



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

July 1, 2014

Mr. Jay DeMel
Vice President of Operations
DeMenno/Kerdoon
2000 N. Alameda Street
Compton, CA 90222

SUBJECT: Title V Facility Permit Revision
REFERENCE: SCAQMD Facility ID: 800037
Title V/RECLAIM Minor Permit Revision (A/N 560778)

Dear Mr. DeMel:

Attached is a Permit Revision to your Title V Facility Permit. This revision includes the following sections:

- Title Page and Table of Contents – Revision # 41, July 1, 2014
- Section B – Revision #23, July 1, 2014
- Section I – Revision #7, July 1, 2014

Included in this minor permit revision are:

	A/N	Equipment	Dev ID	Permit Action	Section	Processes	System
1	560779	Revised Rule 1173(h)(3) compliance plan - atmospheric PRD monitoring	--	Approved compliance plan	I	-	-

The proposed minor permit revision was submitted to EPA Region IX for review on May 9, 2014. No comment was received.

Additionally, the following administrative changes are being made to your Title V/Reclaim permit.

Section B – RECLAIM Annual Emission Allocation

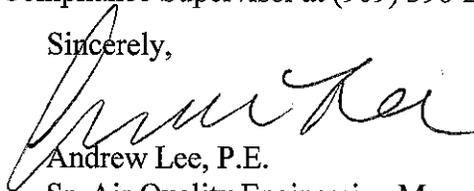
Section B has been updated to reflect all RECLAIM Trading Credits transactions that have been approved by SCAQMD through June 24, 2014. Please be sure to take any changes to your RTC holdings occurring after this date into consideration when reconciling your facility's quarterly and year-to-date emissions.

In addition, the SCAQMD has updated Section B of the Facility Permit to list your facility's allocation balances for the next fifteen years pursuant to Rule 2002(b)(4). Also, your facility's Starting Allocation and Non-Tradable RTCs in Compliance Year 1994 are listed within this section. This establishes the level used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) – Trading Zone Restrictions.

If you determine that certain changes or clarifications need to be made to the enclosed permit, you may appeal the terms and conditions by petitioning the Hearing Board within thirty days of receipt. If you determine there are administrative errors in these permit sections, please notify SCAQMD staff within thirty days of receipt of your permit sections. Your facility is still bound by the requirements of your entire Facility Permit while your appeal is under consideration by SCAQMD staff and/or Hearing Board.

Any comments or questions regarding your RECLAIM Facility Permit may be directed to Mr. Charles Tupac, Air Quality Analysis and Compliance Supervisor at (909) 396-2684.

Sincerely,



Andrew Lee, P.E.

Sr. Air Quality Engineering Manager
Energy/Public Services/Waste Mgmt/Terminals
Engineering & Compliance

AL:CT:KM:ju

Enclosure: Revised Title V Facility Permit, Sections B, and I
cc w/enclosure: Geraldo Rios, EPA Region IX
(via email to R9AirPermits_SC@epa.gov)
Compliance
Title V Central File



FACILITY PERMIT TO OPERATE

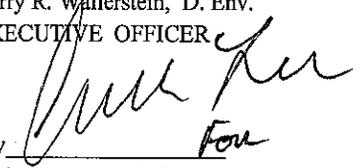
**DEMENNO/KERDOON
2000 N ALAMEDA ST
COMPTON, CA 90222**

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By 
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance



**FACILITY PERMIT TO OPERATE
DEMENNO/KERDOON**

TABLE OF CONTENTS

Section	Description	Revision #	Date Issued
A	Facility Information	6	07/01/2011
B	RECLAIM Annual Emission Allocation	23	07/01/2014
C	Facility Plot Plan	TO BE DEVELOPED	
D	Facility Description and Equipment Specific Conditions	17	03/21/2014
E	Administrative Conditions	8	07/01/2011
F	RECLAIM Monitoring and Source Testing Requirements	6	07/01/2011
G	Recordkeeping and Reporting Requirements for RECLAIM Sources	7	07/01/2011
H	Permit To Construct and Temporary Permit to Operate	18	03/21/2014
I	Compliance Plans & Schedules	7	07/01/2014
J	Air Toxics	1	07/01/2011
K	Title V Administration	2	07/01/2012
Appendix			
A	NOx and SOx Emitting Equipment Exempt From Written Permit Pursuant to Rule 219	4	07/01/2011
B	Rule Emission Limits	1	07/01/2011



**FACILITY PERMIT TO OPERATE
DEMENNO/KERDOON**

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NOx RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NOx emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NOx RTC Initially Allocated	NOx RTC ¹ Holding as of 07/01/2014 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
7/2011 6/2012	Coastal	11908	1363	1286
1/2012 12/2012	Coastal	0	0	0
7/2012 6/2013	Coastal	11908	1158	0
1/2013 12/2013	Coastal	0	16600	0
7/2013 6/2014	Coastal	11908	12729	0
7/2014 6/2015	Coastal	11908	9229	0
7/2015 6/2016	Coastal	11908	9229	0
7/2016 6/2017	Coastal	11908	9229	0
7/2017 6/2018	Coastal	11908	9229	0
7/2018 6/2019	Coastal	11908	9229	0
7/2019 6/2020	Coastal	11908	9229	0
7/2020 6/2021	Coastal	11908	9229	0
7/2021 6/2022	Coastal	11908	9229	0
7/2022 6/2023	Coastal	11908	9229	0
7/2023 6/2024	Coastal	11908	9229	0
7/2024 6/2025	Coastal	11908	9229	0
7/2025 6/2026	Coastal	11908	9229	0

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.



**FACILITY PERMIT TO OPERATE
DEMENNO/KERDOON**

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NOx RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NOx emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NOx RTC Initially Allocated	NOx RTC ¹ Holding as of 07/01/2014 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
7/2026 6/2027	Coastal	11908	9229	0
7/2027 6/2028	Coastal	11908	9229	0
7/2028 6/2029	Coastal	11908	9229	0

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.



**FACILITY PERMIT TO OPERATE
DEMENNO/KERDOON**

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. If the facility submits a permit application to increase in an annual allocation to a level greater than the facility's starting Allocation plus Non-Tradable credits as listed below, the application will be evaluated for compliance with Rule 2005 (c)(4). Rule 2005 (e) - Trading Zone Restrictions applies if an annual allocation is increased to a level greater than the facility's Starting Allocation plus Non-Tradable Credits:

Year		Zone	NOx RTC	Non-Tradable
Begin	End		Starting Allocation	Credits(NTC)
(month/year)			(pounds)	(pounds)
7/1994	6/1995	Coastal	12813	5702



FACILITY PERMIT TO OPERATE DEMENNO/KERDOON

SECTION I: PLANS AND SCHEDULES

This section lists all plans approved by AQMD for the purposes of meeting the requirements of applicable AQMD rules specified below. The operator shall comply with all conditions specified in the approval of these plans, with the following exceptions:

- a. The operator does not have to comply with NO_x or SO_x emission limits from rules identified in Table 1 or Table 2 of Rule 2001(j) which become effective after December 31, 1993.
- b. The operator does not have to comply with NO_x or SO_x emission limits from rules identified in Table 1 or Table 2 of Rule 2001(j) after the facility has received final certification of all monitoring and reporting requirements specified in Section F and Section G.

Documents pertaining to the plan applications listed below are available for public review at AQMD Headquarters. Any changes to plan applications will require permit modification in accordance with Title V permit revision procedures.

List of approved plans:

Application	Rule
494706	480
560779	1173

NOTE: This section does not list compliance schedules pursuant to the requirements of Regulation XXX - Title V Permits; Rule 3004(a)(10)(C). For equipment subject to a variance, order for abatement, or alternative operating condition granted pursuant to Rule 518.2, equipment specific conditions are added to the equipment in Section D or H of the permit.



**FACILITY PERMIT TO OPERATE
DEMENNO/KERDOON**

**RULE 1173 Compliance Plan Approval
Application Number 560779**

ADMINISTRATIVE REQUIREMENTS:

This facility shall be subject to the terms and conditions of this plan unless this plan is suspended, revoked, modified, reissued or denied. Failure to maintain a valid plan is a violation of Rule 1173.

It is the responsibility of the facility to comply with other District Rules and Regulations and with all laws, ordinances and regulation of other government agencies which are applicable to the operation of the equipment.

This plan does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code or the Rules and Regulations of the AQMD. This plan cannot be considered as permission to violate existing laws, ordinances, regulations, or statutes of other governmental agencies.

RULE 1173 EQUIPMENT:

TABLE 1 - PRESSURE RELIEF DEVICE INVENTORY

SCAQMD Device No.	D/K Equipment No.	Location	Inlet Size (in.)	Outlet Size (in.)	Set Pressure (psig)
D125	C201	Atmospheric Dehydration Tower	4	6	60
D126	C202	Atmospheric Dehydration Tower	4	6	60
D127	C203	Vacuum Dehydration Tower	4	6	60
D188	C207	Vacuum Unit #1	3	4	40
D236	C205	Vacuum Unit #2	3	4	40
D178	C206	Vacuum Dehydration Vessel	3	4	60
D128	D-204	Phase Separator, Accumulator	4	6	15
C281	Dowtherm Return Line	New Afterburner	6	8	175
C281	Expansion Drum	New Afterburner	1.5	3	175



**FACILITY PERMIT TO OPERATE
DEMENNO/KERDOON**

CONDITIONS:

1. The operator shall install and operate its atmospheric PRD monitoring systems in accordance with all data and specifications submitted with this application under which this plan is approved unless otherwise specified below.
2. The operator shall install electronic monitoring devices on all nine atmospheric PRDs identified in Table 1 that are subject to Rule 1173(h)(3).
3. The operator shall use a continuous pressure monitoring system (CPMS) to continuously monitor and record the process pressure that is used as an indicator of release for the PRD identified in the plan.
4. CPMS shall be defined to include the pressure sensors or transmitters, receivers, and the data acquisition or recording systems. Continuous recording shall be defined as the recorded pressure readings at a minimum of one minute intervals. The data recording systems shall be accurately synchronized with the time and date of the measurement.
5. The operator shall ensure that the CPMS for each of the subject atmospheric PRDs is properly maintained and kept in good operating condition at all times when the process equipment that it serves is in operation, except when it is taken out of service due to the following reasons:
 - a. Failure, breakdown, or unplanned maintenance of the data acquisition or recording system, which shall not exceed 48 hours cumulatively in any given calendar quarter. The operator shall also report the time period that the data recording system is out of service in the quarterly report.
 - b. Planned maintenance of the CPMS shall not exceed 7 days in a calendar year unless the operator has notified the District by telephone at 1-800-CUT-SMOG detailing the specific reason for the maintenance within 24 hours of taking the CPMS from service.
6. The operator shall use following equation(s) or other alternative District-approved methodology to determine the volatile organic compound (VOC) emissions from a PRD release. The operator shall submit a plan application in order for the District to evaluate an alternative VOC emission estimation methodology.

PRD Equation for Vapor or Gas Service

$$W_s = \frac{(ACK_d K_b K_c)(P+14.7)}{3600 \sqrt{\frac{(T+460)Z}{M}}}$$

$$W_{voc} = W_s * VOC * t$$



**FACILITY PERMIT TO OPERATE
DEMENNO/KERDOON**

$$W_{TVOC} = \sum W_{voc}$$

Where:

A = Relief Valve Orifice Size

$$C = \text{Sizing Coefficient} = 520 \sqrt{k \left(\frac{2}{k+1} \right)^{\frac{k+1}{k-1}}}$$

k = Cp/Cv = Specific Heat Ratio for the released gas

Kd = Effective Coefficient of Discharge (use Kd = 0.975 in absence of manufacturer's PRD specific data)

Kb = Capacity Correction Factor

Kc = Combination Correction Factor. (Kc = 1 if no rupture disk; Kc = 0.9 if rupture disk)

M = Molecular Weight of the released gas

P = Pressure (psig), as measured with Continuous Process Monitoring System

T = Temperature (°F)

t = Recorded Duration of Release in Seconds by Electronic Monitoring Device

VOC = weight percent VOC in the released gas

Ws = Flow through the PRD, lb/sec

Wvoc = Flow of VOCs through the PRD

W_{TVOC} = Total VOC Released during the Event, lbs

Z = Compressibility Factor

PRD Equation for Liquid Service

$$Q = 0.63AK_dK_wK_v\sqrt{\frac{P}{G}}$$

$$M = Q * 8.34 * G * t$$

Q = flow rate, (U.S. gallon per second)

Kd = Rated Coefficient of Discharge (use Kd = 0.65 in absence of manufacturer's PRD specific data)

Kw = Capacity Correction Factor (Kw = 1 for atmospheric back pressure)

Kv = Correction Factor due to Viscosity (assume = 1)

P = Pressure (psig), as measured with Continuous Process Monitoring System

G = Specific Gravity of the liquid at flowing temperature

M = Release per Event in lbs

t = Recorded Duration of Release in Seconds by Electronic Monitoring Device



**FACILITY PERMIT TO OPERATE
DEMENNO/KERDOON**

For each PRD release event, it shall be assumed that the PRD is fully open for the duration of the release recorded by the monitoring device. Any alternative in determining the release duration or quantity shall be evaluated and approved in writing by the District.

7. The operator shall calibrate and maintain each pressure sensor in accordance with manufacturer's specifications.
8. All components of the CPMS shall be made available to District personnel for inspection upon request.
9. The operator shall keep adequate records to show compliance with all plan conditions. Such records shall be made available to District personnel upon request. The operator shall maintain records for at least five years.
10. The provisions of this plan shall not apply to any PRDs that are determined to be no longer subject to Rule 1173(h)(3), including PRDs that have been removed, tied into a closed system, or are located on equipment that is out of service and hydrocarbon free. If the operator makes any changes allowed under this condition, the operator shall submit an updated inventory to the District within 12 months identifying changes to the inventory.

1173 Pressure Relief Valves Compliance Plan

**DeMenno/Kerdoon
2000 N. Alameda Street
Compton, CA 90222**

February 13, 2014

FACILITY INFORMATION:

Name: DeMenno/Kerdoon
SCAQMD Facility ID: 800037
Facility Address: 2000 N. Alameda Street
Compton, CA 90222
Mailing Address: 2000 N. Alameda Street
Compton, CA 90222
Phone No.: (310) 537-7100
Contact Person: Alok Das, Environmental Engineering Manager
Jay Demel, Vice President of Operations

FACILITY DESCRIPTION:

DeMenno/Kerdoon's (DK) is a used storage, treatment, recycling, and transfer facility for waste oil, waste ethylene glycol, oily water, and other hazardous waste.

PRESSURE RELIEF VALVES INVENTORY:

The current relief valve inventory at DK is listed below:

SCAQMD Device No.	D/K Equipment No.	Location	Outlet Size (in)	Outlet Size (in)	Set Pressure (psig)
D125	C201	Atmospheric Dehydration Tower	4	6	60
D126	C202	Atmospheric Dehydration Tower	4	6	60
D127	C203	Vacuum Dehydration Vessel	4	6	60
D188	C207	Vacuum Unit # 1	3	4	40
D236	C205	Vacuum Unit # 2	3	4	40
D178	C206	Vacuum Dehydration Vessel	3	4	60
D128	D204	D-204	4	6	15
C281	Dowtherm Return Line	New Afterburner	6	8	175
C281	Expansion drum	New Afterburner	1.5	3	175

COMPLIANCE PLAN

DK has installed a continuous pressure monitoring device for each atmospheric relief valve that is listed above. DK will replace the existing D-204(D128) PRV with the new PRV and the continuous pressure monitoring device as soon as the plan is approved.