

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 4	PAGE 1
	APPL. NO. 527512	DATE January 6, 2012
	PROCESSED BY Jon Uhl	CHECKED BY

Deminimis Significant Title V/RECLAIM Permit Revision

COMPANY NAME, LOCATION ADDRESS:

DeMenno/Kerdoon, SCAQMD ID # 800037
 2000 N. Alameda Street
 Compton, CA 90222

BACKGROUND:

DeMenno/Kerdoon operates this waste oil/waste glycol/wastewater processing facility in the city of Compton. The facility is a NOx RECLAIM facility. The Title V permit was issued effective 7/1/2011.

DeMenno/Kerdoon submitted application number 527512 for a deminimis significant revision to their Title V facility permit. This application was received 9/20/2011 and deemed complete 9/29/2011. Five applications are included in this permit revision:

Table 1-Applications included in Permit Revision

	A/N	Equipment	Device ID	Permit Action	Section	Process	System
1	527509	Soil Vapor Extraction	D554 D555 D556	• New soil vapor extraction system vented to facility afterburners	H	11	4
2	527510	Afterburner	C142	• Modify existing afterburner to connect soil vapor extraction system	H	9	7
3	527511	Afterburner	C281	• Modify existing afterburner to connect soil vapor extraction system	H	9	13
4	528472	Sludge Dewatering	C64	• Replace sludge centrifuge	H	5	2
5	530589	Storage Silo	D557 C558	• New storage silo with vent filter	H	5	3

FEE EVALUTION:

The fees paid for this application are:

Table 2 – Application Fees Paid

A/N	Equipment	BCAT	Type	Status	Fee Schedule	Fees Required, \$	Fees Paid, \$
527512	Facility Permit Revision – RECLAIM/Title V	555009	86	21	--	1,747.19	1,747.19

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RULES EVALUATION:

PART 1 SCAQMD REGULATIONS

REG XXX	Title V	November 5, 2010																														
	<p>DeMenno/Kerdoon was issued a Title V permit effective on July 1, 2011. This is a de minimis significant permit revision as defined in Rule 3000(b)(7), where the cumulative emission increases of non-RECLAIM pollutants or hazardous air pollutants (HAP) from all de minimis significant permit revisions during the term of the Title V permit are not greater than the threshold levels given in this rule.</p> <table border="1"> <thead> <tr> <th>Air Contaminant</th> <th>Prior revisions</th> <th>This revision</th> <th>Total</th> <th>Threshold level</th> </tr> </thead> <tbody> <tr> <td>HAP</td> <td>0.</td> <td>0.</td> <td>0.</td> <td>30. lb/day</td> </tr> <tr> <td>VOC</td> <td>0.25</td> <td>2.24</td> <td>2.49</td> <td>30. lb/day</td> </tr> <tr> <td>PM10</td> <td>0.00</td> <td>0.04</td> <td>0.04</td> <td>30. lb/day</td> </tr> <tr> <td>SO_x</td> <td>0.</td> <td>0.</td> <td>0.</td> <td>60. lb/day</td> </tr> <tr> <td>CO</td> <td>0.</td> <td>0.</td> <td>0.</td> <td>220. lb/day</td> </tr> </tbody> </table>		Air Contaminant	Prior revisions	This revision	Total	Threshold level	HAP	0.	0.	0.	30. lb/day	VOC	0.25	2.24	2.49	30. lb/day	PM10	0.00	0.04	0.04	30. lb/day	SO _x	0.	0.	0.	60. lb/day	CO	0.	0.	0.	220. lb/day
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	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.																														
	(b)(15)(A)(iii)	This revision does not require any significant change in monitoring terms or conditions in the permit.																														
	(b)(15)(A)(iv)	This revision does not require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit.																														
	(b)(15)(A)(vii)	This revision does not result in an increase in GHG emissions of >75,000 tpy CO ₂ e.																														
	(b)(15)(A)(viii)	This revision does not establish or change a permit condition that the facility has assumed to avoid an applicable requirement.																														
	(b)(15)(A)(ix)	This revision is not an installation of a new permit unit subject to a New Source Performance Standard (NSPS) pursuant to 40 CFR Part 60, or a National Emission Standard for Hazardous Air Pollutants (NESHAP) pursuant to 40 CFR Part 61 or 40 CFR Part 63.																														
	(b)(15)(A)(x)	This revision is not a modification or reconstruction of an existing permit unit, resulting in new or additional NSPS requirements pursuant to 40 CFR Part 60, or new or additional NESHAP requirements pursuant to 40 CFR Part 61 or 40 CFR Part 63.																														
	<p>A de minimis significant permit revision is subject to a 45-day EPA review, Rule 3003(j) and not subject to public participation requirements, Rule 3006(b). The proposed permit revision and engineering evaluations were submitted electronically to EPA Region IX on</p>																															

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3003(b)(2)	D/K submitted Forms: 500-A1 : Title V Permit Application Supplemental 500-A2 : Title V Application Certification (dated 9/13/2011) 500-C1 : Compliance Status Report 500-C2 : Non-Compliant Operations Report (dated 12/15/2012)
3003(f)	D/K has submitted process flow diagrams (PFD's) under a claim of confidentiality.
3003(i)(1)(A)	D/K is operating under Order for Abatement Case No. 5753-1, for Rule 431.1 exceedances. This order for abatement and compliance schedule are included on the Form 500-C2. D/K submitted a Compliance Schedule/Plan Progress Report on January 1, 2012 (Attachment #7).
3003(j)	The EPA cover letter, proposed revisions to the Title V permit and Engineering Evaluations for A/N's 527509, 527510, 527511, 528472 & 530589 were submitted electronically to EPA Region IX on
3003(k)	
3003(m)	There are no Affected States.
3004(a)	Section E lists the administrative terms and conditions. Section K lists the Title V administrative terms and conditions. Sections B, F and G list the RECLAIM terms and conditions. Sections D and H list the facility, process, system and device level 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, June 30, 2016, 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 D/K.
3004(b)	The general RECLAIM provisions are included in Sections B, F and G. Device specific provisions are included with the affected device under RECLAIM Source Type/ Monitoring Unit, Emissions and Requirements, and Conditions.
3004(c)	No permit shield was requested by D/K.
3004(f)(1)	The Title V permit will expire 5 years from the date of issuance unless renewed. The permit expiration date, June 30, 2016, is listed in Section A.
3005(e)(2)(A)(ii)	D/K submitted a letter dated December 15, 2011, 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 de minimis significant permit revision procedures and a request that such procedures be used.

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REVIEW OF COMPLIANCE DATABASE:

As of January 5, 2012, the AQMD Compliance Database shows that this facility has no open Notices of Violation (NOV). The violation of sulfur emission limits is the subject of Order of Abatement Case 5753-1, specifying a schedule for the installation and performance testing of SOx scrubbers on the facility afterburners. D/K submitted a Compliance Schedule/Plan Progress Report on January 1, 2012 (Attachment #7).

COMPLIANCE RECORDS:

D/K submitted compliance records (Attachment #8) for the following Title V permit conditions:

1. F2.1 – VOC < 2550 lb/month for each month – stack samples & fugitives total
2. Sludge Dewatering Throughput

D/K has met these permit conditions for July through December 2011 (initial Title V permit was issued effective July 1, 2011), and expects to be able to continue to meet the permit conditions.

RECOMMENDATION

A/N	Recommendation
527512	Issue de minimis significant revision to Title V Facility Permit, Section H.

ATTACHMENTS

1. Form 500-A1 : Title V Permit Application Supplemental
2. Form 500-A2 : Title V Application Certification, dated 9/13/2011
3. Form 500-C1 : Compliance Status Report
4. Form 500-C2 : Non-Compliant Operations Report, dated 12/15/2011
5. Certification Letter, dated 12/15/2011
6. AQMD Compliance Database (1/5/2012)
7. 40 CFR Part 70 Compliance Schedule/Plan Progress Report, dated 1/1/2012
8. Compliance Records – Facility Condition F2.1
9. Compliance Records – Sludge Dewatering Throughput