO_2 concentrations in the exhaust gases from the turbines. The results from the April 20, 2012 performance test indicated that on an average basis, taking into account three runs, the emission rate for SO_2 was 0.007 lbs/MMBtu, well within the federal requirement of 0.15 lbs/MMBtu. The results of the May 8, 2015 performance test indicated an emissions rate of 0.022 lbs/MMBtu. And, the results from the May 17, 2016 performance test indicated and average of two runs at 0.034 lbs/MMBtu. The SO2 concentration corresponding to the current permit emission limit is equal to 0.029 lbs/MMBtu. It is worth noting that during the period of 2015 and 2016, the concentration rate of H_2S exceeded the 100 ppm permitting limit as demonstrated in deviation reports submitted by CCLE. Yet, there is no evidence that the elevated H_2S readings resulted in elevated SO_2 emissions in a range that would exceed the NSPS standard or the annual emission limit established in the permit.

Pursuant to 40 CFR 60.4360 and 40 CFR 60.4370, CCLE is required to determine and record the sulfur content of the fuel once per unit operating day. The sulfur content of the gaseous fuel at CCLE is determined and recorded at 15-minute intervals during each operating day using the Rosemount Analytical 700XA Process Gas Chromatograph. Each record will be stored by the Permitttee for at least five years and be made available to Air Quality upon request. If a 15-minute sulfur content value increases above CCLE's established working parameters, an email notification will automatically alert personnel. CCLE will notify Republic Services regarding the increasing sulfur content in the LFG so they can determine the cause of the increasing H_2S so any necessary adjustments can be made to their treatment system. The sulfur content of the LFG will be used to estimate the actual SO_2 emissions from the Turbine. If the daily average sulfur content value indicates that the SO_2 limits in Tables III-B-1 and III-B-3 of the OP have been exceeded, CCLE will provide the appropriate excess emissions notification to Air Quality as required.

Air Quality has updated condition III.B.3.b of the Title V Operating Permit to reflect the requirement to determine the sulfur content of the LFG to each turbine (EUs: A01 and A02) and the flare (EU: A03) on a 24-hour daily average basis in compliance with 40 CFR 60.4370".

There will be no change in emissions resulting from this revision.

Also, due to the court decision regarding affirmative defense being incorporated in permitting actions, general condition II.D.7.b has been updated to remove the requirement to comply with

AQR 25, but, to continue to provide a written excess emission report to Air Quality within 72 hours that includes the information listed in AQR 25.6.3.

Conclusion

As stated above, there will be no additional annual emissions resulting from the suggested changes to the permit and there will be no additional applicable requirements that would apply if these changes occur. The Source shall continue demonstrating compliance with the emission limitations established in the permit. Therefore, this proposed modification meets the criteria for a re-open for cause.

III. REGULATORY REVIEW

A. Local Regulatory Requirements

Air Quality has determined that the following public law, statutes and associated regulations are applicable:

1. Clean Air Act, as amended (CAAA), Authority: 42 U.S.C. § 7401, et seq.;
2. Title 40 of the Code of Federal Regulations (CFR);
3. Nevada Revised Statutes (NRS), Chapter 445B;
4. Portions of the AQR that are included in the State Implementation Plan (SIP) for Clark County, Nevada. SIP requirements are federally enforceable. All requirements from Authority to Construct permits issued by Air Quality are federally enforceable because these permits were issued pursuant to SIP-included sections of the AQR; and
5. Portions of the AQR that are not included in the SIP. These locally applicable requirements are locally enforceable only.

The Nevada Revised Statutes (NRS) and the Clean Air Act Amendments (CAAA) are public laws that establish the general authority for the Regulations mentioned.

The Air Quality Part 70 (Title V) Program received Final Approval on November 30, 2001 with publication of that approval appearing in the Federal Register December 5, 2001 Vol. 66, No. 234. AQR Section 19 - Part 70 Operating Permits [Amended 07/01/04] details the Clark County Part 70 Operating Permit Program. On September 20, 2010, Clark County submitted a revision to the operating permit program (AQR 12.5) pursuant to 40 CFR Part 70.4(i)(2). EPA has not acted on that request yet. These regulations may be accessed on the Internet at: http://www.clarkcountynv.gov/depts/AirQuality/Pages/Rules_CurrentRulesandRegulations.aspx

Local regulations contain sections that are federally enforceable and sections that are locally enforceable only. Locally enforceable only rules have not been approved by EPA for inclusion into the State Implementation Plan (SIP). Requirements and conditions that appear in the Part 70 OP which are related only to non-SIP rules are notated as locally enforceable only.

B. Federally Applicable Regulations

Subpart A - General Provisions

40 CFR 60.7-Notification and record keeping
Discussion: This regulation requires notification to Air Quality of modifications, opacity testing, records of malfunctions of process equipment and/or continuous monitoring device, and performance test data. These requirements are found in the OP. Air Quality requires records to be maintained for five years, a more stringent requirement than the two (2) years required by 40 CFR 60.7.

40 CFR 60.8 - Performance tests
Discussion: These requirements are found in the OP. Notice of intent to test, the applicable test methods, acceptable test method operating conditions, and the requirement for three runs are outlined in this regulation. Air Quality requirements for initial performance testing are identical to 40 CFR 60.8. Air Quality also requires periodic performance testing on emission units based upon throughput or usage. More discussion is in this document under the compliance section.

40 CFR 60.11 - Compliance with standards and maintenance requirements
Discussion: AQR Section 26 is more stringent than the federal opacity standards, setting a maximum of 20 percent obscurity for a period of more than 6 consecutive minutes. CCLE operate in a manner consistent with this section of the regulation.

40 CFR 60.12 - Circumvention
Discussion: This prohibition is addressed in the OP. This is also local rule AQR Section 80.1.

Subpart KKKK – Standards of Performance for Stationary Combustion Turbines

40 CFR 60.4305 – Applicability
Discussion: Subpart KKKK applies to Turbine Units 1 and 2 (EUs: A01 and A02) as construction commenced after the applicability date of February 18, 2005.

40 CFR 60.4320 – Standard for nitrogen oxides
Discussion: The NO_x limit from 40 CFR 60, Subpart KKKK is 25 ppmvd at 15 percent oxygen. The source has a limit in the Part 70 OP. This limit has been achieved by the BACT requirement of 24 ppm NO_x at 15 percent oxygen.

40 CFR 60.4330 – Standard for sulfur dioxide
Discussion: The source meets this condition by limiting the sulfur content of the LFG and flare to 100 ppmv.

40 CFR 60.4333 – Compliance Determination Procedures and Methods
Discussion: The compliance demonstration for this source is discussed in the OP.

40 CFR 60.4345 - Monitoring of operations
Discussion: Per 40 CFR 60.4340, to demonstrate continuous compliance with NO_X the Permittee may choose to conduct annual stack testing or may choose to install a continuous monitoring system. CCLE has elected to demonstrate continuous compliance with NO_X by conducting an annual stack test.

40 CFR 60.4375 – Reporting Requirements
Discussion: These are discussed in the OP.

40 CFR 60.4400 – Test methods and procedures
Discussion: These requirements are found in the conditions for performance testing found in the OP.

40 CFR 64 – COMPLIANCE ASSURANCE MONITORING

40 CFR 64.2 – Applicability
Discussion: The CAM Rule is not applicable to Turbine Units 1 and 2 (EUs: A01 and A02) based on the applicability statement outlined in 40 CFR 64.2(a)(3), i.e., the add-on control device (SCR) for NOx control has a control efficiency of 30 percent and therefore, the pre-controlled emission is less than 100 tons per year for each turbine unit. A control device is not used on this unit any other pollutant to achieve compliance with any emission limitation or standard for a regulated air pollutant.

40 CFR 72-ACID RAIN PERMITS REGULATION

Subpart A – Acid Rain Program General Provisions

40 CFR 72.2 – Applicability
Discussion: This regulation defines "unit" as fossil fuel fired combustion device. Landfill gas is not classified as fossil fuel. Therefore this regulation does not apply.

40 CFR 75 – CONTINUOUS EMISSION MONITORING
Discussion: CCLE is not subject to the Acid Rain emission limitations of 40 CFR 40 CFR 72; therefore, the source is not subject to the monitoring, recordkeeping, and reporting requirements of this regulation.

IV. COMPLIANCE

A. Compliance Certification

1. Regardless of the date of issuance of the OP, the schedule for the submittal of reports to the Air Quality shall be as follows:

Table V-A-1: Reporting Schedule

Required Report	Applicable Period	Due Date[1]
Semiannual Report for 1st Six-Month Period	January, February, March, April, May, June	July 30 each year
Semiannual Report for 2nd Six-Month Period. Any additional annual records required.	July, August, September, October, November, December	January 30 each year
Annual Compliance Certification Report	Calendar Year	January 30 each year

Required Report	Applicable Period	Due Date[1]
Annual Emission Inventory Report	Calendar Year	March 31 each year
Notification of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emissions	As Required	Within 24 hours of the Permittee learning of the event
Report of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emissions	As Required	Within 72 hours of the notification
Deviation Report without Excess Emissions	As Required	Along with semiannual reports
Performance Testing	As Required	Within 60 days from the end of the test

[1]If the due date falls on a Saturday, Sunday or a Federal or Nevada holiday, then the submittal are due on the next regularly scheduled business day.

2. A statement of methods used for determining compliance, including a description of monitoring, recordkeeping, and reporting requirements and test methods.
3. A schedule for submission of compliance certifications during the permit term.
4. A statement indicating the source's compliance status with any applicable enhanced monitoring and compliance certification requirements of the Act.

B. Compliance Activities This Action

Table V-B-1: Compliance Summary - AQR

Submittal Date	Compliance Plan Item	Notes
June 5, 2015	Request for Revision of Part 70 OP by letter	Air Quality requested a Minor Revision Application
August 28, 2015	Minor Revision Application received	Requested that the Part 70 OP and TSD be revised to include a 24-hour averaging period for the 100ppmv sulfur limit in the LFG. Also a revision to the LFG fuel limits to reflect a combined total rather than for each turbine.
June 5, 2015	Landfill Gas Fuel Sulfur Monitoring Plan Modification	The monitoring plan was revised to include the statement that: “If a 15 minute sulfur content value exceeds the 100 ppmv permit limit, notification to Republic Services will be made to determine the cause of the exceedance so a correction can be made to their treatment system as necessary”. Only the text body of the monitoring plant is included in this submittal. The Attachments included in the April 27, 2015 submittal are still applicable to this monitoring plan.

C. Compliance Summary

Table V-C-1: Compliance Summary - AQR

Applicable Section - Title	Applicability	Applicable Test Method	Compliance Status
AQR Section 0 - Definitions.	Applicable – CCLE will comply with all applicable definitions.	CCLE will meet all applicable test methods should new definitions apply.	CCLE complies with applicable requirements.
AQR Section 4 - Control Officer	Applicable – The Control Officer or his representative may enter into CCLE property, with or without prior notice, at any reasonable time for purpose of establishing compliance.	CCLE will allow Control Officer to enter property as required.	CCLE complies with applicable requirements.
AQR Section 12.5 - Part 70 Operating Permits	Applicable – CCLE is a major stationary source and under Part 70. Renewal applications are due between 6 and 18 months prior to expiration. Revision applications will be submitted within 12 months of commencing operation of the new emission unit.	CCLE submitted the initial Part 70 permit application within 12 months of startup.	CCLE complies with applicable requirements.
AQR Section 14.1.1 Subpart A - NSPS – General Provisions	Applicable – CCLE is an affected facility under the regulations.	Applicable monitoring, recordkeeping and reporting requirements.	CCLE complies with applicable requirements.
AQR Section 14.1.82 Subpart KKKK - Standards of Performance for Stationary Combustion Turbines	Applicable – CCLE turbines are affected units under the regulations.	Applicable monitoring, recordkeeping and reporting requirements.	CCLE complies with applicable requirements.
AQR Section 18 - Permit and Technical Service Fees	Applicable – CCLE will be required to pay all required/applicable permit and technical service fees.	CCLE is required to pay all required/applicable permit and technical service fees.	CCLE complies with applicable requirements.
AQR Section 25 - Upset/Breakdown, Malfunctions	Applicable – Any upset, breakdown, emergency condition, or malfunction which causes emissions of regulated air pollutants in excess of any permit limits shall be reported to Control Officer.	Any upset, breakdown, emergency condition, or malfunction in which emissions exceed any permit limit shall be reported to the Control Officer within 24 hours of onset of such event.	CCLE complies with applicable requirements.
AQR Section 26 - Emissions of Visible Air Contaminants	Applicable – Opacity for the CCLE emission units must not exceed 20 percent for more than six (6) minutes in any 60-minute period.	Compliance determined by EPA Method 9.	CCLE complies with applicable requirements.

Applicable Section - Title	Applicability	Applicable Test Method	Compliance Status
AQR Section 40 - Prohibition of Nuisance Conditions	Applicable – No person shall cause, suffer or allow the discharge from any source whatsoever such quantities of air contaminants or other material which cause a nuisance. AQR 40 is locally enforceable only.	CCLE air contaminant emissions controlled by pollution control devices or good combustion in order not to cause a nuisance.	CCLE complies with applicable requirements.
AQR Section 43 - Odors in the Ambient Air	Applicable – An odor occurrence is a violation if the Control Officer is able to detect the odor twice within a period of an hour, if the odor causes a nuisance, and if the detection of odors is separated by at least fifteen minutes. AQR 43 is a locally enforceable rule only.	CCLE will not operate its facility in a manner which will cause odors. CCLE is a natural gas fired facility and is not expected to cause odors.	CCLE complies with applicable requirements.

Table V-C-2: Compliance Summary Table – Federal Regulations

Citation - Title	Applicability	Applicable Test Method	Compliance Status
40 CFR Part 52.21 - Prevention of Significant Deterioration (PSD)	Not applicable – CCLE is not listed as one of the 28 source categories. Source is a major source of CO because it is over 100 tpy CO but not subject to PSD analysis.	BACT/RACT analysis and air quality analysis using modeling performed for AQR ATC permits.	CCLE complies with applicable sections as required by AQR regulations.
40 CFR Part 52.1470 - SIP Rules	Applicable – CCLE is classified as a Title V source, and SIP rules apply.	Applicable monitoring and record keeping of emissions data.	CCLE is in compliance with applicable state SIP requirements including monitoring and record keeping of emissions data.
40 CFR Part 60, Subpart A - Standards of Performance for New Stationary Sources (NSPS) – General Provisions	Applicable – CCLE is an affected facility under the regulations.	Applicable monitoring, recordkeeping and reporting requirements.	CCLE complies with applicable requirements.
40 CFR Part 60 - Appendix A, Method 9 or equivalent, (Opacity)	Applicable – Emissions from stacks are subject to opacity standards.	Opacity determined by EPA Method 9.	CCLE complies with applicable requirements.
40 CFR Part 60 - Standards of Performance for New Stationary Sources (NSPS) - Subpart KKKK	Applicable – CCLE has turbines subject to 40 CFR 60, Subpart KKKK.	Applicable recordkeeping and reporting requirements.	CCLE complies with applicable requirements.

Citation - Title	Applicability	Applicable Test Method	Compliance Status
40 CFR Part 70 - Federally Mandated Operating Permits	Applicable – CCLE is a major stationary source and under Part 70 the initial Title V permit application was submitted as required. Renewal applications are due between 6 and 18 months prior to expiration. Revision applications will be submitted within 12 months or commencing operation of any new emission unit.	CCLE applied for the initial OP on January 14, 2013. Applications for new units will be submitted within 12 months of startup.	CCLE complies with applicable requirements.
40 CFR Part 82 - Protection of Stratospheric Ozone	Applicable – CCLE is subject to stratospheric ozone regulations based on 40 CFR 82.4.	Applicable.	Applicable.

D. Summary of Monitoring for Compliance

Table V-D-1: Compliance Monitoring

EU	Process Description	Monitored Pollutants	Applicable Subsection Title	Requirements	Compliance Monitoring
A01 and A02	Combustion Turbine Units 1 and 2	NO_x, CO, SO_x, NH_3	40 CFR 60, Subpart KKKK AQR 12.2, 12.4 and 12.5	Annual and short-term emission limits. Stack testing annually for NO_x, and CO Fuel consumption recordkeeping and reporting	Stack testing for NO_x, CO, NH_3, and SO_x Compliance for monitored emissions shall be based on fuel consumption and emission factors. Record keeping is required for compliance demonstration SO_x will be monitored through sulfur content in the fuels.
A01 and A02	Combustion Turbine Units 1 and 2 and Flare	Opacity	AQR 26	Opacity 20%	Good combustion practices EPA Method 9 Weekly visual observations of opacity shall be made while operating. Immediate logging of any opacity noted, and correction of opacity exceedance.

EU	Process Description	Monitored Pollutants	Applicable Subsection Title	Requirements	Compliance Monitoring
A03	Flare	Opacity	AQR 26	Shall not discharge into the atmosphere any visible emissions except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.	EPA Method 22 Quarterly (or whenever operated if no operation occurred during a calendar quarter) visual observations of opacity shall be made while operating. Immediate logging of any opacity noted, and correction of opacity exceedance.

E. Permit Shield

A permit shield was not requested by the source.

V. EMISSION REDUCTION CREDITS (OFFSETS)

The source is not subject to federal offset requirements because the Garnet Valley (hydrographic area 216) is in attainment for all applicable pollutants.

VII. ADMINISTRATIVE REQUIREMENTS

AQR Section 12.5 requires that Air Quality identify the original authority for each term or condition in the OP. Such reference of origin or citation is denoted by *[italic text in brackets]* after each OP condition.

Air Quality proposes to issue the Part 70 OP conditions on the following basis:

Legal:
On December 5, 2001 in Federal Register Volume 66, Number 234 FR30097 the EPA fully approved the Title V Operating Permit Program submitted for the purpose of complying with the Title V requirements of the 1990 Clean Air Act Amendments and implementing Part 70 of Title 40 Code of Federal Regulations.

Factual:
CCLE has supplied all the necessary information to Air Quality to draft Part 70 OP conditions encompassing all applicable requirements and corresponding compliance.

Conclusion:
Air Quality has determined that CCLE will continue to demonstrate compliance through the use of performance testing, semiannual reporting, daily record keeping, coupled with annual certifications of compliance. Air Quality proposes that a Part 70 OP should be issued as drafted to CCLE for a period not to exceed five years.