

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

**PAGES**

**PAGE**

**ENGINEERING AND COMPLIANCE DIVISION**

**APPLICATION NO.**

**DATE**

**APPLICATION PROCESSING AND CALCULATIONS**

**533672**

**6/18/2013**

**ENGINEER**

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**COMPLIANCE PLAN**

**COMPANY NAME & MAILING ADDRESS**

City of LA, Bureau of Sanitation (Terminal Island)  
445 Ferry Street  
San Pedro, CA 90731

**EQUIPMENT ADDRESS**

445 Ferry Street  
San Pedro, CA

APPLICATION NO. 534031

This Compliance Assurance Monitoring Plan (CAM) under Reg. XXX (40 CFR Part 64) for ROG emissions controlled by flare station and digester gas boilers.

**BACKGROUND**

This application was submitted on Mar. 13, 2012 for a CAM plan for the flare system Permit to Operate No. G7408 (A/N 474646), and boilers Permit to Operate No. F48950 (A/N 393799) and Permit to Construct (A/N 406262). The Initial Title V permit for this facility was issued on 8/1/2007. The facility submitted their Title V renewal application (A/N 533674) on 3/13/2012. The application is for a Compliance Assurance Monitoring plan under Reg. XXX (40 CFR Part 64).

This regulation became effective on November 21, 1997. However requirements of the plan were delayed while the Title V program was being implemented. Thus, owners and operators were subject to CAM plan requirements at the time of their Title V permit renewal.

**CAM Applicability & Requirements:**

CAM regulation (40 CFR Part 64) covers emission units that are evaluated on a pollutant by pollutant basis for equipment that meet the definition of pollutant specific emission units (PSUEs). The regulation applies to each PSUE if the unit is located at a major source that is required to obtain a Part 70 or 71 (Title V) permit. The CAM plan requirements are;

1. Describing the indicators to be monitored.
2. Describing ranges or the process to set indicator ranges.
3. Describing the performance criteria for the monitoring, including specifications for obtaining representative data, verification procedures to confirm monitoring operational status, QA/QC procedures and monitoring frequency.
4. Providing justification for the use of parameters, ranges, and monitoring approach.
5. Providing emissions test data, if necessary.
6. Providing an implementation plan, if monitoring requires installation, testing, or other activities prior to implementation.

**EVALUATION:**

The above facility currently operates flaring system under Permit to Operate No. G7408, and digester gas/natural gas boilers under Permit to Operate NO. F48950 and Permit to Construct No. 406262.

Presently, the permit for the flares is subject to limit of 1.152 mm ft<sup>3</sup>/day of digester gas burned in both flares and maximum operating hours of 3744 hours in any twelve-month period for each flare and flares operating temperature (1,400 °F min.).

Note:

Based on the attached email dated 2/12/13, the following conditions will be added to the existing Facility Wide Conditions:

- 1) The fuel usage for the flares will be limited to 115.1 mmcf/yr.
- 2) The total fuel usage for the boilers 1 & 2 under PO # F48950 & A/N 406262, will be limited to 115.1 mmcf/yr.

It should be noted that the fuel usages for the above flares & the boilers reported in the District Annual Emissions Report for the year 2011 are reported as 21 mmcf/yr & 51.1 mmcf/yr, respectively. Based on the above limitations stated in items 1 & 2, the uncontrolled ROG emissions will be less than 10 tpy threshold.

With the permit limits in place, the flares and boilers will not meet the applicability criteria for CAM.

**RECOMMENDATION**

CAM plan cancellation is recommended, and the facility permit conditions will be revised to incorporate the following conditions:

1. THE TOTAL VOLUME OF FUEL BURNED IN THE FLARES UNDER PERMIT TO OPERATE NO. G7408 SHALL NOT EXCEED 115.1 MMCF PER YEAR.
2. THE TOTAL VOLUME OF FUEL BURNED IN THE BOILERS UNDER PERMIT TO OPERATE NO. F48950 AND PERMIT TO CONSTRUCT NO. 406262 SHALL NOT EXCEED 115.1 MMCF PER YEAR.