



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov



August 6, 2010

Gerardo Rios
Chief – Permit Office
U.S. EPA – Region IX – Air – 3
75 Hawthorne Street
San Francisco, CA 94105

Subject: Los Angeles World Airport (ID 800335) Title V Permit Revision

Dear Mr. Rios:

Los Angeles World Airport has proposed to revise their Title V permit by adding an emergency engine, device D180. This is an aviation service facility (NAICS 48819) located at 275 Center Way, Los Angeles, CA 90045. This proposed permit revision is considered as a “de minimis significant permit revision” to their Title V permit. Attached for your review are the evaluation and permit for the proposed revision.

If you have any questions concerning these changes, please call the processing engineer, Mr. Thai Tran at (909) 396-2562.

Sincerely,

Brian L. Yeh
Senior Manager
General Commercial and Energy Team
Engineering and Compliance

BLY:AYL:RGC:TT
Enclosure

FACILITY PERMIT TO OPERATE LA CITY, DEPT OF AIRPORTS

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

| Equipment | ID No. | Connected To | RECLAIM Source Type/ Monitoring Unit | Emissions* And Requirements | Conditions |
|---|--------|--------------|---|--|--|
| Process 1: INTERNAL COMBUSTION ENGINES | | | | | |
| System 1: EMERGENCY | | | | | |
| INTERNAL COMBUSTION ENGINE, EMERGENCY POWER, AIRPORT RESPONSE COORDINATION CENTER, DIESEL FUEL, MTU DETROIT DIESEL, MODEL 12V1600G70S, WITH AFTERCOOLER, TURBOCHARGER, 822 HP A/N: | D180 | | NOX: PROCESS UNIT** | CO: 2.6 GRAM/BHP-HR DIESEL (4); NOX: 469 LBS/1000 GAL DIESEL (1); NOX + ROG: 4.8 GRAM/BHP-HR DIESEL (4) ; PM: (9); PM: 0.15 GRAM/BHP-HR DIESEL (4) | C1.4, C1.11, C1.23, D12.1, E71.5, K67.12 |

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

**FACILITY PERMIT TO OPERATE
LA CITY, DEPT OF AIRPORTS**

SECTION H: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**

**FACILITY PERMIT TO OPERATE
LA CITY, DEPT OF AIRPORTS**

SECTION H: DEVICE ID INDEX

| Device Index For Section H | | | |
|-----------------------------------|---------------------------|----------------|---------------|
| Device ID | Section H Page No. | Process | System |
| D180 | 1 | 1 | 1 |

FACILITY PERMIT TO OPERATE LA CITY, DEPT OF AIRPORTS

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F14.2 The operator shall not purchase diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

F52.1 This facility is subject to the applicable requirements of the following rules or regulation(s):

FACILITY PERMIT TO OPERATE LA CITY, DEPT OF AIRPORTS

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

For the purpose of this condition, "facility" shall be defined as Process 9 - Concrete Batch Plant and Concrete/Asphalt Crushing Operations.

District Rule 1157. The requirements include, but not limited to:

Maintaining fugitive dust emissions from any activity, equipment, storage pile, or disturbed surface area not to exceed a) 20% opacity, based on an average of 12 consecutive readings, using the SCAQMD Opacity Test Method No. 9B, or b) 50% opacity, based on five individual, consecutive readings, using the SCAQMD Opacity Test Method No. 9B, or c) any visible fugitive dust plume from exceeding 100 feet in any direction

Promptly removing any pile of material spillage on any internal paved roads, or maintaining in a stabilized condition the pile of material spillage with dust suppressants and remove it by the end of each day

Applying dust suppressants or using other dust control methods during loading, unloading, or transferring activities; at the conveyor including all transfer points where materials are released; at crushing activities; at the screening equipment including all discharge points; open storage piles; internal unpaved haul roads; unpaved roads and parking and staging areas

Posting signs at the two ends of the internal unpaved haul roads, stating that haul trucks shall use these roads unless traveling to the maintenance areas

Sweeping the internal paved roads with a street sweeper at the applicable interval specified by the rule

Using sweepers that are certified by Rule 1186

Installing and utilizing a rumble grate, a wheel washer, or a truck washer in accordance with applicable requirements specified by the rule

Keeping all records specified by the rule on-site for at least 5 years, and making such records available to the Executive Officer upon request

[RULE 1157, 9-8-2006]

FACILITY PERMIT TO OPERATE LA CITY, DEPT OF AIRPORTS

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

SYSTEM CONDITIONS

S1.1 The operator shall limit the material processed to no more than 70000 cubic yard(s) in any one calendar month.

For the purpose of this condition, material processed shall be defined as those from both Systems 1 and 2 - Concrete Batch Plants A and B.

The operator shall maintain records in a manner approved by the District to demonstrate compliance with this condition.

The above throughput is the combined material processed for System 1 and 2.

Records shall be kept for at least 5 years in a manner approved by the District and made available to District personnel upon request.

The operator shall keep the storage piles sufficiently moist to prevent fugitive dust emissions

[**RULE 1303(b)(1)-Modeling, 5-10-1996; RULE 1303(b)(1)-Modeling, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]**

[Systems subject to this condition : Process 9, System 1 , 2]

S1.2 The operator shall limit the material processed to no more than 31200 ton(s) in any one calendar month.

For the purpose of this condition material processed from this system is from concrete and asphalt crushing operations

The operator shall maintain records in a manner approved by the District to demonstrate compliance with this condition.

Records shall be kept for at least 5 years in a manner approved by the District and made available to District personnel upon request.

FACILITY PERMIT TO OPERATE LA CITY, DEPT OF AIRPORTS

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[**RULE 1303(b)(1)-Modeling, 5-10-1996**; **RULE 1303(b)(1)-Modeling, 12-6-2002**;
RULE 1303(b)(2)-Offset, 5-10-1996; **RULE 1303(b)(2)-Offset, 12-6-2002**; **RULE 401,**
3-2-1984; **RULE 401, 11-9-2001**; **RULE 403, 4-2-2004**; **RULE 403, 6-3-2005**]

[Systems subject to this condition : Process 9, System 3]

DEVICE CONDITIONS

C. Throughput or Operating Parameter Limits

C1.4 The operator shall limit the operating time to no more than 200 hour(s) in any one year.

[**RULE 1110.2, 2-1-2008**; **RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996**;
RULE 1401, 6-5-2009]

[Devices subject to this condition : D180]

C1.11 The operator shall limit the maintenance testing to no more than 50 hour(s) in any one year.

[**RULE 1303(a)(1)-BACT, 5-10-1996**; **RULE 1303(a)(1)-BACT, 12-6-2002**; **RULE 1470,**
6-1-2007]

[Devices subject to this condition : D180]

C1.23 The operator shall limit the maintenance and testing to no more than 4.2 hour(s) in any one calendar month.

[**RULE 1303(b)(2)-Offset, 5-10-1996**; **RULE 1303(b)(2)-Offset, 12-6-2002**]

[Devices subject to this condition : D180]

D. Monitoring/Testing Requirements

FACILITY PERMIT TO OPERATE LA CITY, DEPT OF AIRPORTS

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

- D12.1 The operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine.

[RULE 1110.2, 2-1-2008; **RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(1)-Modeling, 12-6-2002; **RULE 1303(b)(2)-Offset, 5-10-1996**; RULE 1303(b)(2)-Offset, 12-6-2002; **RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996**; RULE 1401, 6-5-2009; RULE 1470, 6-1-2007; **RULE 2005, 5-6-2005**; **RULE 2011, 5-6-2005**; **RULE 2012, 5-6-2005**; **RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997**]

[Devices subject to this condition : D180]

E. Equipment Operation/Construction Requirements

- E71.5 The operator shall only operate this equipment for more than 50 hours per year allocated for engine maintenance and testing only in the event of a loss of grid power or up to 30 minutes prior to a rotating outage provided that the engine operation shall be terminated immediately after the utility distribution company advises that a rotating outage is no longer imminent or in effect.

[**RULE 1303, 5-10-1996**; RULE 1303, 12-6-2002; **RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1303(a)(1)-BACT, 12-6-2002; **RULE 1303(b)(2)-Offset, 5-10-1996**; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 1470, 6-1-2007]

[Devices subject to this condition : D180]

K. Record Keeping/Reporting

- K67.12 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

FACILITY PERMIT TO OPERATE LA CITY, DEPT OF AIRPORTS

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

The date of operation

Indication of whether the engine is started manually or automatically

Time reading in hours at the beginning and end of operation

The elapsed time in hours

The reason for operation

The annual total hours of operation (include hours for manual and automatic operation) which shall be recorded no later than January 15th of the following year

The records shall be kept for a minimum of five calendar years prior to the current year and made available to District personnel upon request.

[RULE 1110.2, 2-1-2008; **RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1303(a)(1)
-BACT, 12-6-2002; **RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996**; **RULE**
1304(c)-Offset Exemption, 6-14-1996; RULE 1470, 11-3-2005; **RULE 2005, 5-6-2005**;
RULE 2011, 5-6-2005; **RULE 2012, 5-6-2005**; **RULE 3004(a)(4)-Periodic Monitoring,**
12-12-1997]

[Devices subject to this condition : D180]

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
STATIONARY SOURCE COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS

PAGE 1 OF 7
APPL. NO. 512301
PROCESSED BY TT
CHECKED BY
DATE 8/4/2010

APPLICANT'S NAME: LOS ANGELES CITY, DEPARTMENT OF AIRPORTS,
aka LOS ANGELES WORLD AIRPORT (LAWA)

MAILING ADDRESS: 7301 WORLD WAY WEST, 3rd Floor
LOS ANGELES, CA 90045

EQUIPMENT ADDRESS: 275 CENTER WAY (AIRPORT RESPONSE
COORDINATION CENTER)
LOS ANGELES, CA 90045

EQUIPMENT DESCRIPTION:

DEVICE NO. 179/180, as seen in attached Section D/H of the draft facility permit.

HISTORY / PROCESS DESCRIPTION:

As part of a major modernized and expansion project, LAWA will be building a new Airport Response Coordination Center (ARCC). This center will consolidate LAWA's various operational centers to one centralized location for incident management. This proposed engine is to provide emergency power to the new ARCC when the primary power is curtailed. The new ARCC is scheduled to be operational by December 2010. LAWA submitted this application and has requested for an expedited permit processing to ensure that there are sufficient time to obtain the permit as this facility is federally regulated by Title V.

This application was filed on 7/01/10 as class 1 for a permit to construct/operate (PC-PO) an engine driving emergency electrical generator at the above location. This engine is subject to Best Available Control Technology (BACT) requirements. The applicable BACT/LAER is Tier 2, (4.8 gram/BHp-hr NO_x +NMHC, 2.6 gram/BHp-hr CO and 0.15 gram/BHp-hr PM, 10-3-2008 version, revision 4). This engine is subject to Rule 1470 requirements amended on June 1, 2007. Since this is a emergency equipment, it is exempt from requirements of Rules 1110.2 and 1401. It is also exempt from modeling and offsets requirements.

This is a NO_x RECLAIM facility so it is subject to the requirements of applicable Rules in Regulation 20. As shown below, addition of this equipment results in NO_x emission increase. The equipment, therefore, is subject to and meets BACT and emission requirements. This equipment is exempt from modeling requirements pursuant to Rule 2005(k)(5) for being a standby unit.

This is a Title V facility so it is subject to the applicable Rules in Regulation 30. Installation of this equipment is defined as a de minimus significant permit revision so it is subject to EPA 45-day review and other applicable requirements.

| | |
|--|---|
| SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT STATIONARY SOURCE COMPLIANCE APPLICATION PROCESSING AND CALCULATIONS | PAGE 2 OF 7 APPL. NO. 512301 PROCESSED BY TT CHECKED BY DATE 8/4/2010 |
|--|---|

CALCULATIONS:

Given:

Emission factors: (Standard timing)

| | RHC [^] | NOX [^] | SOX* | CO [^] | PM [^] | PM10 [^] |
|-----------------------|------------------|------------------|-------|-----------------|-----------------|-------------------|
| g/BHP-hr ⁺ | 1.00 | 3.63 | 0.005 | 0.90 | 0.14 | 0.14 |

* Adjusted for diesel fuel with sulfur content no higher than 15 ppm sulfur by weight

[^] Certified engine, see attachment for detail

⁺ Converted from g/kw-hr and assumed 1.0 g/Bhp-hr out of NMHC+NOx

Operating schedule:

- 1 hr/day Max.
- 1 days/wk
- 50 wks/yr

Engine rating: 822 HP

Computations:

| | RHC | NOX | SOX | CO | PM | PM10 |
|---------------------|------|------|-------|------|------|------|
| g/BHP-Hr | 1.00 | 3.63 | 0.005 | 0.90 | 0.14 | 0.14 |
| R1=R2 lb/hr | 1.81 | 6.57 | 0.01 | 1.63 | 0.25 | 0.25 |
| R1=R2 lb/dy | 1.81 | 6.57 | 0.01 | 1.63 | 0.25 | 0.25 |
| 30-dy ave. Lb/dy | 0.25 | 0.91 | 0.00 | 0.23 | 0.03 | 0.03 |

RULES EVALUATION:

Rule 212:

Installation of this engine is not a significant project defined by this rule. A public notice is not required.

Rule 401:

Base on experience with similar equipment, this engine is expected to comply with the visible emission limits.

Rule 402:

Based on experience with similar equipment, nuisance complaints are not expected.

Rule 404:

Based on experience with similar equipment, compliance with this rule is expected.

Rule 431.2:

Diesel fuel supplied to this equipment must contain not higher than 15 ppm by weight of sulfur. Compliance is expected.

Rules 1110.2:

This engine is exempt from this rule because they are emergency engines.

REGULATION XIII - New Source Review

Rule 1301:

The equipment meets BACT requirements (4.8 gram/BHp-hr NO_x +NMHC, 2.6 gram/BHp-hr CO and 0.15 gram/BHp-hr PM). However, it is exempt from modeling and offsets requirements for being a emergency equipment.

REGULATION XIV – TOXICS AND OTHER NON-CRITERIA POLLUTANTS

This engine is exempt from this regulation per Rule 1401(g)(1)(F).

Rule 1470

The engine is subject to the requirements of this rule as “new” engine as defined by this rule.

Section (c)(1) Diesel fuel purchased for this equipment must contain not higher than 15 ppm by weight of sulfur. Compliance is expected.

Section (c)(2)(A) Because this equipment is located more than 1000 feet from a school, it is not subject to the requirements of this section.

Section (c)(2)(B) The equipment shall not be operated unless it meets all of the criteria described in this section.

Section (c)(2)(C) This equipment meets the 0.15 gram/BHp-hr PM emission requirement and is only allow to be operated no more than 50 hours in any calendar year for testing and maintenance purposes. It also meets the Off-Road Compression-Ignition Engine Standard for engines of the same model year and maximum rated power for NO_x, NMHC+NO_x, and CO. Compliance is expected.

Section (d)(1)(B) The owner/operator of this equipment is required to keep a log of entries described in (9)(B) for 36 months. However, since this is Title V facility, the owner/operator is required to maintain records for 5 years.

REGULATION XX: RECLAIM

Rule 2001: This facility is a NOx RECLAIM facility so this engine is subject to RECLAIM requirements.

Rule 2005

Section (c) The installation of this equipment at this facility is subject to BACT requirements. The engine is Tier 2 engine and will be operated no more than 50 hours a year for testing and maintenance purposes so it meets BACT for NOx .

This equipment is not subject to modeling requirements as it is used on a standby basis pursuant to Section (k)(5).

Consents from the meeting on July 28, 2010 among Messieurs B. Yeh, A. Lee and R. Castro that potential to emit (PTE) emissions from emergency engine are to assess on 50 hours a year (to be consistent with the limits BACT and public notification from Rule 212), rather than 200 hours a year.

The annual PTE of this engine is 329 lb (@6.57 lb/hr). As of July 2010, this facility holds 34860 lb NOx RTC and 3503 lb non-tradable NOx RTC so this facility holds sufficient RECLAIM Trading Credit to offset annual emission increase from installing this equipment.

Section (f) Since January 1, 1994, this facility has added the following NOx emission sources and their cumulative emission increases are as follows:

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 STATIONARY SOURCE COMPLIANCE
 APPLICATION PROCESSING AND CALCULATIONS

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| <u>A/N</u> | <u>Description (Device #)</u> | <u>(lb/hr)</u> | <u>Annual PTE (lb)</u> |
|------------|-------------------------------|----------------|------------------------|
| 300846 | 911 ICE, 60 Bhp, D56 | 1.55 | 78 |
| 300850 | 911 ICE, 150 Bhp, D58 | 4.13 | 207 |
| 317969 | 911 ICE, 750 Bhp, D63 | 19.7 | 985 |
| 329653 | 911 ICE, 94 Bhp, D83 | 2.58 | 129 |
| 329654 | 911 ICE, 94 Bhp, D84 | 2.58 | 129 |
| 329655 | 911 ICE, 94 Bhp, D85 | 2.58 | 129 |
| 340744 | 911 ICE, 465 Bhp, D101 | 6.49 | 324 |
| 367015 | 911 ICE, 166 Bhp, D89 | 2.58 | 129 |
| 388358 | 911 ICE, 300 Bhp, D103 | 4.5 | 225 |
| 436555 | 911 ICE, 1199 Bhp, D81 | 26.06 | 1303 |
| 436556 | 911 ICE, 474 Bhp, D80 | 9.08 | 454 |
| 371864 | 911 ICE, 635 Bhp, D92 | 8.78 | 439 |
| 475663 | 911 ICE, 2200 Bhp, D124 | 21.56 | 1078 |
| 475664 | 911 ICE, 2200 Bhp, D125 | 21.56 | 1078 |
| 475957 | 911 ICE, 349 Bhp, D86 | 3.48 | 174 |
| 475958 | 911 ICE, 823 Bhp, D87 | 11.22 | 561 |
| 475959 | 911 ICE, 349 Bhp, D88 | 3.48 | 174 |
| 500956 | 2F.Loaders, 500 Bhp, D155 | 0.0 | 0 |
| 500957 | 2F.Loaders, 500 Bhp, D161 | 0.0 | 0 |
| 500958 | F.Loader, 500 Bhp, D170 | 0.0 | 0 |
| 504875 | 911 ICE, 755 Bhp, D173 | 1.1 | 55 |
| 506759 | Tarpot+219 ICE, 33 Bhp, D112 | 1.2 | 192 (@160hrs) |
| 511274 | 911 ICE, 422 Bhp, D176 | 2.42 | 121 |
| 512301 | 911 ICE, 822 Bhp, D179 | 6.57 | 329 |

Cumulative NOx Emission Increase post 1993 8293

As of July 2010, this facility holds 34860 lb NOx RTC and 3503 lb non-tradable NOx RTC so this facility holds sufficient RECLAIM Trading Credit to offset emission increase from all new sources installed since January 1994. Compliance is expected.

Section (g) Not applicable because the emission source is not a major source.

Rule 2012: This engine is defined as a NOx process unit by this rule. It meets the requirements of this rule by installing, maintaining and operating a timer; by reporting emissions quarterly; and by accepting the emission factors and permit conditions.

REGULATION XXX: TITLE V PERMITS

Rule 3000 (b)(6): As seen in the table below, because the cumulative emissions increase (since the last permit renewal) remains within the applicable threshold and that this revision has satisfied all the applicable conditions listed in this rule, this revision is a de minimus permit revision.

| | | | <u>HAP</u> | <u>VOC</u> | <u>NOx</u> | <u>CO</u> | <u>SOx</u> | <u>PM</u> | <u>PM10</u> |
|---|---------------|----------------|------------|------------|------------|-----------|------------|-----------|-------------|
| <u>1st Revision</u> – A/N 511341 | | | | | | | | | |
| | <u>Device</u> | <u>Appl No</u> | | | | | | | |
| • Add | D176 | 511274 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| <u>2nd Revision</u> – A/N 512302 | | | | | | | | | |
| | <u>Device</u> | <u>Appl No</u> | | | | | | | |
| • Add | D179 | 512301 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |
| Cumulative Total | | | 0 | 0 | 1 | 0 | 0 | 0 | 0 |

Rule 3002: The facility complies with the requirements of this rule by filing for applications in a timely manner and by for the appropriate fees.

Rule 3003: The anticipated de minimus permit revision is expected to comply with all the applicable requirements in this rule, of special note are the sections listed below.

Section (j)(1)(A): The EPA Administrator will timely receive the de minimus permit revision application whenever it becomes available to the Executive Officer.

Section (j)(1)(B): The EPA Administrator will timely receive the draft of the de minimus permit revision upon completion of District evaluation.

Section (j)(4): The applicant and the EPA will be timely notified of any refusal to accept all recommendations for the draft permit.

Rule 3005 (e): Whenever applicable, the procedures for de minimus permit revision stated in this rule will be addressed in a proper and timely manner.

CEQA: The installation of this engine is part of the larger federally mandated project. Environmental impact study was conducted and it was determined that no significant effect on the environment.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

STATIONARY SOURCE COMPLIANCE

APPLICATION PROCESSING AND CALCULATIONS

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DISCUSSIONS:

It has been determined that the equipment will operate in compliance with all the applicable Rules and Regulations of the District.

RECOMMENDATIONS:

Issue permit to operate subject to the permit conditions described in the attached Condition D of draft facility permit.