



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING & COMPLIANCE DIVISION
APPLICATION PROCESSING AND CALCULATIONS

PAGES

11

PAGE

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APPL. NO.

528472

DATE

1/6/2012

PROCESSED BY

Jon Uhl

CHECKED BY

PERMIT TO CONSTRUCT – Sludge Dewatering (modification)

COMPANY NAME, LOCATION ADDRESS:

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

EQUIPMENT DESCRIPTION:

Permit to Construct:

Section H of DeMenno/Kerdoon Facility Permit, ID# 800037

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 5 : OIL/WATER SEPARATION					
System 2 : SLUDGE DEWATERING					S1.2
UNLOADING STATION, TRUCK WASHOUT, LOCATED INSIDE THE TRUCK WASHOUT ENCLOSURE, WITH A 10 HP CONVEYOR, WIDTH: 8 FT ; HEIGHT: 7 FT ; LENGTH: 28 FT A/N: 447671 528472	D52	D322			H23.2
TANK, HOLDING, V-701, WASTE WATER, 500 BBL A/N: 447671 528472	D60	D322			
CENTRIFUGE, SHARPLES, MODEL P-4600 SUPER D-CANTER, 75 HP ELECTRIC MOTOR WITH A/N: 447671 ENCLOSURE, CENTRIFUGE UNIT, WIDTH: 11 FT ; HEIGHT: 17 FT ; LENGTH: 21 FT CENTRIFUGE, DECANTER-TYPE, B&P PROCESS EQUIPMENT, MODEL WID602, 100 HP ELECTRIC MOTOR A/N: 528472 Permit to Construct Issued: xx/xx/xx	D64	D322			H23.2 K171.1
HOPPER, PORTABLE, UP TO 4 CUBIC YARD CAPACITY EACH, COVERED, 10 TOTAL A/N: 447671 528472	D418				H23.2

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Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
BIN, ROLLOFF, UP TO 40 CUBIC YARD CAPACITY EACH, COVERED, 10 TOTAL A/N: 447674 528472	D524				

Section D of DeMenno/Kerdoon Facility Permit, ID# 800037 (no changes)

Process 9 : AIR POLLUTION CONTROL					
System 12 : VAPOR RECOVERY SYSTEM – SLUDGE DEWATERING					S15.2, S18.9
KNOCK OUT POT, KO-800, HEIGHT: 4 FT ; DIAMETER: 2 FT A/N: 493611	D323	D29			
KNOCK OUT POT, KO-801, HEIGHT: 13 FT ; DIAMETER: 2 FT A/N: 493611	D322	D52 D60 D64			
KNOCK OUT POT, KO-802, HEIGHT: 4 FT ; DIAMETER: 3 FT A/N: 493611	D321				
KNOCK OUT POT, KO-803, HEIGHT: 4 FT ; DIAMETER: 3 FT A/N: 493611	D320				
POT, SEAL, SP-800, HEIGHT: 6 FT ; DIAMETER: 2 FT A/N: 493611	D319				
BLOWER, VACUUM, BL-706, 7.5 HP A/N: 493611	D289	C142 C281			D90.6, K67.11
BLOWER, AUXILIARY AIR, BL-708, 20 HP A/N: 493611	D324	C142 C281			

No change to permit conditions:

F16.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or items(s):

Records of the monthly (and quarterly where applicable) inspections, and subsequent repair and reinspection of VOC fugitive components subject to District 1173.

RULE 1173, 5-13-1994; RULE 1173, 2-6-2009

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S1.2 The operator shall limit the material processed to no more than 4,320,000 gallon(s) in any one calendar month.

For the purpose of this condition, material processed shall be defined as the total amount of sludge or any other hydrocarbon containing material processed in this system before dewatering.

To comply with this condition, the operator shall install and maintain a non-resettable totalizing flow meter to accurately indicate the total volume of volume of sludge processed in this system before dewatering.

The operator shall determine and record the volume of sludge processed once every calendar month.

The operator shall calibrate the flow meter per the manufacturer's specifications.

RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002
RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997

S15.2 The vent gases from all affected devices of this process/system shall be vented as follows:

All vent gases from this system shall be vented to the Afterburners (Process 9, Systems 7 & 13).

This process/system shall not be operated unless at least one of the afterburners is in full use and has a valid permit to receive vent gases from this system.

RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002;
RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002

S18.9 All affected devices listed under this process/system shall be used only to receive, recover and/or dispose of vent gases routed from the system(s) or process(es) listed below, in addition to specific devices identified in the "connected to" column:

Sludge Dewatering (Process: 5, System: 2)

RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002;
RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002

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D90.6 The operator shall periodically monitor the operation of the vacuum blower according to the following specifications:

The operator shall monitor once every day.

**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002;
RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997**

H23.2 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	464

RULE 464, 12-7-1990

K67.11 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Monitoring, maintenance and repair of the vacuum blower.

Records shall be kept and maintained for at least five years, and shall be made available to the Executive Officer or his authorized representative upon request.

**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002;
RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997**

K171.1 The operator shall provide to the District the following items:

Final drawings and/or specifications of the equipment installed/constructed/modified, including but not limited to PFD, P&ID and revisions/updates, shall be submitted to the SCAQMD within 60 days after completion of the project.

RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002;

BACKGROUND:

DeMenno/Kerdoon, Inc. (D/K, Facility ID #800037) operates a Title V, NOx-RECLAIM facility in the city of Compton. The initial Title V permit (A/N 334197) was issued on 7/1/2011.

This facility receives used oil, used antifreeze and oily wastewater. These materials are delivered by truck and unloaded into fixed roof storage tanks. Oil and antifreeze are processed into recycled products. Oily water is processed in an industrial wastewater treatment system, and discharged to Los Angeles County Sanitation Districts (LACSD). Recycled products are loaded into tanker trucks or drums for shipment. D/K operations are also subject to a permit issued by the California Department of Toxic Substance Control (DTSC).

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Sludge Dewatering System

The sludge dewatering system is listed as Process 5 : System 2 in the DeMenno/Kerdoon facility permit (ID 800037). D/K submitted A/N 528472 on 10/18/2011 to modify the active Permit to Operate (A/N 447671, PTO #G13277). D/K proposes the following changes:

1. Replace the existing sludge centrifuge (D64) with a new functionally identical centrifuge. There is no increase in throughput; throughput is limited by permit condition S1.2. The centrifuge will still be vented to the Vapor Recovery System – Sludge Dewatering (Process 9 : System 12), and then to the afterburners (Process 9 : Systems 7 & 13).

PROCESS DESCRIPTION:

Sludge Dewatering System

The sludge dewatering system receives sludge from the wastewater treatment system (Process 5 : System 1) and tank cleanouts, as well as high solids wastewater from truck washouts.

The Truck Washout Station (D52) is located inside the truck washout enclosure and consists of a enclosed metal box (8 ft wide x 28 ft long x 7 ft high) with two 18” square openings to receive truck washout water or high-solids wastewater from vacuum trucks. The openings are covered when not in use and the box is vented to the Vapor Recovery System – Sludge Dewatering (Process 9 : System 12). The metal box serves as a solids settling basin; solids are scraped off the bottom into covered hoppers (D418) and liquids are transferred to the wastewater treatment system (Process 5, System 1). The process is designed to process the liquids through a holding tank (D60) and a centrifuge (D64), but D/K has had unsatisfactory performance with the existing centrifuge; therefore, D/K is replacing the centrifuge.

Additional solids from the wastewater treatment system and tank cleanouts are also transferred into the portable, covered hoppers (D418). Each portable hopper is then moved to the storage silo (Process 5, System 3) where cement kiln dust or Type F fly ash is added to dry the sludge. Currently, the sludge and drying agent are mixed in the portable hoppers manually or with a backhoe. D/K originally planned to use a pugmill to mix the sludge and drying agent, but has been unable to get satisfactory performance from the pugmill. The pugmill is present on-site, but currently out-of-service. D/K plans to install VOC controls on the pugmill and attempt to get the pugmill to operate properly. D/K plans to submit an application covering any modifications to this permit unit, and the pugmill is not listed on the permit at this time.

The dry sludge is transferred to larger, covered rolloff bins (D524) for off-site disposal. D/K uses a maximum of 10 portable hoppers and 10 rolloff bins.

Sludge throughput is limited to a maximum of 4,320,000 gallons per calendar month, before dewatering, by Condition S1.2. Throughput is monitored by a totalizing flow meter.

Process vents from the truck washout unloading station (D52), holding tank V-701 (D60) and centrifuge (D64) are connected to the Vapor Recovery System – Sludge Dewatering (Process 9 : System 12) and facility afterburners. Attachment #4 shows the two 4” vent connections on the centrifuge housing. Attachment #5 shows the process flow diagrams for the vapor recovery connection from the centrifuge to the facility afterburners.

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EMISSIONS CALCULATIONS:

Sludge Dewatering System (no changes from previous evaluation A/N 447671)

The uncontrolled VOC emissions from all the sludge dewatering system process vents was estimated using the 5 lb/1000 gal emission factor for an uncontrolled oil/water separator listed in EPA AP-42, Table 5.1-2, the maximum throughput of 4,320,000 gal/month, and the current afterburner conditions require a minimum control efficiency of 98%. No estimate of fugitive emissions has been provided. The post-modification VOC emissions from the process vents are:

Uncontrolled, $R1 = (4,320,000 \text{ gal/month})(1 \text{ month}/30 \text{ day})(5 \text{ lb}/1000 \text{ gal}) = 720 \text{ lb/day VOC}$
Controlled, $R2 = (1 - 0.98)(720 \text{ lb/day}) = 14.4 \text{ lb/day}$

REVIEW OF COMPLIANCE DATABASE:

As of January 5, 2012, the AQMD Compliance Database shows that this facility has no open Notices of Violation (NOV), Attachment #1. 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 #2).

RULES EVALUATION:

PART 1 STATE REGULATIONS

California Environmental Quality Act (CEQA)	
	DeMenno/Kerdoon has submitted Form 400-CEQA, which indicated that this is not a significant project.

PART 2 SCAQMD REGULATIONS

Rule 212	Standards for Approving Permits	November 14, 1997
	These modifications meet all the criteria in Rule 212 for permit approval. No Rule 212 public notice is required.	
212(a)	The equipment is designed so that it can operate without emitting air contaminants in violation of Division 26 of the State Health and Safety Code or in violation of AQMD's rules and regulations.	
212(b)	Does not apply; this is a Permit to Construct.	
212(c)(1)	The equipment is located within 1000 feet of a school, but there is no potential emission increase.	
212(c)(2)	There are no emission increases.	
212(c)(3)	This permit unit does not have an increased cancer risk greater than, or equal to, one in a million (1×10^{-6}) during a lifetime of 70 years or pose a risk of nuisance.	

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Rule 401	Visible Emissions	November 9, 2001
	Visible emissions are not expected under normal operation.	

Rule 402	Nuisance	May 7, 1976
	Nuisance complaints are not expected under normal operating conditions, with the process vents connected to control equipment.	

Rule 407	Liquid and Gaseous Air Contaminants	April 2, 1982
407(a)(1)	Does not apply. CO emissions are not expected.	
407(a)(2)	Discharge of sulfur compounds in excess of 500 ppmv, calculated as sulfur dioxide, is not expected. The process vents are vented to vapor recovery systems and afterburners. Discharge of sulfur compounds is evaluated at the afterburners, devices C142 and C281.	

Rule 464	Wastewater Separators	December 7, 1990
	Devices D52, D64 and D418 meet the definition of a wastewater separator. The process vents from these devices are connected to a vapor recovery system and afterburners. This meets the control requirements of Rule 464(b). Any skimmed oil is transferred to the used oil recycling units.	

Rule 1173	Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants	February 6, 2009
1173(b)	<p><u>Applicability:</u> Rule applies; this facility is a lubricating oil and grease re-refiner.</p> <p>On Form 400A, D/K gives their primary NAICS code as 32191 – Petroleum Lubricating Oil and Grease Manufacturing. Per the NAICS Association website (www.naics.com), this is equivalent to a 1987 SIC code 2992 – Lubricating Oils and Greases. This facility is included in the definition of a “lubricating oil and grease re-refiner” given in Rule 1173(c)(15), which includes SIC code 2992.</p> <p>The sludge dewatering system is expected to continue to comply with Rule 1173 given proper recordkeeping and inspections. Compliance with Rule 1173 requirements per condition F16.1.</p>	

Rule 1176	VOC Emissions from Wastewater Systems	September 13, 1996
1176(b)	<p>Applicability. Rule does not apply. On Form 400A, D/K gives their primary NAICS code as 32191 – Petroleum Lubricating Oil and Grease Manufacturing. Per the NAICS Association website (www.naics.com), this is equivalent to a 1987 SIC code 2992 – Lubricating Oils and Greases. This facility is not included in the definition of a “petroleum refinery, chemical plant or industrial facility” given in Rule 1176(c), which does not include SIC code 2992.</p>	

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REG XIII	New Source Review (NSR)	December 6, 2002												
	<u>Emissions Summary – ROG</u> (no changes from previous evaluation A/N 447671)													
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">A/N</th> <th style="width: 40%;">Permit Unit</th> <th style="width: 10%;">R1 (lb/hr)</th> <th style="width: 10%;">R1 (lb/day)</th> <th style="width: 10%;">R2 (lb/hr)</th> <th style="width: 10%;">R2 (lb/day)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">447671</td> <td>Sludge Dewatering</td> <td style="text-align: center;">30.</td> <td style="text-align: center;">720.</td> <td style="text-align: center;">0.60</td> <td style="text-align: center;">14.4</td> </tr> </tbody> </table>	A/N	Permit Unit	R1 (lb/hr)	R1 (lb/day)	R2 (lb/hr)	R2 (lb/day)	447671	Sludge Dewatering	30.	720.	0.60	14.4	
A/N	Permit Unit	R1 (lb/hr)	R1 (lb/day)	R2 (lb/hr)	R2 (lb/day)									
447671	Sludge Dewatering	30.	720.	0.60	14.4									
1303(a)	BACT: There is no increase in criteria pollutant emission PTE. Use of a vapor recovery system and afterburners to control VOC emissions with an overall system efficiency of 98% exceeds BACT for controlling the process vent VOC emissions from this wastewater treatment system. Current BACT for wastewater treatment systems requires a minimum control efficiency of 95%.													
1303(b)(1)	Modeling: Modeling for VOC is not required (Rule 1303, Appendix A); no further modeling analysis is required.													
1303(b)(2)	Offsets: No offsets are required; exempt from offsets by Rule 1304(c)(1) – Replacement with a functionally identical unit, with no increase in throughput (condition S1.2) or PTE.													
1303(b)(3)	Sensitive Zone Requirements. ERC's are not required.													
1303(b)(4)	Facility Compliance. This facility complies with all applicable District rules and regulations.													
1303(b)(5)	Major Polluting Facilities. This is not a new major polluting facility or major modification at an existing major polluting facility. Therefore, the provisions of this paragraph do not apply to this equipment.													

Rule 1401	New Source Review of Toxic Air Contaminants	September 10, 2010 Application Deemed Complete: October 28, 2011
	There is no increase in TAC emissions.	
	Federal NSR for toxics does not apply since this equipment is not located at a plant site that is a major source as defined in 40CFR63, Subpart A, §63.2. This facility emits less than 10 tons per year of any HAP and 25 tons per year of all hazardous air pollutants (HAPs).	

Rule 1401.1	Requirements for New and Relocated Facilities Near Schools	November 4, 2005
1401.1(b)	This is an existing facility.	

REG XX	RECLAIM	May 6, 2005
	D/K has been designated as a NO _x RECLAIM facility. This process does not emit NO _x ; therefore, RECLAIM requirements do not apply.	

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REG XXX	Title V	November 5, 2010
	DeMenno/Kerdoon was issued a Title V permit effective on July 1, 2011. This is a minor permit revision as defined in Rule 3000(b)(15); however, it will be included in the Title V de minimis significant revision (A/N 527512).	
	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)(v)	This revision does not result in an emission increase of RECLAIM pollutants.
	(b)(15)(A)(vi)	This revision does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review or a hazardous air pollutant.
	(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.
	A minor permit revision is subject to a 45-day EPA review , Rule 3003(j) and not subject to public participation requirements, Rule 3006(b).	

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PART 3 FEDERAL REGULATIONS

40CFR Part 61 Subpart FF	National Emission Standard for Benzene Waste Operations
§60.340	<p><u>Applicability</u></p> <p>(a) This facility is not a chemical manufacturing plant, coke by-product recovery plant or petroleum refinery as defined in §61.341.</p> <p>(b) This facility does not treat, store or dispose of hazardous waste generated by any facility listed in paragraph (a).</p> <p>This equipment is not subject to the requirements of 40CFR Part 61 Subpart FF.</p>

40CFR Part 63 Subpart CC	National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries
§60.340(a)(1)	<p><u>Applicability</u> - This facility is not a major source as defined in section 112(a) of the Clean Air Act. This facility emits less than 25 tons per year of all hazardous air pollutants (HAPs) listed in table 1 of this subpart, and less than 10 tons per year of any one HAP.</p> <p>This equipment is not subject to the requirements of 40CFR Part 63 Subpart CC.</p>

40CFR Part 63 Subpart DD	National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations
§63.680(a)	<p>Applicability – This equipment is not located at a plant site that is a major source as defined in 40CFR §63.2. This facility emits less than 10 tons per year of any HAP and 25 tons per year of all hazardous air pollutants (HAPs). This equipment is not subject to 40CFR Part 63 Subpart DD.</p>

40CFR Part 63 Subpart VV	National Emission Standards for Hazardous Air Pollutants for Oil-Water Separators and Organic-Water Separators
§63.1040	<p>Applicability – This facility is not subject to another subpart of 40 CFR parts 60, 61, or 63 which references the use of this subpart for air emission control. This equipment is not subject to 40CFR Part 63 Subpart VV.</p>

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CONCLUSION

Based on the above evaluation, it is recommended that the following be issued:

A/N	Recommendation
528472	Issue Permit to Construct (PC) with conditions listed in the Conditions Section. Include changes to Section H of the facility permit with the Title V/RECLAIM de minimis significant permit revision (A/N 527512)

List of Attachments

1. AQMD Compliance Database (1/5/2012)
2. 40 CFR Part 70 Compliance Schedule/Plan Progress Report, dated 1/1/2012
3. Compliance Records, Sludge Throughput
4. Centrifuge drawing
5. Vapor recovery system connection from the centrifuge to the facility afterburners

FEE EVALUTION

The fees paid for the applications are:

Table 1 – Application Fees Paid

A/N	Equipment	BCAT/ CCAT	Type	Status	Fee Schedule	Fees Required, \$	Fees Paid, \$
528472	Centrifuge D64, P5:S2	440345	50	20	D	4,636.58	4,636.58
527512	RECLAIM/Title V deMinimis Significant Revision	555009	86	21	--	1,747.19	1,747.19