



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov



August 28, 2012

Mr. Gerardo Rios
Chief - Permit Office
US EPA, Region IX Air 3
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Rios:

Subject: Transmittal of Proposed Title V Significant Permit Revision
Southern California Gas Company/Playa Del Rey Storage Facility ID 800288

Enclosed are the proposed Title V Significant Permit Revision, public notice, and the permit evaluation for Southern California Gas Company/Playa Del Rey Storage Facility, located at 8141 Gulana Avenue, Playa Del Rey, CA 90293. This proposed Title V Significant Permit Revision submitted under Application No. 539157 is for the approval of alternate VOC limits for 3 2-stroke, lean burn engines subject to Rule 1110.2. The engines are also subject to 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ. With your receipt of the proposed Title V revision permit, we will note that the EPA's 45-day review period will begin on August 28, 2012.

If you have any questions concerning the proposed Title V Significant Permit Revision, please contact Mr. Marcel Saulis, Air Quality Engineer, at (909) 396-3093 or by e-mail at msaulis@aqmd.gov.

Sincerely,

Brian L. Yeh
Senior Manager
Mechanical, Chemical and Public Services
Engineering and Compliance

BLY:AYL:JTY:MS

Enclosures:

Proposed Title V Significant Permit Revision
Public Notice

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
INTERNAL COMBUSTION ENGINE, EMERGENCY POWER, NATURAL GAS, WAUKESHA, MODEL H-2476-GU, 348 HP WITH A/N: 198433 GENERATOR	D1		NOX: PROCESS UNIT**	NOX: 3400 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; PM: (9) [RULE 404, 2-7-1986]	C1.3, D12.1
INTERNAL COMBUSTION ENGINE, EMERGENCY POWER, NATURAL GAS, WAUKESHA, MODEL NO. 145-GZB, 110 HP WITH A/N: 198434 GENERATOR	D2		NOX: PROCESS UNIT**	NOX: 3400 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; PM: (9) [RULE 404, 2-7-1986]	C1.3, D12.1
INTERNAL COMBUSTION ENGINE, EMERGENCY FIRE, NATURAL GAS, CATERPILLAR, MODEL NO. 3306NG, 93 HP WITH A/N: 198424 PUMP	D7		NOX: PROCESS UNIT**	NOX: 3400 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; PM: (9) [RULE 404, 2-7-1986]	C1.3, D12.1

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
INTERNAL COMBUSTION ENGINE, NON-EMERGENCY, TWO STROKE, LEAN BURN, WITH INSULATED DUCTS AND CATALYST HOUSING, 6CB, NATURAL GAS, COOPER-BESSEMER, MODEL GMVH-10, 2000 HP WITH A/N:	D14	C132	NOX: LARGE SOURCE**	CO: 70 PPMV NATURAL GAS (5) [RULE 1110.2, 2-1-2008]; CO: 89 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996]; CO: 2000 PPMV (5) [RULE 1110.2, 11-14-1997]; NOX: 225 PPMV NATURAL GAS (3) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; PM: (9) [RULE 404, 2-7-1986]; VOC: 56 PPMV NATURAL GAS (5) [RULE 1110.2, 2-1-2008]	A195.1, C1.1, D29.5, H23.10, K67.4
CO OXIDATION CATALYST, BASF CAMEL, 24" X 24" X 3 11/16" D., WITH AN AIR TO FUEL RATIO CONTROLLER, (WASTE GATE VALVE), EMBEDDED IN THE ENGINE CONTROL SYSTEM.	C132	D14			H23.8
COMPRESSOR					

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
INTERNAL COMBUSTION ENGINE, NON-EMERGENCY, TWO STROKE, LEAN BURN, WITH INSULATED DUCTS AND CATALYST HOUSING, 8CB, NATURAL GAS, COOPER-BESSEMER, MODEL GMVH-10, 2000 HP WITH A/N:	D16	C133	NOX: LARGE SOURCE**	CO: 70 PPMV NATURAL GAS (5) [RULE 1110.2, 2-1-2008]; CO: 89 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996]; CO: 2000 PPMV (5) [RULE 1110.2, 11-14-1997]; NOX: 225 PPMV NATURAL GAS (3) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; PM: (9) [RULE 404, 2-7-1986]; VOC: 56 PPMV NATURAL GAS (5) [RULE 1110.2, 2-1-2008]	A195.1, C1.1, D29.5, H23.10, K67.4
CO OXIDATION CATALYST, BASF CAMET, 24" X 24" X 3 11/16" D., WITH AN AIR TO FUEL RATIO CONTROLLER, (WASTE GATE VALVE), EMBEDDED IN THE ENGINE CONTROL SYSTEM.	C133	D16			H23.8
COMPRESSOR					

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1- INTERNAL COMBUSTION					
INTERNAL COMBUSTION ENGINE, NON-EMERGENCY, TWO STROKE LEAN, LEAN BURN, WITH INSULATED DUCTS AND CATALYST HOUSING, 9CB, NATURAL GAS, COOPER-BESSEMER, MODEL GMVH-10, 2000 HP WITH A/N:	D17	C134	NOX. LARGE SOURCE**	CO: 70 PPMV NATURAL GAS (5) [RULE 1110.2, 2-1-2008]; CO: 89 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996]; NOX: 225 PPMV NATURAL GAS (3) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; PM: (9) [RULE 404, 2-7-1986]; ROG: 250 PPMV (5) [RULE 1110.2, 11-14-1997]; VOC: 56 PPMV NATURAL GAS (5) [RULE 1110.2, 2-1-2008]	A195.1, C1.1, D29.5, H23.10, K67.4
CO OXIDATION CATALYST, BASF CAMEL, 24" X 24" X 3 11/16" D, WITH AN AIR TO FUEL RATIO CONTROLLER, (WASTE GATE VALVE), EMBEDDED IN THE ENGINE CONTROL SYSTEM.	C134	D17			H23.8
COMPRESSOR					

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

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The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2: OIL AND GAS PRODUCTION					
VESSEL, SEPARATOR, FILTER/SEPARATOR, V-600, LENGTH: 12 FT 8 IN, DIAMETER: 5 FT A/N: 391138	D137				
VESSEL, TEG CONTACTOR #1, V-601, HEIGHT: 35 FT ; DIAMETER: 6 FT A/N: 391138	D138				
VESSEL, TEG CONTACTOR #2, V-602, HEIGHT: 35 FT ; DIAMETER: 6 FT A/N: 391138	D139				
VESSEL, STILL COLUMN, V-640, HEIGHT: 13 FT ; DIAMETER: 2 FT 6 IN A/N: 391138	D141				
VESSEL, GLYCOL REBOILER, V-642, LENGTH: 36 FT ; DIAMETER: 6 FT A/N: 391138	D142				
VESSEL, GLYCOL FLASH TANK, V-643, LENGTH: 8 FT ; DIAMETER: 4 FT A/N: 391138	D143				
VESSEL, STILL OVERHEAD CONDENSER, V-644, VENTED TO VAPOR RECOVERY,, HEIGHT 6 FT 6 IN, DIAMETER: 1 FT 4 IN A/N: 391138	D144			HAP: (10) [40CFR 63 Subpart HHH, 2-22-2002]	
System 4: OIL/WATER/GAS SEPARATION					
TANK, WASH, TK-1A, 1000 BBL, DIAMETER: 18 FT ; HEIGHT: 24 FT A/N: 137495	D67	C96 C97			E127.1, H23.1, H23.5

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

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SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 2: OIL AND GAS PRODUCTION					
TANK, WASH, TK-1B, 1000 BBL; DIAMETER: 18 FT; HEIGHT: 24 FT A/N: 137495	D68	C96 C97			E127.1, H23.1, H23.5
System 7: WASTEWATER TREATMENT					
TANK, SURGE, TK-12, WASTEWATER, 2000 BBL; DIAMETER: 29 FT 8 IN; HEIGHT: 16 FT 1 IN A/N: 355183	D77	C96 C97			E127.1, H23.1, H23.4, H23.5
TANK, SURGE, TK-2, WASTE WATER, 1000 BBL; DIAMETER: 21 FT 6 IN; HEIGHT: 16 FT A/N: 355183	D78	C96			E57.5, E127.1, H23.1, H23.4, H23.5
Process 3: PETROLEUM STORAGE					P13.1
STORAGE TANK, FIXED ROOF, TK-3, OFF-SPEC OIL, 2000 BBL; DIAMETER: 29 FT 9 IN; HEIGHT: 16 FT A/N: 110251	D79	C96 C97			E127.1, H23.1, H23.5
STORAGE TANK, FIXED ROOF, TK-4A, CRUDE OIL, 2000 BBL; DIAMETER: 29 FT 9 IN; HEIGHT: 16 FT A/N: 110252	D80	C96 C97			E127.1, H23.1, H23.5
STORAGE TANK, FIXED ROOF, TK-4B, CRUDE OIL, 2000 BBL; DIAMETER: 29 FT 9 IN; HEIGHT: 16 FT A/N: 110253	D81	C96 C97			E127.1, H23.1, H23.5

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

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SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 3: PETROLEUM STORAGE					P13.1
STORAGE TANK, FIXED ROOF, TK-4C, CRUDE OIL, VENTED TO VAPOR RECOVERY SYSTEM, 2000 BBL; DIAMETER: 29 FT 9 IN; HEIGHT: 16 FT A/N: 110254	D82	C96 C97			E127.1, H23.1, H23.5
STORAGE TANK, FIXED ROOF, TK-5, CONDENSATE, 500 BBL; DIAMETER: 15 FT 6 IN; HEIGHT: 16 FT A/N: 111946	D83	C96 C97			E127.1, H23.1, H23.5
STORAGE TANK, FIXED ROOF, TK-6, SLOP, 200 BBL; DIAMETER: 9 FT 2 IN; HEIGHT: 16 FT A/N: 110255	D84	C96 C97			E127.1, H23.5
STORAGE TANK, FIXED ROOF, CRANKCASE AND DIRTY LUBE OIL, 1000 GALS; DIAMETER: 5 FT 6 IN; HEIGHT: 6 FT A/N: 165545	D85				
Process 6: FUGITIVE EMISSIONS					
FUGITIVE EMISSIONS, PUMPS A/N: 137495	D89				
FUGITIVE EMISSIONS, PRV A/N: 137495	D90				
FUGITIVE EMISSIONS, FLANGES A/N: 137495	D91				
FUGITIVE EMISSIONS, COMPRESSORS A/N: 227890	D92				
FUGITIVE EMISSIONS, VALVES A/N: 137495	D93				

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

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The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 8: VAPOR RECOVERY SYSTEM					
DRUM, KNOCKOUT, V-662, 1ST STAGE, HEIGHT: 4 FT; DIAMETER: 8.75 IN A/N: 391138	D148				
DRUM, KNOCKOUT, V-663, 2ND STAGE, HEIGHT: 4 FT; DIAMETER: 8.75 IN A/N: 391138	D149				
Process 9: BULK OIL LOADING FACILITY					
LOADING ARM, TANK TRUCK, CRUDE OIL, WITH SUBMERGED FILLING, 1 TOTAL; DIAMETER: 6 IN A/N: 491695	D125	C131			C1.2, E178.1, E191.1, H23.6, K48.1
Process 10: R-219 EXEMPT EQUIPMENT SUBJECT TO SOURCE SPECIFIC RULES					
RULE 219 EXEMPT EQUIPMENT, COATING EQUIPMENT, PORTABLE, ARCHITECTURAL COATINGS	E126			ROG: (9) [RULE 1113, 5-14-1999; RULE 1171, 6-13-1997; RULE 1171, 10-8-1999]	K67.1
RULE 219 EXEMPT EQUIPMENT, AIR CONDITIONING UNITS	E127				H23.3
RULE 219 EXEMPT EQUIPMENT, WELL HEADS AND PUMPS, OIL AND GAS	E128				
RULE 219 EXEMPT EQUIPMENT, PUMPS, CRUDE OIL/NATURAL GAS PIPELINE TRANSFER	E129				
RULE 219 EXEMPT EQUIPMENT, SMALL BOILERS, WATER HEATERS AND PROCESS HEATERS, >1 MMBTU/HR AND <= 2 MMBTU/HR	E153				
Process 11: ACTIVATED CARBON ADSORPTION PORTABLE (INTRA-FACILITY)					

- | | |
|--|---|
| * (1) (1A) (1B) Denotes RECLAIM emission factor | (2) (2A) (2B) Denotes RECLAIM emission rate |
| (3) Denotes RECLAIM concentration limit | (4) Denotes BACT emission limit |
| (5) (5A) (5B) Denotes command and control emission limit | (6) Denotes air toxic control rule limit |
| (7) Denotes NSR applicability limit | (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.) |
| (9) See App B for Emission Limits | (10) See section J for NESHAP/MACT requirements |

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

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SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 11: ACTIVATED CARBON ADSORPTION PORTABLE (INTRA-FACILITY)					
CARBON ADSORBER, SIEMENS, MODEL 400, PORTABLE (INTRA-FACILITY), 400 LBS A/N: 509525	C154			VOC: 500 PPMV (5) [RULE 1149, 7-14-1995; RULE 1149, 5-2-2008]	D90.2, E153.1, E193.1, E202.1, H23.9, K48.2

- * (1) (1A) (1B) Denotes RECLAIM emission factor
 - (3) Denotes RECLAIM concentration limit
 - (5) (5A) (5B) Denotes command and control emission limit
 - (7) Denotes NSR applicability limit
 - (9) See App B for Emission Limits
 - (2) (2A) (2B) Denotes RECLAIM emission rate
 - (4) Denotes BACT emission limit
 - (6) Denotes air toxic control rule limit
 - (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 - (10) See section J for NESHAP/MACT requirements
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

**FACILITY PERMIT TO OPERATE
SO CAL GAS CO/PLAYA DEL REY STORAGE FACI**

SECTION D: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**

**FACILITY PERMIT TO OPERATE
 SO CAL GAS CO/PLAYA DEL REY STORAGE FACI
 SECTION D: DEVICE ID INDEX**

Device Index For Section D			
Device ID	Section D Page No.	Process	System
D1	1	1	0
D2	1	1	0
D7	1	1	0
D14	2	1	0
D16	3	1	0
D17	4	1	0
D67	6	2	4
D68	7	2	4
D77	7	2	7
D78	7	2	7
D79	7	3	0
D80	7	3	0
D81	7	3	0
D82	8	3	0
D83	8	3	0
D84	8	3	0
D85	8	3	0
D89	8	6	0
D90	8	6	0
D91	8	6	0
D92	8	6	0
D93	8	6	0
C96	9	8	0
C97	9	8	0
D115	5	2	1
C117	5	2	1
D125	10	9	0
E126	10	10	0
E127	10	10	0
E128	10	10	0
E129	10	10	0
D130	9	6	0
C132	2	1	0
C133	3	1	0
C134	4	1	0

**FACILITY PERMIT TO OPERATE
SO CAL GAS CO/PLAYA DEL REY STORAGE FACI
SECTION D: DEVICE ID INDEX**

Device Index For Section D			
Device ID	Section D Page No.	Process	System
D135	5	1	0
D137	6	2	2
D138	6	2	2
D139	6	2	2
D141	6	2	2
D142	6	2	2
D143	6	2	2
D144	6	2	2
D145	9	7	0
D147	9	8	0
D148	10	8	0
D149	10	8	0
E153	10	10	0
C154	11	11	0

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

(a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[RULE 401, 3-2-1984; RULE 401, 11-9-2001]

F14.1 The operator shall not use diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

PROCESS CONDITIONS

P13.1 All devices under this process are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1149

[RULE 1149, 7-14-1995]

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The operator shall comply with the terms and conditions set forth below:

[Processes subject to this condition : 3]

SYSTEM CONDITIONS

S4.1 The following condition(s) shall apply to all affected devices listed under Section H of this system for fugitive emissions of volatile organic compounds (VOC):

All valves, fittings, and flanges associated with the still column (V-641), glycol reboiler (V-642), glycol flash tank (V-643) and still overhead condenser (V664) shall be identified, tagged and inspected quarterly using EPA Method 21.

Any leak greater than 500 ppm shall be repaired within 14 days of detection.

The operator shall keep records of the quarterly inspection, subsequent repair, and re-inspection, in a manner approved by the District.

[**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002**]

[Systems subject to this condition : Process 2, System 2]

DEVICE CONDITIONS

A. Emission Limits

A195.1 The 56 PPMV VOC emission limit(s) is averaged over 15 minutes at 15 percent O₂, dry.

The VOC concentration limit shall not apply during the engine start-up period. A start-up period shall not exceed 30 minutes from time initial fuel is consumed by the engine.

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SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[RULE 1110.2, 7-9-2010]

[Devices subject to this condition : D14, D16, D17]

B. Material/Fuel Type Limits

B61.1 The operator shall only use Diesel Fuel containing the following specified compounds:

Compound	Limit	ppm by weight
Sulfur	less than or equal to	15

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D135]

C. Throughput or Operating Parameter Limits

C1.1 The operator shall limit the operating time to no more than 2190 hours in any one year.

To comply with this condition, the operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine.

The purpose(s) of this condition is to ensure that this equipment qualifies as a large source.

[RULE 2012, 12-5-2003; RULE 2012, 1-7-2005]

[Devices subject to this condition : D14, D16, D17]

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

C1.2 The operator shall limit the loading rate to no more than 800000 gallon(s) per month.

[**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002**]

[Devices subject to this condition : D125]

C1.3 The operator shall limit the operating time to no more than 200 hour(s) in any one year.

[**RULE 1110.2, 6-3-2005; RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996**]

[Devices subject to this condition : D1, D2, D7]

C1.4 The operator shall limit the operating time to no more than 199 hour(s) in any one year.

[**RULE 1110.2, 6-3-2005; RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996;
RULE 1401, 3-4-2005; RULE 2012, 12-5-2003; RULE 2012, 1-7-2005**]

[Devices subject to this condition : D135]

C1.5 The operator shall limit the fuel usage to no more than 23000 MM Btu in any one year.

Devices D145 and D146 shall not be operating simultaneously..

For the purpose of this condition, fuel usage shall be defined as the combined usage of both heaters D145 and D146.

[**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002**]

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D145]

D. Monitoring/Testing Requirements

D12.1 The operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine.

[**RULE 2012, 12-5-2003; RULE 2012, 1-7-2005**]

[Devices subject to this condition : D1, D2, D7]

D12.2 The operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine.

[**RULE 1110.2, 6-3-2005; RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996; RULE 1401, 3-4-2005; RULE 2012, 12-5-2003; RULE 2012, 1-7-2005**]

[Devices subject to this condition : D135]

D12.3 The operator shall install and maintain a(n) non-resettable totalizing fuel flow meter to accurately indicate the fuel usage of the heaters.

[**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 2012, 12-5-2003; RULE 2012, 1-7-2005**]

[Devices subject to this condition : D145]

D29.2 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

NOX emissions	District method 100.1	15 minutes	Outlet
CO emissions	District method 100.1	15 minutes	Outlet

The test shall be conducted at least once every year.

The test shall be conducted to demonstrate compliance with the NOx and CO BACT limits.

The test shall be conducted when the heater is operating at normal load.

The test shall be conducted and the results submitted to the District within 60 days after the test date. The AQMD shall be notified of the date and time of the test at least 10 days prior to the test..

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 2005, 4-20-2001; RULE 2005, 5-6-2005]

[Devices subject to this condition : D145]

D29.5 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
CO emissions	District method 100.1	15 minutes	Outlet
VOC emissions	District Method 25.3	15 minutes	Outlet

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

The test shall be conducted once every two years or 8760 operating hours, whichever comes first. If the engine operates less than 2000 hours since the previous test, then testing once every 3 years.

If the engine has not been operated within 3 months of the test date, follow the testing schedule per Rule 1110.2 (f)(1)(C).

The source test results shall be submitted to the District no later than 60 days after the source test was conducted, per Rule 1110.2 (f)(1)(C)(vi).

The operator of the engine shall keep sufficient operating records to demonstrate that it meets the requirements of extension of the source testing deadlines.

[RULE 1110.2, 7-9-2010]

[Devices subject to this condition : D14, D16, D17]

D90.1 The operator shall periodically monitor the H₂S concentration at the outlet according to the following specification according to the following specifications:

The operator shall monitor once during each odorant transfer and tank depressurization.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C117]

D90.2 The operator shall monitor the VOC concentration of the carbon control system according to the following specifications:

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

The VOC concentration (measured as methane) measured at the outlet of the secondary carbon vessel shall not exceed 500 ppmv.

For each tank degassing, the VOC concentrations, in PPMV as methane, at the inlet, midpoint, and outlet of the system shall be measured and recorded upon the degassing start-up and at minimum every hour interval thereafter.

The VOC concentration shall be measured according to EPA Reference 21 using an appropriate analyzer calibrated with methane. The analyzer shall be maintained and calibrated per manufacturer guidelines.

[RULE 1149, 7-14-1995; RULE 1149, 5-2-2008; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C154]

E. Equipment Operation/Construction Requirements

E57.5 The operator shall vent this equipment to an air pollution control system in full use with a valid permit issued by the Executive Officer whenever the equipment is in operation.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D78]

E127.1 The operator shall keep gauge/sample hatches closed except during actual gauging/sampling operations.

[RULE 463, 3-11-1994]

[Devices subject to this condition : D67, D68, D77, D78, D79, D80, D81, D82, D83, D84]

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

E153.1 The operator shall change over the carbon in the adsorber whenever saturation occurs.

Whenever the VOC concentration exceeds 500 ppmv measured at the midpoint between the primary and secondary carbon vessels, the carbon adsorbers shall be replaced as follows: The primary carbon canister shall be replaced with either a fresh carbon canister or the secondary carbon canister, and the secondary carbon canister shall be replaced with a fresh carbon canister.

The fresh activated carbon used in the adsorber shall have a carbon tetrachloride (CTC) no. of not less than 60% as measured by ASTM Method D3467.

[RULE 1149, 7-14-1995; RULE 1149, 5-2-2008]

[Devices subject to this condition : C154]

E162.1 The operator shall use this equipment only during utility failure periods, except for maintenance purposes.

**[RULE 1110.2, 6-3-2005; RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996;
RULE 1401, 3-4-2005]**

[Devices subject to this condition : D135]

E175.1 The operator shall not use this equipment unless all exhaust air passes through the following:

activated carbon filter which is in proper operating condition

[RULE 402, 5-7-1976]

[Devices subject to this condition : D115]

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

E178.1 The operator shall load crude oil into using bottom loading.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D125]

E191.1 The operator shall vent emissions from transfer of organic liquids to equipment number C131.

[RULE 462, 5-14-1999]

[Devices subject to this condition : D125]

E193.1 The operator shall operate and maintain this equipment according to the following requirements:

Vapors drawn in by the blower shall be vented through two carbon vessels connected in series.

The amount of carbon adsorbent material contained in each carbon canister shall be no less than 400 lbs.

Sampling ports shall be provided at the gas inlet, midpoint, and final exhaust of the two carbon vessels.

[RULE 1149, 7-14-1995; RULE 1149, 5-2-2008]

[Devices subject to this condition : C154]

E202.1 The operator shall clean and maintain this equipment according to the following specifications:

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Spent carbon removed from the system shall be removed or stored in sealed containers prior to removal from site.

[RULE 1149, 7-14-1995; RULE 1149, 5-2-2008]

[Devices subject to this condition : C154]

H. Applicable Rules

H23.1 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	463

[RULE 463, 3-11-1994]

[Devices subject to this condition : D67, D68, D77, D78, D79, D80, D81, D82, D83]

H23.3 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Refrigerants	District Rule	1415

[RULE 1415, 10-14-1994]

[Devices subject to this condition : E127]

H23.4 This equipment is subject to the applicable requirements of the following rules or regulations:

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1176

[RULE 1176, 9-13-1996]

[Devices subject to this condition : D77, D78, D130]

H23.5 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	40CFR60, SUBPART	Ka

[40CFR 60 Subpart Ka, 5-5-1989]

[Devices subject to this condition : D67, D68, D77, D78, D79, D80, D81, D82, D83, D84]

H23.6 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	462

[RULE 462, 5-14-1999]

[Devices subject to this condition : D125]

H23.8 This equipment is subject to the applicable requirements of the following rules or regulations:

**FACILITY PERMIT TO OPERATE
 SO CAL GAS CO/PLAYA DEL REY STORAGE FACI**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Contaminant	Rule	Rule/Subpart
CO	District Rule	1110.2
VOC	District Rule	1110.2

The Integrated Air to Fuel Ratio Controller connected with Devices D14, D16, & D17 shall comply with all applicable Inspection and Monitoring requirements as outlined in approved compliance plan under section I of this permit.

[RULE 1110.2, 6-3-2005]

[Devices subject to this condition : D14, D16, D17]

H23.9 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1149
VOC	District Rule	1176

[RULE 1149, 7-14-1995; RULE 1149, 5-2-2008; RULE 1176, 9-13-1996]

[Devices subject to this condition : C154]

H23.10 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	40CFR63, SUBPART	ZZZZ

[40CFR 63 Subpart ZZZZ, 1-18-2008]

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D14, D16, D17]

I. Administrative

1296.1 This equipment shall not be operated unless the operator demonstrates to the Executive Officer that the facility holds sufficient RTCs to offset the annual emissions increase for the first 12 months of operation. In addition, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds sufficient RTCs in an amount equal to the annual emissions increase.

To comply with this condition, the operator shall prior to each compliance year hold a minimum NOx RTCs of 335 lbs. This condition shall commence with the initial operation of the heaters. For this condition only the RTC requirements are for D145 and D146 combined.

For the purposes of this condition, the annual emission increase is 335 lbs. of NOx

RTCs held for the purpose of demonstrating compliance with this condition either at the commencement of initial operation or of a compliance year may be sold only after 12 months of start of initial operation or after the fourth quarter of the applicable compliance year, respectively.

[RULE 2005, 4-20-2001; RULE 2005, 5-6-2005]

[Devices subject to this condition : D145]

K. Record Keeping/Reporting

K40.2 The operator shall provide to the District a source test report in accordance with the following specifications:

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Source test results shall be submitted to the District no later than 60 days after the source test was conducted.

Emission data shall be expressed in terms of concentration (ppmv) corrected to 3 percent oxygen (dry basis), mass rate (lbs/hr), and lbs/MM Cubic Feet. In addition, solid PM emissions, if required to be tested, shall also be reported in terms of grains per DSCF.

All exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute (DACFM).

All moisture concentration shall be expressed in terms of percent corrected to 3 percent oxygen.

Source test results shall also include the oxygen levels in the exhaust, fuel flow rate (CFH), and the flue gas temperature under which the test was conducted.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 2005, 4-20-2001; RULE 2005, 5-6-2005]

[Devices subject to this condition : D145]

K48.1 The operator shall maintain records in a manner approved by the District, to demonstrate compliance with the following condition number(s):

Condition Number C 1-2

[RULE 462, 5-14-1999]

[Devices subject to this condition : D125]

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

K48.2 The operator shall maintain records in a manner approved by the District, to demonstrate compliance with the following condition number(s):

Condition Number D 90- 2

Condition Number E 153- 1

[RULE 1149, 7-14-1995; RULE 1149, 5-2-2008]

[Devices subject to this condition : C154]

K67.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

For architectural applications where no thinners, reducers, or other VOC containing materials are added, maintain semi-annual records for all coating consisting of (a) coating type, (b) VOC content as supplied in grams per liter (g/l) of materials for low-solids coatings, (c) VOC content as supplied in g/l of coating, less water and exempt solvent, for other coatings.

For architectural applications where thinners, reducers, or other VOC containing materials are added, maintain daily records for each coating consisting of (a) coating type, (b) VOC content as applied in grams per liter (g/l) of materials used for low-solids coatings, (c) VOC content as applied in g/l of coating, less water and exempt solvent, for other coatings.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : E126]

K67.3 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FACI

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Date of operation, the elapsed time, in hours and the reason of operation.

Records shall be kept and maintained on file for a minimum of two years and made available to AQMD personnel upon request.

[RULE 1110.2, 6-3-2005; **RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996;**
RULE 1401, 3-4-2005]

[Devices subject to this condition : D135]

K67.4 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

This engine shall comply with the following additional monitoring and record keeping requirements of Rule 1110.2 (F)(1)(e) as outlined below:

1. Total hours of operation
2. Type of gaseous fuel
3. Fuel consumption (cubic feet of gas) and,
4. Cumulate hours of operation since the last source test required in subparagraph (f)(1)(c) of Rule 1110.2

All records required by these devices shall be retained for a minimum of five years, and shall be made available to any District representative upon request.

[RULE 1110.2, 7-9-2010]

[Devices subject to this condition : D14, D16, D17]

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ENGINEERING EVALUATION

COMPANY NAME AND ADDRESS

Southern California Gas Company – Playa Del Rey
8141 Gulana Avenue
Playa Del Rey, CA 90293

CONTACT(S): Charles Soares, Environmental Specialist, (310) 578-2685
Zach Muepo, Environmental Specialist, (213) 244-5822

EQUIPMENT LOCATION

AQMD ID 8582
8141 Gulana Avenue
Playa Del Rey, CA 90293

EQUIPMENT DESCRIPTION

Section D of the facility permit: Permit to Operate

Deletions are shown with ~~strikeouts~~ and additions are shown with **hold underline**.

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
INTERNAL COMBUSTION ENGINE, NON-EMERGENCY, TWO STROKE, LEAN BURN, WITH INSULATED DUCTS AND CATALYST HOUSING , 6CB, NATURAL GAS, COOPER-BESSEMER, MODEL GMVH-10, 2000 HP WITH A/N: 482122- 539154	D14	C132	NOX: LARGE SOURCE	CO: 70 PPMV NATURAL GAS (5) [RULE 1110.2]; CO: 89 PPMV NATURAL GAS (4) [RULE 1303(A)(1)-BACT]; CO: 2000 PPMV NATURAL GAS (5) [RULE 1110.2]; NOX: 225 PPMV NATURAL GAS (3) [RULE 2012]; PM: (9) [RULE 404]; VOC: 30 <u>56</u> PPMV NATURAL GAS (5) [RULE 1110.2]; VOC: 250 PPMV (5) [RULE 1110.2]	A195.1, C1.1, D29.5, H23.10, K67.4
CO OXIDATION CATALYST, ENGLEHARD BASE CAMEL , 24" X 24" X 3 11-16" D, WITH AN AIR TO FUEL RATIO CONTROLLER (WASTE GATE VALVE), EMBEDDED IN THE ENGINE CONTROL SYSTEM.	C132	D14			H23.8
COMPRESSOR					

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
INTERNAL COMBUSTION ENGINE, NON-EMERGENCY, TWO STROKE, LEAN BURN, WITH INSULATED DUCTS AND CATALYST HOUSING , 8CB, NATURAL GAS, COOPER-BESSEMER, MODEL GMVH-10, 2000 HP WITH A/N: 482123-539155	D16	C133	NOX: LARGE SOURCE	CO: 70 PPMV NATURAL GAS (5) [RULE 1110.2]; CO: 89 PPMV NATURAL GAS (4) [RULE 1303(A)(1)-BACT]; CO: 2000 PPMV NATURAL GAS (5) [RULE 1110.2]; NOX: 225 PPMV NATURAL GAS (3) [RULE 2012]; PM: (9) [RULE 404]; VOC: 30 56 PPMV NATURAL GAS (5) [RULE 1110.2]; VOC: 250 PPMV (5) [RULE 1110.2]	<u>A195.1, C1.1, D29.5, H23.10, K67.4</u>
CO OXIDATION CATALYST, ENGLEHARD BASF CAMEL , 24" X 24" X 3 11-16" D, WITH AN AIR TO FUEL RATIO CONTROLLER (WASTE GATE VALVE), EMBEDDED IN THE ENGINE CONTROL SYSTEM. COMPRESSOR	C133	D16			H23.8
INTERNAL COMBUSTION ENGINE, NON-EMERGENCY, TWO STROKE, LEAN BURN, WITH INSULATED DUCTS AND CATALYST HOUSING , 9CB, NATURAL GAS, COOPER-BESSEMER, MODEL GMVH-10, 2000 HP WITH A/N: 482124-539156	D17	C134	NOX: LARGE SOURCE	CO: 70 PPMV NATURAL GAS (5) [RULE 1110.2]; CO: 89 PPMV NATURAL GAS (4) [RULE 1303(A)(1)-BACT]; CO: 2000 PPMV NATURAL GAS (5) [RULE 1110.2]; NOX: 225 PPMV NATURAL GAS (3) [RULE 2012]; PM: (9) [RULE 404]; VOC: 30 56 PPMV NATURAL GAS (5) [RULE 1110.2]; VOC: 250 PPMV (5) [RULE 1110.2]	<u>A195.1, C1.1, D29.5, H23.10, K67.4</u>
CO OXIDATION CATALYST, ENGLEHARD BASF CAMEL , 24" X 24" X 3 11-16" D, WITH AN AIR TO FUEL RATIO CONTROLLER (WASTE GATE VALVE), EMBEDDED IN THE ENGINE CONTROL SYSTEM. COMPRESSOR	C134	D17			H23.8

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SUMMARY

Southern California Gas Company – Playa Del Rey (The Gas Co.) owns and operates a natural gas storage facility in Playa Del Rey (PDR) under a RECLAIM/Title V Facility Permit. They submitted applications for change of conditions for three of the engines located at the PDR facility as well as a Title V RECLAIM revision. The applications are summarized in table 1.

Table 1 Application Summary

A/N	Equipment	Submittal Date	Deemed Complete	BCAT/CCAT	Schedule	Fee
539154	Non-Emergency ICE	6/7/12		040002	C	\$1820.98
539155	Non-Emergency ICE	6/7/12		040002	C	\$910.49
539156	Non-Emergency ICE	6/7/12		040002	C	\$910.49
539157	TV/RECLAIM Revision	6/7/12		555009	-	\$1747.19
TOTAL						\$5389.15

The Gas Co. is requesting to change the Rule 1110.2 VOC compliance limit on their permit, for their 2000 bhp engines, from 30 ppmv, as required per Table II of R1110.2(d)(1)(B), to a higher alternate limit as stated in the same section of the rule. This provision states the following:

“If the operator of a two-stroke engine equipped with an oxidation catalyst and insulated exhaust ducts and catalyst housing demonstrates that the CO and VOC limits effective on and after July 1, 2010 are not achievable, then the Executive Officer may, with the United States Environmental Protection Agency (EPA) approval, establish technologically achievable, case-by-case CO and VOC limits in place of the concentration limits effective on and after July 1, 2010.”

The application package includes a final report, along with data summarized in tables, as well a catalyst vendor’s guarantee of 56 ppmvd-VOC at 15% O2 as the alternate limit proposed for the PDR engines. These engines are large NOx sources per RECLAIM and are each limited to 2190 hours of operation per year. The Gas Co. also proposed alternate limits for engines at their Moreno Valley Compressor Station (AQMD ID 4242). The draft permits for both PDR and Moreno Valley will be forwarded to the Region IX EPA Permits Office, to the attention of Gerardo Rios, for the 45 day review. At the same time, the request to review and approve the alternate VOC limits will be sent to the Region IX EPA Rulemaking Office after the project has gone out for 30 Day public review as a significant revision to the Title V permit.

BACKGROUND & DISCUSSION

Rule 1110.2

AQMD Rule 1110.2 was first adopted in 1990 to regulate NOx, CO and VOC emissions of stationary and portable engines in AQMD. Prior to the most recent amendment of July 9, 2010, the rule was amended on February 1, 2008 that added the 30 ppmv VOC limit and the provision for operators of two stroke engines to demonstrate that the emission limit was not achievable by July 1, 2010. The rulemaking process involved a Public Workshop that was held on February 6, 2007, at the District offices, as well as several meetings with the Rule 1110.2 ICE Working Group; comprised of engine

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manufacturers, control equipment manufacturers, trade organizations, and consultants. A follow up Public Consultation meeting was noticed and held on September 6, 2007. The Gas Company was actively involved in this process and the provision for alternate VOC limits was specifically put into the rule for the PDR and Moreno Valley facilities, as discussed in the Rule 1110.2 Staff Report.

The Gas Company submitted applications (459756, 459757, & 459758) that were received by the District on August 30, 2006 to add oxidation catalysts to the engines to mitigate odor complaints from residents located adjacent to the facility. The request was to allow the Gas Company to experiment with two different catalyst vendors; Johnson Matthey and Englehard. The amended permit was issued on October 4, 2006 and the engines were subsequently source tested in February 2007. The results for VOC varied from 16.2 ppmv at low load for ICE D17 to 50.1 ppmv at low load for ICE D16.

On February 20, 2009 the Gas Company contacted the District to discuss the viability of applying for a Rule 441 Research Permit to try various catalyst manufacturers over a period of 3 years in an effort to demonstrate an alternate VOC limit. The District informs the Gas Company that a Research Permit could only be granted over a one year period. Applications Nos. 482122, 482123, & 482124 were submitted by the Gas Company and received by the District on April 30, 2008 to include an Air to Fuel Ratio Controller on the engines to comply with section (d)(1)(E) of the rule. A revised permit was issued on August 19, 2009.

The Gas Company requested an alternate VOC limit on June 30, 2010 via email to District staff that included testimonials from catalyst vendors and some emission testing results. The District requested clarification in response on July 9, 2010 for the information they provided in a meeting at the District. It was conveyed to the Gas Company that since the July 1, 2010 deadline had passed, they would need to apply for a variance with the Hearing Board to continue to operate the engines above the 30 ppm limit of Rule 1110.2

Hearing Board

The Gas Company appeared before the Hearing Board on September 8, 2010 and was granted a regular variance from the 30 ppmv limit (Variances 0137-68 for PDR and 3607-12 for Moreno Valley). The variance allowed the Gas Company to implement a District-approved source test plan to demonstrate if the equipment could meet 30 ppmv and if not than to establish an alternate VOC limit. The test schedule involved source tests to be conducted at 500, 1000, 1500, and 2000 hours of engine operation. The Gas Company would be required to notify the District Source Test engineer prior to testing and submit monthly reports to District Source Test Engineering and Enforcement staff. The facility would be allowed to continue to use the equipment for normal operational purposes during the variance period to end on November 2, 2010. The Gas Company was also ordered to meet with District staff to determine the excess emissions as well as discuss VOC mitigation measures to present to the Hearing Board on October 20, 2010.

The Gas Company appeared again before the Hearing Board on October 20, 2010 requesting an extension of the final compliance date of November 2, 2010. The Gas Company was unable to comply with the variance because it could not test the engines at every 500 hour intervals up to the cumulative 2000 operating hours per unit due to low usage. The extension was granted until October 7, 2011 with essentially the same conditions as well as the requirement to pay excess emission fees.

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On September 15, 2011, the Gas Company appeared again before the Hearing Board requesting another extension of the final compliance date of October 7, 2011. The Gas Company indicated that they still could not test the engines at the agreed upon test schedule and that they were seeking a revised testing protocol that would allow them to switch out catalysts to accumulate the required operating hours. The Hearing Board once again approved the request to extend the variance until October 7, 2012 with essentially the same conditions along with an "action plan" with due dates for the Gas Company to meet. The "action plan" sets dates for completion of testing by April 7, 2012 and the submittal of the final test report with the proposed limits along with applications to modify the Title V permit by July 7, 2012. Dates were also included for the District to complete its review of the final report and to forward it to EPA for their approval. A date was also set for the EPA to approve the VOC limits as well as to approve the TV permit with the VOC limits. The dates were tentatively agreed upon with discussions between the District and Gas Company, so the Gas Company could have an idea of timelines; however, it is uncertain how these due dates were include into an "action plan" and put on the Minute Order, as the Hearing Board has no influence on the EPA. The Gas Company did meet the timelines of the "action plan" and submitted its final test report for District staff review on June 1, 2012.

Final Report

The Final Report submitted by the Gas Company entitled "Case by Case Demonstration to Determine Technical Achievability of SCAQMD Rule 1110.2 Volatile Organic Compound (VOC) Limit of 30 ppm for 2-Stroke Lean Burn Engines and the Development of Alternative Limits" dated June 1, 2012 includes a summary of the test results and the analyses of those results by two different catalyst vendors; DCL and BASF, for the Moreno Valley and PDR engines, respectively. The vendor analyses, specifically BASF for PDR, led to the development of the proposed warranted VOC stack emission of 56 ppmvd-VOC corrected to 15% O2 measured per AQMD Method 25.3 for the PDR engines; identified as PDR-6 (Device D14), PDR-8 (Device D16), and PDR-9 (Device D17) in the BASF report.

Rule 1110.2 paragraph (g) outlines AQMD Methods 25.1 or 25.3 as the method to use to verify compliance with the VOC limits of the rule. Emission measurements using these methods are of little use to catalyst manufacturers when they analyze data to determine a warranted VOC limit. The preferred method for analysis is data obtained by EPA Method 18, which speciates the constituents to yield the actual reduction of each compound. In addition, formaldehyde is included as a VOC in Method 25.3 and not in Method 18. Thus, providing a warranted value on Method 25.3 presented a challenge for BASF.

Test results showed that the operating temperature range of the engines were from 580°F to 659°F, which is insufficient for complete destruction of propane as shown in Figure 1. So for the PDR engines, propane destruction is limited by kinetics, whereas conversion across the catalyst for the remaining organic compounds is governed by mass transfer as illustrated in Figure 2.

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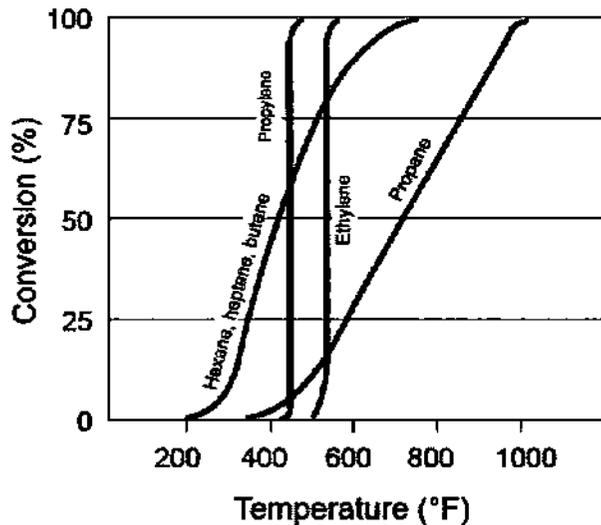


Figure 1. Destruction efficiency curves for selected organics.
 (Taken from the EPA document *APTI 415: Control of Gaseous Emissions*)

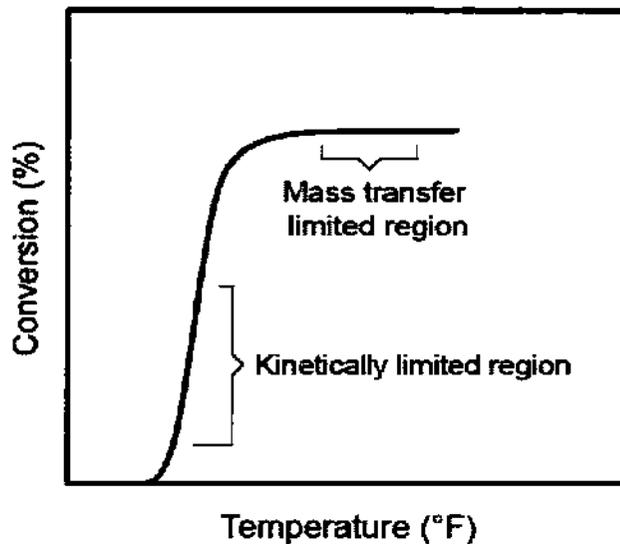


Figure 2. Importance of temperature in catalytic systems.
 (Taken from the EPA document *APTI 415: Control of Gaseous Emissions*)

The final report dated May 2, 2012 is actually the second analysis performed by BASF to determine a warranted stack emission. The first report or “Interim Report” dated September 9, 2011 was the first analysis of the data which resulted in BASF initially stating that they would warrant a VOC stack emission limit of 95 ppmvd-VOC corrected to 15% O₂ measured per AQMD Method 25.3. A combination in the uncertainty of the constituents per Method 25.3 and some data points with high propane content led BASF to take a conservative approach in the derivation of a predictive model to

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establish the warranted VOC limit. The chart below, identified as Figure 3, taken from the Interim BASF report shows how they arrived at the 95 ppmvd value. The triangles in the graph are “normalized” data points at assumed engine conditions which were much higher than the actual Method 25.3 test results. The Gas Company wanted the warranty to be effective over 8000 operating hours. However, at the time, the catalysts had only a little over 4000 hours of operation. BASF was required to extrapolate the deactivation model to cover 8000 hours. As shown in Figure 3, the final value was determined using the warranted emission curve.

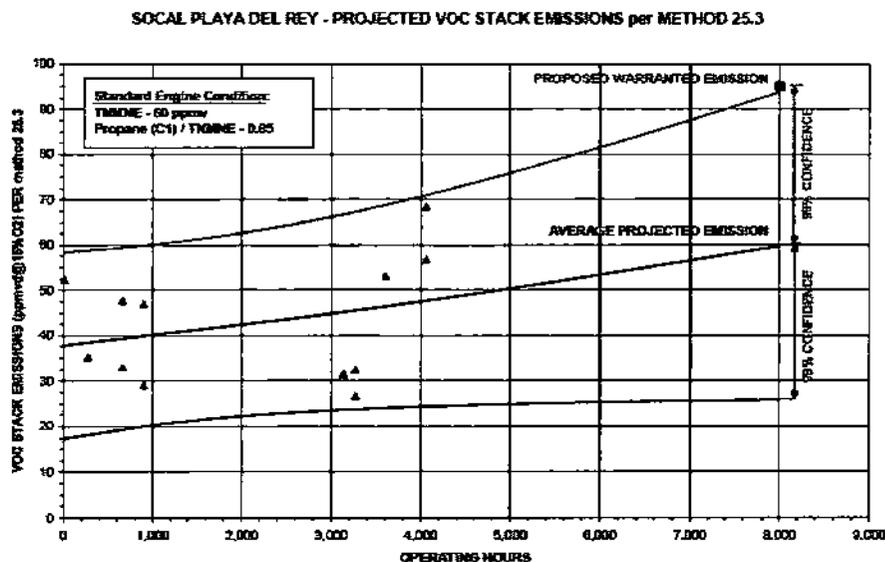


Figure 3. Projected VOC stack emissions.
(Taken from the BASF Report *VOC Stack Emission Modeling SOCAL – Playa Del Rey Rev. 2* dated September 9, 2011)

The Gas Company presented the BASF report and the catalyst vendor’s guarantee of 95 ppmvd to District Staff for their review and comment. The District provided feedback to the Gas Company requesting them to perform additional testing, such as: taking natural gas samples for speciation analysis, VOC analysis at both inlet and outlet of the catalyst, continued collection of Fourier transform infrared spectroscopy (FTIR) data at inlet and outlets, and to meet with District staff to review what engine parameters would be adjusted before each test. BASF performed a re-analysis and provided a warranted value of 80 ppmvd. The Gas Company was still acquiring data even after this re-analysis.

During the period of further testing, the Gas Company continued to work with BASF by providing additional data for analysis. The testing of the PDR engines concluded in March 2012 and the final report was submitted in June 2012. BASF performed their analysis and warranted a 56 ppmv limit up to 6300 hours or 3 years, whichever occurs first. The warranted operating hours were shortened from 8000 hours to 6300 hours in accordance with the PDR permit conditions limiting operation of the engines to 2190 hours per year. This allowed BASF to refine the final warranted number since they did not have to extrapolate too far from the 5000 operational hours that the data was based on.

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The Gas Company had also requested BASF to discard some data points that had indicated a high ratio of inlet propane to TNME. It was determined that the data sets were non-representative of the gas samples and the Gas Company was unable to replicate the high propane characteristics. The data for PDR-9 was selected as representative of the engine population. Majority of the TMNE emissions were ethene, propane, and butane, so the conversions for these compounds were examined. The catalyst activity trends for PDR-9 defined what BASF believed to be "end of warranted life" on a compound by compound basis. Ethene conversion data showed a deactivation step-change that BASF determined to be a 50% loss in catalyst surface area. BASF used the expected conversion at 6300 operating hours as the expected design limiting conversion of ethene across the oxidation catalyst. Similarly, the step-changes for propane and butane were examined to arrive at the expected conversion at 6300 hours.

To account for the difference between Methods 18 and 25.3, the TMNE conversion was plotted against the difference between the stack VOC for Methods 25.3 and 18. It was determined that the difference between test methods increased as the conversion across the catalyst was higher. Using the expected conversion of TMNE at end of catalyst life at 6300 hours, a "corrected" value of 5.7 ppmvd was determined. This number was cross-checked with the FTIR data for PDR-9, which showed formaldehyde emissions at the same order of magnitude as the "corrected" term. The calculation for the emission guarantee is summarized in the table below.

Table 2 Proposed Warranted VOC Stack Emission per Method 25.3 (Taken from the BASF Report *VOC Stack Emission Modeling SOCAL - Playa Del Rey Rev. 2* dated September 9, 2011)

	PROPOSED WARRANTY CALCULATION	REFERENCE	COMMENTS
TNME	101.3	Figure 4	Minimum catalyst inlet temperature = 580F Exhaust gas flow not to exceed 8,500 dscfm TNME inlet not to exceed 101.3 ppmv actual
%-ethene	53.6%	Figure 8	
%-propane	44.6%	Figure 6	Relative propane content in exhaust gas inlet to oxidation catalyst not to exceed 45%, calculated as propane (C3) / TNME
%-butane	1.8%	Mass balance 100% - 53.6% - 44.6%	
Emissions to catalyst			
ethene	54.3	101.3 * 53.6%	
propane	45.2	101.3 * 44.6%	
butane	1.8	101.3 * 1.8%	
Expected conversion rates at end of warranted life			Warranted life defined as 3 calendar years since initial startup or 6,300 operating hours (2,100 hours/year per permit condition), whichever occurs first
ethene	75.9%	Figure 9	
propane	20.6%	Figure 10	
butane	32.2%	Figure 11	
Expected outlet emissions			
ethene	13.1	54.3 * (1 - 75.9%)	
propane	35.9	45.2 * (1 - 20.6%)	
butane	1.2	1.8 * (1 - 32.2%)	
controlled TNME emission	50.2	13.1 + 35.9 + 1.2	
DRE per Method 18 modeling	50.5%	(101.3 - 50.2) / 101.3	
Correction to Method 25.3	5.7	Figure 12	
Stack VOC per Method 25.3	56	50.2 + 5.7	ppmvd@15%O2

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District Source Test Engineering reviewed the test reports as well as the data submitted and found the information to be acceptable representations of the required testing and determined that the analytical methods used were in accordance with District approved standards. Upon reviewing the final report and the catalyst vendor analysis, it is determined that the VOC concentration limit of 56 ppmvd @ 15% O2 proposed is a realistic and achievable limit for the 2 stroke natural gas fired engines equipped with oxidation catalysts at the PDR facility.

COMPLIANCE REVIEW

A review of the District compliance database reveals that the facility received one Notice to Comply (NC #D04875) and no Notices of Violations within the last three years. NC #D04875 was issued on 9/22/10 to submit their quarterly electronic emission reports. The facility was last inspected on 1/17/12 and it was determined that they were operating in compliance at the time of inspection.

CALCULATIONS

The Gas Company has requested to comply with the alternate VOC limit, thus the emissions from the other criteria pollutants are not going to change. The emission rates for VOC are shown in Table 3.

DATA

Rating 2000 bhp
SMV 385 scf/mol
Fd 8710 dscf/10E6 Btu
BSFC (@100%) 2545 Btu/bhp-hr
Efficiency 28%
MW (as CH4) 16 lb-mol/mol
Schedule 24 hrs/day
 2190 hrs/yr

Limit 56 ppmvd

$$EF \text{ (g/bhp-hr)} = \frac{\text{ppmvd} \times Fd \times MW \times BSFC(@100\%) \times (20.9/(20.9-15)) \times 453.6 \text{ g/lb}}{\text{Efficiency} \times SMV} = \boxed{0.296}$$

Table 3 VOC (as CH4) Emissions for the PDR Engines

RATE	1	2	3	TOTALS
lb/hr	1.31	1.31	1.31	3.92
lb/day	31.33	31.33	31.33	93.98
lb/yr	2,859	2,859	2,859	8,576
30-DA	31	31	31	94

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RULES EVALUATION

RULE 212-STANDARDS FOR APPROVING PERMITS AND ISSUING PUBLIC NOTICES

Rule 212 requires that a person shall not build, erect, install, alter, or replace any equipment, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants without first obtaining written authorization for such construction from the Executive Officer. Rule 212(c) states that a project requires written notification if there is an emission increase for ANY criteria pollutant in excess of the daily maximums specified in Rule 212(g), if the equipment is located within 1,000 feet of the outer boundary of a school, or if the MICR is equal to or greater than one in a million (1×10^6) during a lifetime (70 years) for facilities with more than one permitted unit, source under Regulation XX, or equipment under Regulation XXX, unless the applicant demonstrates to the satisfaction of the Executive Officer that the total facility-wide maximum individual cancer risk is below ten in a million (10×10^6) using the risk assessment procedures and toxic air contaminants specified under Rule 1402; or, ten in a million (10×10^6) during a lifetime (70 years) for facilities with a single permitted unit, source under Regulation XX, or equipment under Regulation XXX. There is no increase in emissions associated with this application; therefore, the public notice requirements of this rule are not applicable.

RULE 401 - VISIBLE EMISSIONS

This rule limits visible emissions to an opacity of less than 20 percent (Ringlemann No.1), as published by the United States Bureau of Mines. Compliance is expected with well maintained and properly operated equipment. There are no visible emissions expected from properly operated equipment.

RULE 402 - NUISANCE

This rule requires that a person not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which cause, or have a natural tendency to cause injury or damage to business or property. It is expected that the Compliance with this rule is expected.

RULE 431.1-SULFUR CONTENT OF GASEOUS FUELS

The engines will use natural gas that will comply with the 16 ppm sulfur limit, calculated as H₂S, specified in this rule. Natural gas will be supplied by the Gas Company which has a H₂S content of less 0.25 gr/100scf, which is equivalent to a concentration of about 4 ppm. It is also much less than the 1 gr/100scf limit typical of pipeline quality natural gas. Compliance is expected.

RULE 1110.2 - EMISSIONS FROM GASEOUS- AND LIQUID FUELED ENGINES

The purpose of Rule 1110.2 is to reduce Oxides of Nitrogen (NO_x), Volatile Organic Compounds (VOCs), and Carbon Monoxide (CO) from engines. The following sections discuss the key requirements of this rule as it applies to the equipment:

(d)(1)(B)

The engines are subject to the emission requirements in Table II (of the rule), with the exception of NO_x, as of 7/1/2010.

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Concentration limits effective 7/1/2010 (> 500 bhp)

Item	ppmv @ 15% oxygen
NOx	11
CO	250
VOC	30

Rule 1110.2 (d)(1)(B)(ii), states that "If the operator of a two-stroke engine equipped with an oxidation catalyst and insulated exhaust ducts and catalyst housing demonstrates that the CO and VOC limits effective on and after July 1, 2010 are not achievable, then the Executive Officer may, with United States Environmental Protection Agency (EPA) approval, establish technologically achievable, case-by-case CO and VOC limits in place of the concentration limits effective on and after July 1, 2010. The case-by-case limits shall not exceed 250 ppmvd VOC and 2000 ppmvd CO." The San Diego Gas & Electric, Moreno Valley (fac ID 4242) (SDG&E) and Southern California Gas Company, Playa del Rey (fac ID 8582) (SCGC) have requested to use the case-by-case analysis to determine VOC limits higher than the 30 ppmvd as required by this clause under Table II. Both facilities have shown that by July 1, 2010 the VOC emission limit could not be maintained on a consistent manner, the CO emission requirements were able to be met by the July 1, 2010 time line. The facilities have operated their respective equipment under a District Variance and have ran extensive testing during the last two years to try and determine what appropriate VOC limit can be found for their engines. During this testing period two types of oxidation catalysts were used, as well as, trying to determine whether cleaning of the catalysts assists in retaining their control efficiencies. The goals of the testing was to determine commercial availability of the control equipment, reliability of the control equipment, and effectiveness over the expected range of operation.

The engines and demonstration results are summarized in the table below:

Engine	Was 30 ppm VOC sustainable?	Proposed VOC Limit (at 15% O2)
SDG&E Moreno Valley D5, D6, & D7	Yes	30
SDG&E Moreno Valley D8 & D9	No	47
SDG&E Moreno Valley D10	Yes	30
SCGC Playa Del Rey D14, D16, & D17	No	56

In the SCGC facility, three engines Device 14, 16, and 17, could not meet the 30 ppmvd limit and through testing the facility has requested an alternate limit of 56 ppmvd. In the SDG&E facility, two engines Device 8 and 9, could not meet the 30 ppmvd limit and through testing the facility has requested an alternate limit of 47 ppmvd. Based upon the staff report for February 1, 2008 rule amendment date, the total rule emission reduction resulting from lowering the VOC limit from 250 ppm to 30 ppm was estimated to be 1372 lbs/day. Using the same criteria used in the staff report for total rule emission reduction calculations, the emission foregone for the engines at SCGC and SDG&E facilities are estimated to be 2.75 lbs/day and 1.21 lbs/day, respectively.

Combined for both facilities the estimated emissions foregone would be (2.75 lbs/day + 1.21 lbs/day)/ 1372 lbs/day = 0.29% of the total rule emission reductions for VOC for the February 1, 2008 rule amendment. This amount of emissions foregone is considered to be insignificant and is not expected to interfere with the clean air goal of this rule amendment.

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Based upon the extensive testing, the District believes this request for alternative limits are warranted and have submitted the testing information to EPA for their concurrence and approval of these alternative limits.

(d)(1)(E)

The engines are equipped with air to fuel ratio controllers and oxygen sensors for feedback control.

(d)(1)(F)

The engines are not considered new per sub-section (v), the engines were installed prior to 2/2008 and they will be treated as "existing", thus section (d)(1)(F) does not apply.

(e)(4)

The Gas Company submitted an I&M Plan. The plan is awaiting evaluation based on the approval of the alternate limit.

(e)(5)

The engines are equipped with air fuel ratio controllers.

(f)(1)(B)

The engines are equipped with time meters.

(f)(1)(C)(i)

Source testing frequency for CO, and VOC, effective 8/1/08, is required once every 2 years or every 8760 operating hours. If the engines operate less than 2000 hours from the previous test, then testing is once every three years.

(f)(1)(C)(ii)

Source testing is to be conducted for at least 60 minutes. Since the engines operate at variable loads, testing at 15 minutes at minimal and 15 minutes at maximum loads are required, in addition to the 30 minute operation at normal load. Testing must occur at least after 40 hours following a tune up.

(f)(1)(C)(iii)

An AQMD approved contractor is required to perform testing.

(f)(1)(C)(iv)

Source test protocol to be submitted at least 60 days prior to testing and the protocol has to be approved by the District.

(f)(1)(C)(v)

Source test reports to be submitted within 60 days of the test

(f)(1)(D)

This section outlines the requirements of the I&M plan. The Gas Company will be expected to comply with the requirements of this section.

(f)(1)(E)

The Gas Company is required to maintain an operating log for these engines.

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(h)(10)

The concentration limits of the rule are not applicable at engine start-up, until sufficient operating temperatures are reached for proper operation of the emission control equipment, not to exceed 30 minutes.

NEW SOURCE REVIEW (NSR)

There is no increase in emissions associated with these applications. Therefore, NSR is not applicable.

RULE 1401 – NEW SOURCE REVIEW OF TOXIC AIR CONTAMINANTS

There is no increase in emissions associated with these applications; therefore, the requirements of this rule are not triggered.

REGULATION XX – REGIONAL CLEAN AIR INCENTIVES MARKET (RECLAIM)

The facility is in NOx RECLAIM and in cycle 1.

RULE 2006 – PERMITS

(c)(4) The Executive Officer shall deny any application for permit amendment unless the applicant demonstrates that operation of the facility, pursuant to the proposed revised permit will comply with all applicable District rules, and state and federal statutes and regulations which the District has jurisdiction to enforce. As stated in the Compliance section, one Notice to Comply and no Notices of Violation have been issued to the facility in the last three years. Compliance is expected.

REGULATION XXX – TITLE V PERMITS

The Gas Co. is a Title V facility with a Title V permit

RULE 3000 – GENERAL

(b)(31)(I) requires that the installation of new equipment subject to an NSPS or NESHAPS will be handled as a significant revision.

RULE 3003 – APPLICATIONS

The “significant permit revision” is expected to comply with all applicable requirements of this rule.

(i)(4) The significant permit revision will be issued only after the permit revision application has been found to comply with all conditions of this rule.

(j)(1) The permit revision will be forwarded to EPA for a 45 day review period.

RULE 3005 – PERMIT REVISION

(f) The proposed Title V permit revision satisfies all the applicable conditions listed in this rule. The modification constitutes a “significant permit revision”.

RULE 3006 – PUBLIC PARTICIPATION

(a) The proposed “significant permit revision” requires that the AQMD process includes public participation, as such a public notice with a 30-day comment period will be conducted.

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40 CFR 60 SUBPART JJJ – STANDARD OF PERFORMANCE FOR STATIONARY SPARK IGNITION CONTROL ENGINES

§60.4230

The PDR engines were constructed prior to June 12, 2006. In addition, the engines have not been modified (as defined per 40 CFR 60.14) or reconstructed (as defined per 40 CFR 60.15) after June 12, 2006; therefore, this subpart is not applicable.

40 CFR 63 SUBPART ZZZZ – NESHAPS FOR STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES

§63.6585

The PDR facility is a Major Source for HAP emissions and subject to 40 CFR 63 Subpart HHH and the existing PDR engines are stationary RICE as defined by this section; therefore, it is subject to the requirements of this subpart.

§63.6590

As defined by this section, the PDR facility is an Affected Source with Existing Stationary RICE, since the engines were constructed prior to December 19, 2012. In addition the engines have not been modified or reconstructed (as defined per §63.2).

§63.6600

(c) As previously mentioned, the PDR facility is a Major HAP source that operates existing 2 stroke lean burn (2SLB) engines; therefore, per this section, the equipment does not have to meet the emission limitations or the operating limitations of the this subpart.

§63.6645

(a)(5) There are no notification requirements for existing stationary RICE not subject to numerical emission standards.

§63.6650

(a) There are no applicable reporting requirements in Table 7 for this equipment.

§63.6655

(a) Records are only required for equipment that must comply with the emission and operating limitations of this subpart. Therefore, recordkeeping is not required per this subpart.

§63.6665

There are no general provisions that apply to this equipment.

RECOMMENDATION(S)

Issue Permit to Operate for the engines with the permit conditions shown below following the EPA 45 Day Review Period and EPA approval of the alternative VOC limit.

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PERMIT CONDITIONS

The conditions below will be added to the TV permit.

A195.1 The 56 PPMV VOC emission limit(s) is averaged over 15 minutes at 15 percent O2, dry.

The VOC concentration limit shall not apply during the engine start-up period. A start-up period shall not exceed 30 minutes from time initial fuel is consumed by the engine.

[Rule 1110.2]

D29.9 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant to be tested	Required Test Method(s)	Averaging Time	Test Location
CO emissions	District method 100.1	15 minutes	Outlet
VOC emissions	District Method 25.3	15 minutes	Outlet

The test shall be conducted once every two years or 8760 operating hours, whichever comes first. If the engine operates less than 2000 hours since the previous test, then testing once every 3 years

If the engine has not been operated within 3 months of the test date, follow the testing schedule per Rule 1110.2 (f)(1)(C).

The source test results shall be submitted to the District no later than 60 days after the source test was conducted, per Rule 1110.2 (f)(1)(C)(vi).

The operator of the engine shall keep sufficient operating records to demonstrate that it meets the requirements of extension of the source testing deadlines

[Rule 1110.2]

H23.10 This equipment is subject to the applicable requirements of the following rules and regulations:

Contaminant	Rule	Rule/Subpart
VOC	40CFR63, SUBPART	ZZZZ

[40CFR 63 Subpart ZZZZ]

K67.4 The operator shall keep records in a manner approved by the District, for the following parameter(s) or item(s):

This engine shall comply with the following additional monitoring and record keeping requirements of Rule 1110.2 (F)(1)(e) as outlined below:

1. Total hours of operation
2. Type of gaseous fuel
3. Fuel consumption (cubic feet of gas) and,
4. Cumulate hours of operation since the last source test required in subparagraph (f)(1)(c) of Rule 1110.2

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All records required by these devices shall be retained for a minimum of five years, and shall be made available to any District representative upon request.
[Rule 1110.2]



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

NOTICE OF PROPOSED TITLE V SIGNIFICANT PERMIT REVISION

The South Coast Air Quality Management District (AQMD) is proposing to revise the existing Title V permit that was previously issued to the following facility:

Southern California Gas Company
Playa Del Rey Storage Facility
8141 Gulana Ave.
Playa Del Rey, CA 90293
Facility ID# 8582

Contact Person:
Charles Soares
Principal Environmental Specialist
8141 Gulana Ave.
Playa Del Rey, CA 90293

This is an existing facility applying for a Significant Permit Revision for their Title V permit. The facility is a natural gas storage facility that is requesting to comply with alternate VOC limits for their lean burn engines that are subject to AQMD Rule 1110.2. The engines are also subject to New Source Performance Standards (NSPS) 40 CFR 60 Subpart JJJJ and National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63 Subpart ZZZZ.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3000(b)(31)(I), a facility with a Title V permit that proposes to modify existing equipment subject to a NSPS or NESHAP is considered a Significant Permit Revision. Accordingly, the above facility has submitted a Title V Significant Permit Revision application and requested the AQMD to revise their Title V permit. The proposed permit incorporates the addition of the alternate VOC limits for the three existing lean burn engines.

The proposed permit is available for public review at AQMD, 21865 Copley Drive, Diamond Bar, CA 91765 and at the Playa Vista Branch Library, 6400 Playa Vista Drive, Los Angeles, CA 90094. Information regarding the facility owner's compliance history submitted to the AQMD pursuant to California Health & Safety Code Section 42336, or otherwise known to the AQMD based on credible information, is also available from the AQMD for public review. For more information or to review additional supporting documents, call the AQMD's Title V hotline at (909) 396-3013. Written comments should be submitted to:

South Coast Air Quality Management District
Mechanical, Chemical, and Public Services Team
21865 Copley Drive
Diamond Bar, CA 91765
Attention: Marcel Saulis

Comments must be received by October 1, 2012. The AQMD will consider all public comments and may revise the Title V permit in accordance with AQMD rules and regulations.

The public may request AQMD to conduct a public hearing on the proposed permit by submitting a Hearing Request Form (Form 500-G) to Mr. Brian Yeh at the above AQMD address. The AQMD will hold a public hearing if there is evidence that the proposed permit is not correct or is not adequate to ensure compliance with regulatory requirements, and a hearing will likely provide additional information that will affect the drafting and/or issuance of the permit. A public hearing request form and the public hearing schedule may be obtained from the AQMD by calling the Title V hotline at (909) 396-3013, or from the internet at <http://www.aqmd.gov/titlev>. The request for a public hearing is due by September 15, 2012. A copy of the hearing request must also be sent by first class mail to the appropriate facility contact person listed above.