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| SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT STATIONARY SOURCE COMPLIANCE DIVISION PERMIT APPLICATION PROCESSING AND CALCULATIONS | PAGES 8 | PAGE 1 |
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| | PROCESSED BY AS08 | CHECKED BY |

Permit to Construct (New Construction)

Applicant Eastern Municipal Water District (EMWD) –Perris Valley
Regional Water Reclamation Facility (PVRWRF)

Mailing Address 2270 Trumble Road
P.O. Box 8300
Perris, CA 92572

Equipment Location 1301 Case Road
Perris, CA 92570

Equipment Description
APPLICATION 505538, FACILITY ID 007417

BOILER, HURST, MODEL S5-X-125-125W, DIGESTER GAS AND NATURAL GAS FIRED, 5,400,000 BTU/HR MAXIMUM HEAT INPUT RATE, WITH ULTRA LOW NOX BURNER, POWER FLAME, MODEL LNINVC5-GG-30.

Background/Process Description

The above application was submitted on January 20, 2010 as a New Construction (Permit to Construct) application type for a natural gas or digester gas fired 5.4 mmBtu/hr boiler (firetube). The boiler will be used to provide hot water to heat up the sewage sludge in the digesters of the facility. The operating schedule for this equipment is 24 hours/day, 7 days/week, 52 weeks/ year. The facility is a municipal water district which accepts and treats municipal sewage and produces recycled water for a 120 square mile area in Perris, Sun City, Romoland, and part of Moreno Valley. Eastern Municipal Water District-Perris Valley Regional Water Reclamation Facility (EMWD-PVRWRF) currently consists of two separate wastewater treatment facilities, a 3 MGD and 8 MGD facility. The 3 MGD facility was originally built in 1982 as a 1 MGD until the capacity was optimized to 3 MGD in 1991. The 8 MGD treatment facility has been in operation since 1994. EMWD is in the process of installing a new plant (Plant 3) and modifying the other two plants. Plant expansion is planned for 24.2 MGD. There is no school within 1000 feet of emission source. NOV #P49737 was issued March 31, 2009 for operating a stationary internal combustion engine in a manner that exceeds the emission concentration limits for NOx.

Emission Calculations

Maximum heat input rate: 5.4 mmBtu/hr
Natural gas HHV: 1,050 Btu/scf
Digester gas HHV: 630 Btu/scf
Assume O2 concentration at outlet = 5.28%

Fuel consumption (NG) = 5,400,000 Btu/hr x scf/1,050 Btu
= 5143 scfh = 86 scfm
= 86 scfm natural gas x 13.5 scfm combustion products/scfm gas
= 1,161 scfm

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$$\begin{aligned}
 \text{Fuel consumption (DG)} &= 5,400,000 \text{ Btu/hr} \times \text{scf}/630 \text{ Btu} \\
 &= 8,571 \text{ scfh} = 143 \text{ scfm} \\
 &= 143 \text{ scfm natural gas} \times 13.5 \text{ scfm combustion products/scfm gas} \\
 &= 1,931 \text{ scfm (maximum exhaust flow rate)}
 \end{aligned}$$

Emissions in **bold** will be used for maximum potential emissions for this equipment and NSR.

CO emissions

$$\begin{aligned}
 \text{AER Emission Factors (NG): } &84.00 \text{ lb/mm scfNG} \\
 84.00 \text{ lb/mm scfNG} \times \text{mm scfNG}/1\text{E}6\text{scfNG} \times 5143 \text{ scfhNG} & \\
 &= 0.43 \text{ lbs/hr} \qquad = 10.46 \text{ lbs/day (NSR)}
 \end{aligned}$$

$$\begin{aligned}
 \text{Rule 1146 requirement: } &400 \text{ ppmvd @ 3\% O}_2 \\
 400 \text{ ppmvd @ 3\% O}_2 \times (20.9-5.28)/(20.9-3) \times 1,931 \text{ scfm} \times 60 \text{ min/hr} \times \text{lb-mole}/379 \times 10^6 \text{ ft}^3 \times 28 \text{ lbs/lb-mole} & \\
 &= 2.99 \text{ lbs/hr} \qquad = 72.76 \text{ lbs/day (NSR)}
 \end{aligned}$$

$$\begin{aligned}
 \text{Rule 1303 BACT requirement (DG): } &100 \text{ ppmvd @ 3\% O}_2 \\
 100 \text{ ppmvd @ 3\% O}_2 \times (20.9-5.28)/(20.9-3) \times 1,931 \text{ scfm} \times 60 \text{ min/hr} \times \text{lb-mole}/379 \times 10^6 \text{ ft}^3 \times 28 \text{ lbs/lb-mole} & \\
 &= \mathbf{0.75 \text{ lbs/hr}} \qquad = \mathbf{18.25 \text{ lbs/day (NSR)}}
 \end{aligned}$$

$$\begin{aligned}
 \text{Rule 1303 BACT requirement (NG): } &50 \text{ ppmvd @ 3\% O}_2 \\
 50 \text{ ppmvd @ 3\% O}_2 \times (20.9-5.28)/(20.9-3) \times 1,161 \text{ scfm} \times 60 \text{ min/hr} \times \text{lb-mole}/379 \times 10^6 \text{ ft}^3 \times 28 \text{ lbs/lb-mole} & \\
 &= 0.22 \text{ lbs/hr} \qquad = 5.35 \text{ lbs/day (NSR)}
 \end{aligned}$$

Rule 1303 Modeling requirement (>5 < 10mmBTU), CO: 25.9 lbs/hr > 2.99 lbs/hr, 7.47 lbs/hr and 0.22 lbs/hr

NOx emissions (as NO2)

$$\begin{aligned}
 \text{AER Emission Factors (NG): } &100.00 \text{ lb/mm scfNG} \\
 100.00 \text{ lb/mm scfNG} \times \text{mm scfNG}/1\text{E}6\text{scfNG} \times 5143 \text{ scfhNG} & \\
 &= 0.51 \text{ lbs/hr} \qquad = 12.41 \text{ lbs/day (NSR)}
 \end{aligned}$$

$$\begin{aligned}
 \text{Rule 1146 requirement: } &30 \text{ ppmvd @ 3\% O}_2 \\
 30 \text{ ppmvd @ 3\% O}_2 \times (20.9-5.28)/(20.9-3) \times 1,931 \text{ scfm} \times 60 \text{ min/hr} \times \text{lb-mole}/379 \times 10^6 \text{ ft}^3 \times 46 \text{ lbs/lb-mole} & \\
 &= \mathbf{0.37 \text{ lbs/hr}} \qquad = \mathbf{9.00 \text{ lbs/day (NSR)}}
 \end{aligned}$$

$$\begin{aligned}
 \text{Rule 1303 BACT requirement (DG): } &30 \text{ ppmvd @ 3\% O}_2 \\
 30 \text{ ppmvd @ 3\% O}_2 \times (20.9-5.28)/(20.9-3) \times 1,931 \text{ scfm} \times 60 \text{ min/hr} \times \text{lb-mole}/379 \times 10^6 \text{ ft}^3 \times 46 \text{ lbs/lb-mole} & \\
 &= 0.37 \text{ lbs/hr} \qquad = 9.00 \text{ lbs/day (NSR)}
 \end{aligned}$$

$$\begin{aligned}
 \text{Rule 1303 BACT requirement (NG): } &12 \text{ ppmvd @ 3\% O}_2 \\
 12 \text{ ppmvd @ 3\% O}_2 \times (20.9-5.28)/(20.9-3) \times 1,161 \text{ scfm} \times 60 \text{ min/hr} \times \text{lb-mole}/379 \times 10^6 \text{ ft}^3 \times 46 \text{ lbs/lb-mole} & \\
 &= 0.09 \text{ lbs/hr} \qquad = 2.19 \text{ lbs/day (NSR)}
 \end{aligned}$$

Rule 1303 Modeling requirement (>5 < 10mmBTU), NOx: 0.47 lbs/hr > 0.37 lbs/hr, 0.37 lbs/hr and 0.09 lbs/hr

PM10 emissions

AER Emission Factors (DG): 7.60 lb/mm scfDG (assume emission factor for NG is the same for DG)

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$$7.60 \text{ lb/mm}^3\text{scfNG} \times \text{mm}^3\text{scfNG}/1\text{E}6\text{scfNG} \times 8,571 \text{ scfhDG} \times 0.97\text{PM}10/\text{PM}^* \\ = \mathbf{0.06 \text{ lbs/hr}} \quad = \mathbf{1.46 \text{ lbs/day (NSR)}}$$

AER Emission Factors (NG): 7.60 lb/mm³scfNG

$$7.60 \text{ lb/mm}^3\text{scfNG} \times \text{mm}^3\text{scfNG}/1\text{E}6\text{scfNG} \times 5143 \text{ scfhNG} \times 0.97\text{PM}10/\text{PM}^* \\ = 0.04 \text{ lbs/hr} \quad = 0.97 \text{ lbs/day (NSR)}$$

Rule 1303 BACT requirement (DG): 0.1 grain/scf @ 12% CO₂ (Rule 409)

$$0.1 \text{ grain/scf} @ 12\% \text{ CO}_2 \times 1,931 \text{ scfm} \times 60 \text{ min/hr} \times 1\text{lb}/7000\text{grains} \times 0.97\text{PM}10/\text{PM}^* \\ = 1.61 \text{ lbs/hr} \quad = 38.64 \text{ lbs/day (NSR)}$$

*Based on Weight Fraction for PM Category by Size Distribution for Utility Boilers-Residual

Rule 1303 BACT requirement (NG): Using natural gas

Rule 1303 Modeling requirement (>5 < 10mmBTU), PM₁₀: 2.80 lbs/hr > 0.04 lbs/hr and 0.06 lbs/hr

Rule 404 requirement (DG): Exhaust flow rate: 1,931 dscfm, 0.147 grains/dscf

$$0.147 \text{ grains/dscf} \times 1,931 \text{ scfm} \times 60\text{min}/\text{hr} \times 1\text{lb}/7000\text{grains} = 2.43 \text{ lbs/hr} > 0.06 \text{ lbs/hr}$$

Rule 404 requirement (NG): Exhaust flow rate: 1,161 dscfm, 0.177 grains/dscf

$$0.177 \text{ grains/dscf} \times 1,161 \text{ scfm} \times 60\text{min}/\text{hr} \times 1\text{lb}/7000\text{grains} = 1.76 \text{ lbs/hr} > 0.04 \text{ lbs/hr}$$

ROG emissions

AER Emission Factors (DG): 5.50 lb/mm³scfDG (assume emission factor for NG is the same for DG)

$$5.50 \text{ lb/mm}^3\text{scfNG} \times \text{mm}^3\text{scfNG}/1\text{E}6\text{scfNG} \times 8,571 \text{ scfhDG} \\ = \mathbf{0.05 \text{ lbs/hr}} \quad = \mathbf{1.22 \text{ lbs/day (NSR)}}$$

AER Emission Factors (NG): 5.50 lb/mm³scfNG

$$5.50 \text{ lb/mm}^3\text{scfNG} \times \text{mm}^3\text{scfNG}/1\text{E}6\text{scfNG} \times 5143 \text{ scfhNG} \\ = 0.03 \text{ lbs/hr} \quad = 0.73 \text{ lbs/day (NSR)}$$

SO_x emissions

Applicant SO_x emission estimate:

$$200 \text{ ppmvH}_2\text{S}(\text{inDG}) \times 8571 \text{ scfhDG} \times \text{lb-moleH}_2\text{S}/379 \times 10^6 \text{ ft}^3 \times \text{lbmoleSO}_2/\text{lbmoleH}_2\text{S} \times 64.07 \\ \text{lbsSO}_2/\text{lbmole SO}_2 = \mathbf{0.29 \text{ lbs/hr}} \quad \mathbf{7.06 \text{ lbs/day (NSR)}}$$

AER Emission Factors (DG): 5.50 lb/mm³scfDG (assume emission factor for NG is the same for DG)

$$0.60 \text{ lb/mm}^3\text{scfNG} \times \text{mm}^3\text{scfNG}/1\text{E}6\text{scfNG} \times 8,571 \text{ scfhDG} \\ = 0.01 \text{ lbs/hr} \quad = 0.24 \text{ lbs/day (NSR)}$$

AER Emission Factors (NG): 0.60 lb/mm³scfNG

$$0.60 \text{ lb/mm}^3\text{scfNG} \times \text{mm}^3\text{scfNG}/1\text{E}6\text{scfNG} \times 5143 \text{ scfhNG} \\ = 0.003 \text{ lbs/hr} \quad = 0 \text{ lbs/day (NSR)}$$

Rule 1303 BACT requirement (NG): Using natural gas

BACT requirement: Rule 431.1 compliance: 1) Natural gas ≤ 16 ppmv, 2) Facility wide emission < 5 lbs/day

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- 1) $16 \text{ ppmv} \times 1,161 \text{ scfm} \times 60 \text{ min/hr} \times \text{lb-moleH}_2\text{S}/379 \times 10^6 \text{ ft}^3 \times \text{lbmoleSO}_2/\text{lbmoleH}_2\text{S} \times 64.07 \text{ lbsSO}_2/\text{lbmole SO}_2$
= 0.19 lbs/hr SO_x (as SO₂)
- 2) $5 \text{ lbs/day H}_2\text{S} \times \text{lb-mole}/34.08 \text{ lbsH}_2\text{S} \times 64.07 \text{ lbsSO}_x/\text{lb-mole}$
= 9.40 lbs/day SO_x (as SO₂)
= 0.39 lbs/hr SO_x (as SO₂)
- Annual Emissions (AER 2009) SO_x emission: 0.017 tons/yr
0.017 tons/yr x 2000lbs/ton x 1yr/365days
= 0.093 lbs/day SO_x
= 0.004 lbs/hr SO_x

Toxic Risk Analysis

| | |
|--|--|
| Nearest Residential Receptor Distance: | 3034 ft. (925 m) |
| Nearest Commercial Receptor Distance: | 929 ft. (283 m) |
| Stack height: | 30.83 ft. (9.40 m) |
| Stack inner diameter: | 14.0 in. (0.36 m) |
| Rain cap: | Yes |
| Exhaust flow rate: | 1,840 acfm (per Form 400-PS) |
| Exhaust temperature: | 375 F |
| Building height: | 26 ft. (7.93 m) |
| Building dimensions | 56.0 ft. (17.0 m) x 112.0 ft. (34.1 m), 6272sq.ft. (579.7 sq.m) |

| Compound | MW (lbs/lbmole) | Outlet emission (DG fired) (lb/hr) | Outlet emission (NG fired) (lb/hr) |
|--------------|--------------------|---------------------------------------|---------------------------------------|
| Acetaldehyde | 44.06 | 3.69E-05 | 2.21E-5 |
| Acrolein | 56.06 | 2.31E-05 | 1.39E-5 |
| Ammonia | 17.03 | 2.74E-02 | 9.26E-2 |
| Benzene | 78.11 | 6.86E-05 | 4.11E-5 |
| Ethylbenzene | 106.16 | 8.14E-05 | 4.89E-5 |
| Formaldehyde | 30.03 | 1.46E-04 | 8.74E-5 |
| Hexane | 86.18 | 5.40E-05 | 3.24E-5 |
| Naphthalene | 128.17 | 2.57E-06 | 1.54E-6 |
| PAHs | 92.13 | 8.57E-07 | 5.14E-7 |
| Toluene | 106.2 | 3.14E-04 | 1.88E-4 |
| Xylenes | 44.06 | 2.33E-04 | 1.40E-4 |

The emission rates for the toxic air contaminants (TACs) for digester gas and natural gas firing are based on 2008 Reporting Procedures for AB2588 Facilities Reporting their Quadrennial Air Toxic Emission Inventory in the Annual Emission Reporting Program Table B-7 Default Emission Factors for Digester Gas Combustion (boiler) (lb/mmsecf) and Table B-1 Default Emission Factors for Natural Gas Combustion (boiler) (lb/mmsecf) respectively.

Tier III analysis was used since the exhaust stack does have a rain cap. Tier III risk analysis was based on the emission rates listed in the above table. Building downwash calculations were based on a building 26.0ft(7.93m) tall, 56.0 ft. (17.0 m) x 112.0 ft. (34.1 m). The MICR values are determined to be 2.16×10^{-8} for residential and 9.66×10^{-9} for commercial receptors for digester firing and 1.28×10^{-8} for residential and 5.79×10^{-9} for commercial receptors for natural gas firing. HIA and HIC were less than 1. Cancer Burden was less than 0.5.

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Emissions Summary

Emission Total (based on NSR lbs/day values)

A/N 499897 (DG Treatment System and Fuel Cell Power Plant)

CO = 0.04 lbs/hr = 0.97 lbs/day
NOx = 0.01 lbs/hr = 0.24 lbs/day
PM10 = 0 lbs/hr = 0 lbs/day
ROG = 0.08 lbs/hr = 1.95 lbs/day
SOx = 0 lbs/hr = 0 lbs/day

A/N 503372 (ICE (>500HP) Em Stat NG & LPG)

CO = 2.60 lbs/hr = 0.36 lbs/day
NOx = 0.65 lbs/hr = 0.09 lbs/day
PM10 = 0.17 lbs/hr = 0.02 lbs/day
ROG = 0.65 lbs/hr = 0.09 lbs/day
SOx = 0.01 lbs/hr = 0 lbs/day

A/N 505538 (Boiler (5-20 mmBtu.hr) Other Fuel)

CO = 0.75 lbs/hr = 18.25 lbs/day
NOx = 0.37 lbs/hr = 9.00 lbs/day
PM10 = 0.06 lbs/hr = 1.46 lbs/day
ROG = 0.05 lbs/hr = 1.22 lbs/day
SOx = 0.29 lbs/hr = 7.06 lbs/day

Total of all applications (499897, 503372, and 505538)

CO = 3.39 lbs/hr = 19.58 lbs/day
NOx = 1.03 lbs/hr = 9.33 lbs/day
PM10 = 0.23 lbs/hr = 1.48 lbs/day
ROG = 0.78 lbs/hr = 3.26 lbs/day
SOx = 0.30 lbs/hr = 7.06 lbs/day

Previous Emission Total (based on NSR lbs/day values)

A/N 409351 (ICE (>500HP) N-Em Stat NG)

CO = 2.60 lbs/hr = 63 lbs/day
NOx = 0.65 lbs/hr = 16 lbs/day
PM10 = 0.16 lbs/hr = 4 lbs/day
ROG = 0.65 lbs/hr = 16 lbs/day
SOx = 0.01 lbs/hr = 0 lbs/day

Emission Increase (based on NSR lbs/day values)

CO = 0.79 lbs/hr = -43.42 lbs/day
NOx = 0.38 lbs/hr = -6.67 lbs/day
PM10 = 0.07 lbs/hr = -2.52 lbs/day
ROG = 0.13 lbs/hr = -12.74 lbs/day
SOx = 0.01 lbs/hr = 7.06 lbs/day

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Rules Evaluation

- Rule 212: Rule 212 (c)(1)- There is no school within 1000 feet of the facility.
Rule 212 (c)(2)- On-site emission increases does not exceed the following:
Volatile Organic Compounds 30 lbs/day
Nitrogen Oxides 40 lbs/day
PM10 30 lbs/day
Sulfur Dioxide 60 lbs/day
Carbon Monoxide 220 lbs/day
Lead 3 lbs/day
Rule 212(c)(3)(A)(i)- MICR is below 1 in a million.
Public Notice is not required.
- Rule 401: Visible Emissions
No violations are expected, limits are listed under Rule 401(b)(1).
- Rule 402: Nuisance
Nuisance is not expected with proper operation, monitoring and maintenance. Based on previous operation of the facility for the last two years, compliance is expected. No complaints have been received in the last four years against the facility.
- Rule 404: Particulate Matter
No violations are expected. PM limits are listed under Rule 404 Table 404(a).
- Rule 407: Liquid and Gaseous Air Contaminants
Rule 407 (c)- Provisions of this subsection (a)(2) shall not apply to equipment which is subject to the emission limits and requirements of source specific rules in Reg XI.
- Rule 409: Combustion Contaminants
Combustion contaminants are not expected to exceed 0.1 grain per cubic foot of gas calculated to 12% CO2 at standard conditions averaged over a minimum of 15 consecutive minutes. Compliance is expected.
- Rule 431.1: Sulfur Content of Gaseous Fuels
Rule 431.1(c)(1)- Natural gas contains ≤ 16 ppmv sulfur compounds as H2S.
Rule 431.1(g)(8)- Any facility which emits less than 5 pounds per day total sulfur compounds, calculated as H2S from the burning of gaseous fuels other than natural gas (not applicable to (c)(1)). Compliance is expected.
- Rule 53A: Riverside County – Specific Contaminants (Contained in Addendum to Reg IV)
Rule 53(a)- Sulfur compound emission limit, as SO₂ 50,000 ppmv. Compliance can be expected based on other similar category permits issued in SCAQMD.
Rule 53(b)- Fluorine compounds to be controlled to the maximum degree technically feasible. No fluorine potential emission from this equipment. Compliance is expected.
- Reg IX: Part 63, Chapter I, Title 40 of Code of Federal Regulations, Subpart DDDDD- National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters
This subpart has been vacated by court action.

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- Rule 1146: Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers...
 Rule 1146(a)- Rule applicable to boiler ≥ 5 mmBtu/hr in all industrial, institutional, and commercial operations. Equipment is applicable to this rule.
 Rule 1146(c)(1)(A)- All gaseous fuel fired units, NOx emission limit: 30 ppmvd 3%O2.
 Rule 1146(c)(4)- Heat input capacity > 5 mmBtu/hr, shall exceed CO 400 ppmvd 3%O2.
- Rule 1146(d)(4)- NOx and CO emission requirements shall be determined using District approved contractor under the LAP.
 Rule 1146(d)(6)- Compliance determination with NOx emission requirements shall be conducted once every 5 years ($5.4 \leq 10$ mmBtu/hr).
 Rule 1146(d)(8)(A)- Shall check NOx emissions with a portable NOx, CO and O2 analyzer according to the Protocol for the Periodic Monitoring of Nitrogen Oxides, Carbon Monoxide, and Oxygen from Units Subject to SCAQMD Rules 1146 and 1146.1 at least monthly or every 750 unit operating hours, whichever occurs later. If a unit is in compliance for three consecutive emission checks, without any adjustments to the oxygen sensor set point, then the unit may be checked quarterly or every 2,000 unit operating hours, whichever occurs later, until there is an emission check indicating noncompliance.
 Rule 1146(d)(8)(C)- Records shall be maintained for 5 years and shall be made available to SCAQMD personnel upon request.
 Rule 1146(d)(8)(D)- Portable analyzer tests shall only be conducted by a person who has completed District approved training program in the operation of portable analyzers and has received a certification issued by the District.
 Compliance with all applicable requirements of this Rule is expected.
- Rule 1147: NOx Reductions From Miscellaneous Sources
 Rule 1147(a)- Applicability: not applicable to boilers subject to SCAQMD Rule 1146.
- Reg XIII: Rule 1303(a)- LAER/BACT is required (major source). The boiler is equipped with an ultra low NOx burner.
 BACT Natural gas: CO: 50 ppmvd 3%O2, NOx: 12 ppmvd 3%O2
 BACT Digester gas: CO: 1000 ppmvd @ 3%O2, NOx: 30 ppmvd @ 3%O2, PM10: 0.1 gram/scf @ 12%CO2.
 Rule 1303(b)(1)- Modeling for VOC and SOx is not required (1303 Appendix A). NOx, CO and PM10 are less than the allowable emissions in Table A-1, no further analysis is required (1303 Appendix A).
 Rule 1303(b)(2)- Offsets are not required; the facility is a POTW and is an essential public service.
- Rule 1401: Toxic Air Contaminants
 Rule 1401(d)(1)(A)- MICR less than 1.0×10^{-6} . The maximum Risk is estimated to be 2.16×10^{-8} for residential and 9.66×10^{-9} for commercial receptors.
 Rule 1401(d)(1)(C)- Cancer burden is less than 0.5.
 Rule 1401(d)(2) and Rule 1401(d)(3)- HIC and HIA values are estimated to be less than 1 respectively.
 Compliance is expected.
- Rule 1401.1: Rule 1401.1(b)- Equipment is exempt since it is located at an existing facility.

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Reg. XXX: The installation of the digester gas treatment system and fuel cell power plant, change of conditions for the stationary ICE, and installation of the digester gas and natural gas boiler is considered a Title V De Minimis Significant permit revision under Rule 3000(b)(6), since the cumulative emission increases of non-RECLAIM pollutants or HAPs do not exceed the emissions in Table 5-4 of the Draft Title V TDG March 2005 and does not result in new or additional NSPS or NESHAP requirements and will be subject to an EPA review (Rule 3003(j)). A public notice is not required. Compliance is expected.

Conclusions & Recommendations

The equipment is in compliance with the Rules and Regulations of the AQMD. A Permit to Construct is recommended for application 505538. For Permit Conditions please see Sample Permit. A revised Title V permit is recommended after EPA review.