

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES 2	PAGE 1
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**TITLE V PERMIT EVALUATION
(Minor Permit Revision)**

APPLICANT'S NAME: ORANGE COUNTY SANITATION DISTRICT (OCSD)

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Background:

This application 545002 was submitted for Title V permit revision on 11/27/2012. This revision consists of the following two items proposed by the Orange County Sanitation District (OCSD);

1. Proposed changes to the equipment description for clarity and change of conditions to the existing odor control PC issued under A/N 518276, including revised H2S emission limit for the biofilters (3). New application for the odor control is A/N 545003.
2. Two new applications (545004 and 545005) for changing the existing boiler permits (R-D94232 and R-D94235) by retrofitting with new burners to comply with Rule 1146 NOx limits.

This revision application will be done in two parts, boiler applications are addressed first due to OCSD's need to go for the construction bids and proceed with the final design. Odor control A/N 545003 will be handled in a separate revision but under same revision A/N 545002.

Please refer to the boilers evaluations included in folder. The changes result in no emission increase due to the slightly lower burner rating, and lower NOx guarantee. Additionally, the applicant has provided information regarding the costs of the project which demonstrate that the changes are not Reconstruction, as defined in Part 63. As such, and according to Rule 3000 (b)(15), a MINOR PERMIT REVISION means any Title V permit revision that:

- (A) (i) 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;
- (ii) does not violate a regulatory requirement;
- (iii) does not require any significant change in monitoring terms or conditions in the permit;
- (iv) does not require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit;
- (v) does not result in an emission increase of RECLAIM pollutants over the facility starting Allocation plus nontradeable Allocations, or higher Allocation amount which has previously undergone a significant permit revision process;

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- (vi) does not result in an increase in emissions of a pollutant subject to Regulation XIII - New Source Review or a hazardous air pollutant;
- (vii) does not result in an increase in GHG emissions of >75,000 tpy CO₂e;
- (viii) does not establish or change a permit condition that the facility has assumed to avoid an applicable requirement;
- (ix) 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; and,
- (x) 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; or,
- (B) incorporates an existing general permit, as defined in subdivision (e) of Rule 3004, and its associated requirements, into another Title V permit.

Conclusions & Recommendations:

Issue the revised Title V permit, incorporating two boiler permits (Section D), upon completion of 45-day EPA review and commenting period.