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

February 28, 2008

Mr. Gerardo Rios
Chief-Permits Office
U.S. EPA Region IX
Mail Stop A-5-2
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Rios:

Eastern Municipal Water District, Moreno Valley Facility, (Facility ID 13088), has proposed to revise their Title V permit by the addition of a digester gas treatment and fuel cell system. This facility is located at 17140 Kitching Street, Moreno Valley, CA, in Riverside County. This permit revision which is proposed under application No. 474813, is considered a "De Minimis Significant permit revision" to their Title V permit. Attached for your review is the draft permit for the proposed permit revision.

Currently, the majority of digester gas generated is either flared or burned in internal combustion engines resulting in significant criteria pollutant emissions. The proposed project consists of a digester gas treatment system and three digester gas fuel cells each rated at 300 Kw. The fuel cells are expected to generate fewer emissions than the flare or engines. In addition, Eastern Municipal Water District requested expedited processing in order to meet construction deadlines tied to significant matching funds thru the self-generation grant program. AQMD has evaluated these applications and made a preliminary determination that the equipment will operate in compliance with all of the applicable requirements of our Rules and Regulations. Therefore, the AQMD is proposing to issue a revised Title V facility permit to the Eastern Municipal Water District.

If possible, your expedited review within 15 days is requested. This request is being made via electronic submittal in order to facilitate your expedited review. If you have any questions or comment regarding this draft permit, please call the processing engineer, Ken Matsuda, at (909) 396-2656, prior to the closing date of the review period.

Sincerely,

Jay Chen, P.E.
Sr. AQ Engineering Manager
Refinery and Waste Management Permitting

JC:CDT:KKM
cc w/ enclosure,
Ed Filadelfa, EMWD