

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b>  <b>PERMIT APPLICATION EVALUATION AND CALCULATIONS</b>	PAGES 7	PAGE 1
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**Permit to Construct (Alteration/Modification)**

**Applicant** Inland Empire Utilities Agency (IEUA), Regional Plant 5 (RP-5), Solids Handling Facility (SHF)

**Mailing Address** P.O. Box 9020  
Chino Hills, CA 91709

**Equipment Location** 6063 Kimball Avenue (contiguous facility)  
Chino, CA 91708

16090 Mountain Avenue (physical address)  
Chino, CA 91708

**Equipment Description**  
**APPLICATION 536399, FACILITY ID 147371**

ALTERATION OF THE AIR POLLUTION CONTROL SYSTEM UNDER PERMIT F72330, A/N 388295  
CONSISTING OF:

1. BIOFILTER, CUSTOM MADE, MULTI-COMPARTMENTS, 37'- 0" W. X 74'- 0" L. X 9'- 0" D. OVERALL DIMENSIONS EACH COMPARTMENT, CONTAINING BIOFILTER MEDIA, WITH INCOMING FOUL AIR HUMIDIFICATION AND SURFACE IRRIGATION SYSTEM.
2. EXHAUST SYSTEM WITH A 60 H.P. FAN, HARTZELL FAN, INC., MODEL 412-44-FAU3-STFC13, 29,000 CFM, SERVING THE DAIRY MANURE RECEIVING AND DELIVERY BUILDING, CONTAINING MANURE HANDLING, LOADING/UNLOADING, STORAGE, HEATING / MIXING TANKS, SLUDGE DEWATERING, AND SLUDGE-CAKE STORAGE OPERATIONS;

BY REPLACEMENT OF THE FOLLOWING:

1. "37'- 0" W. X 74'- 0" L. X 9'- 0" D. OVERALL DIMENSIONS EACH COMPARTMENT" WITH "74'- 0" W. X 111'- 0" L. X 9'- 0" D. OVERALL BIOFILTER DIMENSIONS" (ITEM NO. 1).
2. "DAIRY MANURE RECEIVING AND DELIVERY BUILDING" WITH "FOOD WASTE AND DAIRY MANURE RECEIVING AND DEWATERING BUILDING" (ITEM NO. 2).

AND BY ADDITION OF THE FOLLOWING:

1. OPTIONAL ADDITION OF 5 FT. OF MEDIA IN WIDTH, 16 FT. OF MEDIA IN LENGTH, AND 2 FT. OF MEDIA IN HEIGHT TO THE OVERALL DIMENSIONS OF THE BIOFILTER, AND/OR OPTIONAL REDUCTION OF 3 FT. OF MEDIA IN HEIGHT TO THE BIOFILTER (ITEM NO. 1).
2. OPTIONAL SHORING EQUIPMENT ALONG THE SIDES OF THE BIOFILTER, INCLUDING CONCRETE BARRIERS, SUCH AS K-RAILS, OR EQUIVALENT EQUIPMENT.
3. VENTING THE DIGESTED EFFLUENT WASTEWATER TREATMENT SYSTEM AND FOUR (4) 15,000 GALLON LIQUID FOOD WASTE STORAGE TANKS, VENTED THROUGH THE RECEIVING AND DELIVERY BUILDING (ITEM NO. 2).

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**Background**

The above application was submitted on May 10, 2012 for expedited permit processing (XPP) as a Change of Conditions application to include the following venting sources, the digested effluent wastewater treatment system and four (4) 15,000 gallon liquid food waste storage tanks, vented through the receiving and delivery building. Also these applications are to be used to update the permit conditions and impose additional requirements to ensure compliance. The existing Permit to Operate for this biofilter is operated under A/N 388295, which will be superseded with proposed Permit to Construct A/N 536399.

Please note that the equipment description of the biofilter previously had omitted the number of compartments or cells contained in the biofilter. The equipment description was updated to indicate there are 3 cells in the biofilter. This value was based on correspondence in the original application (A/N 388295) materials, as well as dimensions measured during the previous source test conducted on July 30, 2003.

The solids handling facility (SHF) was shutdown on February 18, 2009. The SHF has since restarted operations under a joint project with Environ Strategies. Environ Strategies (Environ) is operating the SHF as a contractor under IEUA.. Pursuant to the facility's monthly progress reports submittal required by Order for Abatement Case No. 5209-4, the following actions occurred. In October 2011, Environ repaired the biofilter distribution piping and blower motor, repaired the air ducts, and purchased and replaced foggers for the biofilter. Environ tested the functionality of the biofilter blower. In November 2011, Environ replaced the biofilter drain sump pump, repaired the biofilter distribution valves, removed old biofilter media from the site, and tested the functionality of the building blower. In December 2011, Environ recommissioned the building blower, installed a new irrigation system on the biofilter, rewired the biofilter condensate sump pump, and installed wiring for the biofilter sprinkler system. IEUA/Environ began accepting delivery of liquid food waste on January 11, 2012. In January 2012, Environ repaired the ducting system inside the building, tested the functionality of the discharge on the biofilter condensate pit, and tested the biofilter sprinkler system. In March 2012, Environ repaired the biofilter distribution valve. In September 2012, Environ fixed leaks on the biofilter blower exhaust, removed condensate water from the biofilter ducts located underground, opened the biofilter valves vault to allow for repairs, collected data regarding water distribution to improve biofilter efficiency, and is pending a variance hearing in order to repair one of the biofilter valves, which will require extended downtime of the biofilter.

Since July 17, 2012 there have been approximately 15 notifications indicating exceedances greater than 0.030 ppmv of H2S from the perimeter ambient air H2S monitoring devices. There are two ambient air H2S monitoring devices, one on the east side and one on the west side of the facility. The source of the H2S emissions appears to be the biofilter permit unit. An AQMD inspector has been dispatched multiple times to report on the breakdown notification. Inspector Stan Koszelak had found small leaks in the ducting from the receiving building to the biofilter. Although the ductwork had been repaired and H2S exceedances are were being reported. I have gone to the facility twice to observe the biofilter.

On September 19, 2012, inspector Stan Koszelak and I went to IEUA RP-5 SHF and took H2S readings with a Jerome meter on the surfaces of the biofilter to identify possible odor problems. The average of the H2S readings did not exceed existing permit condition limits. Although there were two locations along the sides of the northwest corner of the biofilter that had much higher readings. One was coming from the north northwest side from an open white pipe with readings of 5.0 and 7.8 ppmv H2S and the other was coming from the west northwest side where the biofilter flow was audible indicating a thin layer of media

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with readings of 1.8 and 3.2 ppmv H<sub>2</sub>S. The foul odors were clearly coming from the northwest corner of the biofilter. Although these odors did not result in a violation, it is obvious that this could be a source for future complaints or compliance issues. Therefore additional permit conditions will be imposed on this permit unit to ensure proper operation and compliance with applicable rules and regulations.

In the month of October, there have not been any notifications regarding the H<sub>2</sub>S exceedances for the two ambient H<sub>2</sub>S air monitors. Since the September facility visit, the facility has repaired their influent humidification system, improved the distribution of their surface irrigation system, and re-seeded the biofilter with microbes. These improvements seem to have stopped the 30 ppb H<sub>2</sub>S exceedances for the ambient H<sub>2</sub>S air monitors.

IEUA RP-5 consists of a sewage treatment facility and solids handling facility (SHF) on a contiguous property. The sewage treatment facility accepts and treats municipal sewage and produces Title 22 recycled water. The solids handling facility is a manure and food waste processing plant that digests manure and food waste to produce digester gas to fuel these two engines to produce power for the facility. The current sewage influent throughput for the facility is 12 million gallons per day (MGD), although an application A/N 534813 has been submitted to increase the permitted throughput to 15 MGD. There shall be no change of emissions for these engine applications. There is no school within 1000 feet of the emission source. No public notice is required. There are no complaints filed or Notices to Comply or issued against the above facility in the last two years. A Notice of Violation was issued on September 19, 2012 for constructing and operating equipment at a Title V facility without first obtaining a permit revision allowing such construction and operation. The facility is currently operating under a Stipulated Order for Abatement, Case No. 5209-4 concerning IEUA RP-5's restarted operations in January 2011 of the solids handling facility (SHF) since the February 2009 SHF shut down.

### **Process Description**

Air from the food waste/dairy manure receiving and delivery building, and the digested effluent wastewater treatment system and four (4) 15,000 gallon liquid food waste storage tanks, which is vented through the receiving and delivery building, is collected and sent through humidification system and biofilter for treatment. Biofiltration is the most commonly used method of odor treatment because of the expected low cost and low required daily attention. The biofilter relies on a moisture film at the interface of the biofilter media and the air being treated. For optimum performance of the biofilter the air entering the biofilter should be as close to saturation as possible. If the filter is allowed to dry out, the removal efficiency of the media is decreased. Therefore, there are two systems in place to maintain the proper moisture level in the biofilter: 1) the humidification spray system (fogger) in the ducting to the biofilter and 2) the biofilter surface irrigation system.

The media layer is the site of the actual treatment of the exhaust stream. Generally speaking, the media can consist of compost, sand, shredded bark, peat, and other materials. Although, the current media used for the biofilter, which was installed in December 2011, is mostly comprised of wood chips, with a small assortment of two by fours, rags, rubber tubing, and other items. As odorous or contaminated air is passed through the media, two basic removal mechanisms occur simultaneously: absorption/adsorption and biooxidation. The pollutants are adsorbed onto the surfaces of the biofilter media particles and/or absorbed into the moist surface layer (water film) surrounding the media particles. Microorganisms, mainly bacteria, actinomycetes and fungi, are attached to the filtering medium. The media's organic material will supplement those nutrients that may or may not be present in the air stream to be treated.

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These microbes oxidize the organic and inorganic compounds, which make up the odorous gases. When a biofilter system performs properly, carbon dioxide, water, and mineral salts are formed.

Biofilters function best with a minimum of 40 to 45 seconds of retention time. This biofilter should have a retention time of approximately 2.5 minutes. The expected service life of the biofilter media is three to five years. Although, media replacement will be determined based on biofilter performance.

### Emission Calculations

Exhaust flow: 29,000 cfm

Minimum permitted dimensions:

74 ft (width) x 111 ft (length) x 6 ft (depth)

6ft (depth) / [29,000 cfm / (74ft x 111ft)] = 2.5 minutes retention time

There are no emissions associated with this control equipment. All emissions released from the biofilter are associated with the food waste/dairy manure processing plant under existing permit to construct application A/N 451067, which is to be superseded by A/N 530245.

ROG emissions (under A/N 530245):

R1 = 1.73 lbs/hr x 705 wTPD/225 wTPD = 5.42 lbs/hr = 131.89 lbs/day (NSR)

R2 = 5.42 lbs/hr x (1.0-0.80) = 1.08 lbs/hr = 26.28 lbs/day (NSR)

### H2S nuisance calculations

#### CAAQS H2S concentration threshold

Outlet concentration is based on the maximum concentration to be in compliance. 30 ppb is the California Ambient Air Quality Standard at the facility property boundary. This standard was adopted to protect against nuisance odor for the general public. 30ppb is the H2S concentration limit at the facility boundary.

Calculate the effluent concentration of H2S based on screen 3 modeling. Screen 3 modeling was only used for H2S nuisance calculations.

$$\begin{aligned}
 30\text{ppbv} &= 0.030\text{ppmv} \\
 &= 0.030\text{ppmv} \times 34.08\text{lbsH}_2\text{S/lbmole} / 0.02404 \\
 &= 42.53 \text{ ug/m}^3
 \end{aligned}$$

Screen 3 provides an emission rate of 1 lb/hr results in a (maximum) concentration of 633.6 ug/m<sup>3</sup> at the nearest receptor distance of 73m. Concentration associated with 8ppbv at nearest receptor (73m) is:

$$\begin{aligned}
 \text{Equivalent Screen 3 emission rate associated with 30ppbv at nearest receptor (73m) is:} \\
 &= 42.53 \text{ ug/m}^3 \times 1\text{lb/hr} / 633.6 \text{ ug/m}^3 \\
 &= 0.067 \text{ lbs/hr}
 \end{aligned}$$

Concentration of H2S at exhaust is with 30ppbv at the nearest receptor (73m):

$$\begin{aligned}
 &= 0.067 \text{ lbs/hr} \times 1\text{E}6/1 / 29,000\text{cfm} / 60\text{min/hr} \times 379\text{cf/lbmole} / 34.08\text{lbsH}_2\text{S/lbmole} \\
 &= \mathbf{0.43 \text{ ppmv H}_2\text{S}}
 \end{aligned}$$

$$\begin{aligned}
 0.43 \text{ ppmvH}_2\text{S(averaged outlet)} \times 29,000 \text{ cfm} \times 60 \text{ min/hr} \times \text{lb-mole}/379\text{E}6 \text{ cf} \times 34.08 \text{ lbs/lb-mole} \\
 = 0.0673 \sim 0.067 \text{ lbs/hr}
 \end{aligned}$$

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OEHHA H2S concentration threshold

Outlet concentration is based on the maximum concentration to be in compliance. 8ppb is inhalation reference exposure level and odor threshold according to Office of Environmental Health Hazard Assessment (OEHHA). 8ppb is the H2S concentration limit at the nearest receptor.

Calculate the effluent concentration of H2S based on screen 3 modeling. Screen 3 modeling was only used for H2S nuisance calculations.

$$\begin{aligned}
 8\text{ppbv} &= 0.008\text{ppmv} \\
 &= 0.008\text{ppmv} \times 34.08\text{lbsH}_2\text{S/lbmole} / 0.02404 \\
 &= 11.34 \text{ ug/m}^3
 \end{aligned}$$

Screen 3 provides an emission rate of 1 lb/hr results in a (maximum) concentration of 633.6 ug/m<sup>3</sup> at the nearest receptor distance of 73m. Concentration associated with 8ppbv at nearest receptor (73m) is:  
Equivalent Screen 3 emission rate associated with 8ppbv at nearest receptor (73m) is:

$$\begin{aligned}
 &= 11.34 \text{ ug/m}^3 \times 1\text{lb/hr} / 633.6\text{ug/m}^3 \\
 &= 0.0179 \text{ lbs/hr}
 \end{aligned}$$

Concentration of H2S at exhaust is with 8ppbv at the nearest receptor (73m):

$$\begin{aligned}
 &= 0.0179\text{lbs/hr} \times 1\text{E}6/1 / 29,000\text{cfm} / 60\text{min/hr} \times 379\text{cft/lbmole} / 34.08\text{lbsH}_2\text{S/lbmole} \\
 &= 0.11 \text{ ppmv H}_2\text{S}
 \end{aligned}$$

$$\begin{aligned}
 &0.11 \text{ ppmvH}_2\text{S(averaged outlet)} \times 29,000 \text{ cfm} \times 60 \text{ min/hr} \times \text{lb-mole}/379\text{E}6 \text{ cf} \times 34.08 \text{ lbs/lb-mole} \\
 &= 0.0172 \text{ lbs/hr}
 \end{aligned}$$

**Toxic Risk Analysis**

Permitted flow rate: 29,000 cfm  
Nearest Residential Receptor Distance: 3276 ft. (999 m)  
Nearest Commercial Receptor Distance: 351 ft. (107 m)  
Nearest Property Boundary: 238 ft (73 m)  
Stack height: 6 ft. (1.83 m)  
Overall Dimension: 74 ft x 111 ft (22.6 m x 33.8 m)  
Area: 8,214 sq. ft. (763 sq. m)

Compound	MW (lb/mole)	Outlet Emission (lbs/hr)
Ammonia	17.03	5.66E-03
Benzene	78.11	3.69E-04
Chlorobenzene	112.56	7.75E-05
Chloroform	119.38	7.31E-05
1,1-Dichloroethylene	96.95	2.41E-04
Hydrogen sulfide (H2S)*	34.08	6.72E-02
Methylene chloride	84.94	8.53E-04
Tetrachloroethylene	165.83	6.62E-04
Toluene	92.13	1.06E-02
1,1,1-Trichloroethane	133.42	1.54E-04

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m/p-Xylene	106.17	1.71E-03
o-Xylene	106.18	6.35E-04

\*Hydrogen sulfide emission rate based on the CAAQS calculation above for 30 ppb at the nearest fence line receptor distance.

The dimensions listed above are the minimum permitted dimensions of the biofilter for conservative analysis to ensure all permitted dimensions are compliant. The outlet emissions for the toxic air contaminants (TACs) above are based on the prorated emission rates of the Permit F72330, A/N 388295 biofilter source test reports from October 2, 2003. The source test results were when the facility had a maximum processing facility throughput rate of 225 wTPD. The emission rates above are proportional emission rates at 705 wTPD.

Tier III analysis was used since the emission source is an area source and therefore requires SCREEN3 modeling. SCREEN3 modeling for an area source assumed 1.0 lbs/hr (1.0 lbs/hr / 8,214 sq.ft. x 453.6g/1lb x 1hr/3600seconds x 10.76 sq.ft./sq.m = 1.651E-4 g/s-m<sup>2</sup>). Tier III risk analysis was based on the outlet emissions listed in the above table. The MICR values are determined to be 1.09 x 10<sup>-8</sup> for residential and 9.13 x 10<sup>-8</sup> for commercial receptors. Maximum HIA and HIC were 0.587 and 0.198, respectively and therefore less than 1. Cancer burden was less than 0.5.

### Evaluation

- Rule 212: Rule 212 (c)(1)- There is no school within 1000 feet of the facility.  
Rule 212 (c)(2)- There are no emission increases, since the previous Permit to Operate was issued.  
Rule 212 (c)(3)(A)(i)- MICR is below 1 in a million.
- Rule 401: Visible Emissions  
No violations are expected; limits are listed under Rule 401(b)(1).
- Rule 402: Nuisance  
Nuisance is not expected with proper operation, monitoring and maintenance. No complaints have been received in the last two years for this facility. Based on previous operation of the facility for the last two years, compliance is expected.
- Rule 53A: San Bernardino County – Specific Contaminants (Contained in Addendum to Reg IV)  
Rule 53A(a)- Sulfur compound emission limit, as SO<sub>2</sub> 500 ppmv. Compliance is expected due to biofilter H<sub>2</sub>S surface emission limits.  
Rule 53(b)- Combustion contaminants, this permit unit does not contain any combustion equipment, although combustion equipment on site is expected to be in compliance.  
Rule 53(c)- HF, HC, HBr, Br<sub>2</sub>, Cl<sub>2</sub>, F<sub>2</sub>, and other fluorine compounds are to be controlled to the maximum degree technically feasible. There is no expected potential emission from the above listed compounds from this equipment. Compliance is expected.
- Reg. XIII: Rule 1303(a)(2)- There is no increase of emissions, since the issuance of the previous Permit to Operate, therefore BACT is not applicable.  
Rule 1303(b)(1)- There is no increase of emissions, since the issuance of the previous Permit to Operate, therefore modeling is not required.

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Rule 1303(b)(2)- There is no increase of emissions, since the issuance of the previous Permit to Operate. No additional offsets are required.

Rule 1401: Toxic Air Contaminants  
 Rule 1401(d)(1)(B)- MICR less than  $1.0 \times 10^{-6}$  limit. Hydrogen sulfide is currently not a carcinogen; there is no increase in MICR.  
 Rule 1401(d)(1)(C)- Cancer burden is less than 0.5.  
 Rule 1401(d)(2) & (d)(3)- Calculated HIC and HIA values are less than 1 respectively. Compliance is expected.

Reg. XXX: Venting additional equipment and imposing additional monitoring, recordkeeping conditions is considered a Title V Minor permit revision under Rule 3000(b)(15), since there is no emission increase and the modification of the equipment does not result in new or additional NSPS or NESHAP requirements and will be subject to an EPA review (Rule 3003 (j)). A public notice is not required. Compliance is expected.

**Conclusions and Recommendations**

The equipment is in compliance with the Rules and Regulations of the AQMD. A Permit to Construct for A/N 536399 and a revised Title V facility permit is recommended after EPA review. For Permit Conditions please see Sample Permit.

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**Background/Process Description**

The above applications were submitted on May 10, 2012 for expedited permit processing (XPP) as a Change of Conditions applications to include initial commissioning provisions in the permits of these two existing permits for identical digester gas(DG)/natural gas (NG) fired engines. Also these applications are to be used to update previous permit condition no. 5 concerning the amount of natural gas used in the fuel blend to current requirements and included reporting requirements pursuant to Rule 1110.2. The existing permits to construct are A/Ns 449691 and 449694, which will be superseded with proposed permits to construct A/Ns 536396 and 536397, respectively.

These engines are to be equipped with heat exchanger, Organic Rankine Cycle (ORC) system, thermal energy storage, and absorption chilling system. The heat recovery system and ORC system are common to both engines. Each engine shall be equipped with a CEMS to monitor flow rate and NOx and O2 emission concentrations. IEUA shall submit separate applications for CEMS approval and certifications.

A/Ns 449691 & 449694 were issued Permits to Construct on August 28, 2006. The engines were checked for rotation using natural gas on July 23, 2007 and began engine testing on natural gas on July 24, 2007 and July 26, 2007 for engine no. 1 and engine no. 2, respectively. The engines were then not operated from August 23, 2007 until January 10, 2008 due to a pending clarification of the gas cleanup/treatment system used. January 10, 2008 the two engines were started up to begin the initial commissioning process. Subsequent delays transpired due to deficiencies, operation (commissioning) was expected to resume November 2008 at the earliest. IEUA submitted a petition for an Order for Abatement Case NO. 5209-1 on April 15, 2008 due to miscommunication of equipment and fuel used in the engine permits. Conditions of the permit imply that digester gas from the sewage treatment plant will be treated in used in the engines, which is incorrect. Also the permits do not allow for pure natural gas initial commissioning, which is recommended by the manufacturer. Additionally the engines were not source tested due to these operational issues. The following hearing date was pushed back several times until it was determined that the Order for Abatement was no longer needed due to the complete shutdown of the solids handling facility on February 18, 2009.

IEUA RP-5 consists of a sewage treatment facility and solids handling facility (SHF) on a contiguous property. The sewage treatment facility accepts and treats municipal sewage and produces Title 22 recycled water. The solids handling facility is a manure and food waste processing plant that digests manure and food waste to produce digester gas to fuel these two engines to produce power for the facility. The current sewage influent throughput for the facility is 12 million gallons per day (MGD), although an application A/N 534813 has been submitted to increase the permitted throughput to 15 MGD. There shall be no change of emissions for these engine applications. There is no school within 1000 feet of the emission source. No public notice is required. There are no complaints filed or Notices to Comply or issued against the above facility in the last two years. A Notice of Violation was issued on September 19, 2012 for constructing and operating equipment at a Title V facility without first obtaining a permit revision allowing such construction and operation. The facility is currently operating under a Stipulated Order for Abatement Case No. 5209-4 concerning IEUA RP-5's restarted operations in January 2011 of the solids handling facility (SHF) since the February 2009 SHF shut down.