

# South Coast Air Quality Management District

## Statement of Basis

### Title V Facility Permit Renewal

<b>Facility Name:</b>	<b>Inland Empire Utilities Agency (IEUA) RP-5</b>
<b>Facility ID:</b>	<b>147371</b>
<b>SIC Code:</b>	4952
<b>Equipment Location:</b>	6063 Kimball Avenue Chino, CA 91710
<b>Application #(s):</b>	<b>519296</b>
<b>Application Submittal Date(s):</b>	2/25/2011
<b>Permit Renewal:</b>	Draft
<b>Permit Revision No.:</b>	3
<b>Permit Section(s) Affected:</b>	All
<b>AQMD Contact Person:</b>	Angela Shibata, A.Q. Engineer
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#### 1. Introduction and Scope of Permit

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

The 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. NO<sub>2</sub>, SO<sub>2</sub>, CO and lead are in attainment with federal standards. 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 the sewage treatment plant and manure/food waste processing plant. This facility is subject to Title V requirements because it was a major source.

## **2. Facility Description**

This facility is a sewage treatment plant with a manure/food waste processing plant, applying for a Title V renewal permit, consisting of three emergency internal combustion engines for electrical generation, a sewage treatment plant and manure/food waste processing plant, two biofilters, a digester gas storage tank, a flare, two digester gas/natural gas boilers, and two digester gas fired engines at this facility.

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

An initial Title V permit was issued on August 28, 2006 and was due to expire on August 27, 2011. Title V revision No. 1 and No. 2 were issued on March 27, 2008 and May 20, 2009, respectively.

## **4. Regulatory Applicability Determinations**

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

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

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D and Appendix B of the proposed Title V permit). Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluations. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 do not apply to any of the permitted emission sources at this facility.

## **6. Permit Features**

### Permit Shield

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

### Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed 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 2010**

Pollutant	Emissions (tons/year)
CO	0.360
NO <sub>x</sub>	0.655
ROG	1.545
SO <sub>x</sub>	0.006
TSP	3.550

### **Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2010**

The Following TACs Were Reported	Emissions (lbs/yr)
Ammonia	341.728
Benzene	56.491
Carbon tetrachloride	56.198
Ethylene dichloride	56.198
Methylene chloride	56.198
Trichloroethylene	56.198
Vinyl chloride	56.198
Methyl chloroform	25.851
Perchloroethylene	3.467
Formaldehyde	2.303
1,3-Butadiene	0.274
PAHs	0.046
Naphthalene	0.027
Lead (inorganic)	0.010
Nickel	0.004
Arsenic	0.002
Cadmium	0.001
Chromium (VI)	0.000

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

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). AQMD is tracking the status of the facility.

### **8. Compliance History**

The facility has been subject to AQMD inspections. Facility inspection report for August 20, 2010 was satisfactory operating in compliance at the time of inspection. The facility had 0 citizen complaints filed, 0 Notice to Comply issued, 0 Notice of Violation issued in the last two years.

### **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.