



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING & COMPLIANCE DIVISION
APPLICATION PROCESSING AND CALCULATIONS

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APPL. NO.
515618

DATE
September 15, 2011

PROCESSED BY
Jon Uhl

CHECKED BY

Minor Title V Permit Revision

COMPANY NAME, LOCATION ADDRESS:

NM Mid Valley Genco LLC, SCAQMD ID # 129660
30 Bohnert Road
Rialto, CA 92377

MAILING ADDRESS:

FORTISTAR Methane Group
NM Mid Valley Genco LLC
5087 Junction Road
Lockport, NY 14094

BACKGROUND:

NM Mid Valley Genco LLC operates two landfill gas-fueled internal combustion engines driving an electrical generator at the MidValley landfill. The facility is not in NOx or SOx RECLAIM. The Title V permit renewal (A/N 466763) was issued effective 12/21/2007.

NM Mid Valley Genco LLC submitted application number 515618 for a minor revision to their Title V facility permit. This application was received 10/15/2010 and deemed complete 10/22/2010. Three applications are included in this permit revision:

Table 1-Applications included in Permit Revision

	A/N	Equipment	Permit Action	Section
1	515472	Landfill gas-fueled IC Engine #1 for Electrical Generation	Change of Conditions : <ul style="list-style-type: none"> Clarify calculation methods, maximum limit and recordkeeping for the hourly heating value of landfill gas burned in this IC engine. Add non-resettable elapsed time meter. Remove air/fuel ratio controller requirement; engine is equipped with a NOx CEMS. Update VOC & NOx concentration limits based on current Rule 1110.2 requirements. Add Methane concentration limit based on the current Rule 1150.1 requirement. Convert RHC, NOx & CO BACT emission limits from gram/bhp-hr to ppmv with no O2 correction. 	D
2	515472	Landfill gas-fueled IC Engine #2 for Electrical Generation	Change of Conditions : <ul style="list-style-type: none"> Clarify calculation methods, maximum limit and recordkeeping for the hourly heating value of landfill gas burned in this IC engine. Add non-resettable elapsed time meter. Remove air/fuel ratio controller requirement; engine is equipped with a NOx CEMS. Update VOC & NOx concentration limits based on current Rule 1110.2 requirements. Add Methane concentration limit based on the current 	D

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		Rule 1150.1 requirement.	
		<ul style="list-style-type: none"> Convert RHC, NOx & CO BACT emission limits from gram/bhp-hr to ppmv with no O2 correction. 	
3	486801	Rule 1110.2 Inspection & Monitoring Plan	1

Administrative changes to Section A included in this permit revision:

Permit Action	
1	Change the Mailing Address from: 2225 E. 28 th St., Suite 508, Signal Hill, CA 90755 to: 5087 Junction Road, Lockport, NY 14094
2	Change the Responsible Official from: Dean Comand, Division Manager, tel (905) 465-4500 to: Anthony Falbo, Senior Vice President - Operations, tel (716) 439-1004
3	Change the Contact Person from: Paul Ervin, West Coast Operations Manager, tel (562) 424-5830 to: Suparna Chakladar, Vice President, tel (951) 833-4153

See letter dated August 2, 2011, requesting the changes to Section A (Attachment 1).

FEE EVALUATION:

The fees paid for this application are:

Table 2 – Application Fees Paid

A/N	Equipment	BCAT	Type	Status	Fee Schedule	Fees Required, \$	Fees Paid, \$
515618	Facility Permit Revision – Title V only	555007	55	21	--	861.52	861.52

RULES EVALUATION:

PART 1 SCAQMD REGULATIONS

REG XXX	Title V	November 5, 2010
	NM Mid Valley Genco LLC was issued a Title V permit renewal effective on December 21, 2007. This is a minor permit revision as defined in Rule 3000(b)(15).	
	Rule 3000 (b)(15)(A)(i)	This revision does not require or change a case-by-case evaluation of: reasonably available control technology (RACT) pursuant to Title I of the federal Clean Air Act; or maximum achievable control technology (MACT) pursuant to 40 CFR Part 63, Subpart B.



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(b)(15)(A)(ii)	This revision does not violate a regulatory requirement.
(b)(15)(A)(iii)	This revision does not require any significant change in monitoring terms or conditions in the permit.
(b)(15)(A)(iv)	This revision does not require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit.
(b)(15)(A)(v)	This revision does not result in an emission increase of RECLAIM pollutants.
(b)(15)(A)(vi)	This revision does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review or a hazardous air pollutant.
(b)(15)(A)(vii)	This revision does not result in an increase in GHG emissions of >75,000 tpy CO ₂ e.
(b)(15)(A)(viii)	This revision does not establish or change a permit condition that the facility has assumed to avoid an applicable requirement.
(b)(15)(A)(ix)	This revision is not an installation of a new permit unit subject to a New Source Performance Standard (NSPS) pursuant to 40 CFR Part 60, or a National Emission Standard for Hazardous Air Pollutants (NESHAP) pursuant to 40 CFR Part 61 or 40 CFR Part 63.
(b)(15)(A)(x)	This revision is not a modification or reconstruction of an existing permit unit, resulting in new or additional NSPS requirements pursuant to 40 CFR Part 60, or new or additional NESHAP requirements pursuant to 40 CFR Part 61 or 40 CFR Part 63.
	A minor permit revision is subject to a 45-day EPA review , Rule 3003(j) and not subject to public participation requirements, Rule 3006(b). The proposed permit revision and engineering evaluations were submitted electronically to EPA.
3003(b)(2)	On 9/28/2010, NM Mid Valley Genco LLC submitted Forms: 500-A2 : Title V Application Certification 500-C1 : Compliance Status Report 500-C2 : Non-Compliant Operations Report
3003(f)	No materials were submitted under a claim of confidentiality.
3003(i)(1)(A)	The applicant has shown that operation under the permit will comply with all regulatory requirements.
3003(j)	The EPA cover letter, proposed revisions to the Title V permit and engineering evaluations for A/N 515472 & 515473 were submitted electronically to EPA Region 9.
3003(k)	e. b.
3003(m)	There are no Affected States.

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3004(a)	<p>Section E lists the administrative terms and conditions. Section K lists the Title V administrative terms and conditions. Sections D and H list the terms and conditions. Section I lists the approved compliance plans and schedules. These terms and conditions assure compliance with all regulatory requirements, including monitoring, recordkeeping and reporting requirements.</p> <p>The permit expiration date, December 20, 2012, is listed in Section A.</p> <p>The origin and authority (Rule or Regulation) is listed for each permit term and condition, including permit conditions which are not federally enforceable.</p> <p>No alternative operating scenarios have been submitted by NM Mid Valley Genco LLC.</p>
3004(b)	This is not a RECLAIM facility.
3004(c)	No permit shield was requested by NM Mid Valley Genco LLC.
3004(f)(1)	The Title V permit will expire 5 years from the date of issuance unless renewed. The permit expiration date, December 20, 2012, is listed in Section A.
3005(c)(2)(A) (ii)	NM Colton Genco LLC submitted a letter dated September 28, 2010, containing the certification by a responsible official, consistent with paragraph (c)(7) of Rule 3003, that the requested revisions meet the criteria for use of minor permit revision procedures and a request that such procedures be used.

Mid Valley

REVIEW OF COMPLIANCE DATABASE:

As of September 13, 2011, the AQMD Compliance Database shows that this facility has one open Notice of Violation (NOV – P54923). This NOV pertains to the annual compliance test on May 11&12, 2010. Applicant submitted additional source test results for 2010 and 2011 showing compliance with the Rule 1110.2 and 1150.1 limits.

Engine #1

Rule	Limit	5/11/2010 test	8/16/2010 test	3/7/2011 test	
1110.2 – VOC	40 ppmv	85.8 ppmv	26.7 ppmv	25.9 ppmv	as CH4 @ 15% O2
1150.1 – VOC	20 ppmv	43.37 ppmv	13.51 ppmv	13.1 ppmv	as hexane @ 3% O2

Engine #2

Rule	Limit	5/12/2010 test	9/10/2010 test	3/8/2011 test	
1110.2 – VOC	40 ppmv	58.6 ppmv	33.9 ppmv	22.2 ppmv	as CH4 @ 15% O2
1150.1 – VOC	20 ppmv	29.62 ppmv	17.2 ppmv	11.2 ppmv	as hexane @ 3% O2

RECOMMENDATION

A/N	Recommendation
515 518	Issue minor revision to Title V Facility Permit, Sections A, I & D.

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ATTACHMENTS

1. Letter requesting Section A changes, dated 8/2/2011
2. Form 500-A2 : Title V Application Certification, dated 9/28/2010
3. Form 500-C1 : Compliance Status Report, dated 9/28/2010
4. Form 500-C2 : Non-Compliant Operations Report, dated 9/28/2010
5. AQMD Compliance Database (10/13/2011)