

COMPLIANCE AND ENFORCEMENT DIVISION

OFFICE MEMORANDUM

November 3, 2004

TO: BRIAN BATEMAN, DIRECTOR, ENGINEERING DIVISION

FROM KELLY WEE, DIRECTOR OF ENFORCEMENT 

SUBJECT: REVIEW OF COMPLIANCE RECORD OF

CARDINAL COGEN, INC., Site #A1629

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**Background**

This review was initiated as part of the District evaluation of an application by Cardinal Cogen, Inc., for a Title V permit renewal. It is standard practice of the Compliance and Enforcement Division to undertake a compliance record review in advance of the renewal of a Permit to Operate. The purpose of this review is to assure that any non-compliance problems identified during the prior twelve months have been adequately addressed. Additionally, the review is intended to recommend such additional permit conditions and limitations as may be necessary to reasonably assure on-going compliance.

**Finding**

The Enforcement Division staff has commenced a review of the records for Cardinal Cogen, Inc. for the period of September 30, 2003 to September 30, 2004. During this review period, Cardinal Cogen's activities known to the District include:

The District did not issue any Notices of Violation during this review period

The District did not receive any complaints alleging Cardinal Cogen, Inc. as the source.

During this review period, Cardinal Cogen, Inc. requested breakdown relief for an indicated NOX excess that lasted 1 hour. District staff reviewed the indicated excess and it was determined not to be in violation.

There are no pending variances or abatement orders for Cardinal Cogen, Inc

In addition, staff reviewed Cardinal Cogen's Annual Compliance Certifications for 1999-2004 and found no outstanding compliance issues.

### **Conclusions**

The Compliance and Enforcement Division finds that ongoing compliance can be reasonably assured for this facility, for the review period, due to the above record.