PERMITTING MEMORANDUM
&
TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

TO:	Mara Grace Nasca District Air Program Administrator
THRU:	Cindy Zhang-Torres, P.E. Manager, Air Permitting
FROM:	Quaid Noor Engineering Specialist IV
DATE:	12/17/2010
SUBJECT:	(a) Draft Notice of Permit Revision Letter – DEP Project No: 1050352-006-AC: Revision to Construction Permit 1050352-001-AC for the construction and operation of twenty nominal 2.5 MW diesel engines and one 294,000-gallon No. 2 fuel oil storage tank. (b) Draft TV Air Operation Permit Renewal – DEP Project No. 1050352-005-AV
Day 90:	02/02/2011

Construction Permit 1050352-001-AC was issued FINAL on 8/20/2001 and was incorporated in the initial Title V Permit 1050352-002-AV. Specific Condition No. 31. (NSPS Requirements: The 294,000-gallon fuel storage tank shall comply with the requirements of 40 CFR 60, Subpart Kb) of the construction permit 1050352-001-AC was carried over to the Title V Permit 1050352-002-AV as condition No. A.30. The facility applied for the Title V Renewal on 7/21/2009. During the review of the Title V Permit renewal application it was noticed that the 294,000-gallon fuel oil storage tank which stores only No. 2 fuel oil, is not subject to 40 CFR 60, Subpart Kb. The tank volume is 1,113 m3 with a vapor pressure of 0.05 kPa. The 40 CFR 60, Subpart Kb does not apply to storage vessels with a capacity greater than or equal to 151 m^3 storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa). The 294,000-gallon fuel oil storage tank is hereby renamed as 294,000-gallon No. 2 fuel oil storage tank per the information provided by the permittee and is listed in Appendix I-1, List of Insignificant Emissions Units and/or Activities.

Since the specific condition was established by a construction permit (1050352-001-AC), a notice of permit revision is required to remove it (1050352-006-AC).

As was discussed with Cindy Zhang-Torres, P.E., the notice of permit revision will be accomplished by a "From - To" AC revision letter in order to limit the scope of what is being opened for public comment and petition to just the proposed revisions to Specific Condition No. 31 of Construction Permit 1050352-001-AC.

The public notice of the construction permit revision is combined with the public notice for the Title V Renewal Project 1050352-005-AV. On 5/13/2008 the Department was denied fuel oil sample removal from the facility premises. A Warning Letter was issued to the facility. The case was closed through an executed consent order OGC No. 10-2520 dated January 7, 2011.

This memo serves as the technical evaluation and preliminary determination for this project as there is no change in potential emission; and there is no rule applicability issues associated with making the requested change to the construction permit other than what's discussed above.

An emergency diesel engine rated at 514 brake horsepower (bhp) has been added to the facility and the facility has become a PSD major facility. This engine is exempt from construction permitting requirement but not Title V permitting requirements.

I recommend that this Draft Notice of Permit Revision and Draft Title V permit package be sent out as attached and submit it for your review and approval.