

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT E&C DIVISION APPLICATION PROCESSING AND CALCULATIONS	TOTAL PAGES:	PAGE NO.:
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PERMIT TO OPERATE

APPLICANT	TRIGEN-LA ENERGY CORP
MAILING ADDRESS	1370 VALLEY VISTA DRIVE SUITE 100 DIAMOND BAR, CA
EQUIPMENT LOCATION	2052 CENTURY PARK EAST CENTURY CITY, CA

EQUIPMENT DESCRIPTION:

APPLICATION NO 486731 (D3), (C18)

INTERNAL COMBUSTION ENGINE, CWP NO. 8, WAUKESHA, MODEL H2470, RICH BURN, NATURAL GAS FIRED, EIGHT CYLINDER, RATED AT 377., WITH A NON SELECTIVE CATALYTIC CONVERTER, ECS, MODEL DC49-10 AND AN AIR/FUEL RATIO CONTROLLER, ALTRONIC EPC-100E, DRIVING A COMPRESSOR DRIVING AN COMPRESSOR,

APPLICATION NO 486735 (D4), (C19)

INTERNAL COMBUSTION ENGINE, CWP NO. 7, WAUKESHA, MODEL H2470, RICH BURN, NATURAL GAS FIRED, EIGHT CYLINDER, RATED AT 377., WITH A NON SELECTIVE CATALYTIC CONVERTER, ECS, MODEL DC49-10 , AND AN AIR/FUEL RATIO CONTROLLER, ALTRONIC EPC-100E, DRIVING A COMPRESSOR DRIVING AN COMPRESSOR,

APPLICATION NO 486736 (D5), (C20)

INTERNAL COMBUSTION ENGINE, CWP NO. 4, WAUKESHA, MODEL 1860, RICH BURN, NATURAL GAS FIRED, EIGHT CYLINDER, RATED AT 287, WITH A NON SELECTIVE CATALYTIC CONVERTER, ECS, MODEL DC49-10 , AND AN AIR/FUEL RATIO CONTROLLER, ALTRONIC EPC-100E, DRIVING A COMPRESSOR DRIVING AN COMPRESSOR,

APPLICATION NO 486737 (D6)

INTERNAL COMBUSTION ENGINE, CWP NO. 1, WAUKESHA, MODEL F817GU, NATURAL GAS FIRED, LEAN BURN, SIX CYLINDER, AND AN AIR/FUEL RATIO CONTROLLER, ALTRONIC EPC-100E, RATED AT 193 B.P. DRIVING AN PUMP.

APPLICATION NO 486738 (D7)

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INTERNAL COMBUSTION ENGINE, CWP NO. 2, WAUKESHA, MODEL F817GU, NATURAL GAS FIRED, LEAN BURN, SIX CYLINDER, AND AN AIR/FUEL RATIO CONTROLLER, ALTRONIC EPC-100E, RATED AT 193 B.P. DRIVING AN PUMP.

APPLICATION NO 486739 (D8)

INTERNAL COMBUSTION ENGINE, CWP NO. 3, WAUKESHA, MODEL F817GU, NATURAL GAS FIRED, LEAN BURN, SIX CYLINDER, AND AN AIR/FUEL RATIO CONTROLLER, ALTRONIC EPC-100E, RATED AT 193 B.P. DRIVING AN PUMP.

APPLICATION NO 486740 (D11)

INTERNAL COMBUSTION ENGINE, CT FAN NO. 2, WAUKESHA, MODEL F140GZ, NATURAL GAS FIRED, LEAN BURN, SIX CYLINDER, AND AN AIR/FUEL RATIO CONTROLLER, ALTRONIC EPC-100E, RATED AT 132 B.P. DRIVING AN FAN.

APPLICATION NO 486741 (D12)

INTERNAL COMBUSTION ENGINE, CT FAN NO. 1, WAUKESHA, MODEL F140GZ, NATURAL GAS FIRED, LEAN BURN, SIX CYLINDER, AND AN AIR/FUEL RATIO CONTROLLER, ALTRONIC EPC-100E, RATED AT 132 B.P. DRIVING AN FAN.

APPLICATION NO 486742 (D13)

INTERNAL COMBUSTION ENGINE, CT FAN NO. 3, WAUKESHA, MODEL F140GZ, NATURAL GAS FIRED, LEAN BURN, SIX CYLINDER, AND AN AIR/FUEL RATIO CONTROLLER, ALTRONIC EPC-100E, RATED AT 132 B.P. DRIVING AN FAN.

APPLICATION NO 500607

TITLE V/RECLAIM REVISION

PERMIT CONDITIONS

Engine D3, D4, D5

- C1.5 Add condition, limit hours of operation to 500 hours per year per Rule 1110.2 (CO/VOC emissions limits not change)
- D12.3 Remove, modify D12-4 to include inlet temperature
- D12-4 Keep, modify to add temperature recorder per Rule 3004 (applies to engines equipped with NSCR)
- D12.5 Add time meter condition required per Rule 1110.2 (f)(1)(B)
- D28.2 Remove, see D29.2
- D29.2 Update Rule 1110.2 source testing condition. The testing frequency per Rule 1110.2 (f)(1)(C). Update for testing at one load, the engines operate at one load (90% load +/- 10%). Use approved Rule 1110.2 protocol. Submit s/t results within 60 days of the test to the District.
- D182.1 Remove condition, Rule 1110.2 testing and monitoring more stringent.

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- E71.1 For Rule 1110.2, add condition to operate the engine at 95% load (+/- 10 percent).
- E115.1 Update the air fuel ratio controller condition, add mv range and when oxygen is replaced reset AFCR set points.
- H23.6 Add Rule 1110.2 condition, add breakdown condition. Require periodic monitoring, but does not apply to the lean burn engines.
- K40.1 Remove, addressed in condition D29.1
- K67.2 Modify record keeping condition per Rule 1110.2

Engines D6, D7, D8, D11, D12 and D13

- C1.5 Add condition, limit hours of operation to 500 hours per -Rule 1110.2 (CO/VOC emissions limits not change)
- D12.5 Add time meter condition required per Rule 1110.2 (f)(1)(B)
- D29.2 Add Rule 1110.2 source testing condition. The testing frequency per Rule 1110.2 (f)(1)(C). Update for testing at one load, the engines operate at one load (90% load +/- 10%). Use approved Rule 1110.2 protocol. Submit s/t results within 60 days of the test to the District.
- E71.1 For Rule 1110.2, add condition to operate the engine at 95% load (+/- 10 percent).
- E115.1 Add air fuel ratio controller condition, add mv range and when oxygen is replaced reset AFCR set points.
- H23.6 Add Rule 1110.2 condition, add breakdown condition. Require periodic monitoring, but does not apply to the lean burn engines.
- K67.2 Add record keeping condition per Rule 1110.2

BACKGROUND:

The above applications were filed as change of conditions. The applicant proposes to updated permit description (add air fuel ratio controller) and update permit conditions for Rule 1110.2. The engines are used to drive compressors, pumps and fans that are used to run chillers. The chillers provide chilled (air conditioning) water to various office buildings.

In the Facility Permit ID#9053, additions are requested to Section D by ad-min change of conditions of nine non emergency engines (ICE). Attached is a draft of Section D in the Facility Permit affected by this addition.

This Title V modification is considered as a "minor permit revision" to the Title V permit because there is no increase of pollutant emission. The total project emissions are listed in this evaluation.

CALCULATIONS

- 1. Permit processing Emissions calculation methodology
 - A. Emissions calculations

Determine emissions from N0x, CO and ROG

-

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Determine emissions from SO_x and PM (if EF not given in g/bhp-hr)

$$R1(LB / HR) = \frac{EF \times GAS\ USAGE}{1 \times 10^6}$$

Note R1 = R2

Where EF equal lb/MMCF (ref AP42 table 3.2-3)

B. AEIS and NSR calculations

$$Lb/dy = lb/hr * hr/dy$$

$$30\text{-day ave} = lb/dy * dy/wk * 4.33\ wk/month * 1\ month/30\ days$$

$$lb/yr = lb/dy * dy/wk * wk/yr$$

2. EMISSIONS CALCULATIONS

A. D5 current emissions

	lb/hr	lb/dy	lb/mon	30-dy ave	R2-lb/yr
NO _x	0.62	14.87	309.75771	10.33	309.76
ROG	0.71	16.99	354.00881	11.80	354.01
CO	9.93	238.35	4965.6057	165.52	4965.61
SO _x	0.001	0.035	0.7203669	0.02	0.72
PM	0.02428	0.583	12.140877	0.40	12.14
PM10	0.02328	0.559	11.638581	0.39	11.64

Revise emissions based on 500 hr/yr limit per Rule 1110.2. For NSR purpose assume all the allowed operations are in one month (worst case 30 day ave).

The CO and VOC emissions were updated to the current Rule 1110.2 concentrations limits. NO_x emissions based on 1641 lb/mmcf RECLAIM EF. The engines were previously Rule 219 exempt and the engine was equipped with NSCR due to Rule 1110.1 and no NSR emissions were entered in the NSR system.

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The applicant mainly operates electric chillers, the engines were used on the ave ½ the year. Effective 7/1/2010 the engine operation will be limited to 500 hours per year, because the applicant decided not to replace the NSCR (new unit) to control the CO and VOC emissions to the new compliance limits.

Revise the previous emissions based on full time operation, see previous application number, revise NOx, CO and VOC to current EF.

Previous emissions

	lb/hr	lb/dy	lb/mon	30-dy ave	R2-lb/yr
NOx	0.62	14.87	446.0511	14.87	446.05
ROG	0.71	16.99	509.77269	16.99	509.77
CO	9.93	238.35	7150.4722	238.35	7150.47
SOx	0.001	0.035	1.0373283	0.03	1.04
PM	0.02428	0.583	17.482863	0.58	17.48
PM10	0.02328	0.559	16.759556	0.56	16.76

B. D3 and D4 current emissions

	lb/hr	lb/dy	lb/mon	30-dy ave	R2-lb/yr
NOx	0.81	19.53	406.89427	13.56	406.89
ROG	0.93	22.32	465.02203	15.50	465.02
CO	13.05	313.09	6522.7643	217.43	6522.76
SOx	0.002	0.054	1.1168766	0.04	1.12
PM	0.03765	0.904	18.82355	0.63	18.82
PM10	0.03609	0.866	18.044775	0.60	18.04

Revise emissions based on 500 hr/yr limit per Rule 1110.2. For NSR purpose assume all the allowed operations are in one month (worst case 30 day ave)

The CO and VOC emissions were updated to the current Rule 1110.2 concentrations limits. NOx emissions based on 1641 lb/mmcf RECLAIM EF. The engines were previously Rule 219 exempt and the engine was equipped with NSCR due to Rule 1110.1 and no NSR emissions were entered in the NSR system.

The applicant mainly operates electric chillers, the engines were used on the ave ½ the year. Effective 7/2011 the engine operation will be limited to 500 hours per year, because the applicant decided not to replace the NSCR

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(new unit) to control the CO and VOC emissions to the new compliance limits.

Revise the previous emissions based on full time operation, see previous application number, revise NOx, CO and VOC to current EF.

Previous emissions

	lb/hr	lb/dy	lb/mon	30-dy ave	R2-lb/yr
NOx	0.81	19.53	585.92775	19.53	585.93
ROG	0.93	22.32	669.63172	22.32	669.63
CO	13.05	313.09	9392.7806	313.09	9392.78
SOx	0.002	0.054	1.6083023	0.05	1.61
PM	0.03765	0.904	27.105911	0.90	27.11
PM10	0.03609	0.866	25.984476	0.87	25.98

C. D6, D7 and D8 current emissions

	lb/hr	lb/dy	lb/mon	30-dy ave	R2-lb/yr
NOx	2.41	57.89	1206.135	40.20	1206.14
ROG	0.41	9.95	207.24119	6.91	207.24
CO	5.80	139.16	2899.2511	96.64	2899.25
SOx	0.001	0.022	0.453789	0.02	0.45
PM	0.01530	0.367	7.6480425	0.25	7.65
PM10	0.01466	0.352	7.331625	0.24	7.33

Revise emissions based on 500 hr/yr limit per Rule 1110.2. For NSR purpose assume all the allowed operations are in one month (worst case 30 day ave)

The CO and VOC emissions were updated to the current Rule 1110.2 concentrations limits. NOx emissions based on 1641 lb/mmcf RECLAIM EF. The engines were previously Rule 219 exempt and no NSR emissions were entered in the NSR system.

Note, the previous a/n 447407 for D8 was filed as ad-min to correct the equipment description, no change in previous emissions.

The applicant mainly operates electric chillers, the engines were used on the ave ½ the year. Effective 7/2011 the engine operation will be limited to 500 hours per year, because the applicant decided not to replace the NSCR (new unit) to control the CO and VOC emissions to the new compliance limits.

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Revise the previous emissions based on full time operation, see previous application number, revise NOx, CO and VOC to current EF.

Previous emissions

	lb/hr	lb/dy	lb/mon	30-dy ave	R2-lb/yr
Nox	2.41	57.89	1736.8344	57.89	1736.83
ROG	0.41	9.95	298.42731	9.95	298.43
CO	5.80	139.16	4174.9216	139.16	4174.92
SOx	0.001	0.022	0.6534562	0.02	0.65
PM	0.01530	0.367	11.013181	0.37	11.01
PM10	0.01466	0.352	10.55754	0.35	10.56

D. D11, D12 and D13 current emissions

	lb/hr	lb/dy	lb/mon	30-dy ave	R2-lb/yr
Nox	1.71	41.12	856.602	28.55	856.60
ROG	0.28	6.80	141.74009	4.72	141.74
CO	3.97	95.18	1982.9075	66.10	1982.91
SOx	0.001	0.015	0.3222828	0.01	0.32
PM	0.01086	0.261	5.431671	0.18	5.43
PM10	0.01041	0.250	5.20695	0.17	5.21

Revise emissions based on 500 hr/yr limit per Rule 1110.2. For NSR purpose assume all the allowed operations are in one month (worst case 30 day ave)

The CO and VOC emissions were updated to the current Rule 1110.2 concentrations limits. NOx emissions based on 1641 lb/mmcf RECLAIM EF. The engines were previously Rule 219 exempt and no NSR emissions were entered in the NSR system.

The applicant mainly operates electric chillers, the engines were used on the ave 1/2 the year. Effective 7/2011 the engine operation will be limited to 500 hours per year, because the applicant decided not to replace the NSCR (new unit) to control the CO and VOC emissions to the new compliance limits.

Revise the previous emissions based on full time operation, see previous application number, revise NOx, CO and VOC to current EF.

Previous emissions

	lb/hr	lb/dy	lb/mon	30-dy ave	R2-lb/yr
Nox	1.71	41.12	1233.5069	41.12	1233.51

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ROG	0.28	6.80	204.10573	6.80	204.11
CO	3.97	95.18	2855.3868	95.18	2855.39
SOx	0.001	0.015	0.4640872	0.02	0.46
PM	0.01086	0.261	7.8216062	0.26	7.82
PM10	0.01041	0.250	7.498008	0.25	7.50

2. COMPLIANCE RECORD REVIEW

The SCAQMD compliance database for the past two year period (08/25/2008-08/25/2010) and no N/C or NOV's were issued during this time period.

3 Permitting since the Title V permit was renewed since 2007,(RULE 3000 (6))

One Title V revision application (correct equipment description, no increase in emissions) was submitted for review after the Title V renewal (a/n 332509) in 2007

A/n	Device	NOx	ROG	CO	SOx	PM10
486731	D3	13.56	15.50	217.43	0	0.6
486735	D4	13.56	15.50	217.43	0	0.6
486736	D5	10.33	11.80	165.52	0	0.39
486737	D6	40.20	6.91	96.64	0	0.24
486738	D7	40.20	6.91	96.64	0	0.24
486739	D8	40.20	6.91	96.64	0	0.24
486740	D11	28.55	4.72	66.10	0	0.17
486741	D12	28.55	4.72	66.10	0	0.17
486742	D13	28.55	4.72	66.10	0	0.17
156968	D3	-19.53	-22.32	-313.09	0	-0.87
156967	D4	-19.53	-22.32	-313.09	0	-0.87
156966	D5	-14.87	-16.99	-238.35	0	-0.56
190071	D6	-57.89	-9.95	-139.16	0	-0.35
190072	D7	-57.89	-9.95	-139.16	0	-0.35
447407	D8	-57.89	-9.95	-139.16	0	-0.35
447408	D11	-41.12	-6.8	-95.18	0	-0.25
447409	D12	-41.12	-6.8	-95.18	0	-0.25
447410	D13	-41.12	-6.8	-95.18	0	-0.25
Net change in emissions		-107.26	-34.19	-478.95	+0	-1.28

The net change in emissions are below the threshold limits per Rule 3000 (6)-Table 1.

RULES EVALUATION:

Rule 212 There is no increase in emissions, thus section (c) and (g) does not apply. The previous 30 day ave emissions were revised, there is no actual increase in emissions

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Section (c)(3)(A)(i)

Equipment	MICR	Limit	Trgger Public Notice
Engine	n/a	10E-06	NO

Section (g)

Item	Lb/dy daily maximum	Allow limit-lb/dy	Trigger Public notice
NOx	-211.67	40	No
ROG	-43.25	30	No
CO	-357.11	220	No
PM10	-1.3	30	No
SOx	+0	60	No

See previous section for change in emissions summation

Rule 401 :The equipment is not expected to emit visible emissions.

Rule 402 :The equipment is not expected to emit odorous emissions.

Rule 404 :Grain loading from the engine expected to comply.

Rule 407 :Does not apply per section (b)(1)

Rule 409 :Does not apply per second paragraph of this Rule

Rule 1110.2. Compliance is expected with the following sections:

Current concentration limits

Item	Ppmv @ 15% oxygen
CO	2000
ROG	250

Section (d)(1)(B)-the applicant proposes to operate all the engines less than 500 hours per year (permit condition), The applicant provided yearly operational information for the engine, proving the annual hours of operation is less

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than 500 hours per year, thus the more recent concentration limits do not apply.

Section (d)(1)(E)- Rich burn engines are equipped with air/fuel ratio controllers (will be listed on the permit description). The air fuel ratio controllers are added to the lean burn engines.

Section (e)(4)-Requires I&M plan to be submitted to the District by 8/1/2008. The plan has been filed with the District (see a/n 486499)

Section (e)(5)-the original command and control permits does list the air/fuel ratio controller, but when the permit was listed in RECLAIM format the controller was not listed. The controller will be listed in the facility permit.

Section (f)(1)(A)(ii)(III)- Each of the engines are less than 500 HP, thus no CEMs are required to be installed on the engines.

Section (f)(1)(B)-install time meter. Time meter is already installed on the engines.

Section (f)(1)(C)(i)-Effective 8/1/08 require source testing once every 2 years or every 8760 operating hours. If the engines operate less than 2000 hours since the previous test, then testing is once every three years.

Section (f)(1)(C)(ii)-Conduct test for at least 60 minutes. Test must occur at least after 40 hours after a tune up

Section (f)(1)(C)(ii)-Use contractor that is approved to do the necessary test

Section (f)(1)(C)(iv)-Submit source test protocol at least 60 days prior to testing and the protocol has to be approved by the District (if required by this Rule).

Section (f)(1)(C)(vi)-Submit source test reports within 60 days of the test (if required by the Rule)

Section (f)(1)(D)-Require one I&M per facility to be submitted to the District. Plan has been submitted to the District (see a/n 486499).

Section (f)(1)(D)(iii) test engine weekly or every 150 hours of operation with a portable analyzer, this applies to the rich burn engines only. The lean burn engines no CO emissions checks are required, because the previous CO limits are 2000 ppmv. Included in the plan evaluation, (see a/n 486499).

Section (f)(1)(D)(iii)(I) if the engine is in compliance with the previous section, then allowing testing once every month or 750 hours of operation. Included in the plan evaluation (see a/n 486499).

Section (f)(1)(D)(iii)(V) the portable analyzer shall be calibrated. Included in the plan evaluation(see a/n 486499).

Section (f)(1)(D)(iv) Procedures for daily monitoring. Included in the plan evaluation, (see a/n 486499).

Section (f)(1)(E) Operating log

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The inspection and monitoring plan is required to be submitted in the compliance plan per section (e)(4). The requirements of section (f)(1)(D) will be addressed in the compliance plan, (plan filed, see a/n 486499).

Reg. XIII Compliance with the following sections is anticipated.

1303 (a)-BACT- Does not apply no increase in HP rating or emissions.

1303 (b)(1)- Does not apply no increase in HP rating or emissions .

1303 (b)(2)- NOx, ROG, CO, PM10 and SOx

A/n	Device	30 day ave-lb/dy				
		NOx	ROG	CO	SOx	PM10
486731	D3	13.56	15.50	217.43	0	0.6
486735	D4	13.56	15.50	217.43	0	0.6
486736	D5	10.33	11.80	165.52	0	0.39
486737	D6	40.20	6.91	96.64	0	0.24
486738	D7	40.20	6.91	96.64	0	0.24
486739	D8	40.20	6.91	96.64	0	0.24
486740	D11	28.55	4.72	66.10	0	0.17
486741	D12	28.55	4.72	66.10	0	0.17
486742	D13	28.55	4.72	66.10	0	0.17
156968	D3	-19.53	-22.32	-313.09	0	-0.87
156967	D4	-19.53	-22.32	-313.09	0	-0.87
156966	D5	-14.87	-16.99	-238.35	0	-0.56
190071	D6	-57.89	-9.95	-139.16	0	-0.35
190072	D7	-57.89	-9.95	-139.16	0	-0.35
447407	D8	-57.89	-9.95	-139.16	0	-0.35
447408	D11	-41.12	-6.8	-95.18	0	-0.25
447409	D12	-41.12	-6.8	-95.18	0	-0.25
447410	D13	-41.12	-6.8	-95.18	0	-0.25
Net change in emissions		-107.26	-34.19	-478.95	+0	-1.28

RULE 1401- There is no increase in HP rating or emissions, thus exempt from this Rule per section (g)(1)(B).

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RULE 1470- Rule does not apply to spark ignited engines

RULE 1472- The applicant maintains two emergency diesel stand-by engines, thus the equipment is not subject to this Rule.

Regulation XX

Reg.2005 Compliance with the following sections is anticipated.

2005 (c)(1)-BACT –Complies see emissions table

2005 (c)(1)(B)-Complies

2005 (c)(2)-Complies

2012 –See the table below

A. D3, D4 and D5

Equipment	Rule- process unit	Section-emissions factor or concentration limit	type	value
ICE	(e)(1)(B)(ii)	(e)(2)(C)	Emissions factor	76 ppmv

The above equipment will be limited to less than 500 hours per year per Rule 1110.2, the equipment will change from “Large Source” to “Process Unit”

B. D6, D7, D8, D11, D12 and D13

Equipment	Rule- process unit	Section-emissions factor or concentration limit	type	value
ICE	(e)(1)(B)(ii)	(e)(2)(C)	Emissions factor	1641 lb/mmcf

Regulation XXX

This facility (id# 11034) is included in Phase One of the Title V universe. Therefore the proposed equipment is expected to comply with the following sections:

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RDO		

Rule 3005 (c)(1): The Title V expected permit revision caused by this equipment addition satisfies all the applicable conditions listed in this rule, it constitutes a Minor Permit revision (no net emissions increase less than required by Rule 3000 (b)(12)(A)(vi)).

Rule 3003 The anticipated Minor permit revision is expected to comply with all the applicable requirements in this rule, of special note are the sections listed below

Section (i)(4) A permit revision may be issued after the permit revision applications meets all conditions in this rule.

Section (j)(1)(A) The EPA Administrator will timely receive the Minor revision upon completion of District evaluation.

Section (j)(1)(C) The EPA Administrator will timely receive the draft of the Minor revision upon completion of District evaluation.

Section (j)(1)(D) The EPA Administrator will timely receive the final Title V permit upon issuance by the District

Section (j)(4)(A) The applicant will be timely notified of any refusal to accept all recommendations for the draft permit

Rule 3006 (a) Exempt per section (b).

RECOMMENDATIONS

Based on the analysis in this report, the equipment is expected to comply with the applicable Rules and Regulations of the SCAQMD and the applicable BACT requirements.

For this reason, the following disposition is recommended; issue a revised Title V Facility Permit reflecting the change of conditions to nine non-emergency ICE's described under section D.

Updates in Section D of the Title V facility Permit resulting from this addition are listed in Equipment and Condition sections of the attached draft permit.

RECOMMENDATIONS

FOR THIS APPLICATION THE FOLLOWING DISPOSITION IS RECOMMENDED:

Issue P/O