

South Coast Air Quality Management District

Statement of Basis

Proposed Renewal of Title V Permit

Facility Name: AES Alamitos, LLC
Facility ID: 115394
NAICS Code: 221112
Equipment Location: 690 N Studebaker Rd., Long Beach, CA 90803

Application #(s): 549420
Application Submittal Date(s): 4/9/13

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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.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

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. CO, NO₂, SO₂, PM₁₀, and lead are in attainment with federal standards. The status for ozone is currently extreme nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of AES Alamitos, LLC. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility, applying for a Title V permit renewal that is in the business of electricity generation and sales. The facility operates six (6) electrical utility boilers, six (6) selective catalytic reduction systems, and four (4) aqueous ammonia storage tanks.

3. Construction and Permitting History

This is an existing facility that was previously owned and operated by Southern California Edison. The facility received an initial Title V permit in 1999 under the current owner and operator.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V 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 NESHAPS requirements of 40 CFR 63 and the permit terms and conditions found in the Sections D and J of the permit. There are no NSPS requirements of 40 CFR 60 applicable to the facility.

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, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in SIP: Combustion Sources (July 2010). The uncontrolled NO_x, VOC, and CO emissions from the boilers are greater than the major source thresholds of 10 tons per year, for NO_x and VOC, and 50 tons per year for CO. In addition, the boilers are subject to an emission limitation and use a control device to achieve compliance for NO_x. Therefore, the equipment is subject to the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. The boilers are required to install, operate, and maintain a CEMS for NO_x, in accordance with SCAQMD Rule 2012. Thus the use of a continuous monitor to show compliance with an emission limit is exempt from CAM under 64.2(vi) for NO_x. There are no control devices for VOC or CO; therefore, CAM requirements are not triggered. The facility is not a major source for SO_x or PM₁₀; therefore, CAM requirements are not applicable.

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 2013

Pollutant	Emissions (tons/year)
NOx	47.642
CO	356.865
VOC	8.668
TSP	10.801
SOx	4.803

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2013**

The Following TACs Were Reported	Emissions (lbs/yr)
1,3-Butadiene	0.009
Ammonia	26870.252
Asbestos	0.005
Benzene	27.225
Formaldehyde	57.671
Naphthalene	4.804
PAHs, total, with components not reported	1.601

Health Risk from Toxic Air Contaminants

The facility is being tracked by the Air Toxics Information and Assessment Act (AB2588). The AQMD is tracking the status of the facility under AB2588.

8. Compliance History

The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had one citizen complaints filed, four Notices to Comply issued, and 1 Notice of Violation issued in the last two calendar years. The facility is currently operating in compliance.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.