

# South Coast Air Quality Management District

## Statement of Basis

### Title V Facility Permit Renewal

<b>Facility Name:</b>	Eastern Municipal Water District (EMWD)
<b>Facility ID:</b>	007417
<b>SIC Code:</b>	4941
<b>Equipment Location:</b>	1401 Case Road Perris, CA 92590
<b>Application #(s):</b>	550497
<b>Application Submittal Date(s):</b>	4/25/2013
<b>Permit Renewal:</b>	Draft
<b>Permit Revision No.:</b>	08
<b>Permit Section(s) Affected:</b>	All
<b>SCAQMD Contact Person:</b>	Angela Shibata, A.Q. Engineer
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<b>E-Mail Address:</b>	ashibata@aqmd.gov

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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 CO are in attainment with federal standards. Lead, PM-2.5, PM-10, and ozone are in nonattainment.

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

## **2. Facility Description**

This facility is a sewage treatment plant, applying for a Title V renewal permit, consisting of four emergency internal combustion engines for electrical generation, three non-emergency internal combustion engines driving aeration blowers, an anaerobic sewage treatment plant, a digester gas treatment system and fuel cell power plant, a digester gas/natural gas boiler, a digester gas flare, a biofilter, a gasoline service and dispensing system, and two LPG storage tanks at this facility.

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

An initial Title V permit was issued on October 31, 2008 and is due to expire on October 30, 2013. There have been seven Title V revisions since the Initial Title V Permit was issued.

## **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 NESHAP requirements applicable to operators of reciprocating internal combustion engines (RICE), 40 CFR Part 63, Subpart ZZZZ. The permit terms and conditions may be found in Sections D 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 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 do not apply to any of the permitted emission sources at this facility.

## **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 compliant 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**

Pollutant	Emissions (tons/year)
CO	1.642
NO <sub>x</sub>	0.526
ROG	8.590
SO <sub>x</sub>	0.138
TSP	0.243

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

The Following TACs Were Reported	Emissions (lbs/yr)
Ammonia	1088.314
Formaldehyde	39.705
Perchloroethylene	37.426
Benzene	23.777
1,3-Butadiene	7.941
Naphthalene	1.503
Methylene chloride	0.494
Ethylene dibromide	0.263
Carbon tetrachloride	0.219
Ethylene dichloride	0.139
PAHs, total, with components not reported	0.090
Vinyl chloride	0.090
2-Methyl naphthalene (PAH, POM)	0.007
Phenanthrene	0.002
Acenaphthylene	0.001
Fluorene	0.001
Acenaphthene	0.000
B[GHI]perylene	0.000
Benzo[b]fluoranthene	0.000
Benzo[e]pyrene (PAH, POM)	0.000
Chrysene	0.000
Fluoranthene	0.000
Pyrene	0.000

## **Health Risk from Toxic Air Contaminants**

The facility has been determined to be subject to Air Toxics Information and Assessment Act (AB2588) requirements. SCAQMD is tracking the status of the facility under AB2588.

### **8. Compliance History**

The facility has been subject to SCAQMD inspections. Facility inspection report for July 12, 2013 was satisfactory operating in compliance at the time of inspection. The facility had 0 citizen complaints filed, 0 Notice to Comply issued, 0 Notice of Violation issued for the period of (August 2011 through August 2013). The facility is in compliance.

### **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.