

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name:	Veolia Energy Los Angeles, Inc.
Facility ID:	11034
SIC Code:	221330
Equipment Location:	2052 Century Park East Los Angeles, CA 90067
Application No.:	574764
Application Submittal Date:	5/1/2015
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1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant in the South Coast Air Basin. The Basin is in attainment with the National Ambient Air Quality Standards (NAAQS) for NO₂, SO₂, CO, and lead. The status for PM₁₀ is serious non-attainment. The status for ozone is currently extreme non-attainment.

A Title V renewal permit is proposed to be issued to cover the operations of Veolia Energy Los Angeles, Inc. at 2052 Century Park East, Los Angeles, CA 90067. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility, applying for a Title V permit renewal, that is in the business of providing cooling and heated air conditioning to various office buildings, hotels, hospital and apartment buildings. The facility is operating boilers, non-emergency internal combustion engines, emergency generators, and other supporting equipment.

3. Construction and Permitting History

The facility has been in constant operation with a Title V permit at this location since 2005. One Title V permit revision was issued to this facility on 6/15/2006. An initial Title V permit was issued to the facility on November 29, 2005.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Sections D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. The emergency stand-by engine is not subject to NSPS because the engine was installed prior to the year 2008. The boilers are subject NSPS testing requirements every five years for NO_x and CO. The non-emergency engines are not subject to 40 CFR63 Subpart ZZZZ because the HAP emissions are well below the thresholds. Device D41 (boiler) is subject to 40CFR 60 Subpart Db NO_x limit of 0.1 lb/mmbtu.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Sections D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001). Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 do not apply to any of the permitted emission sources at this facility.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each of the equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year) Annual Reported Emissions for Reporting Period 2012

Pollutant	Emissions (tons/year)
CO	8.067
NOX	2.655
VOC	0.475
SOX	0.049
PM	7.689

Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2012

The Following TACs Were Reported	Emissions (lbs/yr)
Ammonia	529.657
Formaldehyde	17.986
Benzene	1.301
1, 3 Butadiene	0.449
Naphthalene	0.117
Methylene Chloride	0.025
Paahs, Total, With Components Not Reported	0.022
Ethylene Dibromide	0.016
Carbon Tetrachloride	0.013

Ethylene Dichloride	0.008
Vinyl Chloride	0.005
2-Methyl Naphthalene (Pah, Pom)	0.003
Asbestos	0.001
Lead (Inorganic)	0.001

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The AQMD is tracking the status of the facility under AB2588.

8. Compliance History

As noted, the facility has been in constant operation. The facility has been subject to both self-reporting requirements and SCAQMD inspections. The facility had no citizen complaints filed, one Notice to Comply and one Notice of Violation in the last two years. Notice to Comply NC D04849 was issued on 12/13/13 for not submission QCER timely. Notice of Violation NOV P55543 was issued on 12/13/13 for failure to submit the daily mass NOx emissions report etc on time. The facility is currently operating in compliance with all applicable rules and regulations.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this Title V renewal permit, the reporting frequency for compliance certification for the facility shall be annual.