

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES 2	PAGE 1
	APPL. NO 535752	DATE 12/19/2012
	PROCESSED BY GCR	CHECKED BY COT

TITLE V RENEWAL EVALUATION

APPLICANT'S NAME: **BREA PARENT 2007, LLC**
(Previous Business name Ridgewood Power Management, LLC)

MAILING ADDRESS: 1057 East Imperial Highway, # 609
Placentia, CA 92870-1717

EQUIPMENT ADDRESS: 1942 Valencia Avenue
Brea, CA 92823-6807

FACILITY ID: **113518**

CONTACTS: Attn.: Karl Darrington, Plant Manager
Phone: (714) 985-1781
E-mail: kdarrington@broadrock.com

Yorke Engineering, LLC
Kedar Desai, Sr. Engr.
Phone: (949) 248-8490, Ext 233
E-mail: kdesai@yorkeengr.com

BACKGROUND:

On 4/04/2012, A/N 535752 was submitted for Title V permit renewal for the Brea Parent 2007; LLC (Previously named, Ridgewood Power Management, LLC). The facility is a landfill gas to energy (LFGTE) facility operating a LFG treatment system, IC engines, gas combustion turbines, ammonia storage tank and a regenerative flare. Internal combustion engines (3) and gas turbines (4) are designed to produce total of 28 MW gross power for sale to the grid.

In addition A/Ns 541293 and 543895 are filed for Compliance Assurance Monitoring (CAM) Plan required under 40 CFR part 64 for the combustion gas turbines, and IC engines and, regenerative flare; respectively.

Initial Title V permit was issued on October 01, 2007 (initially to Ridgewood Power Management).

Attached are the documents for the Title V renewal and evaluations for CAM plans; A/Ns 541293 and 543895.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES 2	PAGE 2
	APPL. NO 535752	DATE 12/19/2012
	PROCESSED BY GCR	CHECKED BY

PERMITTED EQUIPMENT LIST: (Section D)

THE FOLLOWING IS A LIST OF ALL PERMITS TO CONSTRUCT AND PERMITS TO OPERATE AT THIS FACILITY:

Application Number	Permit to Operate Number	Equipment description
468740	F92618	FLARE, WASTE/LANDFILL GAS
468743	F92619	LANDFILL GAS TREATMENT
414941	G16274	1 C E-A (2650 HP), LANDFILL GAS, WITH OXIDATION CATALYST
414942	G16275	1 C E-B (2650 HP), LANDFILL GAS, WITH OXIDATION CATALYST
414943	G16276	1 C E-C (2650 HP), LANDFILL GAS, WITH OXIDATION CATALYST

PERMITTED EQUIPMENT LIST: (Section H)

THE FOLLOWING IS A LIST OF ALL PERMITS TO CONSTRUCT AT THIS FACILITY:

Application number	Equipment Description
474009	Landfill Gas, Treatment (Siloxanes Removal)
475036	Flare, Landfill/Digester Gas, Enclosed
474001	Gas Turbine, NO.1
474002	Gas Turbine, NO.2
474003	Gas Turbine, NO.3
474004	Gas Turbine, NO.4
474005	Air Pollution Control System (SCR), No.1
474006	Air Pollution Control System (SCR), No.2
474007	Air Pollution Control System (SCR), No.3
474008	Air Pollution Control System (SCR), No.4
487106	Storage Tank, Aqueous Ammonia

RULES EVALUATION:

Compliance with all applicable rules and regulations is expected for this TV renewal.

CONCLUSIONS/RECOMMENDATION:

Issuance of the Title V permit renewal is recommended upon issuance of the public notice and completion of EPA review/commenting period (45 days) and public commenting period (30 days).

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES 4	PAGE 1
	APPL NO 543895	DATE 12/06/2012
	PROCESSED BY GCR	CHECKED BY CD

Compliance Assurance Monitoring (CAM) Plan Evaluation
(40 CFR Part 64)

OWNER/OPERATOR:

BREA PARENT 2007, LLC
1057 E. IMPERIAL HIGHWAY
P. O. BOX #609
PLACENTIA, CA 92870-1717

FACILITY LOCATION:

1942 VALENCIA AVENUE (OLINDA ALPHA LANDFILL)
BREA, CA 92821

CO ID: 113518

CONTACT PERSON:

Karl Darrington, Plant Manager
(714) 985 -1781
E-mail: kdarrington@broadrock.com

Kelvin K. Lu, Sr. A. Q. Engr.
Yorke Engineering, LLC
(949) 547-1103
E-mail: klu@yorkeengr.com

INTRODUCTION:

This application was submitted on October 16, 2012 for Compliance Assurance Monitoring (CAM) plan under 40 CFR Part 64, for the regenerative flare PC issued under A/N 475036. The facility, Brea Parent 2007 (previously Ridgewood Power Management, LLC) is a Title V facility. This CAM plan is submitted for the control of Non-Methane Hydrocarbons (NMHC) emissions generated from the LFG treatment system (siloxanes removal) permitted under A/N 474009 PC.

The CAM rule became effective November 21, 1997, however requirements of the plan were delayed while Title V program being implemented. Thus, owners and operators were subject to CAM plan requirement at the time of their initial Title V permit renewal. Title V renewal A/N 535752 for this facility was submitted on 4/03/2012.

APPLICABILITY & REQUIREMENTS:

CAM rule (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 (PSEUs). The rule applies to each PSEU 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;

- Describe the indicators to be monitored
- Describe ranges or the process to set indicator ranges
- Describe 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.
- Provide a justification for the use of parameters, ranges, and monitoring approach.
- Provide emissions test data, if necessary
- Provide an implementation plan for installing, testing, and operating the monitoring.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES 4	PAGE 2
	APPL NO 543895	DATE 12/06/2012
	PROCESSED BY GCR	CHECKED BY

EVALUATION:

Brea Parent 2007 facility currently operates a regenerative LFG fueled flare (475036 PC) to treat exhaust from the LFG treatment system (Siloxanes removal) permitted under 474009 PC, and a waste gas incinerator (A/N 468740/F92618) that treats exhaust from selexol and condensate stripper.

NMOC emission limit is 20 ppmv@3% O2, as hexane, or 98 wt% reduction of NMOC. This limit is based on 40 CFR 60, subpart WWW, 40 CFR 63, subpart AAAA and AQMD Rule 1150.1

Also, the facility is subject to NMOC limit based on Rule 1303 (b) (2) - emission offsets, that are based on LFG flow rate, flare and waste gas incinerator operating temperature and NMOC destruction efficiency..

Flare: John Zink, 13.5 MMBTU/HR, T= min. 1400 deg F, 15-minute avg.,
NMOC emission limit is 1.0 lb/day, as Methane.

Waste gas incinerator: John-Zink, 2 MMBTU/Hr, Temp. = 1500deg. F minimum. NMOC emission limit is 1.00.

MONITORING & PERFORMANCE:

Indicator: When the flare is in operation continuous temperature monitoring in the exhaust stack and temperature recorder must be in operation.
Temperature shall be measured at a location above the flame zone, at least 0.6 second downstream of the burner and not less than 5 feet from the top of the stack.
Temperature monitor shall have an accuracy of +/- 1% of the temperature being measured.
Installation, replacement and preventative maintenance for the temperature monitors shall be in accordance with manufacturer's specifications.
There shall be multiple monitors installed on each flare. When a thermocouple malfunctions or is non-functional, it shall be replaced.

Range: Minimum temperature of 1400 deg F for flare (1500 deg F for waste gas incinerator) is required. Temperature shall be recorded in degrees Fahrenheit. The data collected by an electronic data recorder shall record at least every 15 minutes.
Excursion can be defined as any three-hour period of operation during which avg. combustion temperature is greater than 28 deg C (50 deg. F) below the minimum combustion temperature specified for the flare.
Upon detecting any excursion from the acceptable range of readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable.

Frequency: Continuous temperature monitoring and recording. Valid hour of data must have measured values for at least three 15-minute monitoring periods within the hour.
[Minimum 4 times per hr if post-control emissions are ≥ MST; or
Minimum 1 time per day if post-control emissions are < MST].
All exceedance shall be reported semi-annually that includes summary of information, at a minimum – number, duration and cause, and corrective actions taken.
Same requirements apply for the monitor downtime incidences.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES 4	PAGE 3
	APPL NO 543895	DATE 12/06/2012
	PROCESSED BY GCR	CHECKED BY

Recordkeeping & Reporting:

The permittee shall be conditioned to comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9

Performance Test:

Recent Source Tests Results:

ST report "conditionally acceptable", Ref. PR 12351, Memo from Rudy Eden to Jay Chen, Nov. 17, 2012 (Included in folder).

Typical ST results;

Inlet LFG flow rate = 635.5 scfm, HHV = 310 Btu/ cu. Ft. = 11.8 MMBTU/HR
(Flare Design capacity = 13.5 MMBTU/HR)
Fd Factor = 9222 dscf/mmbtu
Avg. stack temperature = 1431.5 deg F.
Exhaust flow rate = 5049 dscfm (EPA M19), 5355 dscfm (Method 2.1/5.1)
% O2 = 13.38
TNMOC ppm as Hexane @ 3% O2, exhaust = 1.15
TNMOC emission = 0.03 lbs/hr x 24 hr = 0.72 lbs/day
@ 99.8% VOC control efficiency, TNMOC inlet = 0.72/0.002 = 360 lbs/day
= 65.7 TPY uncontrolled TNMOC

Quality Improvement Plan:

If the District or EPA determine that a Quality Improvement Plan (QIP) is required under 40 CFR Part 64.7 (d)(2), the permittee shall develop and implement the QIP in accordance with 40 CFR Part 64.8.

Permit condition for the LFG flare (A/N 4475036), Section H, shall be amended with the following;

THE OPERATOR SHALL OPERATE AND MAINTAIN THIS EQUIPMENT ACCORDING TO THE FOLLOWING REQUIREMENTS:

THE EXHAUST TEMPERATURE, FOR EACH FLARE, SHALL BE MAINTAINED AT A MINIMUM OF 1,400 DEGREES FAHRENHEIT WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION.

CONTINUOUS EXHAUST TEMPERATURE MONITORING AND RECORDING SYSTEM SHALL BE PURSUANT TO THE OPERATION AND MAINTENANCE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.7. SUCH A SYSTEM SHALL HAVE AN ACCURACY OF WITHIN ± 1% OF THE TEMPERATURE BEING MONITORED AND SHALL BE INSPECTED, MAINTAINED, AND CALIBRATED ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS USING AN APPLICABLE AQMD OR EPA APPROVED METHOD.

FOR THE PURPOSE OF THIS CONDITION, A DEVIATION SHALL BE DEFINED AS WHEN A TEMPERATURE OF LESS THAN 1,400 DEGREES FAHRENHEIT OCCURS DURING NORMAL OPERATION EXCEPT DURING STARTUPS OR SHUTDOWNS. NOT TO EXCEED 30 MINUTES. THE EXHAUST TEMPERATURE SHALL BE AVERAGED OVER A 15-MINUTE PERIOD, AND HOURLY AVERAGE SHALL BE COMPUTED FROM SUCH DATA POINTS. THE OPERATOR SHALL REVIEW

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES 4	PAGE 4
	APPL NO 543895	DATE 12/06/2012
	PROCESSED BY GCR	CHECKED BY

THE RECORDS OF TEMPERATURE ON A DAILY BASIS TO DETERMINE IF A DEVIATION OCCURS OR SHALL INSTALL AN ALARM SYSTEM TO ALERT THE OPERATOR WHEN A DEVIATION OCCURS.

FOR EACH SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K, WHENEVER A DEVIATION OCCURS FROM 1,400 DEGREES FAHRENHEIT, THE OPERATOR SHALL TAKE IMMEDIATE CORRECTIVE ACTION, AND KEEP RECORDS OF THE DURATION AND CAUSE (INCLUDING UNKNOWN CAUSE, IF APPLICABLE) OF THE DEVIATION AND THE CORRECTIVE ACTION TAKEN.

ALL DEVIATIONS SHALL BE REPORTED TO THE AQMD ON A SEMI-ANNUAL BASIS PURSUANT TO THE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.9 AND CONDITION NOS. 22 AND 23 IN SECTION K OF THIS PERMIT.

THE OPERATOR SHALL SUBMIT AN APPLICATION WITH A QUALITY IMPROVEMENT PLAN (QIP) IN ACCORDANCE WITH 40 CFR PART 64.8 TO THE AQMD IF AN ACCUMULATION OF DEVIATIONS EXCEEDS 5 PERCENT DURATION OF THIS EQUIPMENT'S TOTAL OPERATING TIME FOR ANY SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT. THE REQUIRED QIP SHALL BE SUBMITTED TO THE AQMD WITHIN 90 CALENDAR DAYS AFTER THE DUE DATE FOR THE SEMI-ANNUAL MONITORING REPORT.

THE OPERATOR SHALL INSPECT AND MAINTAIN ALL COMPONENTS OF THIS EQUIPMENT ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS.

THE OPERATOR SHALL KEEP ADEQUATE RECORDS IN A FORMAT THAT IS ACCEPTABLE TO THE AQMD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS SPECIFIED IN THIS CONDITION AND 40 CFR PART 64.9 FOR A MINIMUM OF FIVE YEARS. [RULE 3004(A) (4)-PERIODIC MONITORING, 40CFR PART 64]

Rules:

Proposed CAM plan for TNMOC control using enclosed flare (s) - flare station -is expected to comply with the Applicable requirements of the,

- 40CFR Part 64
- 40 CFR Part 60, subpart WWW
- 40 CFR Part 63, subpart AAAA
- Rule 1150.2 and,
- Rule 1303 (b) (2)-Emission offsets.

RECOMMENDATION:

It is recommended that a CAM plan be issued for LFG control equipment for TNMOC control.



South Coast Air Quality Management District

Form 400-A

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.

Mail To: SCAQMD, P.O. Box 4944, Diamond Bar, CA 91765-0944, Tel: (909) 396-3385, www.aqmd.gov

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit): Brea Parent 2007, LLC
2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 113518
3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address

Section C - Permit Mailing Address

4. Equipment Location Is: Fixed Location Various Location
1942 Valencia Avenue
Brea, CA 92821
Karl Darrington, Plant Manager
(714) 985-1781
E-Mail: kdarrington@broadrock.com
5. Permit and Correspondence Information:
1057 East Imperial Highway, PO Box 609
Placentia, CA 92870-1717
Karl Darrington, Plant Manager
(714) 985-1781
E-Mail: kdarrington@broadrock.com

Section D - Application Type

6. The Facility Is: Not in RECLAIM or Title V In RECLAIM In Title V In RECLAIM & Title V Programs
7. Reason for Submitting Application (Select only ONE):
7a. New Equipment or Process Application: New Construction (Permit to Construct), Equipment On-Site But Not Constructed or Operational, Equipment Operating Without A Permit, Compliance Plan, Registration/Certification, Streamlined Standard Permit
7b. Facility Permits: Title V Application or Amendment (Also submit Form 500-A1), RECLAIM Facility Permit Amendment
7c. Equipment or Process with an Existing/Previous Application or Permit: Administrative Change, Alteration/Modification, Existing or Previous Permit/Application, Alteration/Modification without Prior Approval, Change of Condition, Change of Condition without Prior Approval, Change of Location, Change of Location without Prior Approval, Equipment Operating with an Expired/Inactive Permit

8a. Estimated Start Date of Construction (mm/dd/yyyy):
8b. Estimated End Date of Construction (mm/dd/yyyy):
8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule): Title V Permit Renewal
10. For identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each equipment / process)
11. Are you a Small Business as per AQMD's Rule 102 definition? (10 employees or less and total gross receipts are \$500,000 or less OR a not-for-profit training center)
12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? If Yes, provide NOV/NC#:

Section E - Facility Business Information

13. What type of business is being conducted at this equipment location? Electric Power Generation, Other (Landfill Gas)
14. What is your business primary NAICS Code? (North American Industrial Classification System) 221119
15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator?
16. Are there any schools (K-12) within 1000 feet of the facility property line?

Section F - Authorization/Signature I hereby certify that all information contained herein and information submitted with this application are true and correct.

17. Signature of Responsible Official: [Signature]
18. Title of Responsible Official: VP, Engineering & Operations
19. I wish to review the permit prior to issuance. (This may cause a delay in the application process.)
20. Print Name: Kevin Hubanks
21. Date: March 30, 2012
22. Do you claim confidentiality of data? (If Yes, see instructions.)

23. Check List: [X] Authorized Signature/Date [X] Form 400-CEQA [] Supplemental Form(s) (ie., Form 400-E-xx) [X] Fees Enclosed

Table with columns for AQMD USE ONLY, DATE, EQUIPMENT NUMBER, and other tracking information. Includes handwritten values like 535752, 1034, 1984.24, CT701303, 4/4/12.

12 APR -3 P2:29

SCAQMD
REVENUE & RECEIVING

12 APR -4 AB

S.O. ENGINEERING



South Coast Air Quality Management District

Form 400-CEQA

California Environmental Quality Act (CEQA) Applicability

Mail To:
SCAQMD
P.O. Box 4944
Diamond Bar, CA 91765-0944

Tel: (909) 396-3385
www.aqmd.gov

The SCAQMD is required by state law, the California Environmental Quality Act (CEQA), to review discretionary permit project applications for potential air quality and other environmental impacts. This form is a screening tool to assist the SCAQMD in clarifying whether or not the project¹ has the potential to generate significant adverse environmental impacts that might require preparation of a CEQA document [CEQA Guidelines §15060(a)].² Refer to the attached instructions for guidance in completing this form.³ For each Form 400-A application, also complete and submit one Form 400-CEQA. If submitting multiple Form 400-A applications for the same project at the same time, only one 400-CEQA form is necessary for the entire project. If you need assistance completing this form, contact Permit Services at (909) 396-3385 or (909) 396-2668.

Section A - Facility Information	
1. Facility Name (Business Name of Operator To Appear On The Permit): <u>Brea Parent 2007, LLC</u>	2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): <u>113518</u>
3. Project Description: <u>Title V Permit Renewal</u>	

Section B - Review For Exemption From Further CEQA Action		
Check "Yes" or "No" as applicable		
	Yes	No
1.		• A CEQA and/or NEPA document previously or currently prepared that specifically evaluates this project? If yes, attach a copy of the signed Notice of Determination to this form.
2.		• A request for a change of permittee only (without equipment modifications)?
3.		• A functionally identical permit unit replacement with no increase in rating or emissions?
4.		• A change of daily VOC permit limit to a monthly VOC permit limit?
5.		• Equipment damaged as a result of a disaster during state of emergency?
6.	•	A Title V (i.e., Regulation XXX) permit renewal (without equipment modifications)?
7.		• A Title V administrative permit revision?
8.		• The conversion of an existing permit into an initial Title V permit?

If "Yes" is checked for any question in Section B, your application does not require additional evaluation for CEQA applicability. Skip to Section D - Signatures on page 2 and sign and date this form.

Section C - Review of Impacts Which May Trigger CEQA		
Complete Parts I-VI by checking "Yes" or "No" as applicable. To avoid delays in processing your application(s), explain all "Yes" responses on a separate sheet and attach it to this form.		
	Yes	No
		Part I - General
1.		Has this project generated any known public controversy regarding potential adverse impacts that may be generated by the project? Controversy may be construed as concerns raised by local groups at public meetings; adverse media attention such as negative articles in newspapers or other periodical publications, local news programs, environmental justice issues, etc.
2.		Is this project part of a larger project? If yes, attach a separate sheet to briefly describe the larger project.
		Part II - Air Quality
3.		Will there be any demolition, excavating, and/or grading construction activities that encompass an area exceeding 20,000 square feet?
4.		Does this project include the open outdoor storage of dry bulk solid materials that could generate dust? If Yes, include a plot plan with the application package.

¹ A "project" means the whole of an action which has a potential for resulting in physical change to the environment, including construction activities, clearing or grading of land, improvements to existing structures, and activities or equipment involving the issuance of a permit. For example, a project might include installation of a new, or modification of an existing internal combustion engine, dry-cleaning facility, boiler, gas turbine, spray coating booth, solvent cleaning tank, etc.

² To download the CEQA guidelines, visit http://ceres.ca.gov/env_law/state.html.

³ To download this form and the instructions, visit <http://www.aqmd.gov/ceqa> or <http://www.aqmd.gov/permit>

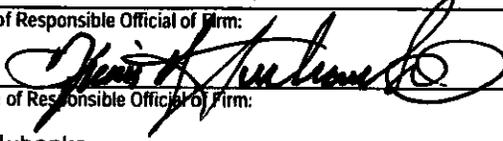
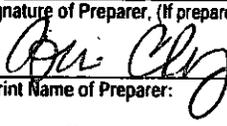
Section C - Review of Impacts Which May Trigger CEQA (cont.)

	Yes	No	Part II - Air Quality (cont.)
5.			Would this project result in noticeable off-site odors from activities that may not be subject to SCAQMD permit requirements? For example, compost materials or other types of greenwaste (i.e., lawn clippings, tree trimmings, etc.) have the potential to generate odor complaints subject to Rule 402 - Nuisance.
6.			Does this project cause an increase of emissions from marine vessels, trains and/or airplanes?
7.			Will the proposed project increase the QUANTITY of hazardous materials stored aboveground onsite or transported by mobile vehicle to or from the site by greater than or equal to the amounts associated with each compound on the attached Table 17 ⁴
Part III - Water Resources			
8.			Will the project increase demand for water at the facility by more than 5,000,000 gallons per day? The following examples identify some, but not all, types of projects that may result in a "yes" answer to this question: 1) projects that generate steam; 2) projects that use water as part of the air pollution control equipment; 3) projects that require water as part of the production process; 4) projects that require new or expansion of existing sewage treatment facilities; 5) projects where water demand exceeds the capacity of the local water purveyor to supply sufficient water for the project; and 6) projects that require new or expansion of existing water supply facilities.
9.			Will the project require construction of new water conveyance infrastructure? Examples of such projects are when water demands exceed the capacity of the local water purveyor to supply sufficient water for the project, or require new or modified sewage treatment facilities such that the project requires new water lines, sewage lines, sewage hook-ups, etc.
Part IV - Transportation/Circulation			
10.			Will the project result in (Check all that apply):
			a. the need for more than 350 new employees?
			b. an increase in heavy-duty transport truck traffic to and/or from the facility by more than 350 truck round-trips per day?
			c. increase customer traffic by more than 700 visits per day?
Part V - Noise			
11.			Will the project include equipment that will generate noise GREATER THAN 90 decibels (dB) at the property line?
Part VI - Public Services			
12.			Will the project create a permanent need for new or additional public services in any of the following areas (Check all that apply):
			a. Solid waste disposal? Check "No" if the projected potential amount of wastes generated by the project is less than five tons per day.
			b. Hazardous waste disposal? Check "No" if the projected potential amount of hazardous wastes generated by the project is less than 42 cubic yards per day (or equivalent in pounds).

****REMINDER:** For each "Yes" response in Section C, attach all pertinent information including but not limited to estimated quantities, volumes, weights, etc.**

Section D - Signatures

I HEREBY CERTIFY THAT ALL INFORMATION CONTAINED HEREIN AND INFORMATION SUBMITTED WITH THIS APPLICATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE. I UNDERSTAND THAT THIS FORM IS A SCREENING TOOL AND THAT THE SCAQMD RESERVES THE RIGHT TO CONSIDER OTHER PERTINENT INFORMATION IN DETERMINING CEQA APPLICABILITY.

1. Signature of Responsible Official of Firm: 		2. Title of Responsible Official of Firm: Vice President, Engineering & Operations	
3. Print Name of Responsible Official of Firm: Kevin Hubanks		4. Date Signed: March 30, 2012	
5. Phone # of Responsible Official of Firm: (925) 708-9601	6. Fax # of Responsible Official of Firm: (401) 943-0634	7. Email of Responsible Official of Firm: khubanks@broadrock.com	
8. Signature of Preparer (if prepared by person other than responsible official of firm): 		9. Title of Preparer: Yorke Engineering, LLC	
10. Print Name of Preparer: Corina Chang		11. Date Signed: 3/30/2012	
12. Phone # of Preparer: (949) 248-8490	13. Fax # of Preparer: (949) 374-3994	14. Email of Preparer: CChang@YorkeEngr.com	

THIS CONCLUDES FORM 400-CEQA. INCLUDE THIS FORM AND ANY ATTACHMENTS WITH FORM 400-A.

⁴ Table 1 - Regulated Substances List and Threshold Quantities for Accidental Release Prevention can be found in the Instructions for Form 400-CEQA.



Form 500-A2
Title V Application Certification

Mail To:
SCAQMD
P.O. Box 4944
Diamond Bar, CA 91765-0944
Tel: (909) 396-3385
www.aqmd.gov

Section I - Operator Information

1. Facility Name (Business Name of Operator That Appears On Permit): Brea Parent 2007, LLC	2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 113518
3. This Certification is submitted with a (Check one):	
a. <input checked="" type="radio"/> Title V Application (Initial, Revision or Renewal)	
b. <input type="radio"/> Supplement/Correction to a Title V Application	
c. <input type="radio"/> MACT Part 1	
4. Is Form 500-C2 included with this Certification? <input checked="" type="radio"/> Yes <input type="radio"/> No	

Section II - Responsible Official Certification Statement

Read each statement carefully and check each that applies - You must check 3a or 3b.

1. For Initial, Permit Renewal, and Administrative Application Certifications:

a. The facility, including equipment that are exempt from written permit per Rule 219, is currently operating and will continue to operate in compliance with all applicable requirement(s) identified in Section II and Section III of Form 500-C1.

i. except for those requirements that do not specifically pertain to such devices or equipment and that have been identified as "Remove" on Section III of Form 500-C1.

ii. except for those devices or equipment that have been identified on the completed and attached Form 500-C2 that will not be operating in compliance with the specified applicable requirement(s).

b. The facility, including equipment that are exempt from written permit per Rule 219, will meet in a timely manner, all applicable requirements with future effective dates.

2. For Permit Revision Application Certifications:

a. The equipment or devices to which this permit revision applies, will in a timely manner comply with all applicable requirements identified in Section II and Section III of Form 500-C1.

3. For MACT Hammer Certifications:

a. The facility is subject to Section 112(j) of the Clean Air Act (Subpart B of 40 CFR part 63), also known as the MACT "hammer." The following information is submitted with a Title V application to comply with the Part 1 requirements of Section 112(j).

b. The facility is not subject to Section 112(j) of the Clean Air Act (Subpart B of 40 CFR part 63).

Section III - Authorization/Signature

I certify under penalty of law that I am the responsible official for this facility as defined in AQMD Regulation XXX and that based on information and belief formed after reasonable inquiry, the statement and information in this document and in all attached application forms and other materials are true, accurate, and complete.

1. Signature of Responsible Official: 	2. Title of Responsible Official: Vice President, Engineering & Operations
3. Print Name: Kevin Hubanks	4. Date: March 30, 2012
5. Phone #: (925) 708-9601	6. Fax #: (401) 943-0634
7. Address of Responsible Official:	
65 Shun Pike	Johnston RI 02919
Street #	City State Zip

Acid Rain Facilities Only: Please Complete Section IV

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES 8	PAGE 1
	APPL NO 541293rev	DATE 4-26-2013
	PROCESSED BY GCR	CHECKED BY CDT

Compliance Assurance Monitoring (CAM) Plan Evaluation
(40 CFR Part 64)

OWNER/OPERATOR:

BREA PARENT 2007, LLC
1057 E. IMPERIAL HIGHWAY
P. O. BOX #609
PLACENTIA, CA 92870-1717

FACILITY LOCATION:

1942 VALENCIA AVENUE (OLINDA ALPHA LANDFILL)
BREA, CA 92821

CO ID: 113518

CONTACT PERSON:

Karl Darrington, Plant Manager
(714) 985 -1781
E-mail: kdarrington@broadrock.com

Kelvin K. Lu, Sr. A. Q. Engr.
Yorke Engineering, LLC
(949) 547-1103
E-mail: klu@yorkeengr.com

INTRODUCTION:

This application was submitted on August 3, 2012 for Compliance Assurance Monitoring (CAM) plan under 40 CFR Part 64. The facility, Brea Parent 2007 (previously Ridgewood Power Management, LLC) is a Title V facility. This CAM plan is submitted for the control of Non-Methane Hydrocarbons (NMHC) emissions, generated by LFG combustion turbines (LFGTE Project), by oxidation catalysts, A/Ns 474005 through 474008, consisting of CatOx/SCR.

As the facility is also permitted for operations of three (3) internal combustion engines with oxidation catalyst, [A/N 414941 (G16274), A/N 414942 (G16275) and A/N 414943 (G16276)], this application evaluation also includes CAM requirements for TNMOC control, in lieu of a separate CAM application for ICEs/CatOx.

The CAM rule became effective November 21, 1997, however requirements of the plan were delayed while Title V program being implemented. Thus, owners and operators were subject to CAM plan requirement at the time of their initial Title V permit renewal. Title V renewal A/N 535752 for this facility was submitted on 4/03/2012.

APPLICABILITY & REQUIREMENTS:

CAM rule (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 (PSEUs). The rule applies to each PSEU 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;

- Describe the indicators to be monitored
- Describe ranges or the process to set indicator ranges
- Describe 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.
- Provide a justification for the use of parameters, ranges, and monitoring approach.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES	PAGE
	8	2
	APPL NO 541293rev	DATE 4-26-2013
	PROCESSED BY GCR	CHECKED BY

- Provide emissions test data, if necessary
- Provide an implementation plan for installing, testing, and operating the monitoring.

EVALUATION:

LFG combustion gas turbines (4):

A/Ns 474001 through 474004), Solar, Taurus 60, 5.6 MW, each

Gas Turbine Exhaust treated by:

Air Pollution Control (APC) system(s), with oxidation catalyst and Selective Catalytic Reduction (SCR) with ammonia injection.

TNMOC emission limit (GT) = 12 lbs/day

Uncontrolled NMOC (in LFG) @ 98% DRE = $12/0.02 = 600\text{lbs/day} = 109\text{ TPY} > 10\text{ TPY}$ threshold

CAM is evaluated for non-methane hydrocarbon (NMOC) that is controlled by oxidation catalyst.

Continuous Emission Monitoring System (CEMS):

CO and NOx CEMS to continuously measure actual emissions levels (CO, NOx, and O2 on a dry basis), in gas turbine's exhaust.

CAM rule does not apply for emission limitation or standards (in this case, CO and NOx) for which compliance determination method, CEMS, is required [Exemptions - 64.2 (b) (1) (vi)]. CEMS is also required by the permit conditions.

Continued Next Page

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES	PAGE
	8	3
	APPL NO 541293rev	DATE 4-26-2013
	PROCESSED BY GCR	CHECKED BY

MONITORING APPROACH (Catalytic Oxidizer for GTs)

	Indicator No. 1	Indicator No. 2
I. <u>Indicator</u>	Temperature of exhaust gas into catalyst.	Temperature of exhaust gas out of catalyst.
Measurement Approach	Exhaust gas temperature is measured continuously using an in-line thermocouple.	Exhaust gas temperature is measured continuously using an in-line thermocouple.
II. <u>Indicator Range</u>	The indicator ranges is above 500°F, but lower than 1200°F. CatOx normal operating range 700-1200 deg F. Excursions trigger corrective action, logging and reporting in semiannual report.	The indicator range is above 500°F but lower than 1,200°F. Excursions trigger corrective action, logging and reporting in semiannual report.
<u>Performance Criteria</u>		
A. Data Representativeness	Temperature is measured at the inlet to the catalyst by a thermocouple. The minimum accuracy is ±4°F.	Temperature is measured at the outlet of the catalyst by a thermocouple. The minimum accuracy is ±4°F.
B. QA/QC Practices and Criteria	Thermocouple visually checked quarterly, and tested annually.	Thermocouple visually checked quarterly, and tested annually.
C. Monitoring Frequency	Temperature is measured continuously.	Temperature is measured continuously.
D. Data Collection Procedures	A digital data recorder collects the temperature continuously.	A digital data recorder collects the temperature continuously.
E. Averaging period	4-hour rolling average.	4-hour rolling average.

Monitoring Operation & Maintenance:

The permittee shall be conditioned to comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7

Recordkeeping & Reporting:

The permittee shall be conditioned to comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9

Performance Test:

Each CatOx unit shall be tested annually (when gas turbine is source tested) to show compliance with the NMOC hourly emission rate (offset limit), CatOx inlet and exhaust operating temperature, deg. F, TNMOC concentration (exhaust) in ppmv at 3% O₂, as hexane or demonstrate 98wt% DRE.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES	PAGE
	8	4
	APPL NO 541293rev	DATE 4-26-2013
	PROCESSED BY GCR	CHECKED BY

Quality Improvement Plan:

If the District or EPA determine that a Quality Improvement Plan (QIP) is required under 40 CFR Part 64.7 (d)(2), the permittee shall develop and implement the QIP in accordance with 40 CFR Part 64.8.

Permit condition for each of the APC (A/Ns 474005 through 474008), Section H, shall be amended with the following:

THE OPERATOR SHALL OPERATE AND MAINTAIN THE CATALYTIC OXIDIZER ACCORDING TO THE FOLLOWING REQUIREMENTS:

PRESSURE DROP ACROSS THE CATALYST BED SHALL BE MEASURED (INCHES OF WATER COLUMN) AND MAINTAINED AS PER MANUFACTURER'S SPECIFICATION AND RECOMMENDATION. READINGS SHALL BE TAKEN ON A MONTHLY BASIS AND PRESSURE TAPS ARE CHECKED MONTHLY FOR PLUGGING.

THE INLET AND EXHAUST TEMPERATURE FOR THE CATALYTIC OXIDIZER SHALL BE MAINTAINED AT A MINIMUM OF 500 DEGREES FAHRENHEIT BUT LOWER THAN 1200 DEGREES FAHRENHEIT WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION.

FOR CATALYTIC OXIDIZER, % OXYGEN IN INLET STREAM SHALL BE MAINTAINED AT GREATER THAN 2% BY MONITORING O2 SENSOR VOLTAGE OUTPUT OR AS PER O2 MEASURING INSTRUMENT'S MANUFACTURER'S SPECIFICATION AND RECOMMENDATION.

CONTINUOUS INLET AND EXHAUST TEMPERATURE MONITORING AND RECORDING SYSTEM SHALL BE PURSUANT TO THE OPERATION AND MAINTENANCE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.7. SUCH A SYSTEM SHALL HAVE AN ACCURACY OF WITHIN $\pm 1\%$ OF THE TEMPERATURE BEING MONITORED AND SHALL BE INSPECTED, MAINTAINED, AND CALIBRATED ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS USING AN APPLICABLE AQMD OR EPA APPROVED METHOD.

FOR THE PURPOSE OF THIS CONDITION, A DEVIATION SHALL BE DEFINED AS WHEN INLET TEMPERATURE OF LESS THAN 500 DEGREES FAHRENHEIT AND EXHAUST TEMPERATURE GREATER THAN 1200 DEGREES FAHRENHEIT OCCURS DURING NORMAL OPERATION EXCEPT DURING STARTUPS OR SHUTDOWNS. NOT TO EXCEED 30 MINUTES. THE 4-HOUR ROLLING AVERAGE SHALL BE COMPUTED FROM SUCH DATA POINTS. THE OPERATOR SHALL REVIEW THE RECORDS OF TEMPERATURE ON A DAILY BASIS TO DETERMINE IF A DEVIATION OCCURS OR SHALL INSTALL AN ALARM SYSTEM TO ALERT THE OPERATOR WHEN A DEVIATION OCCURS.

FOR EACH SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K, WHENEVER A DEVIATION OCCURS FROM 500 AND 1200 DEGREES FAHRENHEIT, THE OPERATOR SHALL TAKE IMMEDIATE CORRECTIVE ACTION, AND KEEP RECORDS OF THE DURATION AND CAUSE (INCLUDING UNKNOWN CAUSE, IF APPLICABLE) OF THE DEVIATION AND THE CORRECTIVE ACTION TAKEN.

ALL DEVIATIONS SHALL BE REPORTED TO THE AQMD ON A SEMI-ANNUAL BASIS PURSUANT TO THE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.9 AND CONDITION NOS. 22 AND 23 IN SECTION K OF THIS PERMIT.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES 8	PAGE 5
	APPL. NO 541293rev	DATE 6/7/2013
	PROCESSED BY GCR	CHECKED BY

THIS PERMIT. THE REQUIRED QIP SHALL BE SUBMITTED TO THE AQMD WITHIN 90 CALENDAR DAYS AFTER THE DUE DATE FOR THE SEMI-ANNUAL MONITORING REPORT.

THE OPERATOR SHALL KEEP ADEQUATE RECORDS IN A FORMAT THAT IS ACCEPTABLE TO THE AQMD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS SPECIFIED IN THIS CONDITION AND 40 CFR PART 64.9 FOR A MINIMUM OF FIVE YEARS. [RULE 3004(A) (4)-PERIODIC MONITORING, 40CFR PART 64]

LFG fueled three (3) IC engines, each with Oxidation Catalyst:

A/N 414941 (G16274), A/N 414942 (G16275) and A/N 414943 (G16276).

Each lean-burn engine is a Cooper Energy Services/ Superior, 2650 H.P., driving 1875 KW electrical generator

Each IC engine's Exhaust treated by:

Air Pollution Control (APC) system(s), with oxidation catalyst.

TNMOC emission limit = 27 lbs/day

Uncontrolled NMOC (in LFG), @ 98% DRE, overall = $27/0.02 = 1350$ lbs/day = 246 TPY > 10 TPY threshold

CAM is evaluated for non-methane hydrocarbon (NMOC) that is controlled by oxidation catalyst.

It is assumed that Catalytic oxidation's (CatOx) operating parameters and monitoring frequency are similar to that for the gas turbine CatOx.

Continued Next Page

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES 8	PAGE 6
	APPL. NO 541293rev	DATE 6/7/2013
	PROCESSED BY GCR	CHECKED BY

MONITORING APPROACH (Catalytic Oxidizer for ICEs)

	Indicator No. 1	Indicator No. 2
I. <u>Indicator</u>	Temperature of exhaust gas into catalyst and inlet O ₂ %.	Temperature of exhaust gas out of catalyst.
Measurement Approach	Exhaust gas temperature and inlet % O ₂ is measured continuously using an in-line thermocouple and Oxygen measuring instrument.	Exhaust gas temperature is measured continuously using an in-line thermocouple.
II. <u>Indicator Range</u>	The indicator range shall be $\geq 450^{\circ}\text{F}$, but less than 1350°F (per EPA's MACT Compliance Handbook for RICE) or as per manufacturer's recommended specs. Minimum inlet % O ₂ is more than 4%, typical range is 5% to 15%. Excursions trigger corrective action, logging and reporting in semiannual report.	The indicator range is above 450°F but less than $1,350^{\circ}\text{F}$; or as per manufacturer's recommended specs. Excursions trigger corrective action, logging and reporting in semiannual report.
<u>Performance Criteria</u>		
A. Data Representativeness	Temperature is measured at the inlet to the catalyst by a thermocouple. The minimum accuracy is $\pm 4^{\circ}\text{F}$.	Temperature is measured at the outlet of the catalyst by a thermocouple. The minimum accuracy is $\pm 4^{\circ}\text{F}$.
B. QA/QC Practices and Criteria	Thermocouple visually checked quarterly, and tested annually.	Thermocouple visually checked quarterly, and tested annually.
C. Monitoring Frequency	Temperature is measured continuously.	Temperature is measured continuously.
D. Data Collection Procedures	A digital data recorder collects the temperature continuously.	A digital data recorder collects the temperature continuously.
E. Averaging period	4-hour rolling average.	4-hour rolling average.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES	PAGE
	8	7
	APPL. NO 541293rev	DATE 6/7/2013
	PROCESSED BY GCR	CHECKED BY

Monitoring Operation & Maintenance:

The permittee shall be conditioned to comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7

Recordkeeping & Reporting:

The permittee shall be conditioned to comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9

Performance Test:

Each CatOx unit shall be tested annually (when ICE is source tested) to show compliance with the NMOC hourly emission rate (offset limit), CatOx inlet and exhaust operating temperature, deg. F, TNMOC concentration (exhaust) in ppmv at 3% O₂, as hexane or demonstrate 98wt% DRE.

Quality Improvement Plan:

If the District or EPA determine that a Quality Improvement Plan (QIP) is required under 40 CFR Part 64.7 (d)(2), the permittee shall develop and implement the QIP in accordance with 40 CFR Part 64.8.

Permit condition for each of the ICE (A/Ns 414941 through 414943), Section D, shall be amended with the following:

THE OPERATOR SHALL OPERATE AND MAINTAIN THE CATALYTIC OXIDIZER ACCORDING TO THE FOLLOWING REQUIREMENTS:

THE INLET AND EXHAUST TEMPERATURE FOR THE CATALYTIC OXIDIZER SHALL BE MAINTAINED AT A MINIMUM OF 450 DEGREES FAHRENHEIT BUT LOWER THAN 1350 DEGREES FAHRENHEIT, OR AS PER MANUFACTURER'S SPECIFICATION AND RECOMMENDATION, WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION.

FOR CATALYTIC OXIDIZER, % OXYGEN IN INLET STREAM SHALL BE MAINTAINED AT GREATER THAN 4% BY MONITORING O₂ SENSOR VOLTAGE OUTPUT OR AS PER O₂ MEASURING INSTRUMENT'S MANUFACTURER'S SPECIFICATION AND RECOMMENDATION.

CONTINUOUS INLET AND EXHAUST TEMPERATURE MONITORING AND RECORDING SYSTEM SHALL BE PURSUANT TO THE OPERATION AND MAINTENANCE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.7. SUCH A SYSTEM SHALL HAVE AN ACCURACY OF WITHIN ± 1% OF THE TEMPERATURE BEING MONITORED AND SHALL BE INSPECTED, MAINTAINED, AND CALIBRATED ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS USING AN APPLICABLE AQMD OR EPA APPROVED METHOD.

FOR THE PURPOSE OF THIS CONDITION, A DEVIATION SHALL BE DEFINED AS WHEN INLET TEMPERATURE OF LESS THAN 450 DEGREES FAHRENHEIT AND EXHAUST TEMPERATURE GREATER THAN 1350 DEGREES FAHRENHEIT OCCURS DURING NORMAL OPERATION EXCEPT DURING STARTUPS OR SHUTDOWNS. NOT TO EXCEED 30 MINUTES. THE 4-HOUR ROLLING AVERAGE SHALL BE COMPUTED FROM SUCH DATA POINTS. THE OPERATOR SHALL REVIEW THE RECORDS OF TEMPERATURE ON A DAILY BASIS TO DETERMINE IF A DEVIATION OCCURS OR SHALL INSTALL AN ALARM SYSTEM TO ALERT THE OPERATOR WHEN A DEVIATION OCCURS.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES 8	PAGE 8
	APPL. NO 541293rev	DATE 6/7/2013
	PROCESSED BY GCR	CHECKED BY

FOR EACH SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K, WHENEVER A DEVIATION OCCURS FROM 450 AND 1350 DEGREES FAHRENHEIT, THE OPERATOR SHALL TAKE IMMEDIATE CORRECTIVE ACTION, AND KEEP RECORDS OF THE DURATION AND CAUSE (INCLUDING UNKNOWN CAUSE, IF APPLICABLE) OF THE DEVIATION AND THE CORRECTIVE ACTION TAKEN.

ALL DEVIATIONS SHALL BE REPORTED TO THE AQMD ON A SEMI-ANNUAL BASIS PURSUANT TO THE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.9 AND CONDITION NOS. 22 AND 23 IN SECTION K OF THIS PERMIT.

THE OPERATOR SHALL SUBMIT AN APPLICATION WITH A QUALITY IMPROVEMENT PLAN (QIP) IN ACCORDANCE WITH 40 CFR PART 64.8 TO THE AQMD IF AN ACCUMULATION OF DEVIATIONS EXCEEDS 5 PERCENT DURATION OF THIS EQUIPMENT'S TOTAL OPERATING TIME FOR ANY SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT. THE REQUIRED QIP SHALL BE SUBMITTED TO THE AQMD WITHIN 90 CALENDAR DAYS AFTER THE DUE DATE FOR THE SEMI-ANNUAL MONITORING REPORT.

THE OPERATOR SHALL KEEP ADEQUATE RECORDS IN A FORMAT THAT IS ACCEPTABLE TO THE AQMD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS SPECIFIED IN THIS CONDITION AND 40 CFR PART 64.9 FOR A MINIMUM OF FIVE YEARS. [RULE 3004(A) (4)-PERIODIC MONITORING, 40CFR PART 64]

Rules:

Proposed CAM plan for TNMOC control using catalytic oxidizer is expected to comply with the Applicable requirements of the,

40CFR Part 64
40 CFR Part 60, subpart WWW
40 CFR Part 63, subpart AAAA
Rule 1150.1 and,
Rule 1303 (b) (2)-Emission offsets.

RECOMMENDATION:

It is recommended that a CAM plan be issued for catalytic oxidizer (for Gas Turbines included under A/Ns 474005 through 474008 and IC engines with CatOx - A/Ns 414941 through 414943) for TNMOC control.