

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 5	PAGE 1
	APPL. NO. 515617	DATE September 16, 2011
	PROCESSED BY Jon Uhl	CHECKED BY

Minor Title V Permit Revision

COMPANY NAME, LOCATION ADDRESS:
 NM Milliken Genco LLC, SCAQMD ID # 129661
 2050 South Milliken
 Ontario, CA 91761

MAILING ADDRESS:
 FORTISTAR Methane Group
 NM Milliken Genco LLC
 5087 Junction Road
 Lockport, NY 14094

BACKGROUND:
 NM Milliken Genco LLC operates two landfill gas-fueled internal combustion engines driving electrical generators at the Milliken landfill. The facility is not in NOx or SOx RECLAIM. The Title V permit renewal (A/N 466878) was issued effective 12/21/2007.

NM Milliken Genco LLC submitted application number 515617 for a minor revision to their Title V facility permit. This application was received 10/15/2010 and deemed complete 10/22/2010. Three applications are included in this permit revision:

Table 1-Applications included in Permit Revision

	A/N	Equipment	Permit Action	Section
1	515470	Landfill gas-fueled IC Engine #1 for Electrical Generation	Change of Conditions : <ul style="list-style-type: none"> • Clarify calculation methods, maximum limit and recordkeeping for the hourly heating value of landfill gas burned in this IC engine. • Add non-resettable elapsed time meter. • Remove air/fuel ratio controller requirement; engine is equipped with a NOx CEMS. • Update VOC & NOx concentration limits based on current Rule 1110.2 requirements. • Add Methane concentration limit based on the current Rule 1150.1 requirement. • Convert RHC, NOx & CO BACT emission limits from gram/bhp-hr to ppmv with no O2 correction. 	D
2	515471	Landfill gas-fueled IC Engine #2 for Electrical Generation	Change of Conditions : <ul style="list-style-type: none"> • Clarify calculation methods, maximum limit and recordkeeping for the hourly heating value of landfill gas burned in this IC engine. • Add non-resettable elapsed time meter. • Remove air/fuel ratio controller requirement; engine is equipped with a NOx CEMS. • Update VOC & NOx concentration limits based on current Rule 1110.2 requirements. • Add Methane concentration limit based on the current Rule 1150.1 requirement. 	D

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			<ul style="list-style-type: none"> Convert RHC, NOx & CO BACT emission limits from gram/bhp-hr to ppmv with no O2 correction. 	
3	486800	Rule 1110.2 Inspection & Monitoring Plan	<ul style="list-style-type: none"> Approve Plan 	1

Administrative changes to Section A included in this permit revision:

Permit Action	
1	Change the Mailing Address from: 2225 E. 28 th St., Suite 508, Signal Hill, CA 90755 to: 5087 Junction Road, Lockport, NY 14094
2	Change the Responsible Official from: Dean Comand, Division Manager, tel (905) 465-4500 to: Anthony Falbo, Senior Vice President - Operations, tel (716) 439-1004
3	Change the Contact Person from: Paul Ervin, West Coast Operations Manager, tel (562) 424-5830 to: Suparna Chakladar, Vice President, tel (951) 833-4153

See letter dated August 2, 2011, requesting the changes to Section A (Attachment 1).

FEE EVALUATION:

The fees paid for this application are:

Table 2 – Application Fees Paid

A/N	Equipment	BCAT	Type	Status	Fee Schedule	Fees Required, \$	Fees Paid, \$
515617	Facility Permit Revision – Title V only	555007	55	21	--	861.52	861.52

RULES EVALUATION:

PART 1 SCAQMD REGULATIONS

REG XXX	Title V	November 5, 2010
	NM Milliken Genco LLC was issued a Title V permit renewal effective on December 21, 2007. This is a minor permit revision as defined in Rule 3000(b)(15).	
	Rule 3000 (b)(15)(A)(i)	This revision does not require or change a case-by-case evaluation of: reasonably available control technology (RACT) pursuant to Title I of the federal Clean Air Act; or maximum achievable control technology (MACT) pursuant to 40 CFR Part 63, Subpart B.
	(b)(15)(A)(ii)	This revision does not violate a regulatory requirement.



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	administrative terms and conditions. Sections D and H list the terms and conditions. Section I lists the approved compliance plans and schedules. These terms and conditions assure compliance with all regulatory requirements, including monitoring, recordkeeping and reporting requirements.
	The permit expiration date, December 20, 2012, is listed in Section A.
	The origin and authority (Rule or Regulation) is listed for each permit term and condition, including permit conditions which are not federally enforceable.
	No alternative operating scenarios have been submitted by NM Milliken Genco LLC.
3004(b)	This is not a RECLAIM facility.
3004(c)	No permit shield was requested by NM Milliken Genco LLC.
3004(f)(1)	The Title V permit will expire 5 years from the date of issuance unless renewed. The permit expiration date, December 20, 2012, is listed in Section A.
3005(c)(2)(A)(ii)	NM Milliken Genco LLC submitted a letter dated September 29, 2010, containing the certification by a responsible official, consistent with paragraph (c)(7) of Rule 3003, that the requested revisions meet the criteria for use of minor permit revision procedures and a request that such procedures be used.

REVIEW OF COMPLIANCE DATABASE:

As of September 15, 2011, the AQMD Compliance Database shows that this facility has one open Notice of Violation (NOV - P49746). This NOV pertains to the annual compliance test on June 7 & 8, 2010. Applicant submitted additional source test results for 2010 and 2011 showing compliance with the Rule 1110.2 and 1150.1 limits.

Engine #1

Rule	Limit	6/8/2010 test	7/15/2010 test	4/19/2011 test	
1110.2 - VOC	40 ppmv	69 ppmv	25.8 ppmv	19.6 ppmv	as CH4 @ 15% O2
1150.1 - VOC	20 ppmv	24.3 ppmv	12.98 ppmv	9.91 ppmv	as hexane @ 3% O2

Engine #2

Rule	Limit	6/7/2010 test	7/15/2010 test	3/9/2011 test	
1110.2 - VOC	40 ppmv	75 ppmv	9.4 ppmv	18.8 ppmv	as CH4 @ 15% O2
1150.1 - VOC	20 ppmv	24.3 ppmv	4.74 ppmv	9.53 ppmv	as hexane @ 3% O2

RECOMMENDATION

A/N	Recommendation
515617	Issue minor revision to Title V Facility Permit, Sections A, I & D.

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ATTACHMENTS

1. Letter requesting Section A changes, dated 8/2/2011
2. Form 500-A2 : Title V Application Certification, dated 9/29/2010
3. Form 500-C1 : Compliance Status Report, dated 9/29/2010
4. Form 500-C2 : Non-Compliant Operations Report, dated 9/2/2010
5. AQMD Compliance Database (10/15/2011)