

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

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| Facility Name: | Pasadena City College |
| Facility ID: | 18960 |
| SIC Code: | 8222 |
| Equipment Location: | 1570 E. Colorado Blvd. Pasadena, CA 91106 |
| Application #(s): | 533073 |
| Application Submittal Date(s): | 02/09/2012 |
| Permit Revision #: | varies depending on the section |
| Revision Date: | TBD |
| Permit Section(s) Affected: | All sections (A-K, plus Appendices A and B) |
| AQMD Contact Person: | Li Chen, Air Quality Engineer |
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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. NO₂, CO, SO₂, and lead are in attainment with federal standards. The status for PM-10 is attainment at the federal level but remains non-attainment at the state level. The status for ozone is currently extreme nonattainment.

A Title V permit is proposed to be issued to cover the operations of LA County Internal Service Department located at 1570 E. Colorado Blvd., Pasadena, CA 91106. This facility is subject to Title V requirements because it is a major source of one or more criteria pollutants.

2. Facility Description

This is an existing facility that is a junior college located in the downtown Pasadena. This facility operates two natural gas fired boilers, five diesel standby generators, one natural gas generator, one spray booth and one pressure washer. The two boilers are less than 5 MMBtu/hr and are subject to the NO_x emission limit of 12 ppmv. The five emergency generators are subject to SCAQMD Rules 1470 and 1472.

3. Construction and Permitting History

The facility's initial Title V permit was issued on October 8, 2001. The original Title V permit included five natural gas boilers, five diesel standby generators, one natural gas generator, one spray booth and one pressure washer. The Title V permit was renewed on August 23, 2007. Since the permit revision in 2007 the facility removed three large natural gas boilers. The permits of these boilers, D68245, D64777, D71176, will be removed from the Title V permit. The facility added one diesel standby generator (A/N 527015). SCAQMD has not issued the permit for this generator yet.

4. Regulatory Applicability Determinations

Applicable legal requirements for which the facility is required to comply are required to be identified in the Title V permit (for example, Sections 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. The facility is not a major HAP source. This facility is not subject to any NSPS or NESHAP requirements.

5. Monitoring and Operational Requirements

Applicable monitoring and operating requirements for which the facility is required to comply are identified in the Title V permit (for example, Sections D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable 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 the SIP; Combustion Sources (July 2001). After the facility removed the three large boilers it does not have any major emission sources. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 do not apply.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility explicit protection from requirements that may be incorrectly specified in the permit. A permit shield is a provision in a permit that states that compliance with the conditions contained in 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

The followings are reported by the facility for the year of 2013.

Criteria Pollutants (Tons per Year):

| Pollutant ID | Pollutant Description | Annual Emissions |
|--------------|------------------------------|------------------|
| CO | Carbon Monoxide | 10.547 |
| NOX | Nitrogen Oxides | 3.883 |
| ROG | Reactive Organic Gases | 0.399 |
| SOX | Sulfur Oxides | 0.014 |
| TSP | Total Suspended Particulates | 4.867 |

Toxic Pollutants (Pounds per Year):

| Pollutant ID | Pollutant Description | Annual Emissions |
|--------------|-----------------------|------------------|
| 106990 | 1,3-Butadiene | 3.347 |
| 7664417 | Ammonia | 856.548 |
| 1332214 | Asbestos | 0.027 |
| 191242 | B[GHI] PERYLENE | 0.000 |

| | | |
|--------|---|---------|
| 71432 | Benzene | 8.216 |
| 205992 | Benzo[b]fluoranthene | 0.000 |
| 192972 | Benzo[e]pyrene [PAH, POM] | 0.000 |
| 56235 | Carbon tetrachloride | 0.103 |
| 218019 | Chrysene | 0.000 |
| 106934 | Ethylene dibromide | 0.124 |
| 107062 | Ethylene dichloride | 0.066 |
| 206440 | FLUORANTHENE | 0.000 |
| 86737 | FLUORENE | 0.002 |
| 50000 | Formaldehyde | 114.652 |
| 75092 | Methylene chloride | 0.209 |
| 91203 | Naphthalene | 0.520 |
| 1151 | PAHs, total, with components not reported | 0.004 |
| 85018 | PHENANTHRENE | 0.005 |
| 129000 | PYRENE | 0.000 |
| 75014 | Vinyl chloride | 0.042 |

8. Compliance History

There are currently no outstanding compliance issues with the facility. The facility was issued 1 Notice of Violation (NOV) and 1 Notice to Comply (N/C) in the last two calendar years. The NOV notice P61605 was issued in April 2014 for not submitting annual emission report for the year of 2013. The facility has submitted the annual report. The case has been closed.

9. Compliance Certification

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