

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES 1	PAGE 1
	APPL. NO 559019 rev	DATE 3/27/2014
	PROCESSED BY GCR	CHECKED BY CDT

**TITLE V PERMIT EVALUATION
(Minor Revision)**

Applicant's Name: OC WASTE & RECYCLING, FRB

Mailing Address: 300 N. Flower Street, Suite 400
Santa Ana, CA 92703-5000

Equipment Location: 11002 Bee Canyon Access Road (Frank R. Bowerman Landfill)
Irvine, CA 92602

Facility ID NO.: 69646

Contact(s): Mohammad Salam, Civil Engineer
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Background:

This application, 559019, was submitted for Title V permit revision on 12/12/2013. Most recent revision includes TV Revision issued on June 19, 2013.

The proposed revision includes the following equipment.

<u>Application No.</u>	<u>Description</u>
559018	Replacement of a condensate storage tank, 11,000-gallon (G24853, A/N 547634) with a functionally identical condensate storage tank, 10,500- gallon capacity.
559472	Replace existing Phase I vapor recovery system (D66334, A/N 219026) with a new Phase I Enhanced Vapor Recovery (EVR) system, with no net increase in emissions. This upgrade for EVR system is required by Rule 461, by July 1, 2014.

This revision is considered a minor revision that includes replacement of an existing condensate storage tank (11,000 gallon), with a functionally identical, new storage tank (10,500- gallon). The proposed change does not result in net emission increase, no change in permit condition and no engineering evaluation is required. Public notice is not required for this minor revision to Title V permit, however, is subject to 45-day EPA review.

Note: Facility has also filed a separate TV revision A/N 559473 for modification (D66334, A/N 219026) to replace Phase I vapor recovery system and upgrade with Phase I EVR system, for fuel storage and dispensing facility under A/N 559472 (described above) . However, A/N 559473 is cancelled and, A/N 559472 is addressed under this minor revision.

Permits evaluations for A/Ns 559018 & 559472 are included in folder.

Rules Evaluation:

No net increase in emissions is expected for the proposed changes. Compliance with applicable rules and Reg. XXX -Title V permit is expected.

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Conclusions & Recommendations:

Issue the revised Title V permit (Section D, Revision 05) upon approval.

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**TITLE V PERMIT EVALUATION
(PC-PO with an Administrative Change)**

Applicant's Name: OC WASTE & RECYCLING, SANTIAGO

Mailing Address: 300 N. Flower Street, Suite 400
Santa Ana, CA 92703-5000

Equipment Location: 11002 Bee Canyon Access Road (Frank R. Bowerman Landfill)
Irvine, CA 92602

Facility ID NO.: 69646

Contact(s): Mohammad Salam, Civil Engineer
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John Tzeng, Senior Civil Engineer
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Equipment Description:

LANDFILL CONDENSATE/LEACHATE/GROUNDWATER COLLECTION AND STORAGE SYSTEM,
CONSISTING OF:

CONDENSATE:

1. CONDENSATE TRAP, 48" DIAMETER BY 84" HIGH, POLYETHYLENE PIPE, VENTED TO 21-INCH DIA. HEADER LINE.
2. PUMP, 25 GPM, PUMPING CONDENSATE FROM CONDENSATE TRAP TO CONDENSATE TANK.
3. CONDENSATE TRAP (CPS-1), 18" HDPE PIPE, VENTED TO 18-INCH DIA. HEADER, GRAVITY DRAIN.
4. PUMP, 2 GPM, PUMPING CONDENSATE FROM CONDENSATE TANKS TO LEACHATE TANKS.
5. TANK (C-1), CONDENSATE, ABOVEGROUND, POLYETHYLENE, 11'-10" DIA. BY 14'-1" HIGH, 10,500 GALLON CAPACITY, WITH PRESSURE RELIEF VALVE, WITH VAPOR BALANCE LINE TO TANK C-2.
6. TANK (C-2), CONDENSATE, ABOVEGROUND, POLYETHYLENE, 11'-0" DIA. BY 13'-8" HIGH, 10,500 GALLON CAPACITY, WITH PRESSURE RELIEF VALVE, FLAME ARRESTOR, VENTED TO CARBON DRUM.
7. CARBON ADSORBER, NIXTOX OR EQUIVALENT, CONTAINING 150 POUNDS OF ACTIVATED CHARCOAL, VENTING TANK C-2.
8. ASSOCIATED PIPING TRANSPORTING CONDENSATE/LEACHATE/GROUNDWATER

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9. INSTALLATION OF AN ELECTRIC TRANSFER PUMP, DOUBLE WALLED CONDENSATE TRANSFER PIPING FROM THE BOTTOM TANK FARM TO A NEW TANK (C-3).
10. TANK (C-3), CONDENSATE, ABOVEGROUND, LOCATED AT THE FLARE STATION, POLY PROCESSING SAFE-TANK, 5'- 11" DIA. X 2'-10" HIGH, 540 GALLON CAPACITY, AND VENTED TO 55- GALLON CARBON DRUM CONTAINING 200 LBS OF GRANULAR ACTIVATED CARBON.
11. CONDENSATE FEED PIPE FROM TANK (C-3) TO EXISTING PNEUMATIC INJECTOR PUMPS AND ASSOCIATED PIPING TO EXISTING INJECTION LANCE AND NOZZLES (FLARES NO. 3, 4 & 5).

LEACHATE/GROUNDWATER:

1. SIX (6) STORAGE TANKS, CENTRAL CALIFORNIA CONTAINER MFG. INC., MODEL 12 HCT 13K, HDPE, 13000 GALLON CAPACITY.
2. SIX (6) FLAME ARRESTORS, GROTH OR EQUIVALENT, MODEL 7618-02-15-F00, LOCATED AT VENT VALVES.
3. SIX (6) TANK VENT VALVES, GROTH OR EQUIVALENT, MODEL 1220-02-115-TOO.
4. SIX (6) CARBON ADSORBERS, CALGON CARBON OR EQUIVALENT, EACH CONTAINING 200 POUNDS OF ACTIVATED CARBON.

Conditions:

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
3. THIS EQUIPMENT SHALL BE OPERATED BY PERSONNEL PROPERLY TRAINED IN ITS OPERATION.
[RULE 204]
4. THIS PERMIT SHALL EXPIRE IF CONSTRUCTION OF THE EQUIPMENT, DESCRIBED UNDER EQUIPMENT DESCRIPTION ITEM NO. 5, IS NOT COMPLETED WITHIN ONE YEAR FROM THE ISSUANCE DATE OF THIS PERMIT UNLESS AN EXTENSION IS GRANTED BY THE EXECUTIVE OFFICER.
[RULE 205]
5. ALL CONDENSATE AND/OR LEACHATE/GROUNDWATER COLLECTED SHALL BE DISPOSED OF OR TREATED PROPERLY.
[RULE 402]

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6. THE CONDENSATE STORAGE TANK(S) AND THE LEACHATE/GROUNDWATER STORAGE TANK(S) SHALL BE VENTED THROUGH A CARBON AIR FILTER/CANISTER OR CARBON DRUM (TANK C3).
[RULE 402, 1303(a) (1)-BACT]
7. THE OUTLET(S) OF THE CARBON FILTER(S)/CANISTER(S) SHALL BE TESTED FOR TOTAL ORGANIC COMPOUNDS AS METHANE WITH AN ORGANIC VAPOR ANALYZER (OVA) OR EQUIVALENT AND THE RESULTS RECORDED. THESE TESTS SHALL BE PERFORMED MONTHLY DURING THE FILLING OPERATION OF THE TANK(S).
[RULE 402]
8. EMISSIONS FROM THE OUTLET OF EACH CARBON CANISTER SHALL NOT, AT ANY TIME, EXCEED 50 PPM TOTAL ORGANIC COMPOUNDS MEASURED AS METHANE.
[RULE 402, 1303(b) (2)-OFFSET]
9. ALL CONNECTIONS, VALVES AND OPENINGS SHALL BE PROPERLY SEALED OR CLOSED SO AS TO PREVENT RAW LANDFILL GAS AND/OR CONDENSATE/LEACHATE VAPORS FROM ENTERING INTO THE ATMOSPHERE.
[RULE 402, 1303(a) (1)-BACT]
10. RECORDS REQUIRED BY THIS PERMIT SHALL BE KEPT AND MAINTAINED FOR AT LEAST FIVE YEARS AND MADE AVAILABLE TO AQMD PERSONNEL UPON REQUEST.
[RULE 204]

Background:

This application, 559018, was submitted for administrative change to the existing permit to operate Landfill condensate/leachate/groundwater collection and storage system (PO G24853, A/N 547634). The proposed change requires replacement of an existing 11,000-gallon capacity tank (Equipment Description Item No. 5) with a new, functionally identical, 10,500-gallon capacity storage tank. No engineering evaluation is required for no change in emission.

Most recent Title V revision was issued June 19, 2013.

Emission:

The replacement tank, functionally identical equipment, is of reduced capacity of 10, 500 gallons than the existing tank being replaced which is 11,000 gallon capacity.

No net increase in emission is expected.

For AEIS/NSR, same emission is kept for ROG R1 = 0.02 lbs/hr and R2 = 0.01 lbs/hr.

Rules Evaluation:

With no increase in emission for the tank replacement, compliance with applicable rules and regulation is expected.

Conclusions & Recommendations:

Issue PC-PO for the above equipment with an administrative change. Revised Equipment Description Item #5 and reworded Condition #4. Include it under TV Revision Section D (Rev 05). Upon approval, remove G24853 from Section D.

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APPLICATION PROCESSING AND CALCULATIONSAPPL NO
559472DATE
2/1/2014ENGINEER
JM04CHECK BY
MVA**EVALUATION FOR PERMIT TO CONSTRUCT/OPERATE****APPLICANT'S NAME:** OC WASTE & RECYCLING, FRB**MAILING ADDRESS:** 300 N FLOWER SUITE 400 ST, ATTN MOHAMMAD SALAM
SANTA ANA, CA 92703 - 0000**EQUIPMENT ADDRESS:** 11002 BEE CANYON ACCESS RD, IRVINE, CA 92602**EQUIPMENT DESCRIPTION:**

Fuel Storage and Dispensing Facility Consisting of:

- 1) 1 - GASOLINE ABOVEGROUND STORAGE TANK, CONVAULT AST (VR-301-E), RECTANGULAR, 10' - 6" L. X 6' - 0" W. X 4' - 2" H., 1,000 GALLON CAPACITY, EQUIPPED WITH A HUSKY 5885 PRESSURE/VACUUM RELIEF VALVE, AND A MORRISON BROTHERS PHASE I ENHANCED VAPOR RECOVERY (EVR) SYSTEM (VR-402-B).
- 2) 1 - GASOLINE NOZZLE DISPENSING 1 PRODUCT, EQUIPPED WITH PHASE II VAPOR RECOVERY SYSTEM, BALANCE RETRACTOR (G-70-52-AM).

BACKGROUND HISTORY:

This application was submitted for an alteration on 1/2/2014. The planned installation date will be as soon as the permit is granted. The alteration involves the removal of the existing Phase I vapor recovery system and replacing it with a Morrison Brothers Phase I EVR system. The facility's proposed normal operating schedule is as follows: 10 hours/day, 6 days/week, 30 days/month and 52 weeks/year. This is a governmental gasoline storage and dispensing facility. The facility has received 5 Notices to Comply (A11326, C60050, C73013, D15134, and D21852) from the District. No record of Notice of Violation was found in the Inspector Report files. This application was not submitted as a result of a notice. The applicant has since remedied these notices. An application, A/N 219026 was previously filed with the District for this equipment.

PROCESS DESCRIPTION:

The gasoline storage and dispensing facility is used to store and dispense one grade of gasoline. This facility is equipped with CARB certified Phase I and Phase II vapor controls, which complies with Rule 461. Furthermore, these vapor controls are considered to be T-BACT, which complies with Rule 1401. Finally, the project will not result in a net emission increase and thus will comply with Reg. XIII.

EMISSION CALCULATIONS:

The hydrocarbon and benzene emissions from storage tank filling and motor vehicle refueling operations are estimated by using appropriate emission factors summarized in the following table. These emission factors were developed by the Districts Planning Division.

I. Emission Factors and Control Efficiencies

The following table summarizes the uncontrolled ROG emission factors in pounds per 1,000 gallons of gasoline throughput, benzene, ethylbenzene and naphthalene content of gasoline, and control efficiencies:

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Emission Factors and Control Efficiencies for Aboveground Tanks

	Loading (a)	Breathing	Refueling (b)	Spillage
ROG				
Uncontrolled ROG Emission Factors (lbs/1000 gal)	8.40	0.21	3.95	0.24 (c)
Control Efficiency	95.000%	75.000%	94.732%	0%
controlled ROG Emission Factors (lbs/1000 gal)	0.420	0.053	0.208	0.240
Toxic Air Contaminants (TACs) wt% (d)				
Benzene	0.300%	0.300%	0.300%	1.000%
Naphthalene	0%	0%	0%	0.140%

- (a) Revised from 90% assumed by CAPCOA to 95% based on SCAQMD's finding
- (b) Revised from 99% assumed by CAPCOA to ~95% based on SCAQMD's finding.
- (c) Spillage emission factor was revised from 0.42 to 0.24 based on EVR Regulation.
- (d) Specification profiles for TACs are from <http://www.arb.ca.gov/ei/speciate/speciate.htm>

II. MICR Calculations

The following equations are used for calculating ROG emissions and MICR from gasoline dispensing operations.

Net Increased Throughput = Proposed throughput - Total permitted throughput prior to the modification or average throughput for the last two years

ROG, uncontrolled = EF (lbs-ROG/1,000 gals gas) x Proposed gas throughput (1,000 gals/month)
 ROG, controlled = ROG, uncontrolled x Control Efficiency

Benzene, uncontrolled = ROG, uncontrolled x Benzene Content in gasoline
 Benzene, controlled = ROG, controlled x Benzene Content in gasoline

Naphthalene, uncontrolled = ROG, uncontrolled x Naphthalene Content in gasoline
 Naphthalene, controlled = ROG, controlled x Naphthalene Content in gasoline

Total Emission Increase - Aboveground Tanks

Proposed GA Throughput (Gals/Month)	2050
Average GA Throughput (Gals/Month)	2050
Net GA Throughput (Gals/Month)	0

The Total Emissions are as follows:

Emission (lbs/month)		Process Type				Total ROG
		Loading	Breathing	Refueling	Spillage	
ROG	R1	17.220	0.435	8.093	0.492	26.240
	R2	0.861	0.109	0.426	0.492	1.888
Benzene	R1	0.052	0.000	0.024	0.005	0.081
	R2	0.000	0.000	0.000	0.005	0.005
Naphthalene	R1	0.000	0.000	0.000	0.000	0.000
	R2	0.000	0.000	0.000	0.000	0.000

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III. Summary of Emissions

	Total ROG		Total Benzene Ethyl Benzene & Naphthalene	
	R1	R2	R1	R2
Monthly (lb/mo)	26.24	1.89	0.080	0.010
30-day average (lb/day)	0.87	0.06	0.000	0.000
Hourly (lb/hr)	0.04	0.00	0.000	0.000

CANCER RISK ASSESSMENT:

From gasoline storage and dispensing operations, benzene is the only toxic emittant that has significant effect to the maximum individual cancer risk (MICR). Using the CAPCOA provided risk values, the staff in the District's Planning Division prepared reference MICR's for different scenarios, i.e., for underground and aboveground tanks, and for residence and workers. These MICR's are tabulated for different downwind distances from a permit unit that is located in West LA with annual gasoline throughput of one million gallons.

Once a reference MICR is determined for a given downwind distance, it has to be adjusted by using the MET factor to reflect the meteorological conditions of a permit unit's location and the actual fuel throughput of a permit unit.

The following is the parameters used for calculating the MICR for this application. The distances are from the center of emission source to the nearest receptor areas:

- Tank Type = Aboveground
- GA Throughput (MMGals-GA/Year) = 0
- Facility Zone = 19
- MET Factor = 0.70
- Downwind Distance to Residence (Meters) = 30
- Downwind Distance to Workers (Meters) = 30

A reference MICR is determined for a given downwind distance in the following manner:

1. If the downwind distance is less than or equal to minimum pre-defined distance, use the MICR at the minimum distance.
2. If the downwind distance is greater than or equal to maximum pre-defined distance, use the MICR at the maximum distance.
3. Find MICRs two distances, i.e., one for nearest higher distance and the other one for nearest lower distance, and interpolate them.

$$\text{MICR, ref} = \text{MICR, low} + [(\text{MICR, high} - \text{MICR, low}) / (\text{High Distance} - \text{Low Distance})] * (\text{Downwind Distance} - \text{Low Distance})$$

where,

- MICR, ref Reference MICR at a given downwind distance
- MICR, low MICR at a lower interpolate distance
- MICR, high MICR at a higher interpolate distance
- Low Distance Lower interpolate distance
- High Distance Higher interpolate distance
- Downwind Dist Given downwind distance

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MICR - Aboveground Tanks

MICR for Residences

Reference MICR [in-a-million / (1 MMGal-GA/Year)]
= 2.931

Adjusted MICR (in-a-million)

= (Reference MICR) x (MET factor) x (Annual Fuel Throughput)
= 2.931 x 0.70 x 0 = 0

MICR for Workers

Reference MICR [in-a-million / (1 MMGal-GA/Year)]
= 0.572

Adjusted MICR (in-a-million)

= (Reference MICR) x (MET factor) x (Annual Fuel Throughput)
= 0.572 x 0.70 x 0 = 0

Modeling Assumptions:

The modeling assumes the generic station operates 24 hours/day, with 80% of the emissions occurring between 6:00 AM and 8:00 PM, and the remaining 20% of the emissions occurring between 8:00 PM and 6:00 AM. In addition, the refueling and spillage emissions were modeled as volume sources and the loading and breathing emissions as point sources.

Risk Calculations:

The revised risk calculation for 1,000,000 gallons a year throughput for the different distances (20, 25, 30.....1000 meters) are based on the inhalation cancer potency factor of 0.1/(mg/kg-day) for benzene, 0.0087/(mg/kg-day) for ethyl benzene, and 0.12/(mg/kg-day) for naphthalene.

RULES EVALUATION:

- Rule 212** There is no school located within 1,000-feet from this facility. The maximum individual cancer risk is less than ten-in-one million. Public notice is exempt.
- Rule 461** The gasoline tank will be equipped with CARB certified Phase I vapor controls and will be installed per CARB executive order VR-402. The tank will also be equipped with a submerged fill tube and a pressure vacuum relief valve. The nozzle serving the gasoline tank is equipped with CARB certified Phase II vapor controls and was installed per CARB executive order G-70-52. Therefore, this facility complies with Rule 461.
- Rule 1170** The facility does not have any underground storage tanks. Therefore, it is exempted from the provisions of this rule.
- Rule 1401** The alteration will not result in a net toxic emission increase and therefore is exempt from further rule evaluation per section (g)(1)(B).. The facility complies with this rule.
- Rule 1401.1** The rule DOES NOT apply as facility is an existing facility.

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Rule REGXIII

No net emission increase. BACT and Offset are not required. No modeling required for VOCs. Complies with Rule. This facility complies with Rule 1313 since the operator has installed both Phase I and Phase II vapor recovery equipment, which meets current BACT requirements. Furthermore, this facility will not have a maximum monthly gasoline throughput condition since this facility has been in continuous operation prior to the adoption of this rule.

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Reference MICR Chart - Above Ground Tanks

MICR for Residential Areas - Above Ground Tanks per One Million Gallons for Gasoline

Dist(m)	20	25	30	40	50	60	70	75	80	90
MICR	5.440	3.896	2.931	1.823	1.249	0.919	0.706	0.622	0.559	0.452

Dist(m)	100	125	150	175	200	250	300	350	400	450
MICR	0.372	0.242	0.169	0.120	0.091	0.058	0.044	0.032	0.026	0.021

Dist(m)	500	600	700	800	900	1000				
MICR	0.018	0.013	0.010	0.008	0.007	0.006				

MICR for Commercial Areas - Above Ground Tanks per One Million Gallons for Gasoline

Dist(m)	20	25	30	40	50	60	70	75	80	90
MICR	1.062	0.761	0.572	0.356	0.244	0.179	0.138	0.121	0.109	0.088

Dist(m)	100	125	150	175	200	250	300	350	400	450
MICR	0.073	0.047	0.033	0.024	0.018	0.011	0.008	0.006	0.005	0.004

Dist(m)	500	600	700	800	900	1000				
MICR	0.003	0.003	0.002	0.002	0.001	0.001				

MET Factors for Facility Zones (Aboveground Tanks)

Zone	01	02	03	04	05	06	07	08	09	10	11	12
MET	0.86	1.00	0.90	1.05	0.80	0.95	0.89	1.04	1.04	1.14	0.80	1.18

Zone	13	15	16	17	18	19	20	21	22	23	24	25
MET	0.70	0.70	0.96	0.90	1.08	0.70	1.08	0.70	0.91	0.91	0.81	0.79

Zone	26	27	28	29	30	31	32	33	34	35	36	37
MET	0.79	0.79	0.81	0.83	1.00	1.00	1.04	1.04	1.06	1.36	1.04	1.01

Zone	38	39										
MET	1.36	0.00										

CONCLUSION & RECOMMENDATIONS:

This application is expected to comply with all applicable District Rules and Regulations. A Permit to Construct/Operate is recommended subject to the conditions as outlined in the sample permit.