

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
 ENGINEERING AND COMPLIANCE
 APPLICATION PROCESSING AND CALCULATIONS

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P/O

COMPANY NAME AND ADDRESS

Quemetco, Inc. ID 8547
 720 South Seventh Avenue
 City of Industry, CA 91746 mailing and equipment address

EQUIPMENT DESCRIPTION

APPLICATION NO. 479286 (previous A/N 274208) PO NO PC

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: ELECTRIC POWER GENERATION EQUIPMENT					
System 1: EMERGENCY ELECTRICAL POWER SYSTEM					
INTERNAL COMBUSTION ENGINE, EMERGENCY POWER, DIESEL FUEL, CUMMINS, MODEL LTA10-G1, WITH AFTERCOOLER, TURBOCHARGER, 380 HP WITH A/N: 479286 GENERATOR	D83	C171	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	HAP: (10) [40CFR 63SubpartZZZ, 3-9-2011]; NOX: 469 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; SOX: 6.24 LBS/1000 GAL DIESEL (1) [RULE 2011, 5-6-2005]	C1.1, C1.14, D12.2, H23.2, K67.3
DIESEL PARTICULATE FILTER, RYPOS, MODEL RA-40X-L-C	C171	D83 B138			

APPLICATION NO. 479287 (previous A/N 327355) PO NO PC

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: ELECTRIC POWER GENERATION EQUIPMENT					
System 1: EMERGENCY ELECTRICAL POWER SYSTEM					
INTERNAL COMBUSTION ENGINE, EMERGENCY POWER, DIESEL FUEL, CUMMINS, MODEL KTA 19-G4, WITH AFTERCOOLER, TURBOCHARGER, 755 HP WITH A/N: 479287 GENERATOR	D92	C172	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	HAP: (10) [40CFR 63SubpartZZZ, 3-9-2011]; NOX: 469 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; SOX: 6.24 LBS/1000 GAL DIESEL (1) [RULE 2011, 5-6-2005]	C1.1, C1.14, D12.2, H23.2, K67.3

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: ELECTRIC POWER GENERATION EQUIPMENT					
System I: EMERGENCY ELECTRICAL POWER SYSTEM					
DIESEL PARTICULATE FILTER, RYPOS, MODEL RA-40X-L-C	C172	D92 B138			

APPLICATION NO. 479286

EMERGENCY DIESEL ICE	
479286	Received 3-14-2008, PO no PC, installed diesel particulate filter and vented to WESP without permit.
274208	Received 10-28-1992, P/O D64519 issued 10-30-1992.

APPLICATION NO. 479287

EMERGENCY DIESEL ICE	
479287	Received 3-14-2008, PO no PC, installed diesel particulate filter and vented to WESP without permit.
327355	Received 4-22-1997, P/O F7245 issued 5-16-1997.

DIESEL ICE'S

In addition to minimum requirements, the applicant has voluntarily proposed the installation of a diesel particulate filter with 85% control efficiency. This control device will control particulate emissions to a level greater than BACT requirements.

Based on all available data, this engine is expected to comply with all applicable Rules and Regulations.

The emission increases from this engine are exempt from offset requirements pursuant to Rule 1304 (a)(4) (Emergency Equipment).

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Emissions

479286

EMISSIONS IN POUNDS PER DAY					
	ROG	NOx	SOx	CO	PM10
Baseline emissions:					
A/N 274208	0	1	0	0	0
Final emissions:					
A/N 479286	0	1	0	0	0

Net Change	0	0	0	0	0

A/N 479287

EMISSIONS IN POUNDS PER DAY					
	ROG	NOx	SOx	CO	PM10
Baseline emissions:					
A/N 327355	0	3	0	0	0
Final emissions:					
A/N 479287	0	1	0	0	0

Net Change	0	-2	0	0	0

Corrections to the emissions calculations resulted in an apparent net decrease in the 30-day average emissions for NOx. It should be noted that this facility is in the RECLAIM program and the NOx emissions are not subject to Reg XIII. This is a data entry correction.

RULE1303/RULE1470

The applicant submitted A/N's 479286 and 479287 for the installation of diesel particulate filters (DPF's) on two existing diesel ICE's and the connection of these engines to the WESP manifold.

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The Title V revision for this project is covered by A/N 479290. These projects have been completed. Based on the application submittal, it appears that the applicant was considering operating the existing emergency diesel engines in conjunction with a voluntary demand reduction program (DRP). The applicant also submitted A/N 460792 for a larger diesel ICE in conjunction with the DRP with the intention of operating the larger ICE also in non-emergency DRP mode, to power the WESP system during planned power curtailment episodes. The SCAQMD concluded that the proposal to use the new diesel ICE for this purpose was not allowed because operation of this engine for non-emergency purposes did not meet BACT/LAER requirements. A/N 460792, and the project for the larger engine, were subsequently cancelled.

In place of the diesel ICE originally proposed, Quemetco submitted A/N 468847 for a natural gas engine that could be used in non-emergency mode for DRP purposes, which complies with BACT/LAER requirements, and which is not subject to this rule.

With regards to the two existing emergency diesel ICE's, the applicant evaluated the following section of Rule 1470. Specifically, Rule 1470 (c)(8)(C) states that:

- (iii) Diesel PM Standard and Hours of Operating Requirements for in-use DRP engines enrolled in an ISC after January 1, 2008:
 - (I) meet a diesel PM standard of 0.01 g/bhp-hr or less diesel PM; and
 - (II) meet the requirements specified in clauses (c)(3)(C)(i) through (c)(3)(C)(v) for maintenance and testing hours of operation; and
 - (III) not operate more than 150 hours per year for ISC operation.

However, since the diesel ICE's cannot be used for non-emergency DRP operation, due to BACT requirements, it is concluded that the 0.01 g/bhp-hr PM limit (and the DPF's) are not currently required by this rule in this case (since the emergency diesel engines cannot be used for DRP purposes.) However, the installation of the DPF's and the connection of these engines to the WESP has resulted in a lower potential to emit than the most stringent PM limit of 0.01 g/bhp-hr contained in this rule, even though this limit is not currently applicable to these existing engines.

Therefore, these engines are expected to operate in compliance with these rules.

RULE 1401

Since the project consists of adding additional air pollution control equipment, no net emission increases are expected, rather the DPF filters and connection of the engines to the WESP will result in a reduction of various air pollutants, including toxics and this rule does not apply.

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REGULATION XXX

The permitting of the modification to the IC engines of A/N's 479286 and 479287 is a minor permit revision and requires an EPA 45 day review period. The Title V application for this minor revision is A/N 479290.

RECOMMENDATION

Propose the engines to EPA as a minor permit revision for inclusion in Section D after EPA concludes its 45-day review.