



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

MAY 22 2015

Mr. James R. Huffman
Vice President of California Operations
Greenleaf Power, LLC
2600 Capital Ave Suite 430
Sacramento, California 95816

RE: Application for Administrative Permit Revisions for Desert View Power Facility under Tribal Minor New Source Review

Dear Mr. Huffman:

On February 9, 2015, the EPA Region 9 Air Permits Office received your application for an administrative permit revision (per 40 CFR 49 – Federal Minor New Source Review (NSR) in Indian Country) to add a hydrochloric acid emissions control system with associated material handling equipment under. Section 49.153(a)(2) of the rule requires owners/operators that propose a physical or operational change at a major source that would increase an emission unit's emissions above its existing emissions limit to obtain a permit revision to increase the permitted emissions limit prior to making the change. Where the change is not otherwise subject to review under major NSR or Tribal Minor NSR, the increase may be accomplished through an administrative permit revision as provided in 40 CFR 49.159(f). According to 40 CFR 49.159(f)(1)(v), an administrative permit revision can be used to establish an increase in an emission unit's annual allowable emissions limit for a regulated NSR pollutant when the action that necessitates such increase is not otherwise subject to review under major or minor NSR. Based on the information submitted in your application, we have determined the following:

1. The affected emissions unit will be located in the Coachella Valley, which is classified as nonattainment for both PM₁₀ (serious) and Ozone (severe-15) National Ambient Air Quality Standards (NAAQS). All other pollutants are classified as attainment or unclassifiable according to the NAAQS.
2. The project will include an increase in truck traffic within the facility from the delivery of hydrated lime (HL). Each truck will travel approximately 1.4 miles, roundtrip, and unload HL into a new storage silo equipped with a fabric filter. The silo will feed one of two new hoppers, each equipped with a fabric filter, and will connect with the existing injection lines to inject the two existing boilers. This is a pneumatic material handling system where the fabric filters are integral to the system. The facility is limited to an annual usage rate of 2,365 tons of HL based upon the design capacity of the boilers and their maximum expected usage rates. This usage rate will also limit the number of truck deliveries to 200 trucks per year.
3. The enclosed table (Table 1) describes the Tribal Minor NSR permitting thresholds in 40 CFR 49.153 and the hydrochloric acid emission control system's estimated potential to emit (PTE) for

each regulated pollutant submitted in your application. As shown in Table 1, the estimated PTE¹ emissions for the system are well below the applicable Tribal Minor NSR permitting thresholds. The emission estimates are based on vendor guarantees provided in your application or estimates found in AP-42 – *Compilation of Air Pollutant Emission Factors*.

Therefore, based on the information you submitted in your application, we concur that this project is not subject to review under major or minor NSR and qualifies for an administrative permit revision. Enclosed you will find the revision to your PSD permit, Permit No. NSR 4-4-1, SE 87-01 which allows you to proceed with the project as proposed in your February 9, 2015 permit application. As identified in the permit amendment, these conditions are only applicable under the Tribal Minor NSR rule.

If you should have any questions please contact Roberto Gutierrez of my staff at (415) 947-4276 or Gutierrez.roberto@epa.gov, or Gerardo Rios, chief of the air permits office, at (415) 972-3974 or rios.gerardo@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Deborah Jordan', written over a light blue horizontal line.

Deborah Jordan
Director, Air Division

Enclosure

cc: Craig Bressan, Corporate EH&S Manager, Greenleaf Power, LLC,

¹ Our calculations do not include the assumed control efficiency provided in the application for reducing fugitive dust caused by additional truck traffic.

Attachment 1 – Application for Administrative Permit Revision for Desert View Power under Tribal
Minor New Source Review

Table 1 Hydrated Lime Injection System Potential to Emit

	DSI System PTE (TPY)	Minor NSR Thresholds (TPY)
CO	0	10
NO _x	0	5*
SO ₂	0	10
VOC	0	2*
PM	0.77	10
PM ₁₀	0.55	1*
PM _{2.5}	0.51	3
Lead	0	0.1
Fluorides	0	1
Sulfuric acid mist	0	2
Hydrogen sulfide	0	2
Total reduced sulfur	0	2
Reduced sulfur compounds	0	2
CO _{2e}	0	NA

*Desert View Power is located in Riverside County, within the Coachella Valley Air Basin, and is classified as Nonattainment for the 8-hour ozone standard (severe-15) and PM₁₀ (serious) and therefore subject to the lower, nonattainment thresholds for NO_x, VOCs and PM₁₀.