



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

April 9, 2015
Via electronic submittal

Mr. Gerardo Rios
USEPA – Region IX
Mail Stop A-5-2
75 Hawthorne Blvd.
San Francisco, CA 94105

Dear Mr. Rios,

Proposed Minor Revision to Title V Permit for Inland Empire Utilities Agency (ID# 147371)

Enclosed for your review is the proposed revision to the Title V Permit for Inland Empire Utilities Agency (IEUA), Regional Plant 5 (RP-5), a sewage treatment and food waste and dairy manure processing facility located at 6063 Kimball Avenue, Chino, CA in San Bernardino County. This revision is considered to be minor. We are enclosing the appropriate pages of the proposed sections, which includes the permit as shown below, and the engineering evaluations. IEUA has requested expedited permit processing and review for the modification of the food waste to energy project. Since the project is expected to bring environmental benefits and food waste diversion from landfill disposal, we respectfully request your expedited review of this proposal on or before April 24, 2015.

SECTION D, PERMIT TO OPERATE

Appl. No.	Equipment	Previous Permit (Appl. No.)	Description
573235	FOOD WASTE AND DAIRY MANURE PROCESSING PLANT	530245	Addition of food waste storage tanks, screening equipment, digester mixers, and dewatering equipment.

The proposed Title V permit revisions for this facility are covered under A/N 573241.

This request is being made via electronic submittal in order to facilitate your review. If you have any questions or need additional information, please contact Ms. Angela Shibata at (909) 396-2737 or by email at ashibata@aqmd.gov.

Sincerely,

Andrew Y. Lee, P.E.
Senior Engineering Manager
Engineering & Compliance

AYL: CDT: AIS
Enclosures
A/N 573241 Title V Permit Revision (06)

FACILITY PERMIT TO OPERATE INLAND EMPIRE UTILITIES AGENCY

PERMIT TO OPERATE

Permit No. TBD
A/N 573235

Equipment Description:

FOOD WASTE AND DAIRY MANURE PROCESSING OPERATIONS CONSISTING OF:

1. WEIGH STATION TRUCK SCALES.
2. LIQUID FOOD WASTE HANDLING SYSTEM, INCLUDING:
 - A. FOUR (4) FOOD WASTE STORAGE TANKS, VERTICAL, 15,000 GALLON CAPACITY EACH, VENTED TO AN AIR POLLUTION CONTROL SYSTEM (BIOFILTER) VIA THE RECEIVING AND DEWATERING BUILDING.
 - B. THREE (3) FOOD WASTE STORAGE TANKS, VERTICAL, 15,000 GALLON CAPACITY EACH, VENTED TO AN AIR POLLUTION CONTROL SYSTEM (BIOFILTER) VIA THE RECEIVING AND DEWATERING BUILDING.
 - C. ASSOCIATED SUMP, FEED PUMPS AND VACUUM TRUCK CONNECTIONS.
3. FOOD WASTE AND MANURE RECEIVING AND DEWATERING BUILDING, WITH FOUR (4) ROLL UP DOORS, VENTED TO AN AIR POLLUTION CONTROL SYSTEM (BIOFILTER), INCLUDING:
 - A. FOOD WASTE AND MANURE RECEIVING AND STORAGE AREA.
 - B. TWO (2) FOOD WASTE STORAGE TANKS, HORIZONTAL, 21,000 GALLON CAPACITY EACH, WITH ASSOCIATED SUMP, FEED PUMPS AND VAPOR LINE VENTED TO THE BIOFLTER.
 - C. GRINDER, VOGELSANG, MODEL RC5000, 1320 GPM, MAXIMUM 10 HP.
 - D. BIO-SEPARATOR, DODA, MODEL BIO012005, 200 GPM, 10 HP, WITH ASSOCIATED SUMP AND FEED PUMPS.
 - E. SCREW PRESS, VINCENT, MODEL KP-10, SERIAL NO.04049-D, 100 GPM MAXIMUM CAPACITY, MAXIMUM 5 HP, WITH PERFORATED SCREEN.
 - F. FOOD WASTE AND MANURE CLIMBING SCREEN.
 - G. TWO (2) CONCRETE RECEIVING PITS/STORAGE/MIX TANKS, BELOW GROUND LEVEL, 95,000 GALLONS EACH, WITH RECIRCULATING SYSTEM AND ASSOCIATED PUMPS.
 - H. SLUDGE CAKE STORAGE.
4. PRIMARY FOOD WASTE AND MANURE DIGESTER SYSTEM CONSISTING OF:

FACILITY PERMIT TO OPERATE INLAND EMPIRE UTILITIES AGENCY

- A. FERRIC CHLORIDE INJECTION AND STORAGE SYSTEM.
 - B. TWO (2) DIGESTERS, ANAEROBIC, CONICAL ROOF, EACH 62' DIA. X APPROXIMATELY 55' H., WITH ASSOCIATED AGITATORS, FEED PUMPS, EFFLUENT LINES, AND FOAM SUPPRESSION SYSTEM.
 - C. ANAEROBIC DIGESTER MIXING SYSTEM, LANDIA, MODEL GASMIX MPTK-1 150, FOR TWO ANAEROBIC DIGESTERS.
 - D. OPTIONAL ACTIVATED CARBON VESSEL(S) VENTING THE DIGESTERS' PRESSURE RELIEF VALVES.
 - E. TWO (2) SHELL AND TUBE HEAT EXCHANGERS.
5. FOOD WASTE AND WET MANURE PLUG-FLOW MIX DIGESTER TANK, CONCRETE, 195' L. X 60' W. X 14' D., BELOW GROUND LEVEL, WITH A GAS-TIGHT CONCRETE COVER, WITH ASSOCIATED MIXERS, CIRCULATION AND EFFLUENT PUMPS, FOAM SUPPRESSION SYSTEM, AND FIVE (5) SHELL AND TUBE HEAT EXCHANGERS.
6. DIGESTER GAS HANDLING SYSTEM WITH ASSOCIATED PUMPS, PIPING, AND WATER TRAPS, CONSISTING OF:
- A. DIGESTER GAS HOLDER (GAS BAG), 424 CUBIC FEET.
 - B. PRIMARY IRON SPONGE DESULFURIZATION SYSTEM WITH TWO IRON SPONGE VESSELS WITH DEMISTER (NEAR CONICAL ROOF DIGESTERS).
 - C. TWO (2) SECONDARY OPTIONAL IRON SPONGE VESSELS WITH DEMISTER (NEAR PLUG FLOW DIGESTER).
 - D. CONDENSATE KNOCK OUT TANK(S).
 - E. TWO (2) LOW PRESSURE DIGESTER GAS TANKS, 1,000 CUBIC FEET EACH.
 - F. GAS BLOWERS, WITH DEMISTER, SUPPLYING DIGESTER GAS FOR BOILERS, STAND-BY FLARE, OR OTHER PERMITTED COMBUSTION EQUIPMENT.
 - G. CONDENSATE KNOCK OUT TANK(S).
 - H. THREE (3) HIGH PRESSURE GAS COMPRESSORS, FOR IC ENGINES.
 - I. TWO (2) DIGESTER GAS TANKS, 4,120 CUBIC FEET EACH, FOR THE IC ENGINES.
7. STORAGE TANK, DIGESTED SOLID EFFLUENT, BELOW GROUND LEVEL, 53,957 GALLONS.
8. DIGESTER SOLIDS DEWATERING SYSTEM (CONTAINED INSIDE THE FOOD WASTE AND MANURE RECEIVING AND DEWATERING BUILDING) CONSISTING OF:

FACILITY PERMIT TO OPERATE INLAND EMPIRE UTILITIES AGENCY

- A. DEWATERING CENTRIFUGE SYSTEM, CENTRISYS, MODEL CS21-4, MAXIMUM CAPACITY 200 GPM, WITH ASSOCIATED LOADING AND DISCHARGE CONVEYORS, AND POLYMER FEED AND CONTROL SYSTEM.
 - B. TWO (2) FOOD WASTE/MANURE PUMPS.
 - C. POLYMER FEED AND CONTROL SYSTEM, TO MAINTAIN WATER FLOW RATE AND SELECTED DILUTE POLYMER CONCENTRATION IN FEED SOLUTION.
 - D. TWO (2) ROTARY PRESSES.
 - E. TWO (2) FLOCCULATORS, WITH SUMP PUMP.
 - F. TWO POLYMER TANKS.
 - G. ONE SCREW CONVEYOR FOR DISCHARGE AND A LOADING CONVEYOR.
9. STORAGE TANK, FILTRATE, 140,000 GALLON CAPACITY, TO BE DISCHARGED TO INLAND EMPIRE BRINE LINE (IEBL) PREVIOUSLY KNOWN AS SANTA ANA RIVER INTERCEPTOR (SARI).
10. SLUDGE CAKE (BIOSOLIDS) HOLDING AREA/BINS FROM DEWATERING EQUIPMENT FOR REMOVAL TO COMPOSTING OR OTHER FACILITY.

Conditions:

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
[RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
- 3. THIS EQUIPMENT SHALL BE OPERATED BY PERSONNEL PROPERLY TRAINED IN ITS OPERATION.
[RULE 204]
- 4. THIS EQUIPMENT SHALL BE OPERATED IN COMPLIANCE WITH RULE 1127.
[RULE 1127]
- 5. THIS FACILITY SHALL NOT ACCEPT OR PROCESS GREATER THAN A COMBINED TOTAL OF 705 WET SHORT TONS PER DAY OF FOOD WASTE AND MANURE.
[RULE 204]
- 6. THIS FACILITY SHALL NOT ACCEPT OR PROCESS GREATER THAN 615 WET SHORT TONS PER DAY OF FOOD WASTE AND 90 WET SHORT TONS PER DAY OF MANURE. THE WASTE WEIGHT AND TYPE SHALL BE RECORDED ON A DAILY BASIS.
[RULE 204]

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7. THE OWNER AND OPERATOR SHALL NOT OPERATE THE PLUG FLOW MIX DIGESTER TANK.
[RULE 204, RULE 402]
8. THE OWNER AND OPERATOR SHALL INSTALL AND MAINTAIN CARBON ADSORPTION VESSEL(S) CONTAINING AT LEAST 2,000 POUNDS OF ACTIVATED CARBON WHICH SHALL BE IN FULL USE TO TREAT AND VENT DIGESTER GAS RELEASED FROM THE DIGESTERS' PRESSURE RELIEF VALVES.
[RULE 204, RULE 402]
9. THE FOOD WASTE AND MANURE TO BE PROCESSED AT THE FOOD WASTE AND MANURE PROCESSING FACILITY SHALL BE TRANSPORTED IN ENCLOSED TANKER TRAILERS TO PREVENT ANY FUGITIVE ODOR EMISSIONS DURING TRANSPORT, LOADING OR DELIVERY. EXTERIOR OF SUCH DELIVERY TANKER TRAILERS SHALL BE CLEAN, INCLUDING TIRES, PRIOR TO THE TRANSPORT.
[RULE 204, RULE 402]
10. ALL DOORS AND OPENINGS TO THE FOOD WASTE AND MANURE RECEIVING AND SLUDGE DEWATERING BUILDING SHALL REMAIN CLOSED EXCEPT DURING SPECIFIC ACTIVITIES WHICH REQUIRE DOORS TO BE OPEN, INCLUDING LOADING AND UNLOADING, ENTRY AND EGRESS.
[RULE 204, RULE 402]
11. THE FOOD WASTE AND DAIRY MANURE RECEIVING AND DEWATERING BUILDING, DIGESTED EFFLUENT WASTEWATER TREATMENT SYSTEM, SEVEN (7) 15,000 GALLON FOOD WASTE TANKS, AND TWO (2) 21,000 GALLON FOOD WASTE TANKS WHEN IN OPERATION SHALL BE VENTED ONLY TO AN AIR POLLUTION CONTROL SYSTEM (BIOFILTER) WHICH IS IN GOOD OPERATING CONDITION, IN FULL OPERATION, AND HAS A VALID PERMIT TO CONSTRUCT/OPERATE ISSUED BY THE SCAQMD.
[RULE 1303(a)(1) – BACT]
12. SCREENING EQUIPMENT SHALL BE VENTED DIRECTLY TO THE AIR POLLUTION CONTROL SYSTEM WHICH IS IN GOOD OPERATING CONDITION, IN FULL OPERATION, AND HAS A VALID PERMIT TO CONSTRUCT/OPERATE ISSUED BY THE SCAQMD.
[RULE 204, RULE 402]
13. ANY SOLID WASTE MATERIAL GENERATED DURING FOOD WASTE AND MANURE SCREENING PROCESS SHALL BE STORED IN DUMPSTERS WITH TIGHT LIDS OR SHALL HAVE ODOR CONTROLS INSTALLED TO PREVENT RELEASE OF ODORS TO ATMOSPHERE.
[RULE 402]
14. FOOD WASTE AND MANURE RECEIVING TANKS SHALL BE COVERED AT ALL TIMES EXCEPT DURING SPECIFIC ACTIVITIES WHICH REQUIRE COVERS TO BE OPEN DURING PERIODIC INSPECTIONS AND CLEANING, AND VENTED TO THE AIR POLLUTION CONTROL SYSTEM WHICH IS IN GOOD OPERATING CONDITION, IN FULL OPERATION, AND HAS A VALID PERMIT TO CONSTRUCT/OPERATE ISSUED BY THE SCAQMD.
[RULE 204, RULE 402]
15. THE TOTAL WEIGHT OF THE INFLUENT FOOD WASTE AND DAIRY MANURE LOADS SHALL BE WEIGHED UPON ENTRY TO THE FACILITY AND RECORDED ON A DAILY BASIS.
[RULE 204]

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16. THE TOTAL GALLONS OF FOOD WASTE PUMPED FROM THE FOUR FOOD WASTE TANKS INTO THE DIGESTERS SHALL BE MEASURED BY FLOW METER(S) AND RECORDED ON A DAILY BASIS.
[RULE 204]
17. THE TOTAL SOLIDS WEIGHT OF FOOD WASTE AND MANURE DELIVERED TO THE FACILITY SHALL BE WEIGHED, ANALYZED, AND RECORDED ON A DAILY BASIS.
[RULE 204]
18. DIGESTER GAS (BIOGAS) PRODUCED, SHALL BE SAMPLED, ANALYZED, AND RESULTS RECORDED ON A MONTHLY BASIS, AND DURING ANY ACCIDENTAL DIGESTER GAS RELEASE EVENT, WITHIN 24 HOURS, FOR BTU CONTENT, TOTAL REDUCED SULFUR AS H₂S (PPMV), AND VOLATILE ORGANICS SPECIATED.
[RULE 204, RULE 431.1]
19. THE SLUDGE CAKE PRODUCED BY DEWATERING PROCESS SHALL BE REMOVED ON A DAILY BASIS AND EITHER STORED ONSITE IN TIGHTLY CLOSED CONTAINERS OR LOADED AND TRANSPORTED IN AN ENCLOSED TRUCK. LOADED TRUCK TRAILERS SHALL RESIDE INSIDE THE MANURE RECEIVING AND SLUDGE DEWATERING BUILDING AT ALL TIMES, PRIOR TO LEAVING THE FACILITY. NO MORE THAN FIVE (5) COVERED TRAILERS, CONTAINING THE SLUDGE CAKE OR EMPTY, STORED ONSITE AT ANY ONE TIME. PRIOR TO LEAVING THE FACILITY, THE EXTERIOR OF THE TRUCK, INCLUDING TIRES, SHALL BE CLEANED.
[RULE 402]
20. ALL OF THE DIGESTER GAS PRODUCED AT THIS FACILITY SHALL BE COMBUSTED IN THE FACILITY FLARE(S), ENGINE(S), BOILER(S), OR OTHER COMBUSTION EQUIPMENT WHICH HAVE EITHER VALID PERMITS TO CONSTRUCT OR OPERATE OR EQUIPMENT WHICH HAVE BEEN DETERMINED TO BE RULE 219 EXEMPT.
[RULE 204, RULE 402, RULE 1303(a)(1)-BACT, RULE 1401]
21. PRIOR TO COMBUSTING DIGESTER GAS PRODUCED IN THIS EQUIPMENT, THE DIGESTER GAS SHALL FIRST BE TREATED THROUGH A DESULFURIZATION SYSTEM WITH A DEMISTER.
[RULE 204]
22. OPERATION OF THIS EQUIPMENT SHALL NOT RESULT IN THE RELEASE OF RAW BIOGAS INTO THE ATMOSPHERE. ANY BREAKDOWN OR MALFUNCTION OF THIS EQUIPMENT RESULTING IN THE EMISSION OF RAW BIOGAS SHALL BE REPORTED TO THE DISTRICT IN ACCORDANCE WITH RULE 430, AND IMMEDIATE REMEDIAL MEASURES SHALL BE UNDERTAKEN TO CORRECT THE PROBLEM AND PREVENT FURTHER EMISSIONS INTO THE ATMOSPHERE.
[RULE 402, RULE 430, RULE 1401]
23. THE OPERATOR SHALL PERFORM AMBIENT AIR MONITORING USING A MONITORING SYSTEM IN ACCORDANCE WITH THE FOLLOWING:
 - A. THE OPERATOR SHALL COMPLY WITH AN AMBIENT AIR HYDROGEN SULFIDE MONITORING PROTOCOL APPROVED IN WRITING BY SCAQMD. IF WRITTEN APPROVAL HAS NOT BEEN GRANTED, THE OPERATOR SHALL COMPLY WITH THE SUBMITTED AMBIENT AIR H₂S MONITORING PROTOCOL, UNTIL WRITTEN APPROVAL IS GRANTED.

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- B. THE MONITORING SYSTEM SHALL CONSIST OF AT LEAST TWO (2) SEPARATE MONITORING STATIONS AT SPECIFIC LOCATIONS AS IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE MONITORING PROTOCOL.
 - C. EACH MONITORING STATION SHALL CONTINUOUSLY MEASURE AND RECORD THE HYDROGEN SULFIDE CONCENTRATION AND MONITORS SHALL BE EQUIPPED WITH AUDIBLE AND VISIBLE ALARM SYSTEM.
 - D. THE MONITORING SYSTEM SHALL BE IN FULL OPERATION WHENEVER THE EQUIPMENT DESCRIBED IN THIS PERMIT IS OPERATED.
 - E. THE DATA PRODUCED BY THE MONITORING SYSTEM SHALL BE RETAINED FOR AT LEAST FIVE YEARS, AND BE MADE AVAILABLE UPON REQUEST BY SCAQMD PERSONNEL.
 - F. THE OPERATOR SHALL INVESTIGATE AND REPORT TO SCAQMD, FOLLOWING THE PROCEDURES OF RULE 430 BREAKDOWN, ANY AMBIENT AIR MONITORING RESULT THAT EXCEEDS 0.03 PPMV HYDROGEN SULFIDE IN AIR AT ANY MONITOR.
[RULE 204, RULE 402, RULE 1401]
24. ALL RECORDS REQUIRED BY THIS PERMIT SHALL BE KEPT AND MAINTAINED FOR A MINIMUM OF FIVE (5) YEARS AND SHALL BE MADE AVAILABLE TO THE SCAQMD PERSONNEL UPON REQUEST.
[RULE 204]

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Permit to Operate (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

APPLICATION 573235, FACILITY ID 147371

Equipment Description

FOOD WASTE AND DAIRY MANURE PROCESSING OPERATIONS CONSISTING OF:

1. WEIGH STATION TRUCK SCALES.
2. LIQUID FOOD WASTE HANDLING SYSTEM, INCLUDING:
 - A. FOUR (4) FOOD WASTE STORAGE TANKS, VERTICAL, 15,000 GALLON CAPACITY EACH, VENTED TO AN AIR POLLUTION CONTROL SYSTEM (BIOFILTER) VIA THE RECEIVING AND DEWATERING BUILDING.
 - B. THREE (3) FOOD WASTE STORAGE TANKS, VERTICAL, 15,000 GALLON CAPACITY EACH, VENTED TO AN AIR POLLUTION CONTROL SYSTEM (BIOFILTER) VIA THE RECEIVING AND DEWATERING BUILDING.
 - C. ASSOCIATED SUMP, FEED PUMPS AND VACUUM TRUCK CONNECTIONS.
3. FOOD WASTE AND MANURE RECEIVING AND DEWATERING BUILDING, WITH FOUR (4) ROLL UP DOORS, VENTED TO AN AIR POLLUTION CONTROL SYSTEM (BIOFILTER), INCLUDING:
 - A. FOOD WASTE AND MANURE RECEIVING AND STORAGE AREA.
 - B. TWO (2) FOOD WASTE STORAGE TANKS, HORIZONTAL, 21,000 GALLON CAPACITY EACH, WITH ASSOCIATED SUMP, FEED PUMPS AND VAPOR LINE VENTED TO THE BIOFLTER.
 - C. GRINDER, VOGELSANG, MODEL RC5000, 1320 GPM, MAXIMUM 10 HP.
 - D. BIO-SEPARATOR, DODA, MODEL BIO012005, 200 GPM, 10 HP, WITH ASSOCIATED SUMP AND FEED PUMPS.
 - E. SCREW PRESS, VINCENT, MODEL KP-10, SERIAL NO.04049-D, 100 GPM MAXIMUM CAPACITY, MAXIMUM 5 HP, WITH PERFORATED SCREEN.
 - F. FOOD WASTE AND MANURE CLIMBING SCREEN.

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- G. TWO (2) CONCRETE RECEIVING PITS/STORAGE/MIX TANKS, BELOW GROUND LEVEL, 95,000 GALLONS EACH, WITH RECIRCULATING SYSTEM AND ASSOCIATED PUMPS.
- H. SLUDGE CAKE STORAGE.
- 4. PRIMARY FOOD WASTE AND MANURE DIGESTER SYSTEM CONSISTING OF:
 - A. FERRIC CHLORIDE INJECTION AND STORAGE SYSTEM.
 - B. TWO (2) DIGESTERS, ANAEROBIC, CONICAL ROOF, EACH 62' DIA. X APPROXIMATELY 55' H., WITH ASSOCIATED AGITATORS, FEED PUMPS, EFFLUENT LINES, AND FOAM SUPPRESSION SYSTEM.
 - C. ANAEROBIC DIGESTER MIXING SYSTEM, LANDIA, MODEL GASMIX MPTK-1 150, FOR TWO ANAEROBIC DIGESTERS.
 - D. OPTIONAL ACTIVATED CARBON VESSEL(S) VENTING THE DIGESTERS' PRESSURE RELIEF VALVES.
 - E. TWO (2) SHELL AND TUBE HEAT EXCHANGERS.
- 5. FOOD WASTE AND WET MANURE PLUG-FLOW MIX DIGESTER TANK, CONCRETE, 195' L. X 60' W. X 14' D., BELOW GROUND LEVEL, WITH A GAS-TIGHT CONCRETE COVER, WITH ASSOCIATED MIXERS, CIRCULATION AND EFFLUENT PUMPS, FOAM SUPPRESSION SYSTEM, AND FIVE (5) SHELL AND TUBE HEAT EXCHANGERS.
- 6. DIGESTER GAS HANDLING SYSTEM WITH ASSOCIATED PUMPS, PIPING, AND WATER TRAPS, CONSISTING OF:
 - A. DIGESTER GAS HOLDER (GAS BAG), 424 CUBIC FEET.
 - B. PRIMARY IRON SPONGE DESULFURIZATION SYSTEM WITH TWO IRON SPONGE VESSELS WITH DEMISTER (NEAR CONICAL ROOF DIGESTERS).
 - C. TWO (2) SECONDARY OPTIONAL IRON SPONGE VESSELS WITH DEMISTER (NEAR PLUG FLOW DIGESTER).
 - D. CONDENSATE KNOCK OUT TANK(S).
 - E. TWO (2) LOW PRESSURE DIGESTER GAS TANKS, 1,000 CUBIC FEET EACH.
 - F. GAS BLOWERS, WITH DEMISTER, SUPPLYING DIGESTER GAS FOR BOILERS, STAND-BY FLARE, OR OTHER PERMITTED COMBUSTION EQUIPMENT.
 - G. CONDENSATE KNOCK OUT TANK(S).
 - H. THREE (3) HIGH PRESSURE GAS COMPRESSORS, FOR IC ENGINES.
 - I. TWO (2) DIGESTER GAS TANKS, 4,120 CUBIC FEET EACH, FOR THE IC ENGINES.
- 7. STORAGE TANK, DIGESTED SOLID EFFLUENT, BELOW GROUND LEVEL, 53,957 GALLONS.
- 8. DIGESTER SOLIDS DEWATERING SYSTEM (CONTAINED INSIDE THE FOOD WASTE AND MANURE RECEIVING AND DEWATERING BUILDING) CONSISTING OF:

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- A. DEWATERING CENTRIFUGE SYSTEM, CENTRISYS, MODEL CS21-4, MAXIMUM CAPACITY 200 GPM, WITH ASSOCIATED LOADING AND DISCHARGE CONVEYORS, AND POLYMER FEED AND CONTROL SYSTEM.
 - B. TWO (2) FOOD WASTE/MANURE PUMPS.
 - C. POLYMER FEED AND CONTROL SYSTEM, TO MAINTAIN WATER FLOW RATE AND SELECTED DILUTE POLYMER CONCENTRATION IN FEED SOLUTION.
 - D. TWO (2) ROTARY PRESSES.
 - E. TWO (2) FLOCCULATORS, WITH SUMP PUMP.
 - F. TWO POLYMER TANKS.
 - G. ONE SCREW CONVEYOR FOR DISCHARGE AND A LOADING CONVEYOR.
9. STORAGE TANK, FILTRATE, 140,000 GALLON CAPACITY, TO BE DISCHARGED TO INLAND EMPIRE BRINE LINE (IEBL) PREVIOUSLY KNOWN AS SANTA ANA RIVER INTERCEPTOR (SARI).
 10. SLUDGE CAKE (BIOSOLIDS) HOLDING AREA/BINS FROM DEWATERING EQUIPMENT FOR REMOVAL TO COMPOSTING OR OTHER FACILITY.

Background/Process Description

The above application was submitted on March 13, 2015 for expedited permit processing (XPP) for the alteration/modification of an existing food waste/ dairy manure processing plant permitted under Permit G28967, A/N 530245. This application is for the inclusion of the Rule 441 Experimental Research Operations permit units of Permit G31126, A/N 562593 for the digester mixing and dewatering systems and Permit G33211, A/N 568624 for the influent pre-digestion food waste screening system, as well as additional food waste storage tanks, and a DODA bio-separator system.

The existing Permit to Operate A/N 530245 allows a maximum of 615 wTPD (approximately 165,000 gallons per day) of food waste and a maximum of 90 wTPD (approximately 25,000 gallons per day) of dairy manure, 705 wTPD of feedstock total. The facility currently accepts less than a quarter of the allowable volume of food waste per day due to the current processing/screening equipment being the rate limiting step. In order to bring the actual throughput capacity of the facility up to the maximum throughput capacity the facility is 1) increasing the volume of food waste the facility can accept with the addition of three (3) high density polyethylene (HDPE) vertical 15,000 gallon capacity and two (2) horizontal 21,000 gallon capacity food waste storage tanks and 2) increasing the digester gas production by reducing the size of the solids and lowering the solids content in the food waste with the addition of a DODA bio-separator and Vincent screw press (A/N 568624). With the addition of the proposed equipment, the facility expects to be able to accept and process nearly the maximum permitted amount of food waste (615 wTPD) and produce a maximum of 981,000 cubic feet of digester gas per day.

The facility needs to increase the food waste throughputs and digester gas production rates in order to comply with source test permit requirements at the facility. The facility needs to accept 75% of the food waste/manure throughput (which is 528.75 wTPD) to conduct a source test on the biofilter (A/N 536399) to fulfill the biofilter's Permit to Construct requirements. The facility needs to produce a digester gas flow rate of 220 scfm (9.72 mmBTU/hr) based on a 30-average to conduct a source test no later than December 12, 2015 on the flare (A/N 448345) to fulfill the permit requirements. Likewise the facility needs to

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produce a digester gas flow rate of 274 scfm (12.08 mmBTU/hr) based on a 30-average to conduct a source test no later than December 12, 2015 on the two digester gas fired IC engines (A/Ns 536396 & 536397) to fulfill the permit requirements.

Vacuum trucks containing food waste and dairy manure enter the facility are weighed on the in-ground truck scale. The waste weight is recorded daily. The trucks pump food waste into either the seven HDPE 15,000 gallon tanks through a hose connected the food waste tanks or the two 21,000 gallon "Baker" tanks (inside the receiving/dewatering building). The contents of the HDPE tanks can be combined in another tank in various amounts to provide a stable and viable waste type for the anaerobic digesters. The contents of HDPE tanks may be pumped directly to the two European-style continuously mixed anaerobic digesters to produce digester gas. Manure will either be pumped directly to the digesters or sent to the receiving pits/mix tanks in the receiving/dewatering building. Food waste and manure may be processed through the Vogelsang grinder to reduce solids to a range of 0.15 inches (3.8mm) to 1.18 inches (30 mm), and then screened, as needed, in the DODA bio-separator to remove solids larger than 5 mm, and then to the Vincent screw press to remove solids larger than 1 mm before being sent to the receiving pits and then onto the digesters. The receiving/dewatering building is vented to a biofilter (A/N 536399) for odor and air pollution control. The food waste tanks and a digested effluent liquid waste processing system (A/N 536401) will be vented to the biofilter through the receiving/dewatering building. There is a sump below the outdoor food waste tanks to collect any spilled food waste, which can then be pumped back into the tanks. It takes about 45 minutes to an hour to discharge the waste from the truck into the tanks. The waste in the outdoor tanks may also be pumped into the two underground mix tanks also known as the receiving pits located on the southern center part of the receiving/dewatering building. These two mix tanks can also be pumped into the two European digesters or the plug-flow mix tank digester. The plug flow digester shall not be operated per permit conditions. The two mix tanks are capable of accepting a larger capacity of waste, approximately 40 truckloads of waste per day, with a 150 gallons/min discharge rate from the trucks. The faster waste accepting rate of the two mix tanks/ receiving pits, compared to the HDPE food waste tanks, allows the facility more operational flexibility. If the incoming waste trucks are pressurized they could be completely discharged in 10 minutes into the two mix tanks/receiving pits.

Digester gas produced in the two European digesters is sent from the top of the digesters to a biogas holding tank with a bladder (gas bag), before being sent to the iron sponge for H₂S reduction in the digester gas. The biogas holding tank with a bladder serves as a pressure balance to ensure the digesters aren't under vacuum and cave in. Condensate from the iron sponge and bladder collect in a sump and is pumped back to the digesters. Digester gas from the holding tank is sent to two 1,000 cubic feet low pressure digester gas tanks to be used in the boilers or is sent to the compressors located on the northwest corner of the SHF and then to the two 4,120 cubic feet digester tanks for storage until the gas is used in the two 2131BHP IC engines each driving a 1.5 MW electrical generator to produce electricity for IEUA RP-5. In addition to the two ICEs, digester gas is also permitted to be used in two boilers, with boiler no. 1 used in heating the plug-flow or mix-tank anaerobic digester and boiler no. 2 used in heating the two European style anaerobic digesters. Any excess digester gas shall be flared. The current average digester gas (DG) production rate from both digesters has been ~100,000 cf/day, with a daily maximum of ~150,000 cf/day. This facility is expected to produce a maximum of 981,000 cubic feet of digester gas per day.

The Landia GasMix anaerobic digester mixing system installed on the two digesters is expected to improve the digester gas production rate compared to the previous physical rotating blade style mixers in the digesters. The GasMix system draws sludge from the bottom of the digesters via a chopper pump, where the sludge is reduced in size and is mixed with digester gas from the top of the digester and injected back into the digester. The mixing system can also draw in sludge from the bottom of the digester and injected it into the lower half of the digester to facilitate more rigorous mixing. A video illustrating the process can be found at <http://www.landiainc.com/mixers/gasmix>.

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Sludge from the digesters is sent to the receiving/dewatering building for dewatering with a centrifuge system and two rotary presses. The dewatered cake will be sent offsite for composting or disposal. A polymer system is used to assist in coagulation for the dewatering process. Liquid from the dewatering process can be rerouted back into the digesters or treated in the dissolved air floatation (DAF) system permitted under the digested effluent liquid waste processing system Permit to Construct A/N 536401 before being discharged into the Inland Empire Brine Line (IEBL) previously known as the Santa Ana Regional Interceptor (SARI) line. Any recovered biomass from the digested effluent liquid waste processing system is returned to the digesters or sent offsite for composting or disposal. There is a large 140,000 gallon filtrate tank on the east side of the plug-flow mix tank digester that may store liquid prior to discharge into the IEBL.

IEUA is working with ES Engineering (previously known as Environ Strategies Consultants, Inc.) and Inland Bioenergy, LLC (which is an entity comprised of ES Engineering and Burrtec) regarding their facility operations and application packages. Environ Strategies and Inland Bioenergy, LLC is in contract with IEUA to lease and the land and equipment of IEUA RP-5 SHF and operate the equipment and processes of the SHF. As of January 14, 2015 Edison has provided conditionally authorization to Interconnect Generating Facility (electric generating IC engines) since Edison completed its inspection of the IEUA's Electrical Components serving the Producer's Generator Facility and reviewed the documentation showing compliance with the technical provisions of SCE's Rule 21 Tariff. Therefore the facility has So Cal Edison's approval to produce electricity from the two IC engines.

The maximum total food waste/manure influent and maximum digester gas production is identical to the previous application. The alteration/modification of the processing plant is expected to have ~0.00 lbs/hr emission increase. All outdoor food waste storage tanks and all equipment housed in the receiving/dewatering building shall be vented to a biofilter for air pollution control.

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, Notices to Comply, or Notices of Violation issued against the above facility in the last two years.

Emission Calculations

There is no expected emissions increase due to the alteration/modification of this application and facility operations. All additional digester gas produced is not expected to exceed the combustion equipment throughputs and emission limits. And the treatment processes are not expected to exceed the permitted throughputs under the existing permit (A/N 536399). Emissions in **bold** will be used for maximum potential emissions for this equipment and NSR.

All NSR 30-day average lbs/day emissions will be based on a schedule of 24 hours/day, 7 days/week, 52 weeks/year.

ROG emissions

Previous emissions under A/N 451067 based on biofilter source test (7/30/2003) inlet emissions under A/N 388295: 1.73 lbs/hr @ 225 wTPD of manure.

$$R1 = 1.73 \text{ lbs/hr} \times 705 \text{ wTPD}/225 \text{ wTPD} = 5.42 \text{ lbs/hr} = 131.89 \text{ lbs/day (NSR)}$$

$$R2 = 5.42 \text{ lbs/hr} \times (1.0 - 0.80) = 1.08 \text{ lbs/hr} = 26.28 \text{ lbs/day (NSR)}$$

80% control efficiency assumed by Rule 1133.2 transfer of technology.

JEIP Emission Estimate

Uncontrolled emissions	Mass Emission Rate
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Solids Handling	Ave.	Min.	Max.	Emission Factor Used (lb/yr/mgd)
Sludge Dewatering – Centrifuges	6.65	0.93	11.54	6.65
Sludge Dewatering - Belt Presses	58.81	3.38	252.56	58.81
Sludge Screening	8.53	2.50	6.03	8.53

Based from Table 1-7 Basinwide Emissions Summary JEIP Unit Process Emission Factors.
Assume sludge screening has the same emissions for influent food waste screening.

Assume VOC emissions of the influent food waste screening system @ 705wTPD ~ 190,000 gallons/day throughput under A/N 530245:

$$8.53 \text{ lb/yr/mgd} \times \text{year}/365\text{days} \times \text{day}/24 \text{ hours} \times (190,000 \text{ gallon/day} / 1\text{E}6\text{gallon}) \\ = 0.000185 \text{ lbs/hr} \sim 0.00 \text{ lbs/hr} = 0 \text{ lbs/day (NSR)}$$

Assume VOC emissions of the existing rotary presses instead of centrifuges for worst case emissions @ 705wTPD ~ 190,000 gallons/day throughput under A/N 530245:

$$58.81 \text{ lb/yr/mgd} \times \text{year}/365\text{days} \times \text{day}/24 \text{ hours} \times (190,000 \text{ gallon/day} / 1\text{E}6\text{gallon}) \\ = 0.00128 \text{ lbs/hr} \sim 0.00 \text{ lbs/hr}$$

Net VOC emission increase: $0.000185 \text{ lbs/hr} + 0.00128 \text{ lbs/hr} = 0.00146 \text{ lbs/hr} \sim 0.00 \text{ lbs/hr} \sim 0 \text{ lbs/hr}$

H2S/SOx Emissions

Rule 431.1 compliance: 1) 40ppmv H2S in fuel, 2) Facility wide emission < 5 lbs/day

- 1) $40 \text{ ppmv H}_2\text{S} \times 981,000 \text{ scf/day} \times \text{day}/24\text{hr} \times \text{lbmole}/379\text{E}6 \text{ cf} \times 34.08 \text{ lbs/lbmole}$
 $= 0.15 \text{ lbs/hr} = 3.65 \text{ lbs/day(NSR)}$
- 2) $5 \text{ lbs/day H}_2\text{S} \times \text{lb-mole}/34.08 \text{ lbsH}_2\text{S} \times 64.07 \text{ lbsSO}_x/\text{lb-mole}$ $= 9.40 \text{ lbs/day SO}_x \text{ (as SO}_2\text{)}$
 $= 0.39 \text{ lbs/hr SO}_x \text{ (as SO}_2\text{)}$

Annual Emissions (AER 2012) SOx emission: 0.158 tons/yr

$$0.158 \text{ tons/yr} \times 2,000\text{lbs/ton} \times 1\text{yr}/365\text{days} = 0.87 \text{ lbs/day SO}_x = 0.04 \text{ lbs/hr SO}_x$$

Toxic Risk Analysis

There is no expected increase of emissions or health risk due to the inclusion of the food waste storage tanks, food waste screening equipment, digester gas mixers, and dewatering 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:
- | | |
|----------------------------|-------------|
| 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.

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- 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 407: Liquid and Gaseous Air Contaminants
Rule 407(a)(1)- CO shall not exceed 2000 ppmvd, averaged over 15 consecutive minutes.
Rule 407(a)(1)- Sulfur compounds which would exist as liquid or gas at standard conditions, shall not exceed 500 ppmv, calculated as SO₂ and averaged over 15 consecutive minutes.
Compliance is expected.
- Rule 431.1: Sulfur Content of Gaseous Fuels
Rule 431.1(c)(1)- Natural gas contains ≤ 16 ppmv sulfur compounds as H₂S.
Rule 431.1(c)(2)- Other gases ≤ 40 ppmv sulfur compounds as H₂S, averaged over 4 hours.
Rule 431.1(d)(1)- If burning gaseous fuels, other than exclusively natural gas, in stationary equipment shall have a properly operating continuous fuel gas monitoring system (CFGMS) to determine the sulfur content, calculated as H₂S, of the fuel gas prior to burning; or a continuous emission monitoring system (CEMS) to determine SO_x emissions after burning. All continuous monitors require District approval, which shall be based on the requirements as specified in Attachment A.
Rule 431.1(d)(1)(B)- A person subject to paragraph (c)(4) of this rule shall comply with paragraphs (d)(1) and (d)(2) no later than twelve months after the date a Permit to Construct is issued by the District for a sulfur removal system or comply with paragraph (d)(3).
Rule 431.1(d)(1)(C)- Compliance with the Table 1 sulfur limits shall be determined based on readings obtained from an approved continuous monitor.
Rule 431.1(d)(2)- A person installing a continuous monitor shall submit to the District for approval, a quality assurance procedure as specified in U.S. EPA 40 CFR, Part 60, Appendix F, Procedure 1 for CEMS and, as applicable, for CFGMS.
Rule 431.1(d)(2)(A)- The quality assurance procedure specified above shall be submitted to the District for written approval by the Executive Officer prior to the CFGMS or CEMS final certification.
Rule 431.1(d)(2)(B)- Any CFGMS or CEMS deemed to be out of control, as specified in Attachment A, according to the facility quality assurance procedure approved by the Executive Officer shall be corrected within 72 hours.
Rule 431.1(d)(2)(B)(i)- The person operating the CFGMS or CEMS shall notify the Executive Officer by telephone or facsimile of any breakdown(s) of the monitoring systems if the duration of the breakdown is in excess of 60 minutes or if there are three or more breakdowns in any one day within 24 hours of the occurrence of the breakdown which triggers notification. Such report shall identify the time, location, equipment involved, and contact person.
Rule 431.1(d)(2)(B)(ii)- The person who complies with the provisions of clause (d)(2)(B)(i) and paragraph (e)(3) shall not be considered in violation of this rule for the 72 hour period of breakdown provided that the breakdown did not result from operator error, neglect or improper operation or maintenance procedures.

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Rule 431.1(d)(3)- A person burning landfill gas or sewage digester gas, or who is subject to paragraph (c)(4) of this rule may use an alternative monitoring method, in lieu of the requirements in paragraphs (d)(1) and (d)(2), that ensures compliance with the daily total sulfur content limitation as specified in Table 1. Alternative monitoring methods shall not be used unless first approved in writing by the Executive Officers of the District, the CARB, and the Regional Administrator of the EPA, Region IX, or their designees.

Rule 431.1(d)(3)(A)- At a minimum, the alternative monitoring method shall meet the guidelines of Attachment A, Section III.

Rule 431.1(d)(3)(B)- A person subject to (c)(4) of this rule shall submit an alternative monitoring method for approval no later than 45 days after the date a Permit to Construct a sulfur removal system is issued.

Rule 431.1(d)(3)(C)- All monitoring must comply with the approved alternative monitoring method.

Rule 431.1(g)(8)- Any facility which emits less than 5 pounds per day total sulfur compounds, calculated as H₂S from the burning of gaseous fuels other than natural gas (not applicable to (c)(1)).

This facility is expected to comply either with sulfur limits as required or exemption requirement under Rule 431.1(g)(8). Compliance is expected.

Rule 53A: San Bernardino County – Specific Contaminants (Contained in Addendum to Reg IV)
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.

Rule 1127: Emission Reductions from Livestock Waste
This facility is a permitted manure processing operation consisting of anaerobic digestion. Compliance is expected.

Reg XIII: Rule 1303(a)- There is no expected emission increase, therefore BACT is not triggered.
Rule 1303(b)(1)- Modeling for VOC and SO_x is not required (1303 Appendix A).
Rule 1303(b)(2)- There is no expected emission increase for this permit unit. 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 less than 1.0×10^{-6} based on previous evaluation.
Rule 1401(d)(1)(C)- Cancer burden is less than 0.5 based on previous evaluation.
Rule 1401(d)(2) and Rule 1401(d)(3)- HIC and HIA values are estimated to be less than 1 respectively based on previous evaluation.
Compliance is expected.

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

Reg. XXX: The addition of food waste storage tanks, screening equipment, digester mixers, and dewatering equipment is considered a Title V Minor permit revision under Rule 3000(b)(15), since there is no emission increase and the modification of the

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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 & Recommendations

The equipment is in compliance with the Rules and Regulations of the SCAQMD. A Permit to Operate is recommended for application 573235. For Permit Conditions please see Sample Permit. A revised Title V permit is recommended after EPA review.

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TITLE V PERMIT MINOR (REV 06) EVALUATION

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

APPLICATION 573241, FACILITY ID 147371 - Title V Permit Revision

Background/Process Description

Inland Empire Utilities Agency (IEUA), Regional Plant 5 (RP-5), Solids Handling Facility (SHF) A/N 573241 was submitted for Title V permit minor revision (06) on March 17, 2015. Application 573235 was submitted for the alteration of an existing food waste/manure processing plant to include additional food waste storage tanks, screening equipment, digester mixers, and dewatering equipment. The facility is currently operating at 23% capacity. The addition of the food waste storage tanks, screening equipment, digester mixers, and dewatering equipment is expected to increase the food waste throughput and digester gas production rates to their design capacity. Public notice is not required. For additional information and permit evaluations please refer to the attached evaluation prepared for EPA review.

IEUA has requested expedited permit processing and review for the modification of the food waste to energy project. Since the project is expected to bring environmental benefits and food waste diversion from landfill disposal, expedited EPA review of this proposal is requested.

Note: Title V Revision 05, Minor was issued on December 12, 2013.

Rules Evaluation

Reg. XXX:

The addition of food waste storage tanks, screening equipment, digester mixers, and dewatering equipment 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

A Permit to Operate is recommended for application 573235. A revised Title V permit is recommended for after the completion of EPA review.