South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 · www.aqmd.gov

NOTICE OF INTENT TO ISSUE TITLE V AND PREVENTION OF SIGNIFICANT DETERIORATION PERMITS PURSUANT TO SCAQMD RULES 212, 1710, 1714 AND 3006

This notice is to inform you that the South Coast Air Quality Management District (SCAQMD) has received applications for permits to construct for a biogas-to-energy project that consists of three (3) digester gas/natural gas fired turbines with corresponding catalytic emission controls, a fuel gas treatment system, two (2) thermal oxidizers (one backup), one (1) diesel fuel engine driving a blackstart emergency electrical generator, and two (2) aqueous ammonia storage tanks. The SCAQMD is the air pollution control agency for all of Orange County and portions of Los Angeles, Riverside and San Bernardino Counties. Anyone wishing to operate, install or modify equipment that could be a source of air pollution within this region must first obtain a permit from the SCAQMD. As required by Title V of the federal Clean Air Act, the SCAQMD is proposing to issue permits in the form of a Title V facility permit. Under certain circumstances, before a permit is granted, a public notice, such as this, is prepared by the SCAQMD. For this project, public notification is required in accordance with SCAQMD Rules 212(c)(2), Rule 212(g) and Rule 1710(b) because the emissions from the project exceed the public notice thresholds for these rules. Public notification is also required by SCAQMD Rule 3006(a) and Rule 1714(e) because there will be a significant revision to the facility's existing air quality Title V permit and the biogas-to-energy project is subject to Prevention of Significant Deterioration (PSD) analysis due to its greenhouse gas emissions.

The SCAQMD has evaluated the permit applications for the following facility and determined that the equipment will meet all applicable federal, state and SCAQMD air quality requirements of our Rules and Regulations.

FACILITY:	**LA CITY, SANITATION BUREAU, HYPERION TREATMENT PLANT**
LOCATION:	**12000 VISTA DEL MAR PLAYA DEL REY, CA 90293**
CONTACT:	**OMAR MOGHADDAM BUREAU OF SANITATION DIVISION MANAGER 1149 SOUTH BROADWAY STREET LOS ANGELES, CA 90015**
APPLICATION NOS.:	**519527, 519528, 519532, 519520, 519521, 519526, 519513, 553659, 553660, 553657, 553658 AND 565288**
PROJECT DESCRIPTION:	**BIOGAS-TO-ENERGY SYSTEM AND FUEL GAS TREATMENT SYSTEM**

Digester gas generated by the thermophilic anaerobic digestion of sewage waste at the Hyperion Treatment Plant (HTP) is presently collected and sent to the neighboring LADWP Scattergood Generating Station (SGS) to be used as supplemental fuel for a gas-fired boiler at SGS. In return, SGS sends back to HTP electric power and produced steam that is used by HTP for process steam. When SGS is not accepting digester gas due to operational conditions at SGS, some of the digester gas produced by HTP is used in HTP's own boilers for steam production and any unused digester gas is burned in HTP's Flare System. After December 31, 2016, SGS will no longer accept digester gas from HTP nor will it provide electricity and critical process steam to HTP. Therefore, HTP has proposed to build a renewable fuel biogas-to-energy facility whereby a blend of digester gas and natural gas will be combusted in a combined cycle utilizing three turbines with heat recovery in order to produce up to 43 MW of electricity to meet all the facility power requirements and to provide the steam for the thermophilic anaerobic digestion process at HTP. The project is called the Digester Gas Utilization Project (DGUP). Each turbine will be installed with a Selective Catalytic Reduction emission control system and an additional sacrificial oxidation catalyst. To prolong the operational expectancy of the turbines, HTP will be treating the raw digester gas through an existing Lo-Cat desulfurization system and a new regenerative gas treatment system. Regenerated off-gas produced during the gas treatment process will be combusted in a thermal oxidizer. An emergency blackstart electric generator will be on

standby in case of a power outage and the turbines need to be started. The existing boilers and flare system at HTP will remain on-site as back-up systems to ensure proper destruction of the digester gas in the event the proposed equipment is inoperable.

This facility will use the best available control technology for controlling air pollution. The maximum emission increase from this project will be limited to the following amounts: Nitrogen Oxide – 980 lbs/day, Volatile Organic Compounds – 448 lbs/day, Carbon Monoxide – 1903 lbs/day, Particulate Matter (PM10/PM2.5) – 302 lbs/day, Sulfur Oxides – 93 lbs/day, Ammonia – 201 lbs/day. This project will generate emissions of greenhouse gases (GHGs). The total quantity of GHGs (282,265 TPY CO_2e) is calculated using the global warming potential for each compound and expressed in an amount equivalent to Carbon Dioxide (CO_2) emissions (CO_2 equivalent). This operation will also emit small quantities of toxic compounds. These toxic compounds have been identified as acute (short term), chronic (long term) or carcinogenic air contaminants. The SCAQMD evaluated the acute and chronic indices, which measure non-cancer health impacts, and were determined to be less than one. According to the health experts, a hazard index of one or less means that the surrounding community including the most sensitive individuals such as very young children and the elderly will not experience any adverse health impacts due to the toxic (non-carcinogenic) nature of these emissions. The SCAQMD has also conducted a risk assessment to determine the maximum individual cancer risk (MICR) associated with the maximum exposure due to this project. This worst case analysis assumes that an individual is exposed to the emissions for an entire 70-year life time. The risk at this location is calculated to be approximately 0.87-in-a-million. This means that if a person stood at this location for 70 years, the chance of contracting cancer would increase by 0.000087 percent. The SCAQMD has found that operation of this equipment will be in compliance with SCAQMD's standards. The operation of this equipment is not expected to have an adverse effect on the surrounding community.

The air quality analysis of this equipment is available for public review at the SCAQMD's headquarters in Diamond Bar, and at the El Segundo Public Library, 111 W. Mariposa Avenue, El Segundo, CA 90245. A copy of the draft permit can be viewed at *http://www3.aqmd.gov/webappl/publicnotices2/Search.aspx* by entering the company's name. Information regarding the owner's compliance history submitted to the SCAQMD pursuant to California Health & Safety Code Section 42336, or otherwise known to the SCAQMD, based on credible information, is also available from the SCAQMD for public review. Anyone wishing to comment on the proposed issuance of this permit should submit their comments in writing by December 15, 2014. If you are concerned primarily about zoning decisions and the process by which this facility has been sited at this location, you should contact your local city or county planning department. Please submit comments related to air quality to Mr. Ray Ronquillo, Air Quality Engineer, Engineering and Compliance, South Coast Air Quality Management District, 21865 Copley Drive, Diamond Bar, California 91765. For additional information, please call Mr. Ray Ronquillo at (909) 396-3049. For your general information, anyone experiencing air quality problems such as dust or odor can telephone in a complaint to the SCAQMD by calling 1-800-CUT-SMOG [1 (800) 288-7664].

Prevention of Significant Deterioration (PSD) For Criteria Pollutants

The South Coast Air Basin is in attainment with the national ambient air quality standards for Nitrogen Dioxide (NO_2), Sulfur Dioxide (SO_2), Carbon Monoxide (CO) and Particulate Matter with aerodynamic diameter less than 10 microns (PM10); therefore the NO_2, SO_2, CO and PM10 emissions from the project are subject to the SCAQMD's Prevention of Significant Deterioration (PSD) regulation (Regulation XVII).

The Hyperion Treatment Plant is classified as a major stationary source, and the peak 1-hour and 8-hour CO impacts plus the worst-case background for the proposed project are 3,461 $\mu g/m^3$ and 2,881 $\mu g/m^3$, respectively. These impacts are less than the state 1-hour and federal 8-hour CO standards of 23,000 $\mu g/m^3$ and 10,000 $\mu g/m^3$, respectively. Therefore, an incremental modeling analysis is not required to demonstrate that the proposed project does not cause, or make significantly worse an existing, violation of the national ambient air quality standard (NAAQS).

Prevention of Significant Deterioration (PSD) For Greenhouse Gases

Based on the proposed DGUP maximum potential greenhouse gas emissions, the proposed project is subject to preconstruction review for GHGs. SCAQMD staff has evaluated the GHG emissions from the DGUP for compliance determination with applicable federal, state and local air quality requirements. The DGUP is found to comply with Rule 1714 BACT requirements for GHG emissions through the use of a combined cycle power plant with heat recovery fueled by clean, renewable biogas fuel.

Proposed Revised Title V Permit

The public may request the SCAQMD to conduct a public hearing on the proposed Title V permit by submitting a Hearing Request Form (Form 500-G) to Mr. Ray Ronquillo of the SCAQMD. The SCAQMD will hold a public hearing if there is evidence that the proposed Title V permit is incorrect or inadequate to ensure compliance with regulatory requirements, and that a public hearing will likely provide additional information that will affect the drafting and/or issuance of the permit. Public hearing request forms and the schedule of public hearings may be obtained from the SCAQMD by calling the Title V hotline at (909) 396-3013 or downloading from the Internet at *http://www.aqmd.gov/docs/default-source/grants/500-g-form.pdf?sfvrsn=2*. The public must submit hearing requests by December 1, 2014 to the SCAQMD, and must send a copy of the hearing request by first class mail to Mr. Omar Moghaddam, Bureau of Sanitation Division Manager, City of Los Angeles Bureau of Sanitation, 1149 South Broadway Street, Los Angeles, CA 90015.