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M QUIZON	

**PERMIT TO CONSTRUCT**

ACCESS BUSINESS GROUP LLC, NUTRILITE  
19600 SIXTH STREET  
LAKEVIEW, CA 92567

**EQUIPMENT DESCRIPTION**

**APPLICATION NO. 514694**

TITLE V FACILITY PERMIT REVISION APPLICATION.

**APPLICATION NO. 514695**

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. CATALYTIC OXIDIZER, FALMOUTH PRODUCTS, MODEL FALCO 600, 3'-4" W. X 6'-6" L. X 7'-3" H., 36 KW ELECTRICALLY HEATED, WITH 5 CUBIC FEET OF CATALYST.
2. EXHAUST SYSTEM WITH A 15-HP BLOWER VENTING TWO ETHANOL TANKS.

**APPLICATION NO. 514696**

STORAGE TANK, ETHANOL, NO. AT-1, FIXED ROOF, 7'-7.5" DIA. X 15'-1" H., 5,000 GALLON CAPACITY WITH A VAPOR RETURN SYSTEM AND A 0.03 PSIG COMBINATION PRESSURE/VACUUM RELIEF VALVE.

**APPLICATION NO. 514697**

STORAGE TANK, ETHANOL, NO. AT-2, FIXED ROOF, 7'-7.5" DIA. X 15'-1" H., 5,000 GALLON CAPACITY WITH A VAPOR RETURN SYSTEM AND A 0.03 PSIG COMBINATION PRESSURE/VACUUM RELIEF VALVE.

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## **HISTORY**

Application No. 514694 was filed on 9/10/10 for a TITLE V facility permit revision.

Application No. 514695 was filed on 9/10/10 for permit to construct and operate a new catalytic oxidizer to vent two existing ethanol tanks. This new catalytic oxidizer will replace an existing carbon adsorber operating under permit to operate F66689 (A/N 417811). The company decided to replace the carbon adsorber with a new catalytic oxidizer because the company had too much trouble complying with the existing permit condition no. 5 requiring the control efficiency of the carbon adsorber to be no less than 95%. The company had to replace the absorbent more often than expected to comply with condition no. 5 and it made the catalytic oxidizer more cost effective in the long run.

Application No. 511249 was filed on 5/27/10 for change of condition on an existing ethanol storage tank operating under permit to operate F66687 (A/N 364875). The company requests to remove permit conditions no. 6 and 7 which requires the ethanol delivery trucks to have a valid AQMD permit for the truck vapor recovery system and keep records of such permits. The district does not issue permits to the trucks vapor recovery system. Application No. 514696 was filed on 9/10/10 for modification of an existing ethanol storage tank operating under permit to operate F66687 (A/N 364875). The modification is to vent the existing ethanol storage tank to the new catalytic oxidizer. Before A/N 511249 could be processed, A/N 514696 was filed. Application No. 511249 will be cancelled and all the changes will be incorporated under A/N 514696.

Application No. 511251 was filed on 5/27/10 for change of condition on an existing ethanol storage tank operating under permit to operate F66688 (A/N 364879). The company requests to remove permit conditions no. 6 and 7 which requires the ethanol delivery trucks to have a valid AQMD permit for the truck vapor recovery system and keep records of such permits. The district does not issue permits to the trucks vapor recovery system. Application No. 514697 was filed on 9/10/10 for modification of an existing ethanol storage tank operating under permit to operate F66688 (A/N 364879). The modification is to vent the existing ethanol storage tank to the new catalytic oxidizer. Before A/N 511251 could be processed, A/N 514696 was filed. Application No. 511251 will be cancelled and all the changes will be incorporated under A/N 514696.

## **PROCESS DESCRIPTION**

The ethanol storage tanks are used to store fresh and reclaim ethanol used in the extraction process. The fresh ethanol is loaded into the storage tanks by delivery trucks

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and the delivery trucks are equipped with a vapor recovery system to control VOC emissions. The reclaimed alcohol from various equipment in the facility is loaded in the storage tanks and the storage tanks are vented to the new catalytic oxidizer to controlled VOC emissions. The VOC emissions from breathing loss from the storage tanks are also controlled by the new catalytic oxidizer.

For the catalytic oxidation process, see the supplemental information submitted by the manufacturer's design engineer, Jim Cleary (e-mails dated 10/27/10 and 9/27/10).

### CALCULATION

The installation of the new catalytic oxidizer will not result in any emission change for the storage tanks because the control efficiency (95%) of the carbon absorber and the catalytic oxidizer is the same. Also the company is not requesting any increase in the amount of fresh and reclaim alcohol loaded in the storage tanks. Previous NSR entry will be used.

### RULE EVALUATION

**RULE 212 (c)(1):** This section requires a public notice for all new or modified permit units that emit air contaminants located within 1,000 feet from the outer boundary of a school.

No public notice is required since the nearest school from this facility is approximately 8,976 feet.

**(c)(2):** This section requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g).

The proposed project will not result in any emission increase for the entire facility. A Rule 212(c) (2) notice will not be triggered since there is no emission increase from this facility.

**(c)(3):** This section requires a public notice for all new or modified permit unit with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in MICR greater than 1E-6 per permit unit or greater than 10E-6 per facility.

The proposed project will not result in any emission increase of toxic emissions associated with the operation. Therefore Public Notice is not required under this section of the rule.

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

*ENGINEERING DIVISION*

**APPLICATION PROCESSING AND CALCULATIONS**

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**(g):** Project emissions < threshold.

**RULE 219** No exempt equipment in this project.

**RULE 401** No visible emission is expected with proper operation of the equipment.

**RULE 402** No nuisance is expected with proper operation of the equipment.

**RULE 404** Equipment is expected to operate in compliance.

**RULE 405** Equipment is expected to operate in compliance.

**REG XIII/XX** The revised version of Reg. XIII ( eff. 4/20/01 ) is applicable.

**OFFSET:** The installation of the new catalytic oxidizer and the modifications of the ethanol storage tanks will not result in any emission increase, therefore offset is not required.

**BACT:** During fresh ethanol loading of the storage tanks, the VOC emissions will be controlled by vapor recovery system on the truck which is BACT for VOC for this type of process. During loading of reclaimed ethanol and breathing loss of the ethanol storage tanks , the VOC emissions will be controlled by the new catalytic oxidizer with minimum 95% control efficiency (manufacturer guarantees 98% destruction efficiency) which is BACT for VOC for this type of process. The catalytic oxidizer is electrically heated.

**MODELING:** Modeling is not required for ROG.

**RULE 3000** The installation of the new catalytic oxidizer will not result in any emission increase, therefore, the modification to the Title V permit is a minor permit revision.

**RECOMMENDATION**

Issue a permit to construct with conditions.