

# South Coast Air Quality Management District

## Statement of Basis Title V Facility Permit Renewal

Issuance Date: 06/18/2013

**Facility Name:** City of LA, Terminal Island Water Reclamation Plant  
**Facility ID:** 10245  
**SIC Code:** 4952  
**Equipment Location:** 445 Ferry Street  
San Pedro, CA 90731

**Application #(s):** 533674  
**Application Submittal Date(s):** 03/13/2012

**Permit Renewal:**  
**Revision No.:** Draft  
**Permit Section(s) Affected:** All

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### 1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

The SCAQMD implements Title V through Regulation XXX – Title V Permits, adopted by the SCAQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO<sub>2</sub>, SO<sub>2</sub>, and lead are in attainment with federal standards. The status of CO is designated to attainment status. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of a water reclamation plant. This facility is subject to Title V requirements because it is a major source.

## **2. Facility Description**

This is a water reclamation plant. Main operations include Digester Gas Hydrogen Sulfide Removal System, Sludge Dewatering System, Odor Control System, Sewage Treatment Plant, Flare Station, Boilers, Emergency Electrical Generators, Open Spray Equipment, and Spray Booth. The facility is located at 445 Ferry St., San Pedro, CA 90731.

## **3. Construction and Permitting History**

An initial Title V permit was issued on 8/1/2007, and expired on 7/31/2012. Title V revision No. 1 was issued on February 26, 2010 for modification of digester gas flaring system by addition of a flare, and removal of internal combustion engine # 3.

## **4. Regulatory Applicability Determinations**

Applicable legal requirements for which this facility is required are identified in the Title V permit (for example, Section D, E, and K, of the proposed Title V renewed permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is subject to NSPS and NESHAP requirements. NSPS requirements of 40 CFR Part 60 apply to certain units at the facility and the permit terms and conditions may be found in Section D of the Title V permit. NESHAP requirements of 40 CFR Part 63 apply to certain units at the facility and the permit terms and conditions may be found in Sections D and J of the Title V permit.

## **5. Monitoring and Operational Requirements**

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D and J and Appendix B of the proposed Title V permit). Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluations. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 apply to the permitted emission source at this facility. CAM plan for TNMHC emission control using APC (flare) is addressed under A/N 533672.

## **6. Permit Features**

### **Permit Shield**

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

### Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

## 7. Summary of Emissions and Health Risks

### Criteria Pollutant Emissions (tons/year) Annual Reported Emissions for Reporting Period 2012

<i>Pollutant</i>	<i>Emissions (tons/year)</i>
CO	0.692
NO <sub>x</sub>	1.893
ROG	10.280
SO <sub>x</sub>	0.353
TSP	1.606

### Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2012

<i>TACs Reported</i>	<i>Emissions (lbs/yr)</i>
1,3-Butdiene	0.352
Ammonia	172.824
Arsenic	0.001
Benzene	3.057
Cadmium	0.001
Chromium (VI)	0.000
Formaldehyde	18.269
Lead (inorganic)	0.009
Naphthalene	0.194
Nickel	0.005
PAHs, total with components not reported	0.087

### Health Risk from Toxic Air Contaminants

The facility is determined to be exempt from the Air Toxics Information and Assessment Act (AB2588).  
Final Facility Health Risk Approved: 6/2/00  
Cancer Risk: 1.83 in one million  
Acute Hazard Index: 0.02  
Chronic Hazard Index: 0.03

## 8. Compliance History

The facility has been subject to both self-reporting requirements and SCAQMD inspections. Facility inspection report for 8/3/2012 indicated that permitted equipment operating satisfactorily and facility was determined to be in compliance.

As per District's records there were no citizen complaints, no NCs or NOVs issued for the facility, for the period 2011 - 2012.

## 9. Compliance Certification

By virtue of the Title V renewal permit application and issuance of the renewed permit in coming months, the reporting frequency for compliance certification for the facility shall be annual.

## 10. Comments

The following Section D permit revisions are incorporated into the proposed Title V Permit:

<b>Application No.</b>	<b>Equipment</b>	<b>Description</b>
406262	Boiler (<=10 mm btu/hr) Dig Gas	PC converted to PO. Also, the burner manufacturer and the rating on the burner was changed (Minor Revision).
533672	CAM Plan	Proposed approval to limit fuel usage to exempt the flares & boilers from CAM (see Facility Wide Conditions).