

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>STATIONARY SOURCE COMPLIANCE DIVISION</b>  <b>PERMIT APPLICATION PROCESSING AND CALCULATIONS</b>	PAGES 11	PAGE 1
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**Permit to Operate (Change of Conditions)**

**Applicant** Eastern Municipal Water District (EMWD) –Moreno Valley  
Regional Water Reclamation Facility (MVRWRF)

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

**Equipment Location** 17140 Kitching Street  
Moreno Valley, CA 92551

**Equipment Description**  
**APPLICATION 485926, FACILITY ID 013088**

INTERNAL COMBUSTION ENGINE, CATERPILLAR, NATURAL GAS AND LIQUID PROPANE GAS FIRED, MODEL NO. G399-SI-TA, SERIAL NO. 49C01555, SIXTEEN CYLINDERS, TURBOCHARGED, AFTERCOOLED, RICH BURN, 930 BHP, WITH A JOHNSON MATTHEY CATALYST, MODEL NO. MX-80, AND AN AIR/FUEL RATIO CONTROLLER, DRIVING AN EMERGENCY ELECTRICAL GENERATOR.

**Background/Process Description**

The above application was submitted on July 31, 2008 as a Proposed Alteration/Modification to Permitted Equipment application type to change a non-emergency natural gas fired engine into an emergency natural gas fired engine and update wording. This application was determined to be a Change of Conditions, since there is no process change, change in equipment, or increase of emissions. The existing permit for this engine is Permit F63608, A/N 414452. This engine is used for electrical generation.

The facility is a municipal water district which accepts and treats municipal sewage at Eastern Municipal Water District Moreno Valley Regional Water Reclamation Facility (EMWD-MVRWRF). In the last three years two Notices to Comply were issued to the above facility. Notice to Comply D14829 was issued on April 8, 2008 to provide the following: 1) copies of source test (cover page & results page only) for ICE permits F68934, F63608, and F68132, 2) Ignition timing inspection report for ICE permits F36089, F36095, F66584, and F68933, 3) oxygen concentration at the outlet for ICE permits F63608 and F68933. The above facility has received one complaint for odors in the last three years.

**Emission Calculations**

Assume R1 = R2 Emissions are based on operating schedule of 100 hours per year, 2hr/day, 1 day/week, 50 weeks/year. Updated BACT/LAER is not applicable since there is no emission increase from the previous application. Although previous BACT (emission limits) is (are) applicable, assume no backsliding. Therefore the correct allowed non-emergency operation schedule is 100 hours per year according to 40 CFR Part 63.6640(f)(1)(ii)

**Engine Specifications**

Source Test	November 8, 2006 (100% load)	March 5, 2009 (53% load)
Exhaust flow rate (dscfm)	1,246	678
Natural gas consumption (cf/hr)	8,172	4,768

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CO emissions

Emission based on Source Test (11/8/2006): = 9.266 lbs/hr  
Emission based on Source Test (3/5/2009): = 0.46 lbs/hr  
Emission based on Source Test (3/5/2009) Retest: = 14.74 lbs/hr

**Rule 1303 requirement: Previous application's BACT: 0.60 g/bhp-hr**  
**0.6g/bhp-hr x 930 bhp x 1lb/453.6g = 1.23 lbs/hr = 0.36 lb/day (NSR)**

NOx emissions

Emission based on Source Test (11/8/2006): = 0.349 lbs/hr  
Emission based on Source Test (3/5/2009): = 0.523 lbs/hr  
Emission based on Source Test (3/5/2009)Retest: = 0.120 lbs/hr

**Rule 1303 requirement: Previous application's BACT: 0.15 g/bhp-hr**  
**0.15g/bhp-hr x 930 bhp x 1lb/453.6g = 0.31 lbs/hr = 0.09 lb/day (NSR)**

PM10 emissions

**10.00 lb/MMscf\* x MMscf/1E6scf x 8,172 scfh x 0.994PM10/PM\*\***  
**= 0.08 lbs/hr = 0.02 lbs/day (NSR)**

\*Based on SCAQMD AER Emission Factors (PM) for Natural Gas, 4-stroke, rich burn ICE.

\*\*Weight fraction for particulate matter for stationary ICE-gas

LAER/BACT: Clean Fuels Policy (NG & LPG are clean fuels)

Rule 404 requirement: Exhaust flow rate: 1,246 dscfm, 0.173 grains/dscf  
0.173 grains/dscf x 1,246 dscfm x 60min/hr x 1lb/7000grains = 1.85 lbs/hr > 0.08 lbs/hr

ROG emissions

Emission based on Source Test (11/8/2006): = 0.0392 lbs/hr  
Emission based on Source Test (3/5/2009): = 0.0042 lbs/hr  
Emission based on Source Test (3/5/2009)Retest: = 0.0085 lbs/hr

**Rule 1303 requirement: Previous application's BACT: 0.15 g/bhp-hr**  
**0.15g/bhp-hr x 930 bhp x 1lb/453.6g = 0.31 lbs/hr = 0.09 lb/day (NSR)**

SOx emissions

**0.60 lb/MMscf\* x MMscf/1E6scf x 8,172 scfh = 0.00 lbs/hr = 0.00 lbs/day (NSR)**

\*Based on SCAQMD AER Emission Factors (SO2) for Natural Gas, 4-stroke, rich burn ICE.

LAER/BACT: Clean Fuels Policy (NG & LPG are clean fuels)

BACT requirement: Rule 431.1 compliance: 1) Natural gas ≤ 16 ppmv, 2) Facility wide emission < 5 lbs/day (assuming a 24 hour day).

- 1) 16 ppmv x 8,172 dscfh x lb-moleH2S/379x10<sup>6</sup> ft<sup>3</sup> x lbmoleSO2/lbmoleH2S x 64.07 lbsH2S/lbmole SO2 = 0.02 lbs/hr SOx (as SO2)
- 2) 5 lbs/day H2S x lb-mole/34.08 lbsH2S x 64.07 lbsSOx/lb-mole = 9.40 lbs/day SOx (as SO2)  
= 0.39 lbs/hr SOx (as SO2)

Annual Emissions (AER 2009) SOx emission: 0.089 tons/yr  
0.089 tons/yr x 2000lbs/ton x 1yr/365days = 0.49 lbs/day SOx  
= 0.02 lbs/hr SOx

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**Emissions Summary**

Emission Total (based on NSR lbs/day values)

A/N 485926 (ICE (>500HP) Em Stat NG & LPG)

CO	= 1.23 lbs/hr	= 0.36 lbs/day
NOx	= 0.31 lbs/hr	= 0.09 lbs/day
PM10	= 0.08 lbs/hr	= 0.02 lbs/day
ROG	= 0.31 lbs/hr	= 0.09 lbs/day
SOx	= 0.00 lbs/hr	= 0 lbs/day

**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)- There are no emission increases of toxic air contaminants.  
**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.

Rule 404: Particulate Matter  
No violations are expected limits are listed under Rule 404 Table 404(a).

Rule 407: Liquid and Gaseous Air Contaminants  
Rule 407 (b)- Provisions of this rule shall not apply to emissions from stationary ICEs.

Rule 409: Combustion Contaminants  
Provisions of this rule shall not apply to emissions from ICEs.

Rule 431.1: Sulfur Content of Gaseous Fuels  
Rule 431.1(c)(1)- Natural gas contains  $\leq$  16 ppmv sulfur compounds as H<sub>2</sub>S.  
Rule 431.1(g)(8)- Any facility which emits less than 5 pounds per day total sulfur compounds, calculated as H<sub>2</sub>S 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)

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Rule 53(a)- Sulfur compound emission, as SO<sub>2</sub> 50,000 ppmv. Compliance can be expected based on other similar category ICE permits issued in SCAQMD.

Rule 53(b)- Fluorine compounds shall be controlled to the maximum degree technically feasible. No fluorine potential emission from this equipment. Compliance is expected.

Reg IX: Standards of Performance for New Stationary Sources  
Part 60, Chapter I, Title 40 of Code of Federal Regulations, Subpart JJJJ Standards of Performance for Stationary Spark Ignition Internal Combustion Engines  
60.4230-Applicability: not applicable.  
60.4230(a)- Construction for this ICE did not commence nor was the ICE reconstructed after June 12, 2006.  
60.4230(b)-This ICE is not being tested at an engine test cell/stand.  
60.4230(f)- This ICE is not a temporary unit.

NESHAPS: Part 63, Chapter I, Title 40 of Code of Federal Regulations, Subpart ZZZZ- National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines  
63.6585(a)- Applicability: Applicable.  
63.6590(a)(1)(iii)- Existing stationary RICE: stationary RICE > 500 HP located at an area source of HAP emissions if commenced construction or reconstruction before June 12, 2006. A previous application A/N 414452 for retrofit submitted an application April 23, 2003; the permit was issued September 26, 2003. Also A/N 162049 the initial application, included the addition of a non-selective catalytic converter was submitted October 27, 1987; the permit was issued June 4, 1990. Does not meet definition of reconstruction see below.

Note Part 63 CFR 40 Subpart A: Reconstruction means the replacement of components of an affected or a previously nonaffected source to such an extent that:

- 1) The fixed capital cost of the new components exceeds 50% of the fixed capital cost that would be required to construct a comparable new source, and
- 2) It is technologically and economically feasible for the reconstructed source to meet the relevant standards established by the Administer pursuant to section 112 of the Act. Upon reconstruction, an affected source, or a stationary source that becomes an affected source, is subject to relevant standards for new sources, including compliance dates, irrespective of any change in emissions of hazardous air pollutants from that source.

63.6595(a)(1)- Existing stationary SI RICE located at an area source of HAP shall comply with the applicable emission limitations and operating limitations no later than October 19, 2013.

63.6595(c)- Must meet applicable notification requirements in 63.6645 and in 40CFR63, subpart A.

63.6603- Emission Limitations and Operating Limitations (see 63.6620 & Table 4)

63.6603(a)- Existing stationary RICE at an area source of HAP, must comply with requirements in Table 2d to this subpart and operating limitations in Table 2b to this subpart which apply to you.

Table 2b does not have any requirements for existing emergency RICE > 500HP at an area source of HAP.

Table 2d (5) for Emergency stationary SI RICE:

- (a)- Change oil and filter every 500 hours of operation or annually, whichever comes first;

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(b)- Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; and

(c)- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

63.6612(a)- Existing stationary RICE located at area source of HAP must conduct any initial performance test or other initial compliance demonstration according to Tables 4 and 5 to this subpart that apply within 180 days after the compliance date (October 19, 2013) that is specified for your stationary RICE in 63.6595 and according to 63.7(a)(2).

Table 4 (2)(a) 4SRB stationary RICE-Reduce formaldehyde

(3)(a) Stationary RICE- Limit the concentration of formaldehyde or CO in the exhaust

Table 5 does not have any requirements for existing emergency RICE > 500HP at an area source of HAP.

63.6615- Subsequent performance tests shall be conducted according to Table 3.

Table 3 does not have any requirements for existing emergency RICE > 500 HP at an area source of HAP.

63.6620- Performance Tests and Other Procedures

63.6620(a)- Conduct each performance test in Tables 3 and 4 of this subpart.

63.6620(d)- Conduct three separate test runs for each performance test required in this section, as specified in 63.7(e)(3). Each test run must last at least 1 hour.

63.6620(i)- The engine percent load during a performance test must be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load. A written report of the average percent load determination must be included in the notification of compliance status. (see this section for additional information to be included in the written report).

63.6625- Monitoring, Installation, Collection, Operation, and Maintenance Requirements

63.6625(e)(3)- Existing emergency stationary RICE located at an area source of HAP must operate and maintain the stationary RICE and after-treatment control device according to the manufacturer's emission related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

63.6625(f)- Existing emergency stationary RICE located at an area source of HAP must install a non-resettable hour meter if one is not already installed.

63.6625(h)- Existing stationary engine must minimize the engine's time spent at idle during startup and minimize the engine's start up time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d.

Tables 1a, 2a, 2c do not have any requirements for existing emergency RICE > 500HP at an area source of HAP.

63.6625(j)- Stationary SI engine subject to 5 in Table 2d has option of utilizing an oil analysis program in order to extend the specified oil change requirement.

63.6630(a)- Demonstrate initial compliance with each emission and operating limitation that applies according to Table 5 of this subpart.

63.6630(b)- During initial performance test, must establish each operating limitation in Tables 1b and 2b of this subpart that applies.

Table 1b (1) 4SRB stationary RICE complying with requirement to reduce formaldehyde emission by 76 % or more (or by 75% or more if applicable) and

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using NSCR; or 4SRB stationary RICE complying with requirement to limit the concentration of formaldehyde in the exhaust to 350 ppbvd or less @15%O<sub>2</sub> and using NSCR; or 4SRB stationary RICE complying with the requirement to limit the concentration of formaldehyde in the exhaust to 2.7 ppmvd or less @15%O<sub>2</sub> using NSCR.

(a)- Maintain catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water at 100% load +/- 10% from the pressure drop across the catalyst measure during the initial performance test, and

(b)- Maintain the temperature the exhaust so the catalyst inlet temperature is  $\geq$  750 F and  $\leq$  1250 F.

63.6630(c)- Submit Notification of Compliance Status containing the results of the initial compliance demonstration according to requirements in 63.6645.

63.6640(a)- Demonstrate continuous compliance with each emission limitation or operating limitation in Tables 1a, 1b, 2a, 2b, 2c, and 2d to this subpart according to methods in Table 6 to this subpart.

Table 6 (9) Existing emergency and black start stationary RICE located at an area source of HAP

(a)- Work or management practices

(i)- Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or

(ii)- Develop and follow the maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice of minimizing emissions.

63.6640(b)- Report each instance which did not meet each emission limitation or operating limitation in Tables 1a, 1b, 2a, 2b, 2c, and 2d to this subpart that apply. Each instance is a deviation, which must be reported per 63.6650. When the values of operating parameters are reestablished, conduct a performance test to demonstrate compliance.

63.6640(e)- Report each instance which did not meet the requirements of Table 8 in this subpart that applies.

Table 8 General Provisions to Subpart ZZZZ. (see 63 Subpart A for more info)

63.6640(f)(1)- Existing emergency stationary RICE located at an area source of HAP emissions shall comply with (f)(1)(i-iii) or will not be considered an emergency engine.

63.6640(f)(1)(i)- There is no time limit on the use of emergency stationary RICE in emergency situations.

63.6640(f)(1)(ii)- Maintenance checks and readiness testing is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.

63.6640(f)(1)(iii)- Operation of the emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except for 15 hours per year for a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or

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energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power.

63.6645- Notifications

63.6645(a)- Owners and operators of existing stationary RICE located at an area source of HAP, shall submit all of the notifications in 63.7(b) & (c), 63.8(e), (f)(4) & (6), 63.9(b)-(e), (g), &(h) that apply.

63.7(b)(1)- Written notification of source test shall be submitted at least 60 days before the test to approve the test plan and have an observer present.

63.7(b)(2)- If the performance test will not occur as indicated in the notification, the owner or operator shall notify the Administrator as soon as possible and indicate the rescheduled date.

63.7(c)(1)- Results of the QA program will be used to determine validity of the performance test.

63.7(c)(2)(i)- Owner or operator shall submit a test plan for approval, including a test program summary, test schedule, data quality objectives, and both internal and external QA program.

63.7(c)(2)(ii)- Internal QA program shall include, activities planned by routine operators and analysts to provide an assessment of test data precision.

63.7(c)(2)(iii)- Test shall include a test method performance audit (PA) during the test. PAs consist of blind audit samples supplied by an accredited audit sample provider and analyzed during the test for a measure of test data bias.

63.7(c)(3)- The Administrator will notify owner or operator of approval or intention to deny the test plan within 30 days after receipt of the plan and within 30 days after any supplemental information is submitted.

63.8(e)(2)- Owner or operator shall notify the Administrator in writing of the date of the performance evaluation simultaneously with the notification of the performance test date required under 63.7(b) or at least 60 days prior to the date the performance evaluation is scheduled to begin if no performance test is required.

63.8(e)(3)(i-iii)- Submit a performance evaluation test plan at least 60 days before the test to the Administrator for approval including program objectives, summary, schedule, data quality objectives- pre-evaluation expectations of precision, accuracy, and completeness of data, internal and external QA program- activities planned by routine operators and analysts to provide an assessment of performance and systems audits including opportunity for on-site evaluation by the Administrator of instrument calibration, data validation, sample logging, and documentation of quality control data and field maintenance activities.

63.8(e)(4)- Conduct a performance evaluation of a required CMS during any performance test required under 63.7 according to relevant standard.

63.8(e)(5)- A copy of the written report of the results of the performance evaluation and test as required under 63.7 or within 60 days of completion of the evaluation if no test is required, unless specified in relevant standard.

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63.8(f)(4)- If owner or operator want to use an alternative monitoring procedure, must submit an application to the Administrator containing a description of the alternative monitoring system which addresses indicators of performance, measurement techniques, monitoring frequency and averaging time (63.2-monitoring) a performance evaluation test plan, and information justifying the request at least 60 days before the performance evaluation is scheduled to begin. Minor changes may be made in the site-specific performance evaluation plan.

63.8(f)(6)- Alternative to the relative accuracy test for CEMS may be requested for affected sources with emission rates less than 50% of the relevant standard. May petition the Administrator to substitute the relative accuracy test in section 7 of Performance Specification 2 with section 10 if emissions are less than 50% of relevant standard. Petition shall include detailed description of procedures, location and procedure for conducting the alternative, concentration or response levels or the alternative materials and other equipment checks included in the alternative. Administrator may rescind approval of alternative if the CEMS data shows that emissions have exceeded 70% of relevant standard. Owner or operator shall notify Administrator within 10 days of such occurrence.

63.9(b)(1)(i)- Initial notifications apply to owner or operator of an affected source when it becomes subject to a relevant standard.

63.9(b)(1)(iii)- Affected sources that are required under this paragraph to submit initial notification may use the application for approval of construction under 63.5(d) to fulfill the requirements

63.9(b)(2)- Affected source that has an initial startup prior to effective date of relevant standard shall notify Administrator in writing not later than 120 calendar days after effective day of relevant standard that the source is subject and indentifying information of the source.

63.9(c)- If owner or operator cannot comply with a relevant standard by the applicable compliance date, or if has installed BACT or technology to meet LAER per 63.6(i)(5), may submit to the Administrator a request for extension of compliance per 63.6(i)(4)-(6).

63.9(d)- Not applicable, since this source is not new.

63.9(e)- Owner or operator shall notify Administrator in writing of intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin.

63.9(g)- Affected source required to use CMS shall furnish the Administrator written notification.

63.9(g)(1)- Notification of CMS performance evaluation date shall be submitted simultaneously with notification of performance test date under 63.7(b). If no test is required, shall notify at least 60 calendar days before it is scheduled to begin.

63.9(g)(3)- Notification that criterion necessary to continue use of an alternative relative accuracy testing, per 63.8(f)(6) has been exceed shall be postmarked not later than 10 days after the occurrence including description of the nature and cause of increased emissions.

63.9(h)(2)(i)- Notification of compliance status as required, shall be submitted to the Administrator and signed by the responsible official to certify its accuracy, including: (A) methods used to determine compliance, (B) results of any performance tests, opacity or visible emission observations, CMS performance evaluations, and/or other monitoring procedures or methods conducted, (C) methods used for determining continuing compliance, including description of monitoring and reporting requirements and test methods, (D) type and quantity of

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hazardous air pollutants emitted by the source, in units and averaging times per test methods, (E) analysis demonstrating whether affected source is a major source, (F) description of APC equipment for each emission point, including control device for each HAP and control efficiency for each control device, and (G) statement by the owner or operator of the affected source whether it has complied with the relevant standard and other requirements.

63.9(h)(2)(ii)- The notification must be sent before the close of business on the 60th day following the completion of the relevant compliance demonstration activity specified in the relevant standard (unless a different reporting period is specified in the standard, in which case the letter must be sent before the close of business on the day the report of the relevant testing or monitoring results is required to be delivered or postmarked). For example, the notification shall be sent before close of business on the 60th (or other required) day following completion of the initial performance test and again before the close of business on the 60th (or other required) day following the completion of any subsequent required performance test. Notifications may be combined as long as the due date requirement for each notification is met.

63.9(h)(5)- If actual emissions data or control efficiencies per (d)(1)(ii)(H) and (d)(2) of 63.5 was not submitted in application, the actual emissions data or other correct information shall be submitted as soon as available and no later than initial notification of compliance status as required.

63.6645(g)- If a performance test is required, must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in 63.7(b)(1).

63.6645(h)- If a performance test or other initial compliance demonstration is required as specified in Tables 4 and 5 to this subpart, submit a Notification of Compliance Status according to 63.9(h)(2)(ii).

#### 63.6650- Reports

63.6650(a)- Submit each report in Table 7 of this subpart that applies.

Table 7 does not have any requirements for existing emergency RICE > 500HP at an area source of HAP.

63.6650(b)- Submit each report according to Table 7 and the requirements in (b)(1)-(9).

63.6650(c)- Compliance report must contain the information in (c)(1)-(6).

63.6650(d)- For each deviation for a RICE not using a CMS, the Compliance report must contain the information in (c)(1)-(4) and (d)(1)-(2)

63.6650(e)- For each deviation from an emission or operating limitation occurring for a stationary RICE using CMS, the Compliance report must contain the information in (c)(1)-(4) and (e)(1)-(12)

63.6650(f)- Each affected source that has obtained a Title V operating permit must report all deviations in the semiannual monitoring report.

#### 63.6655- Records

63.6655(a)(1)- A copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirement in 63.10(b)(2)(xiv).

63.6655(a)(2)- Records of the occurrence and duration of each malfunction of operation (process equipment) or the air pollution control and monitoring equipment.

63.6655(a)(3)- Records of performance tests and performance evaluations as required in 63.10(b)(2)(viii).

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63.6655(a)(4)- Records of all required maintenance performed on the air pollution control and monitoring equipment.

63.6655(a)(5)- Records of actions taken during periods of malfunction to minimize emissions in accordance with 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal manner of operation.

63.6655(d)- Keep records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies.

63.6655(e)(3)-Keep records of the maintenance conducted on an existing stationary emergency RICE or existing stationary RICE located at an area source of HAP subject to management practices in Table 2d to this subpart to demonstrate the RICE and after-treatment control device were operated and maintained according to the maintenance plan.

63.6655(f)(2)- Existing emergency stationary RICE located at an area source of HAP that do not meet the standards applicable to non-emergency engines must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Hours spent for emergency operation, including what classified the operation as emergency and how many hours spent for non-emergency operation must be documented. If the engines are used for demand response operation, must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

63.6660(a)- Records must be in a form suitable and readily available for expeditious review according to 63.10(b)(1).

63.6660(b)- Keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record.

63.6660(c)- Keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of the occurrence, measurement, maintenance, corrective action, report, or record.

63.6675- Emergency stationary RICE means any stationary internal combustion engine whose operation is limited to emergency situations and required testing and maintenance...Stationary RICE used for peak shaving are not considered emergency stationary RICE. Stationary RICE used to supply power to an electric grid that supply non-emergency power as part of a financial arrangement with another entity are not considered to be emergency engines, except as permitted under 63.6640(f). All emergency stationary RICE must comply with the requirements specified in 63.6640(f) in order to be considered emergency stationary RICE. If the engine does not comply with the requirements specified in 63.6640(f), then it is not considered to be an emergency stationary RICE under this subpart.

Compliance is expected.

Rule 1110.2: Emissions From Gaseous and Liquid-Fueled Engines

Rule 1110.2(d)- Equipment is exempt under Rule 1110.2(h)(2).

Rule 1110.2(e)(3)- Stationary Engine CEMS

Rule 1110.2(e)(3)(B)- CEMS is not required.

Rule 1110.2(e)(4)(A)- I&M plan has been submitted. Determination has not yet been made for this application.

Rule 1110.2(e)(5)(B)- This engine is exempt from Rule 1110.2(d) requirements, therefore Rule 1110.2(e)(5)(B) does not apply. Although, the engine is equipped with Air-to-Fuel Ratio Controllers according to LAER/BACT determination.

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Rule 1110.2(f)(1) -Engine not subject to Rule 1110.2(d)(1), therefore Rule 1110.2(f)(1) does not apply.

Rule 1110.2(f)(3)- All data, logs, test reports and other information required by this rule shall be maintained for at least five years and made available for inspection.

Compliance with all applicable requirements of this Rule can be expected.

Rule 1147 NOx Reductions From Miscellaneous Sources

Rule 1147(a)- Applicability: not applicable to ICEs subject to District Rule 1110.2.

Reg XIII:

Rule 1303(a)- BACT was not triggered since there was no emission increase of greater than 1.0 pounds/day. LAER/BACT is already equipped under previous application, if it were not equipped, BACT would apply (no backsliding).

LAER/BACT: CO: 0.60 g/bhp-hr, NOx: 0.15 g/bhp-hr, VOC: 0.15 g/bhp-hr (see BACT determinations A/N 359876). These emissions are the same as under the previous permit.

Rule 1303(b)(1)- Modeling is not required, emergency equipment is exempt under Rule 1304(a)(4).

Rule 1303(b)(2)- Offsets are not required; emergency equipment is exempt under Rule 1304(a)(4). Furthermore, since the facility is an essential public service, any required offsets shall be provided through priority reserve.

Compliance is expected.

Rule 1401: Toxic Air Contaminants

Rule 1401(g)(1)(F)- This equipment is exempt from subdivision (d), since it is an emergency ICE that is exempt under Rule 1304.

Rule 1401.1: Requirements for New and Relocated Facilities Near Schools

Rule 1401.1(b)- Not applicable, since the facility is an existing facility.

Reg. XXX:

The modification of the digester gas flare, conversion of a stationary IC engine from non-emergency use to emergency use, an administrative change to a sewage treatment plant to remove a Rule 219 exempt boiler in the equipment description and permitting a LPG tank that was operating without a permit is considered a Title V Minor permit revision under Rule 3000(b)(15), since there is no emission increase and the modification of the equipment 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 Operate is recommended for application 485926. For Permit Conditions please see Sample Permits. A revised Title V permit is recommended after EPA review.