

Bay Area Air Quality Management District

375 Beale Street, Suite 600
San Francisco, CA 94105
(415) 749-5000

**Permit Evaluation
and
Statement of Basis
For
Renewal
of the**

MAJOR FACILITY REVIEW PERMIT

**for
Delta Energy Center, LLC
Facility #B2095**

Facility Address:
1200 Arcy Lane
Pittsburg, CA 94565

Mailing Address:
PO Box 551
Pittsburg, CA 94565

Application No. 27701

July 2018

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Title V Permit Evaluation/Statement of Basis

A. Background

Delta Energy Center, LLC (DEC) is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Title 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, serves a generator that is over 25 MW that is used to generate electricity for sale, and was built after November 15, 1990. It is a “major facility” because it has the potential to emit more than 100 tons per year of a regulated air pollutant.

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 40 CFR Parts 72 through 78. These regulations were adopted and incorporated by reference by BAAQMD Regulation 2, Rule 7, Acid Rain. The main provisions of the regulations for natural gas fired acid rain sources, such as the ones at this facility, are the requirement to obtain one SO₂ allowance for each ton of SO₂ that is emitted, stringent monitoring requirements for NO_x, CO₂, and SO₂, and stringent recordkeeping and reporting requirements.

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 B2095.

This facility received an Authority to Construct on March 23, 2000 pursuant to Application #19414 that was submitted to the District on January 14, 1999. The District conducted an extensive evaluation of the information received from the facility against the backdrop of all applicable regulations before issuing the Authority to Construct. The results of the evaluation are set forth in the Final Determination of Compliance (FDOC) that the District prepared pursuant to District Regulation 2, Rule 3, Power Plants. The FDOC summarizes how the proposed power plant will comply with all applicable District, state, and federal regulations. As the lead agency under CEQA, the California Energy Commission adopted the FDOC as part of the record for the licensing of power plants in the state of California.

This facility received its initial Title V permit on April 4, 2003. The facility received its first renewal of the Title V permit on July 12, 2011. This current application is for the second permit renewal. Although the current permit expired on July 11, 2016, it continues in force until the District takes final action on the permit renewal because the facility submitted a complete application for renewal at least six months prior to the expiration date of the current permit. The proposed renewal permit shows all changes to the current permit in strikeout/underline format.

B. Facility Description

DEC is a nominal 880-MW, natural-gas-fired, combined cycle merchant power plant owned and operated by Calpine Corporation. The power plant is located on the Dow Chemical USA complex in the city of Pittsburg and is composed of three nominal 200-MW combustion gas turbines, three heat recovery steam generators equipped with 200 MM BTU/hr duct burners, and one 300-MW steam turbine generator.

There has not been a significant change in emissions from the facility since the last renewal Title V permit was issued.

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. Since the Title IV (Acid Rain) requirements for fossil-fuel fired electrical generating facilities and the accidental release (40 CFR § 68) programs apply to this facility, the section will contain a standard condition pertaining to these programs. Many of the requirements and conditions in this section of the permit 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 dates of adoption and approval of rules in Standard Condition 1.A have been updated.

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 more than 2 tons per year of a “regulated air pollutant,” as defined in BAAQMD Rule 2-6-222, or 400 pounds per year of a “hazardous air pollutant,” as defined in BAAQMD Rule 2-6-210.

All abatement (control) devices that control permitted or significant sources are listed. Each abatement device whose primary function is to reduce emissions is identified by an A and a number (e.g., A-24). If a source is also an abatement device, such as when an engine abates VOC emissions, it will be listed in this table but will have an “S” number. An abatement device may also be a source of secondary emissions (such as selective catalytic reduction, which has secondary ammonia emissions). If the primary function of a device is to control emissions, it is considered an abatement (or “A”) device. If the primary function of a device is a non-control function, the device is a source (or “S”).

The equipment section is part of the facility description. It contains information that is necessary for applicability determinations, such as fuel types or the contents or sizes of tanks. 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. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-403.

Changes to permit:

The Megawatt ratings for each gas turbine were moved from the capacity column to the description column in response to a request from the applicant.

III. Generally Applicable Requirements

This section of the permit lists requirements that generally apply to all sources at a facility including not only permitted or significant sources, but also insignificant sources and portable equipment that may not require a District permit. Parts of this section apply to all facilities (e.g., particulate, architectural coating, odorous substance, and sandblasting standards). 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. 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) will appear in this section only.

Changes to permit:

Table III, Generally Applicable Requirements, was revised to change the effectiveness dates of applicable District Rules and Regulations. SIP Regulation 8, Rule 3 was added to Table III since it was missing from the permit. Regulation 9, Rule 1 and the SIP version of this regulation were added to Table III. 40 CFR Part 52.21 was removed from the permit. The facility obtained a valid PSD permit in 2002, but the PSD permit program is not a generally applicable requirement.

IV. Source-Specific Applicable Requirements

Section IV 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 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.

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 reproduced 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. A discussion of monitoring is included in Section C.VII of this permit evaluation/statement of basis.

Some notable applicability determinations regarding DEC's gas turbines and heat recovery steam generators are as follows:

- Accidental Release: Ammonia storage at this facility is subject to 40 CFR 68, Accidental Release, because more than 10,000 pounds of anhydrous (100%) ammonia is stored. The requirement is in Standard Condition I.K.
- Acid Rain: The facility is subject to the Acid Rain program because it is a utility unit that serves a generator with a capacity greater than 25 MW in accordance with 40 CFR Part 72.6. The NO_x and CO CEMs meet the requirements for a continuous compliance determination method contained in 40 CFR Part 64.1. The NO_x and CO CEMs are a monitoring method required by the Part 70 (Title V) operating permit.
- Compliance Assurance Monitoring (CAM): Per 40 CFR 64.2(a), an emission unit is subject to 40 CFR 64, Compliance Assurance Monitoring, if the unit is subject to a federally enforceable requirement for a pollutant, the pollutant is controlled by an abatement device, and the emissions of the pollutant before abatement are more than 100% of the major source thresholds. There are several exemptions in the regulation. In the case of Delta Energy, there are three turbines. Each has an associated fired heat recovery steam generator (HRSG). Each turbine/HRSG set is considered an emission unit for the purposes of 40 CFR 64. Each turbine/HRSG set has the potential to emit more than 100 tons per year of CO and NO_x. There is no abatement device for CO, therefore the emission units are not subject to CAM for CO. NO_x is abated by selective catalytic reduction and is subject to several federally enforceable limitations. However, the turbine/HRSG sets will be exempt from CAM pursuant to 40 CFR 64.2(b)(iii) because the NO_x emissions and monitoring are governed by Acid Rain program requirements.
- Clean Air Act section 112(j): The facility is not subject to the case-by-case MACT determination requirement in 112(j) of the Clean Air Act because it is not a major facility for hazardous air pollutants (HAPs). This facility's potential to emit HAPs can be found in Table 3 of the FDOC. Note that ammonia, propylene, and aluminum are not HAPs pursuant to 112(b) of the Clean Air Act.

Changes to permit:

The adoption dates for District regulations and the federal register notice date for federal regulations were updated in all tables in Section IV.

SIP Regulation 9, Rule 3 was added to Table IV-A.

The BAAQMD Manual of Procedures, Volume V, Continuous Emission Monitoring Policy and Procedures, 40 CFR Appendix B Performance Specifications, 40 CFR 60 Appendix F Quality Assurance Procedures were removed from Table IV-A. These standards/procedures apply to the continuous emission monitors and not the source directly.

40 CFR Part 60 Subpart A Section 60.18 General Control Device Requirements was added to Table IV-A. This citation was missing from the permit.

The GHG mandatory reporting requirements in 40 CFR Part 98 and in the ARB Mandatory Reporting Rule were removed from Table IV-A and Table IV-B. EPA has stated in pages 56287 and 56288 of the federal register notice of October 30, 2009 that promulgated requirements for GHG reporting do not meet the definition of an applicable requirement in 40 CFR 70.2 and 71.2.

There were no changes made to Table IV-B for the Cooling Tower.

Table IV-C for the Fire Pump Diesel Engine was revised to include: the SIP version of Regulation 9, Rule 1, 40 CFR Part 63 Subpart A requirements, and 40 CFR Part 63 Subpart ZZZZ requirements.

Table IV-D for the Emergency Generator was revised: a typo was corrected for Regulation 6, Rule 1, the adoption dates for the applicable requirements were updated. 40 CFR Part 63 Subpart A requirements were added along with 40 CFR Part 63 Subpart ZZZZ requirements. Subpart ZZZZ was missing from the permit.

V. Schedule of Compliance

A schedule of compliance is required in all Title V permits pursuant to BAAQMD Regulation 2-6-409.10, which provides that a major facility review permit shall contain the following information and provisions:

“409.10 A schedule of compliance containing the following elements:

- 10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;
- 10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and
- 10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.”

VI. Permit Conditions

All of the permit conditions that apply to the DEC facility are reproduced in Section VI of the Title V permit.

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.

Additional Monitoring Determinations

The tables below contain only the limits for which there is no monitoring in the applicable requirements. Other than these limits, the District has not identified any other limits for which the existing monitoring requirements are potentially inadequate. Rather, the District has examined the monitoring for all of the other limits in the permit and has determined that monitoring is adequate to provide a reasonable assurance of compliance with those limits.

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.

For each of the limits discussed in this section (for which no monitoring is currently required), the District has confirmed that no monitoring is needed to provide a reasonable assurance of compliance with the limit. Where the District has based its determination on the small size of a source, the District provides in this section its calculations of the source’s potential to emit upon which that determination is grounded.

SO₂ Sources:

The following SO₂ limits for the following sources have no associated monitoring requirements:

SO₂ Sources

| S# & Description | Emission Limit Citation | Federally Enforceable Emission Limit | Monitoring |
|---|--------------------------------|--|-------------------|
| S-1, S-3, S-5 Gas Turbines, S-2, S-4, S-6 HRSGs, S-10 Fire Pump Diesel Engine | BAAQMD 9-1-301 | Ground level concentrations of SO ₂ 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 |
| S-1, S-3, S-5 Gas Turbines, S-2, S-4, S-6 HRSGs | BAAQMD 9-1-302 | 300 ppm (dry) | None |
| S-10 Fire Pump Diesel Engine | BAAQMD 9-1-304 | Sulfur Content of fuel <0.5% by weight | None |

BAAQMD Regulation 9-1-301 & 9-1-302, Sulfur Dioxide, Limits on Ground Level Concentrations and General Emission Limitation

All facility combustion sources are subject to the SO₂ emission limitations in District Regulation 9, Rule 1 (ground-level concentration [9-1-301] and emission point concentration [9-1-302]). In ‘EPA’s June 24, 1999 agreement with CAPCOA and ARB, entitled “Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP”, EPA 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.

Nevertheless, the APCO may, at the APCO’s discretion, require area monitoring to demonstrate compliance with section 9-1-301 (per BAAQMD Regulation 9-1-501). However, because this facility does not have equipment that emits large amounts of SO₂, the APCO has determined that ground level monitoring is not required for this facility.

BAAQMD Regulation 9-1-304

S-10, the Fire Pump Diesel Engine, will be fired on California-spec ultra-low sulfur diesel fuel with a maximum sulfur content of 15 ppmw, which is equal to 0.0015% by weight. Therefore, S-10 will not violate the fuel sulfur content limit of 0.5% by weight.

Sources of Particulate Matter:

The following PM limits for the following sources have no associated monitoring requirements:

PM Sources

| S# & Description | Emission Limit Citation | Federally Enforceable Emission Limit | Monitoring |
|--|--------------------------------|---|-------------------|
| S-1, S-3, S-5 Gas Turbines, S-2, S-4, S-6 HRSGs, S-9 Cooling Tower, S-10 Fire Pump Diesel Engine | BAAQMD Regulation 6-1-301 | Ringelmann 1.0 | None |
| S-1, S-3, S-5 Gas Turbines, S-2, S-4, S-6 HRSGs, S-9 Cooling Tower, S-10 Fire Pump Diesel Engine | SIP Regulation 6-301 | Ringelmann 1.0 | None |
| S-1, S-3, S-5 Gas Turbines, S-2, S-4, S-6 HRSGs, S-9 Cooling Tower, S-10 Fire Pump Diesel Engine | BAAQMD Regulation 6-1-310 | 0.15 gr/dscf | None |

PM Sources

| S# & Description | Emission Limit Citation | Federally Enforceable Emission Limit | Monitoring |
|--|--------------------------------|---|-------------------|
| S-1, S-3, S-5 Gas Turbines, S-2, S-4, S-6 HRSGs, S-9 Cooling Tower, S-10 Fire Pump Diesel Engine | SIP Regulation 6-310 | 0.15 gr/dscf | None |
| S-1, S-3, S-5 Gas Turbines, S-2, S-4, S-6 HRSGs, S-9 Cooling Tower, S-10 Fire Pump Diesel Engine | BAAQMD Regulation 6-1-310.3 | 0.15 gr/dscf @ 6%O ₂ | None |
| S-1, S-3, S-5 Gas Turbines, S-2, S-4, S-6 HRSGs, S-9 Cooling Tower, S-10 Fire Pump Diesel Engine | SIP Regulation 6-310.3 | 0.15 gr/dscf @ 6%O ₂ | None |

BAAQMD Regulation 6, Rule 1, Particulate Matter

Visible Emissions

BAAQMD Regulation 6-1-301 (6-301 SIP) 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). Visible emissions are normally not associated with combustion of gaseous fuels, such as natural gas. The Gas Turbines S-1, S-3 and S-5 and HRSGs S-2, S-4 and S-6 burn natural gas exclusively; therefore, per the EPA’s June 24, 1999 agreement with CAPCOA and ARB, entitled “Summary of Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP”, no monitoring is required to ensure compliance with this limit for these sources. S-11, the natural gas fired Emergency Standby Generator, is also fired exclusively on natural gas and thus no monitoring is required to demonstrate compliance with the BAAQMD Regulation 6-1-301 limits.

With a maximum vendor-guaranteed drift rate of 0.0005% and corresponding maximum grain loading of 0.0023 gr/dscf (see calculations below in the Particulate Weight Limitation discussion), S-9, the Cooling Tower, is not expected to emit visible particulate emissions. Therefore, no monitoring is required to demonstrate compliance with this limit for this source.

EPA’s June 24, 1999 agreement with CAPCOA and ARB, entitled “Summary of Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP”, states that no monitoring will be required to demonstrate compliance with visible emissions limits for diesel standby and emergency reciprocating engines if California diesel or other low-sulfur fuels are used. The reason is that the use of low-sulfur fuels reduces particulates. Also, these engines are used infrequently and therefore are not large sources of particulate emissions. Because S-10, the Fire Pump Diesel Engine, will utilize California diesel fuel,

no monitoring is required to ensure compliance with the visible emissions limit of Regulation 6-1-301.

Particulate Weight Limitation

BAAQMD Regulation 6-1-310 (6-310 SIP) limits filterable particulate (FP) emissions from any source to 0.15 grains per dry standard cubic foot (gr/dscf) of exhaust volume. This is a “grain loading” standard.

Exceedances of the grain loading standards are normally not associated with combustion of gaseous fuels, such as natural gas. The Gas Turbines S-1, S-3 and S-5 and HRSGs S-2, S-4 and S-6 burn natural gas exclusively as does S-11, the Emergency Standby Generator; therefore, per the EPA’s July 2001 agreement with CAPCOA and ARB, entitled “CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources: Summary of Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP”, no monitoring is required to ensure compliance with this limit for these sources.

As shown in the following calculation, the worst-case grain loading from S-9, the Cooling Tower, is much less than 0.15 grains per dscf. Therefore, no monitoring is required to ensure compliance with this limit for this source.

| | |
|---|---------------|
| Maximum PM ₁₀ emission rate: | 2.172 lb/hr |
| Exhaust gas flow rate: | 112,222 dscfm |

$$\begin{aligned}\text{Grain loading} &= (2.172 \text{ lb/hr})(\text{hr}/60 \text{ min})(7000 \text{ gr/lb})/(112,222 \text{ dscfm}) \\ &= 0.0023 \text{ gr/dscf}\end{aligned}$$

EPA’s July 2001 agreement with CAPCOA and ARB, entitled “CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources: Summary of Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP”, proposes the following monitoring to demonstrate compliance with the grain loading standard for non-utility distillate-oil-fueled emergency piston-type IC Engines: Maintain records of all engine usage (such as time or fuel meter readings) and maintenance. S-10, the Fire Pump Diesel Engine, is subject to such monitoring.

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.

IX. Acid Rain Permit

Section IX of the Title V permit sets forth the regulatory requirements related to addressing acid rain as required under Title IV of the federal Clean Air Act and related regulations. Acid rain is principally associated with power plants that burn coal, and the Delta Energy Center is allowed to burn only low-sulfur natural gas. The facility is nevertheless subject to certain acid-rain related requirements as specified in Section IX of the Title V permit.

The facility is subject to the Acid Rain Permit requirements of 40 CFR Part 72 because it is a utility unit as defined by 40 CFR 72.5. The facility is a Phase II Acid Rain Facility pursuant to Regulation 2, Rule 6, Section 217. The principal requirement that applies to this facility is that it must hold SO₂ allowances for each emission unit in an amount not less than the total annual SO₂ emissions from the unit for the previous calendar year pursuant to 40 CFR 72.9(c)(i).

The Acid Rain permit for the Delta Energy Center is contained in section IX of the Title V permit. The Acid Rain Permit Application dated January 11, 2016 is attached to the permit in Section XIII.

Changes to permit:

The format of this section was updated to the current standard language for acid rain permit in the District.

X. Permit Shield

The District rules allow two types of permit shields in District-issued permits. The permit shield types are defined as follows: (1) a provision in a major facility review permit explaining that specific federally enforceable regulations and standards do not apply to a source or group of sources, or (2) a provision in a major facility review permit explaining that specific federally enforceable applicable requirements for monitoring, recordkeeping and/or reporting 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. Accordingly, the District uses the second type of permit shield for all streamlining of monitoring, recordkeeping, and reporting requirements in Title V permits. The District's program does not allow other types of streamlining in Title V permits.

There are no permit shields in the draft Title V permit.

XI. Revision History

This section details the revision history of the facility's Title V permit.

Changes to permit:

The current Title V permit renewal was added to this section.

XII. Glossary

There are no changes to this section of the draft Title V permit.

D. Alternate Operating Scenarios

No alternate operating scenario has been requested for this facility.

E. Compliance Status

The responsible official for Delta Energy Center, LLC. submitted a signed Certification Statement form dated March 21, 2018. On this form, the responsible official certified that the following four statements are true:

Based on information and belief formed after reasonable inquiry, the sources identified in the Applicable Requirements and Compliance Summary form that are in compliance will continue to comply with the applicable requirements;

Based on information and belief formed after reasonable inquiry, the sources identified in the Applicable Requirements and Compliance Summary form will comply with future-effective applicable requirements, on a timely basis;

Based on information and belief formed after reasonable inquiry, information on application forms, all accompanying reports, and other required certifications is true, accurate, and complete;

All fees required by Regulation 3, including Schedule P have been paid.

F. Differences Between the Application and the Proposed Permit

The renewal Title V permit application was submitted on January 14, 2016. This application served as the basis for the District's development of the proposed Title V permit. The proposed changes for sulfur sampling frequency and cold start limit have not been incorporated in the proposed renewal permit because these requests require further analysis and will be processed under Application 27911.