

South Coast Air Quality Management District

Statement of Basis Title V Facility Permit Renewal Issuance Date: TBD

Facility Name: Brea Parent 2007, LLC
Facility ID: 113518
SIC Code: 221119
Equipment Location: 1942 Valencia Avenue (@ Olinda Alpha Landfill)
Brea, CA 92821

Application #(s): 535752
Application Submittal Date(s): 04/04/2012

Permit Renewal: Draft
Revision No. x Date: TBD
Permit Section(s) Affected: Various

AQMD Contact Person: Gaurang Rawal, A.Q. Engineer
Phone Number: (909) 396-2543
E-Mail Address: grawal@aqmd.gov

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 AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD 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. NO₂, SO₂, 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 landfill gas to energy (LFGTE) project to produce electricity for sale to Southern California Edison (SCE) or other customers. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This facility's operations include resource recovery landfill gas to energy system; consisting of LFG pre-treatment system to remove siloxanes and other impurities prior to treated LFG's combustion in combustion equipment. There are three identical internal combustion engines permitted, each with oxidation catalyst, with a total power generation capacity of about 5.6 MW. Also, permits to construct are issued for four identical gas combustion turbines, each with oxidation catalyst and selective catalytic reduction (SCR) unit as air pollution control equipment, with a total power generation capacity of about 22.4 MW for sale to the grid. LFG enclosed flare is also permitted that serves as back-up for the LFGTE plant in the event combustion equipment are down during maintenance or emergency.

3. Construction and Permitting History

An initial Title V permit was issued on 09/12/2007 to Ridgewood Power Management, LLC, which expired on September 30, 2012 at the end of 5-year term. Extensions for permits to construct were granted in 2011 and 2012. The permitted equipment are listed under Section D (permits to operate) and Section H (permits to construct) of the Title V permit. On 12/16/2011 administrative revision was issued for Title V facility permit for the business name change (previously from Ridgewood Power Management to Brea Parent 2007, LLC), update Responsible Official's name and title (section A), add permits to operate for three identical IC engines (A/Ns 414941, 414942 and 414343), remove inactive permits (Section D), and update applicable rules for current versions.

A minor Title V permit revision evaluation (A/N 485959) has been completed. This minor revision includes revision for nitrogen dioxides concentration limit for the IC engines (A/Ns 485956, 485957 and 485958) by applying Emission Correction Factor (ECF). The minor Title V permit revision is pending its' issuance.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required are identified in the Title V permit (for example, Section D, H, 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 applies to certain units at the facility and the permit terms and conditions may be found in Section D and H of the Title V permit. NESHAP requirements of 40 CFR Part 63 applies to certain units at the facility and the permit terms and conditions may be found in Sections H and J of the Title V permit.

The facility was informed about the applicability of Compliance Assurance Plan (CAM), per 40 CFR part 64, for TNMOC control for the equipment permitted at this major facility. Facility has submitted A/Ns 542193 and 543895 for the CAM plans for TNMOC control.

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, H, F, 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. CAM plans for TNMOC emission control using APC equipment (IC engines, gas turbines and flares) are addressed under A/Ns 542193 and 543895.

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 2011**

<i>Pollutant</i>	<i>Emissions (tons/year)</i>
CO	10.98
NO _x	23.89
ROG	3.53
SO _x	0.27
TSP	0.39

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2011**

<i>TACs Reported</i>	<i>Emissions (lbs/yr)</i>	<i>TACs Reported</i>	<i>Emissions (lbs/yr)</i>
Benzene	142.1	Perchloroethylene	0.78
Carbon Tetrachloride	0.72	Trichloroethylene	0.62
Formaldehyde	5.75	Vinyl chloride	0.29
Methylene chloride	4.0		
Naphthalene	0.05		
PAHs, total	0.014		

Health Risk from Toxic Air Contaminants

The status of this new facility for the priority score is being tracked for Air Toxics Information and Assessment Act (AB2588). Search under Annual report on AB2588 (2011) Air Toxics "Hot Spots" Program did not reveal health risk related information. This may be due to facility exemption determination from AB 2588 requirement.

8. Compliance History

The facility has been subject to both self-reporting requirements and AQMD inspections. Facility inspection report for 6/30/2012 indicated that permitted equipment were operating satisfactorily during inspection in compliance with permit conditions and applicable rules. Inspection report indicated that results for the source tests, performed February 7 through February 10, 2011 for the LFG flares, were acceptable. Flare operating temperature and inlet LFG flow rates were within permitted limits. Facility was in compliance with sulfur content of the LFG fuel per Rule 431.1. Construction for the gas turbines (A/Ns 474001 through 47004) is completed and performance source tests have been conducted recently. Source tests results are being reviewed.

As per District records there is no citizen complaint, NC or NOV issued for the past two years; January 2010 through May 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

None.