

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Zak Covar, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 17, 2014

MR STEVEN M. CLOUSE
SR. VICE PRESIDENT
SAN ANTONIO WATER SYSTEM
PO BOX 2449
SAN ANTONIO TX 78298-2449

Re: Cancellation of Air Quality Permit Number: 56274
Customer Number: CN600529069
Regulated Entity Number: RN103123972

Dear Mr. Clouse:

We are in receipt of your letter received July 11, 2014, regarding the facility listed above. We understand that this unit has ceased operations. Accordingly, Permit Number 56274 has been voided and our records have been updated to reflect this change.

Permit Number: 56274
County: Bexar
Permittee/Registrant: San Antonio Water System

Thank you for informing us of the cancellation. If you have any questions regarding this letter, please feel free to contact me at (512) 239-1278.

Sincerely,

A handwritten signature in black ink, appearing to read "Chelsea Allen".

Chelsea Allen
Air Permits Initial Review Team (MC-161)
Air Permits Division

cc: Sanitarian Services Manager, Food and Environment Division, San Antonio Metropolitan
Health District, San Antonio
Air Section Manager, Region 13 - San Antonio
TCEQ Central Records (MC-198)

07/17/2014 -----NSR IMS - PROJECT RECORD -----

PROJECT#: 214283 PERMIT#: STATUS: COMPLETE DISP CODE: _____
RECEIVED: 07/11/2014 PROJTYPE: VOIDPMT AUTHTYPE: ISSUED DT: 07/17/2014
RENEWAL:
PROJECT ADMIN NAME: VOID 56274
PROJECT TECH NAME: VOID 56274
STAFF ASSIGNED TO PROJECT:
ALLEN , CHELSEA - REVIEWR1_2 - AP INITIAL REVIEW

CUSTOMER INFORMATION (OWNER/OPERATOR DATA)

ISSUED TO: SAN ANTONIO WATER SYSTEM
COMPANY NAME: San Antonio Water System
CUSTOMER REFERENCE NUMBER: CN600529069

REGULATED ENTITY/SITE INFORMATION

REGULATED ENTITY NUMBER: RN103123972 ACCOUNT:
PERMIT NAME:

REGULATED ENTITY LOCATION: 900 E COMMERCE ST
REGION 13 - SAN ANTONIO NEAR CITY: SAN ANTONIO COUNTY: BEXAR

PROJECT NOTES:

07/15/2014 DANIEL MYERS 210-233-3991

PERMIT NOTES:

TRACKING ELEMENTS:

TE Name	Start Date	Complete Date
APIRT RECEIVED PROJECT (DATE)	07/11/2014	

PERMIT VOIDS:

Permit	Void Reason
56274	COMPANY REQUESTED



July 7, 2014

Certified Mail Receipt
91 7108 2133 3934 3412 2176

Mr. Johnny D. Bowers, Team Leader
TCEQ Air Permits Initial Review Team (MC-161)
P.O. Box 13087
Austin, TX 78711-3087

Re: Central Heating & Cooling Facility
900 E. Commerce
Permit Number 56274
Regulated Entity Number: RN103123972
Customer Reference Number: CN600529069
Core Data Form – Termination of Air Permit 56274

AIR PERMITS DIVISION
JUL 11 2014
RECEIVED

Dear Mr. Bowers:

The San Antonio Water System terminated boiler operations at the Central Heating & Cooling facility located at 900 E. Commerce on June 6, 2014. Attached is the Core Data Form for this facility to terminate air permit 56274. Also attached is a copy of air permit 56274.

Thank you for your assistance in this matter. If you have questions or need further information, please feel free to contact Daniel Myers at 210/233-3991.

214283

Sincerely,

A handwritten signature in black ink that reads 'Steven M. Clouse'.

Steven M. Clouse
Sr. Vice President/Chief Operating Officer

Attachments

cc: George Ortiz, TCEQ Region 13 Air Manager
Daniel Myers, Director of Fleet & Facilities
Mark Villareal, Manager H&C

H&C\CENTRAL H&C \PERMIT 2013 RENEWAL\2014 0707 SAWS TERMINATE AIR PERMIT 56274 CORE DATA FORM



TCEQ Use Only

TCEQ Core Data Form

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided)	
☐ New Permit, Registration or Authorization (Core Data Form should be submitted with the program application)	
☐ Renewal (Core Data Form should be submitted with the renewal form)	☒ Other Termination of air permit 56274
2. Attachments Describe Any Attachments: (ex. Title V Application, Waste Transporter Application, etc.)	
☐ Yes ☒ No Air Permit Termination 56274 & Copy of Air Permit 56274	
3. Customer Reference Number (if issued)	4. Regulated Entity Reference Number (if issued)
CN 600529069	RN 103123972

SECTION II: Customer Information

5. Effective Date for Customer Information Updates (mm/dd/yyyy)		6/6/2014	
6. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check only <u>one</u> of the following:			
☐ Owner	☐ Operator	☒ Owner & Operator	
☐ Occupational Licensee	☐ Responsible Party	☐ Voluntary Cleanup Applicant	☐ Other: _____
7. General Customer Information			
☐ New Customer		☒ Update to Customer Information	
☐ Change in Legal Name (Verifiable with the Texas Secretary of State)		☐ Change in Regulated Entity Ownership	
		☐ No Change**	
**If "No Change" and Section I is complete, skip to Section III – Regulated Entity Information.			
8. Type of Customer:			
☐ Corporation	☐ Individual	☐ Sole Proprietorship- D.B.A	
☒ City Government	☐ County Government	☐ Federal Government	
☐ Other Government	☐ General Partnership	☐ State Government	
☐ Limited Partnership	☐ Other: _____		
9. Customer Legal Name (If an individual, print last name first: ex: Doe, John)			
San Antonio Water System		If new Customer, enter previous Customer below	
		End Date: _____	
10. Mailing Address:			
Steven M. Clouse, Sr. Vice President/COO			
PO Box 2449			
City	SanAntonio	State	TX
ZIP	78298	ZIP + 4	2449
11. Country Mailing Information (if outside USA)		12. E-Mail Address (if applicable)	
13. Telephone Number		14. Extension or Code	
(210) 233-3774			
15. Fax Number (if applicable)			
(210) 233-4316			
16. Federal Tax ID (9 digits)	17. TX State Franchise Tax ID (11 digits)	18. DUNS Number (if applicable)	19. TX SOS Filing Number (if applicable)
742632530	17426325308	057582603	
20. Number of Employees		21. Independently Owned and Operated?	
☐ 0-20 ☐ 21-100 ☐ 101-250 ☐ 251-500 ☒ 501 and higher		☒ Yes ☐ No	

SECTION III: Regulated Entity Information

22. General Regulated Entity Information (If "New Regulated Entity" is selected below this form should be accompanied by a permit application)	
☐ New Regulated Entity ☐ Update to Regulated Entity Name ☒ Update to Regulated Entity Information ☐ No Change** (See below)	
**If "NO CHANGE" is checked and Section I is complete, skip to Section IV, Preparer Information.	
23. Regulated Entity Name (name of the site where the regulated action is taking place)	
San Antonio Water System Central Heating & Cooling Plant (Boiler 1 & 2)	

24. Street Address of the Regulated Entity: (No P.O. Boxes)	900 E Commerce St						
	City	San Antonio	State	TX	ZIP	78205	ZIP + 4
25. Mailing Address:	Daniel Myers						
	PO Box 2449						
	City	San Antonio	State	TX	ZIP	78298	ZIP + 4 2449
26. E-Mail Address:	Daniel.Myers@saws.org						
27. Telephone Number	28. Extension or Code		29. Fax Number (if applicable)				
(210) 233-3991			(210) 233-5111				
30. Primary SIC Code (4 digits)	31. Secondary SIC Code (4 digits)	32. Primary NAICS Code (5 or 6 digits)		33. Secondary NAICS Code (5 or 6 digits)			
4961		221330					
34. What is the Primary Business of this entity? (Please do not repeat the SIC or NAICS description.)							
Supplier of steam heat							

Questions 34 – 37 address geographic location. Please refer to the instructions for applicability.

35. Description to Physical Location:					
36. Nearest City	County	State	Nearest ZIP Code		
37. Latitude (N) In Decimal:	38. Longitude (W) In Decimal:				
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
29	25	19	98	28	56

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form or the updates may not be made. If your Program is not listed, check other and write it in. See the Core Data Form Instructions for additional guidance.

☐ Dam Safety	☐ Districts	☐ Edwards Aquifer	☐ Industrial Hazardous Waste	☐ Municipal Solid Waste
☒ New Source Review – Air	☐ OSSF	☐ Petroleum Storage Tank	☐ PWS	☐ Sludge
☐ Stormwater	☐ Title V – Air	☐ Tires	☐ Used Oil	☐ Utilities
☐ Voluntary Cleanup	☐ Waste Water	☐ Wastewater Agriculture	☐ Water Rights	☐ Other:

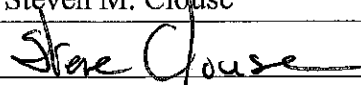
SECTION IV: Preparer Information

40. Name:	Debra Engler	41. Title:	Environmental Analyst II
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address
(210) 233-3745		(210) 233-5258	Debra.Engler@saws.org

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 9 and/or as required for the updates to the ID numbers identified in field 39.

(See the Core Data Form instructions for more information on who should sign this form.)

Company:	San Antonio Water System	Job Title:	Sr. Vice President/Chief Operating Officer
Name (In Print):	Steven M. Clouse	Phone:	(210) 233-3774
Signature:		Date:	7/7/2014

Kathleen Hartnett White, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Larry R. Soward, *Commissioner*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 4, 2004

Mr. Victor Stuckey
Director, Heating and Cooling
San Antonio Water System
P.O. Box 2449
San Antonio, Texas 78298-2449

Re: Permit Application
Permit Number: 56274
Central Heating and Cooling Plant
San Antonio, Bexar County
Regulated Entity Number: RN103123972
Customer Reference Number: CN600529069

Dear Mr. Stuckey:

This is in response to your Form PI-1G, entitled "Grandfathered Facility Permit Application," concerning the above-referenced previously grandfathered facility. We appreciate your cooperation in sending us the information necessary to evaluate your proposal. This project meets the requirements for the Grandfathered Facility Permit, Title 30 Texas Administrative Code § 116.777 (30 TAC § 116.777), if operated as described in your application. This permit will be in effect for ten years from the date of approval.

Additionally, this is in response to your Form PI-1, entitled "General Application for Air Preconstruction Permits and Amendments," concerning the proposed amendment to Permit Number 56274. We understand that you propose to amend the permit to increase fuel consumption to a total of 355.4 MMscf/yr for both Boiler Nos. 1 and 2. As indicated in 30 TAC § 116.116(b), and based on our review, Permit Number 56274 is hereby amended. The amended permit for your facility is enclosed. The permit contains several general and special conditions that define the level of operation and allowable emissions. In addition, the operation of the facilities must be as represented in the application. The permit amendment information will be incorporated into the existing permit file.

This amendment will be automatically void upon the occurrence of any of the following, as per 30 TAC § 116.115(b)(2)(A):

1. Failure to begin construction of the changes authorized by this amendment within 18 months from the date of this authorization.
2. Discontinuance of construction of the changes authorized by this amendment for a period of 18 consecutive months or more.
3. Not completing the changes authorized by this amendment within a reasonable time.

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
AIR QUALITY PERMIT**



A PERMIT IS HEREBY ISSUED TO
San Antonio Water System
AUTHORIZING THE OPERATION OF
Central Heating and Cooling Plant
LOCATED AT

San Antonio, Bexar County, Texas
LATITUDE 29° 25' 19" LONGITUDE 098° 28' 56"



1. Facilities covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code § 116.116 (30 TAC § 116.116)]
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of date of issuance, discontinues construction for more than 18 consecutive months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant a onetime 18-month extension of the date to begin construction. [30 TAC § 116.120(a)]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(B)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting, Remediation, and Registration the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(c)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(D)]
6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(E)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(F)]
8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(G)]
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with § 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(H)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition are applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(I)]
11. This permit may be appealed pursuant to 30 TAC § 50.139.
12. This permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
13. There may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
14. Emissions from this facility must not cause or contribute to a condition of "air pollution" as defined in TCAA § 382.003(3) or violate TCAA § 382.085, as codified in the Texas Health and Safety Code. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.

PERMIT 56274

Date: August 4, 2004

Glenn Shankle
Executive Director

Texas Commission on Environmental Quality

SPECIAL CONDITIONS

Permit Number 56274

Page 2

- A. The TCEQ San Antonio Regional Office shall be contacted as soon as testing is scheduled but not less than 45 days prior to sampling to schedule a pretest meeting. The notice shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in the permit conditions or the TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director or the Director of the TCEQ Compliance Support Division in Austin shall approve or disapprove of any deviation from specified sampling procedures.

Requests to waive testing for any pollutant specified in Special Condition No. 6B shall be submitted to the TCEQ Office of Permitting, Remediation, and Registration, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standards testing which must have the EPA approval shall be submitted to the TCEQ Compliance Support Division in Austin.

- B. The air contaminants emitted from the boilers to be tested for at the maximum firing rate include (but are not limited to) NO_x , CO and opacity. If the boilers are unable to reach the maximum firing rate during testing, then future firing may be limited to the highest firing rate achieved during testing. Furthermore, if the boilers are unable to comply with the emission limits of this permit for any or all of the pollutants of this permit while operating at maximum firing during the test, then future firing will be limited to the maximum emissions-complying firing tested. Additional stack testing may be required for higher firing outside the emissions-complying maximum achieved during the test to be authorized.
- C. Sampling shall occur within 60 days after the facilities achieve maximum production but not later than 180 days after initial start-up of the facilities and at such other times as may be required by the Executive Director of the TCEQ.

SPECIAL CONDITIONS

Permit Number 56274

Page 4

10. The holder of this permit shall mark or physically identify with weatherproof tags, all equipment identified in the MAERT of this permit that has the potential to emit air contaminants. Permitted emission points shall be identified corresponding to the emission point numbering on the MAERT.

Dated August 4, 2004

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 56274

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lb/hr	TPY*
BOILER1	Boiler No. 1	NO _x	2.00	-
		SO ₂	0.74	-
		PM ₁₀	0.37	-
		CO	3.65	-
		VOC	0.27	-
BOILER2	Boiler No. 2	NO _x	2.00	-
		SO ₂	0.74	-
		PM ₁₀	0.37	-
		CO	3.65	-
		VOC	0.27	-
BOILER1	Boiler Nos. 1 and 2	NO _x	-	7.25
BOILER2		SO ₂	-	0.11
		PM ₁₀	-	1.35
		CO	-	13.24
		VOC	-	0.98

- (1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
- (2) Specific point source names.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
 - NO_x - total oxides of nitrogen
 - SO₂ - sulfur dioxide
 - PM - particulate matter, suspended in the atmosphere, including PM₁₀.
 - PM₁₀ - particulate matter equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted.
 - CO - carbon monoxide

* Compliance with annual emission limits is based on a rolling 12-month period.

Date August 4, 2004