

**STATEMENT OF BASIS**  
**Title V Permit Renewal**

**Facility Name:** SDG&E Palomar

**Title V App. Number:** APCD2017-APP-005134, APCD2018-APP-005375,  
APCD2021-APP-006807, APCD2021-APP-006916

**Title V Permit Number:** APCD2013-TVP-00038

**Facility ID:** APCD2001-SITE-04276

**Equipment Address:** 2300 Harveson Place, Escondido, CA 92029

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**Permit Engineer:** Maria Galvez

**Date:** 02/06/24

 Recoverable Signature

**X** Jim Swaney

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Jim Swaney  
Senior Engineer  
Signed by: 4f6a3c69-5263-42b7-937d-4b3b524063e0

**Senior Engineer:**

**1.0 Type of Action and Summary of Changes**

The applicant requests issuance of a renewal Title V permit for SDG&E Palomar Energy Center (Title V Permit APCD2013-TVP-00038) in application number APCD2017-APP-005134. The facility is subject to Title V permitting because it is an NSR major source, and because it is subject to the Acid Rain program under Title IV of the federal Clean Air Act (CAA). In addition, the following changes are proposed:

1. An administrative change to the responsible officials.
2. Testing conditions will be added to the engine permit to show compliance with the emissions limits of 40 CFR 60 Subpart JJJJ. Testing conditions were not added in the original engine permit due to an oversight. An initial testing requirement will be placed in the Title V permit. (See the “updates” section of this report for details.)

3. Applications APCD2018-APP-005375 and APCD2021-APP-006916 for minor modifications will be processed in this analysis. The modifications are to condition number 28 on the turbine permits regarding a change in the steam reheat bowl temperature for the turbines and the definition of “extended start-up”. No emissions increase is proposed. (See condition 28 below). The modification from 500° F to 750° F has already been made as part of the related District applications. District application APCD2018-APP-005374 approved an increase from 500°F to 650°F, and District application APCD2020-APP-006511 approved an increase from 650°F to 750°F. Title V Applications APCD2018-APP-005375 and APCD2021-APP-006916 incorporate these changes from the District applications into the Title V operating permit.

**Condition #28 with temperature changes:**

A startup period is the period of time that begins when fuel flows to the combustion turbine following a non-operational period. For purposes of determining compliance with the emission limits of this permit, the duration of a startup period shall not exceed 120 consecutive minutes if the steam turbine reheat bowl temperature is above 750° F when the startup period begins and shall not exceed 360 consecutive minutes if the steam turbine reheat bowl temperature is less than or equal to 750° F when the startup period begins. (Rule 20.3, 69.3.1)

4. Application APCD2021-APP-006807 is an application for an enhanced A/C and administrative amendment for the significant modification for applications APCD2015-APP-003970 and APCD2015-APP-003971. These applications authorized an upgrade of the hot gas path to an advanced gas path (AGP). This modification allows the gas turbines to fire slightly more fuel while using slightly less cooling air resulting in increased power output and increased efficiency. Changes associated with these District applications have been incorporated into the District permit, and this application will incorporate the changes into the facility’s Title V operating permit. This application is processed as an administrative amendment, since the District application was processed according to enhanced A/C procedures.

**Minor Modification Discussion**

The change in temperature represents a minor modification because it does not trigger NSR or cause a violation. Also, the change does not relax monitoring, recordkeeping, or reporting, nor does it trigger a change in federal emission limits. The facility does not propose changes that would allow exemption from specific rule requirements. In addition, the change is not a Title I modification and does not require MACT. The change was approved in District ATC applications APCD2018-APP-005374 and APCD2020-APP-006511. For these reasons, a minor modification designation is appropriate.

**2.0 History of Title V Applications and Modifications/Applications since previous Renewal:**

The renewal application was received on September 28, 2017. This renewal application was submitted at least 12 months but not more than 18 months prior to the permit expiration date of October 3, 2018, in accordance with Rule 1410. Therefore, the renewal application is timely.

The following table summarizes all previous applications at this facility affecting the Title V permit since the previous renewal.

<b>Title V Application History Since Initial Title V Permit</b>				
<b>Application Number</b>	<b>Title V Permit Number</b>	<b>Application Description</b>	<b>Equipment</b>	<b>Approved</b>
APCD2006-APP-984839	APCD2013-TVP-00038	Initial Title V Permit Application	Two (2) natural gas turbine engines and one (1) emergency engine generator	Yes
APCD2017-APP-005134	APCD2013-TVP-00038	Current Title V Renewal Application	Two (2) natural gas turbine engines and one (1) emergency engine generator	Current Renewal
APCD2018-APP-005375, APCD2021-APP-006916	APCD2013-TVP-00038	Minor Modification Applications	Two (2) natural gas turbine engines and one (1) emergency engine generator	To be processed with current renewal.
APCD2021-APP-006807	APCD2013-TVP-00038	Administrative Amendment Application	Two (2) natural gas turbine engines and one (1) emergency engine generator	To be processed with current renewal.

Since the initial Title V application, the District has received applications from this facility as shown in the following table. These applications are submitted under the District’s local permitting program and typically are associated with a corresponding Title V application to implement the same change to the Title V permit once the modified local permit is issued (see appendix A of the permit).

<b>Application History for facility since most recent renewal</b>				
<b>Application Number</b>	<b>Affected Permit to Operate(s)</b>	<b>Description</b>	<b>Affected Emission Units</b>	<b>Outcome</b>
APCD2006-APP-984082	APCD2010-PTO-000623, APCD2010-PTO-000625	Initial District Permit Application	Two (2) natural gas turbine engines	Approved – related APP to APP-984839
APCD2009-APP-000839	APCD2011-PTO-000839	Initial District Permit Application	One (1) emergency engine generator	Approved – related APP to APP-984839
APCD2015-APP-003970, APCD2015-APP-003971	APCD2010-PTO-000623, APCD2010-PTO-000625	District Modification Application - Modification is to overhaul turbine engines, to be processed using Enhanced ATC Procedures.	Two (2) natural gas turbine engines	Approved – related to APP-006807
APCD2018-APP-005374, APCD2020-APP-006511	APCD2010-PTO-000623, APCD2010-PTO-000625	District Modification Application - Modification to condition 28 - change steam bowl temperature for turbines.	Two (2) natural gas turbine engines	Approved, Related APP to APP-

				005375 and APP-006916
APCD2021-APP-007099	APCD2010-PTO-000623, APCD2010-PTO-000625	District Modification Application – Modification to include hydrogen as a supplemental fuel	Two (2) natural gas turbine engines	Open, Construction not yet completed

### 3.0 Facility Description

The facility consists of two stationary combustion turbine generators (CTGs), two heat recovery steam generators (HRSGs) with duct burners, a steam turbine generator, and an emergency natural gas-fired lean burn engine. The two turbines are equipped with selective catalytic reduction (SCR), ammonia injection control, oxidation catalyst and continuous emission monitoring systems (CEMS).

Permit Number	Equipment Description
APCD2010-PTO-000623	<p>Power Station Unit No.1 (West or Unit No.1) consisting of: one 176 MW rated natural-gas fired combined-cycle General Electric Power Systems Frame 7FA gas turbine generator (combustion turbine), max heat input 1765 MMBtu/hr, S/N 298258, with dry low-NOx combustors, a heat recovery steam generator, a 195 MMbtu/hr (HHV) auxiliary duct burner, a Peerless Selective Catalytic Reduction unit (SCR) [with a Cormetech catalyst block, a Peerless Ammonia Vaporizer Skid], an Engelhart oxidation catalyst, a steam turbine generator shared with Power Station Unit No. 2, and an Emerson Ovation control system with low-load emissions and startup fuel gas heating capability.</p> <p>Centralized chiller plant of 9800 ton refrigeration capacity or less, potentially including a thermal energy storage tank (3 to 5 million gallons), fixed and variable speed pumps and four (4) York chillers, Model YKZ1Z3J7-DHF, S/N's SATM-7832-20, SATM-7834-20, SATM-7920-40 and SATM-9722-70.</p> <p>A shared 130,000 gallons per minute (GPM) wet cooling tower system and high efficiency drift eliminators.</p>
APCD2010-PTO-000625	<p>Power Station Unit No.2 (East or Unit No.2) consisting of: one 176 MW rated natural-gas fired combined-cycle General Electric Power Systems Frame 7FA gas turbine generator (combustion turbine), max heat input 1765 MMBtu/hr, S/N 298257, with dry low-NOx combustors, a heat recovery steam generator, a 195 MMbtu/hr (HHV) auxiliary duct burner, a Peerless Selective Catalytic Reduction unit (SCR) [ with a Cormetech catalyst block, a Peerless Ammonia Vaporizer Skid], an Engelhart oxidation</p>

	<p>catalyst, a steam turbine generator shared with Power Station Unit No. 1, and an Emerson Ovation control system with low-load emissions and startup fuel gas heating capability.</p> <p>Centralized chiller plant of 9800 ton refrigeration capacity or less, potentially including a thermal energy storage tank (3 to 5 million gallons), fixed and variable speed pumps and four (4) York chillers, Model YKZ1Z3J7-DHF, S/N's SATM-7832-20, SATM-7834-20, SATM-7920-40 and SATM-9722-70.</p> <p>A shared 130,000 gallons per minute (GPM) wet cooling tower system and high efficiency drift eliminators.</p>
APCD2011-PTO-000873	<p>Emergency Engine Generator: Cummins Engine, Model QSK60G, S/N 33179607, natural gas fired, 1945 hp, turbocharged and aftercooled, Model Year 2009, lean burn, driving a 1400 kW generator.</p>

**4.0 Title V Applicability & Acid Rain**

The Title V regulation applies to any stationary source that is a major stationary source as defined in Rule 1401(c)(26) or is subject to the acid rain provisions of Title IV of the federal Clean Air Act (CAA).

SDG&E Palomar is a major source for NOx, as shown in the Potential to Emit (PTE) table below. Therefore, the facility is subject to the Title V operating permit program.

The facility is also subject to the acid rain provisions under District Rule 1412 and Title IV of the Federal Clean Air Act. For both these reasons, the facility is subject to Title V permitting.

**5.0 Compliance History**

Facility received Notice of Violation APCD2014-NOV-000380 for discharging air contaminants or other material in a manner which caused a public nuisance.

Facility received Notice of Violation APCD2023-NOV-000357 for failure to renew their permits prior to expiration and for failing to submit an accurate and complete annual and semi-annual Title V report.

Facility received Notice of Violation APCD2023-NOV-000830 for failure to meet ammonia slip concentration limits for one of the turbines during annual source test. This NOV is still being settled.

There are no other ongoing compliance issues at the time of this Title V renewal.

**6.0 Potential to Emit and Actual Emissions**

The following table shows the actual and potential emissions for the facility that are used to establish the major source status for Title V. For pollutants NOx and VOC, potential emissions exceed major source thresholds.

Title V Major Source Determination				
Tons per Year:				
Pollutant	Thresholds	Facility Actual Emissions	Facility Potential to Emit	Major Source
Highest Federal HAP	10	0.59	<10	No
Sum of Federal HAPs	25	0.83	<25	No
NOx	25	58.7	99	Yes
VOC	25	0.269	49	Yes
PM10	100	55.9	99	No
SOx	100	6.24	33.9	No
CO	100	25.2	99	No

- Facility actual emissions are based on the approved 2022 Emissions Inventory Report.
- Facility PTE for NOx, VOC, CO, PM10, any single federal HAP, and sum of all federal HAPs are limited by permit conditions.
- SOx PTE is from the original FDOC and increased proportionally according to the increase in maximum hourly fuel use from the Advanced Gas Path improvement.

**7.0 40 CFR Part 64 CAM (Compliance Assurance Monitoring)**

Pursuant to New Source Review (NSR), the turbines are required to operate and maintain the CEMS to measure NOx and CO, which is also required by District Rules 69.3.1, and 40 CFR 60 Subpart GG. Monitoring and testing are required in the existing District permits. For the related Title V permit, additional recordkeeping and reporting are required pursuant to District Rule 1421. The emission unit has an uncontrolled PTE for NOx and CO in excess of the major source thresholds. For this reason, Compliance Assurance Monitoring (CAM) under 40 CFR Part 64 was considered for this review. The uncontrolled PTE for VOC for each emission unit does not exceed major source thresholds, so CAM does not apply for VOC. The uncontrolled PTE for VOC emissions is 16.2 tons per year, based on the District’s default emission factor for uncontrolled natural gas fired turbines (0.0021 lb/MMBTU), the heat input rating of the turbines (1765 MMBTU/hr), and assuming 8760 hours per year. Additionally, there is an established CO/VOC surrogate relationship, so the units would be exempt from CAM requirements for VOC emissions through continuous monitoring of CO emissions.

§ 64.2 (b)(vi) specifies that the requirements of Part 64 shall not apply to emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in § 64.1. Both the District and Federal operating permits require the turbines to be equipped with Continuous Emissions Monitoring Systems (CEMS), which meets the definition for a continuous compliance determination method, as it is used to determine compliance with an emission limitation or standard on a continuous basis and provides the data in units of the standard or is correlated directly with the compliance limit. Therefore, these units are exempt from the requirements of 40 CFR 64, pursuant to § 64.2 (b)(vi).

### 8.0 Applicable Requirements

This section summarizes the major types of requirements for this facility. These types of requirements include facility-wide and permit specific applicable requirements. Additionally, for each emission unit, the rule that results in the primary emission limitation is listed.

#### General Facility-wide Applicable Requirements

<b>Regulation</b>	<b>Rule Citation</b>	<b>Title</b>
SDCAPCD Reg. II	10(a) 10(b)	Permits Required – (a) Authority to Construct Permits Required – (b) Permit to Operate
SDCAPCD Reg. II	19	Provision of Sampling & Testing Facilities
SDCAPCD Reg. II	19.3	Emission Information
SDCAPCD Reg. II	20, 20.1, 20.2, 20.3	New Source Review
SDCAPCD Reg. II	21	Permit Conditions
SDCAPCD Reg. II	24	Temporary Permit to Operate
SDCAPCD Reg. II	25	Appeals
SDCAPCD Reg. IV	60	Circumvention
SDCAPCD Reg. IV	71	Abrasive Blasting
SDCAPCD Reg. V	98***	Breakdown Conditions: Emergency Variance
SDCAPCD Reg. VI	101	Burning Control
SDAPCD Reg. VIII	131	Stationary Source Curtailment Plan
40 CFR Part 68	Part 68	Risk Management Plan (Ammonia Storage)
40 CFR Part 82	Subpart B	Servicing of Motor Vehicle Air Conditioners
40 CFR Part 82	Subpart F	Recycling and Emissions Reducing
40 CFR Part 89	Part 89	VOC Standards for Consumer Products

#### Facility-wide Prohibitory Requirements

<b>Regulation</b>	<b>Rule Citation</b>	<b>Title</b>
SDCAPCD Reg. II	19.2	Continuous Emission Monitoring Requirements
SDCAPCD Reg. IV	50	Visible Emissions
SDCAPCD Reg. IV	51	Nuisance
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	53	Specific Contaminants
SDCAPCD Reg. IV	62	Sulfur Content of Fuels
SDCAPCD Reg. IV	67.0.1	Architectural Coatings
SDCAPCD Reg. IV	67.17	Storage of Organic Materials Containing VOC
SDCAPCD Reg. IV	68	Fuel Burning Equipment – NOx
SDCAPCD Reg. XII	1200**	Toxic Air Contaminants – New Source Review

SDCAPCD Reg. XII	1206	Asbestos Removal, Renovation, and Demolition
SDAPCD Reg. IV	69.4.1	Stationary Reciprocating Internal Combustion Engines-Best Available Retrofit Control Technology
40 CFR Part 60	Subpart A	NSPS General Provisions
40 CFR Part 63	Subpart A	NESHAP General Provisions
40 CFR Part 61	Subpart M	NESHAP - Asbestos
40 CFR Part 73	Part 73	Sulfur Dioxide Allowance System

\*\*Not federally enforceable \*\*\*Breakdowns/variances are not recognized by EPA and cannot grant relief from federal enforcement of requirements.

Permit Specific Applicable Requirements:

SDAPCD Permit No.	Title V Permit No.	Permit Description	Applicable Rules
APCD2010-PTO-000623	APCD2013-TVP-00038	One natural gas combustion turbine generator: (Unit 1)	SDAPCD Reg. IV, Rules 50, 51, 52, 53, 62, 63, 69.3**, 69.3.1**, 40 CFR 60 subpart GG
APCD2010-PTO-000625	APCD2013-TVP-00038	One natural gas combustion turbine generator (Unit 2)	SDAPCD Reg. IV, Rules 50, 51, 52, 53, 62, 63, 69.3**, 69.3.1**, 40 CFR 60 subpart GG
APCD2011-PTO-000873	APCD2013-TVP-00038	Emergency engine: fuel is natural gas	SDCAPCD Reg. IV, Rules 50, 51, 52, 53, 59, 62, 69.4.1, 40 CFR 60 subpart JJJJ

Emission Limitations

Combustion Turbines	
Pollutant	Primary Limiting Regulations*
NOx	Rule 20.3 (NSR); Rule 69.3**, Rule 69.3.1**; 40 CFR 60 Subpart GG
SO2	Rule 20.3; Rule 62; Rule 53; 40 CFR 60 Subpart GG
VOC	Rule 20.3
CO	Rule 20.3 (AQIA only)
PM10	Rule 20.3; Rule 53 (PM)
Toxic Pollutants	Rule 1200

\*There are certain operating scenarios where a different rule may be the most stringent limitation. For example, the limit for NOx established through NSR does not apply at certain times such as startups, and during these times the prohibitory rule or NSPS emission limit is the most stringent. All these limits are listed as permit conditions.

\*\*District Rule 69.3 has been repealed by SDAPCD and replaced with 69.3.1 which has been submitted to EPA for SIP inclusion. However, EPA has not approved 69.3.1 due to court challenges related to startup and shutdown provisions, which means that the SIP version of Rule 69.3 is still enforceable but may be replaced by 69.3.1 once approved. In the current form of these rules, there is no difference in requirements for this equipment.



Emergency Engine	
Pollutant	Primary Limiting Regulations
NOx	Rule 69.4.1; 40 CFR 60 Subpart JJJJ
SO2	Rule 62; Rule 69.4.1; 17 CCR 93115; 40 CFR 60 Subpart JJJJ
VOC	40 CFR 60 Subpart JJJJ
CO	40 CFR 60 Subpart JJJJ
PM10	Rule 20.3; Rule 53 (PM); 40 CFR 60 Subpart JJJJ
Toxic Pollutants	Rule 1200
Federal HAPs	40 CFR 63 Subpart ZZZZ

**9.0 Updates to the Title V Permit Incorporated into this Action**

The following changes are being made to the emission unit specific permits as indicated below. These changes are due to an update to District Rules and reanalysis of the applicability of NESHAP and NSPS requirements for the emergency engine.

Update for District Rule 69.4.1

District Rule 69.4.1 Stationary Reciprocating Internal Combustion Engines-Best Available Retrofit Control Technology was modified in 2020. The amended rule added additional maintenance requirements for emergency engines. Conditions implementing these requirements were added to the engine permit previously.

Subpart ZZZZ 40 CFR 63 for Stationary RICE

The natural gas fired emergency engine was manufactured in 2009. It is therefore subject to the maintenance provisions of Subpart ZZZZ and must comply with the requirements of NESHAP ZZZZ by complying with NSPS 40 CFR Part 60, Subpart JJJJ.

Subpart JJJJ 40 CFR 60.4244 Emissions and testing for the emergency engine

Subpart JJJJ applies to the natural gas fired lean burn 1945 hp emergency engine APCD2011-PTO-000873. Since the engine build date is 11-9-2009 and it was permitted in 2011, it may be assumed that construction commenced after the start of 2009. Subpart JJJJ provides that engines are subject to the rule if construction commenced after January 1, 2009 and have engine power greater than 130 HP. Table 1 of Subpart JJJJ provides the following emission limits for emergency engines with horsepower greater than or equal to 130 hp:

NOx	CO	VOC	
2.0	4.0	1.0	g/hp-hr
160	540	86	ppm @15%O2

Three source test conditions are proposed to be added to the engine permit for compliance with Subpart JJJJ limits:

1. To demonstrate compliance with the emission limits of this permit, the equipment shall be tested at least once every 8,760 hours of operation or every 3 years, whichever comes first for compliance with the applicable emission limits of Table 1 to 40 CFR 60 Subpart JJJJ. Compliance may be shown with either the mass based limits of 2.0, 4.0 and 1.0 g/bhp-hr NO<sub>x</sub>, CO and VOC respectively, or the concentration based limits of 160, 540 and 86 ppmv corrected to 15 percent oxygen for NO<sub>x</sub>, CO and VOC respectively. This testing shall be performed according to all methods and procedures of Table 2 of Subpart JJJJ.
2. Unless otherwise specified in writing by the District, all source testing shall be performed or witnessed by District personnel. For testing not performed by the District, the test must be performed according to an approved test protocol which shall be submitted to the District no later 30 days prior to testing for review and approval. A final test report shall be submitted to the District no later than 30 days after testing for tests not conducted by the District.
3. Emissions source testing for compliance with the emission limits of 40 CFR 60 Subpart JJJJ as described in this permit shall be performed within +/- 10% of the maximum power rating of the engine. If it is demonstrated to the satisfaction of the District that this engine cannot operate at these conditions, then emissions source testing shall be performed at the highest achievable continuous power rating or under the typical duty cycle or typical duty cycle or typical operational mode of the engine. (40 CFR 60 Subpart JJJJ)

## 10.0 Permit Streamlining

Permit conditions require the use of Public Utility Commission (PUC) quality natural gas. PUC quality natural gas guarantees compliance with District Rule 62, District Rule 53, and 40 CFR 60 Subpart GG for SO<sub>x</sub> emissions. The Standards for Gas Service in the State of California, prescribed by the Public Utilities Commission of the State of California in General Order 58A, states that: (a) no gas supplied by any gas utility for domestic, commercial or industrial purposes in this state shall contain more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, and (b) no gas supplied by any gas utility for domestic, commercial, or industrial purposes shall contain more than five (5) grains of total sulfur per one hundred (100) standard cubic feet.

District Rule 62 requires that any gaseous fuel used contains no more than 10 grains of sulfur compounds, calculated as hydrogen sulfide, per 100 cubic feet of dry gaseous fuel (0.23 grams of sulfur compounds, calculated as hydrogen sulfide, per cubic meter of dry gaseous fuel), at standard conditions. The requirement for PUC natural gas is more stringent than this rule, so this requirement is met with the use of PUC quality natural gas.

District Rule 53 requires that sulfur compounds, calculated as sulfur dioxide, discharged into the atmosphere from any single source of emissions do not exceed 0.05%, by volume, on a dry basis. Maximum grain loading of 10 gr/100 dscf results in SO<sub>2</sub> emissions at 0.002% by volume, so requirements of District Rule 53 are met through use of PUC quality natural gas.

40 CFR 60 Subpart GG requires that gases discharged from stationary combustion turbines do not contain SO<sub>2</sub> in excess of 0.015 percent by volume at 15% O<sub>2</sub> and on a dry basis or that fuel sulfur content does not exceed 0.8 percent by weight. Maximum grain loading of 10 gr/100 dscf results in SO<sub>2</sub> emissions at 0.002% by volume, so requirements of NSPS GG are met through use of PUC quality natural gas.

assume all sulfur in fuel is released as SO <sub>2</sub>	
$SO_2 = (10 \text{ grains S}/100 \text{ scft fuel}) \times (1 \text{ lb S}/7000 \text{ grain}) \times (64 \text{ lbs SO}_2/32 \text{ lb S}) \times (385 \text{ cft SO}_2/64 \text{ lb SO}_2) \times (1 \text{ scft fuel}/1020 \text{ Btu}) \times (10^6 \text{ Mmbtu}/1 \text{ Btu}) \times (1 \text{ MMBtu}/8710 \text{ dscft exhaust}) \times 100 = 0.001935 \%SO_2 \text{ by volume}$	
maximum sulfur content of 10 grains S/ 100 scft fuel shows compliance with Rule 53	
40 CFR 60 GG limit:	0.015 %SO <sub>2</sub> by volume @ 15% O <sub>2</sub>
or	0.8 % sulfur content in fuel by weight

**11.0 Permit Shields**

No permit shield applies.

**12.0 Permit Process-Public Notification and Notice to EPA and Affected States**

Before issuing the final permit, the District will provide the opportunity for a 45 day review by EPA and a concurrent 30 day public notice period. Notice will be provided to the EPA electronically through the CDX and will be sent electronically or by the US postal service to affected states and Bands of Indians. The public notice and associated documents will be provided on our website and the public notice will be published in a newspaper. The District will evaluate any suggested changes made by interested parties.

**13.0 Recommendations**

The facility is expected to comply with all applicable requirements including those cited in the current District permit as well as those under District Rule 1401 and 40 CFR Part 70. Therefore, the recommendation of this report is for the subject renewal Title V permit to be issued following public notice, EPA approval, affected states review, and response to comments.

**14.0 Attachments**

The following are attached:

- Application Package
- Draft Permit
- Public Notice