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| SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT STATIONARY SOURCE COMPLIANCE DIVISION PERMIT APPLICATION PROCESSING AND CALCULATIONS | PAGES 3 | PAGE 1 |
| | APPL NO 536401 | DATE 11/2/2012 |
| | PROCESSED BY AS08 | CHECKED BY AD |

Permit to Construct (New Construction)

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 536401, FACILITY ID 147371

DIGESTED EFFLUENT LIQUID WASTE PROCESSING SYSTEM CONSISTING OF:

1. ROTATING SLUDGE THICKENER (RST) SYSTEM, 300 GPM MAXIMUM FLOW, WITH HORIZONTAL CYLINDRICAL DRUM AND INTERNALLY FED ROTARY SCREEN.
2. DISSOLVED AIR FLOATATION (DAF) SYSTEM, 300 GPM MAXIMUM FLOW, WITH ONE (1) TANK, WITH POLYMER FEED AND STORAGE SYSTEM, AND ASSOCIATED MIXERS AND PUMPS.
3. OPTIONAL MOVING BED BIOFILM REACTOR (MBBR) SYSTEM WITH ASSOCIATED PUMPS.

Background/Process Description

The above application was submitted on May 10, 2012 for expedited permit processing (XPP) as a New Construction (Permit to Construct) application type for a digested effluent liquid waste processing system. This equipment will be used to treat the digested effluent from the anaerobic digesters prior to discharge into the Inland Empire Brine Line (IEBL), previously known as the Santa Ana River Interceptor (SARI). This equipment will reduce total suspended solids (TSS), Fats, Oils, Greases (FOG), dissolved organic carbon (DOC), total Kjeldahl nitrogen (TKN), Ammonia, and other contaminants from the wastewater prior to discharge in order to meet the facility's discharge permit requirements. The current discharge permit allows up to 200,160 gallons per day to be discharged into the IEBL.

This equipment will be located in the receiving/dewatering building, which will be vented to a biofilter for odor and air pollution control. The solids separated from the digested effluent will either be returned to the receiving pits/mix tanks or the digesters or be stored until it will be sent to a composting facility, landfill or other appropriate facility for handling and disposal.

The applicant request to increase the amount of wastewater discharged into the IEBL/SARI line from 42,126 gallons per day to the value indicated on the discharge permit issued by IEUA or remove permit limitations of the amount of wastewater that can be discharged into the IEBL/SARI line.

IEUA is working with Environ Strategies and Inland Bioenergy, LLC regarding their facility operations and application packages. Environ Strategies and Inland Bioenergy, LLC is in contract with IEUA to

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lease and the land and equipment of IEUA RP-5 SHF and operate the equipment and processes of the SHF. Inland Bioenergy, LLC is a LLC consisting of Burrtec and Environ Strategies.

A Notice of Intent to Adopt a Mitigated Negative Declaration, Draft Mitigated Negative Declaration, and Initial Study regarding these changes to the facility was submitted to AQMD and for public review on August 28, 2012. IEUA's board adopted the Mitigated Negative Declaration on September 19, 2012 after the commenting period closed.

The maximum operating schedule for this equipment is 24 hours/day, 7 days/week, 52 weeks/year. There is no school within 1000 feet of 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 (OA), 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.

Emission Calculations

Based on the VOC analysis of the digested effluent conducted in February and March of 2012, it is not expected that there will be a significant amount of emissions. Although currently there is not enough information at this time to calculate VOC emissions, the equipment will be limited to 0.49 pounds per day of VOC. Compliance shall be demonstrated based on information gathered during operation.

Toxic Risk Analysis

There are no expected Rule 1401 toxic air contaminant (TAC) emissions due to the installation and operation of this equipment.

Rules Evaluation

Rule 212: Rule 212 (c)(1)- There is no school within 1000 feet of the facility.
 Rule 212 (c)(2)- On-site emission increases does not exceed the following:

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| Volatile Organic Compounds | 30 lbs/day |
| Nitrogen Oxides | 40 lbs/day |
| PM10 | 30 lbs/day |
| Sulfur Dioxide | 60 lbs/day |
| Carbon Monoxide | 220 lbs/day |
| Lead | 3 lbs/day |

Rule 212(c)(3)(A)(i)- MICR is expected to be below 1 in a million.
Public Notice is not required.

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)

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Rule 53A(a)- Sulfur compound emission limit, as SO₂ 500 ppmv. Compliance is expected due to biofilter H₂S 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, Br₂, Cl₂, F₂, 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)- The increase of emissions are not expected to be greater than or equal to 1 lb/day, therefore BACT is not triggered.

Rule 1303(b)(1)- Modeling is not required for VOC.

Rule 1303(b)(2)- The increase of emissions is not expected to be greater than or equal to 1 lb/day, therefore no offsets are required. Since the facility is an essential public service, any required offsets shall be provided through priority reserve.

Rule 1401: Toxic Air Contaminants

Rule 1401(d)(1)(A)- MICR is expected to be less than 1.0×10^{-6} .

Rule 1401(d)(1)(C)- Cancer burden is expected to be less than 0.5.

Rule 1401(d)(2) and Rule 1401(d)(3)- HIC and HIA values are expected to be less than 1 respectively.

Compliance is expected.

Rule 1401.1: Rule 1401.1(b)- Equipment is exempt since it is located at an existing facility.

Reg. XXX: Installation of the RST, DAF and optional MBBR equipment and updating the quantity of wastewater to be discharged into the brine line to be consistent with the facility's discharge permit, and including additional conditions to ensure the facility is operating in compliance is considered a Title V De Minimis Significant permit revision under Rule 3000(b)(7), since the cumulative emission increases of non-RECLAIM pollutants or HAPs do not exceed the emissions in Table 5-4 of the Draft Title V TDG March 2005 and 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 & Recommendations

The equipment is in compliance with the Rules and Regulations of the AQMD. A Permit to Construct is recommended for application 536401 and a revised Title V facility permit is recommended after EPA review. For Permit Conditions please see Sample Permit.

