

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

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**ENGINEERING AND COMPLIANCE DIVISION**

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**APPLICATION NO.**

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**APPLICATION PROCESSING AND CALCULATIONS**

**548538**  
**ENGINEER**  
**AM**

**9/6/2013**  
**CHECK BY**

**COMPLIANCE PLAN**

**COMPANY NAME & MAILING ADDRESS**

NM Milliken LLC  
5087 Junction Road  
Lockport, NY 14094

**EQUIPMENT ADDRESS**

2050 South Milliken  
Ontario, CA

APPLICATION NO. 548538

This Compliance Assurance Monitoring (CAM) Plan under Reg. XXX (40 CFR Part 64) for non-methane hydrocarbons (NMHC) emissions generated by San Bernardino County Solid Waste Mgmt – Milliken Landfill (Facility ID # 7371) which are collected in a gas collection system and controlled using landfill gas (LFG) resource recovery systems engines 1 & 2.

**BACKGROUND**

This application was filed on Mar. 12, 2013 for a CAM plan for the IC Engines # 1 & # 2 under PO #s G17021 (A/N 515470) & G17023 (515471), respectively, to control emissions generated by a landfill which are collected in a gas collection system. The previous Title V permit for this facility was renewed on 12/21/2007. The facility has applied for a Title V renewal (A/N 538321) which will incorporate this CAM plan into the Title V Facility Permit.

This compliance assurance monitoring plan is to comply with the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). This regulation became effective on November 21, 1997. However requirements of the plan were delayed while the Title V program was being implemented. Thus, owners and operators were subject to CAM plan requirements at the time of their initial Title V permit renewal. This regulation affects emission units at the source subject to a federally enforceable emission limit or standard that uses a control device to comply, and either pre-control or post-control emissions exceed Title V thresholds. See Sample Permit Condition tagged with 40 CFR 64, which are imposed on the engines to comply with the requirements of 40 CFR 64.

**CAM Applicability & Requirements:**

CAM regulation (40 CFR Part 64) covers emission units that are evaluated on a pollutant by pollutant basis for equipment that meet the definition of pollutant specific emission units (PSUEs). The regulation applies to each PSUE if the unit is located at a major source that is required to obtain a Part 70 or 71 (Title V) permit. The CAM plan requirements are;

1. Describing the indicators to be monitored.
2. Describing ranges or the process to set indicator ranges.
3. Describing the performance criteria for the monitoring, including specifications for obtaining representative data, verification procedures to confirm monitoring operational status, QA/QC procedures and monitoring frequency.
4. Providing justification for the use of parameters, ranges, and monitoring approach.
5. Providing emissions test data, if necessary.
6. Providing an implementation plan, if monitoring requires installation, testing, or other activities prior to implementation.

**EVALUATION:**

NM Milliken GENCO currently operates the above engines at this facility. These engines that are fired on landfill gas are considered control equipment for landfill gas from the gas collection system being operated by San Bernardino County Solid Waste Mgmt – Milliken Landfill. The above engines drive electrical generators to produce electricity.

The permits for the engines limit ROG emissions to 3.27 lbs/hr\* for each engine. Subject to Rule 1303(b)(2) – Offsets.

The permits for the engines limit ROG concentration to 391 ppmv\*, as methane, with no O<sub>2</sub> correction for each engine. Subject to Rule 1303(a)(1) – BACT.

\*The 3.27 lbs/hr and the 391 ppmv limits are based on the original BACT for LFG engines, namely, 0.8 gr/bhp-hr.

$$0.8 \times 1850/453.6 = 3.27 \text{ lbs/hr}$$

$$\frac{3.27 \text{ lbs/hr} \times 379 \times 10^{-6}}{16 \times 60 \times 3300 \text{ dscfm}} = 391 \text{ ppmv}$$

These limits are less stringent than the R1150.1/40CFR Subpart WWW limits which correspond to about 0.22 g/bhp-hr.

**MONITORING & PERFORMANCE:**

Indicator: The engines 1 & 2 are equipped with CEMS required by Permit Condition # 17 (P/O Nos. G17021 & G17023) to monitor O<sub>2</sub> exhaust concentrations continuously.

Range: Based on the CEMS data provided, the O<sub>2</sub> concentrations range from 5.20% to 7.00% and 4.95% to 7.27% for engines 1 & 2, respectively, based on a 1-hr avg.

Frequency: Continuous on daily basis, (if post control > 10 tpy, then O<sub>2</sub> readings must be taken 4 times per hour).

**Monitoring Operation**

& Maintenance: The permittee shall be conditioned to comply with the compliance assurance monitoring operation & maintenance requirements of 40 CFR Part 64.7.

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**Recordkeeping**

**& Reporting** The permittee shall be conditioned to comply with the recordkeeping & reporting requirements of 40 CFR Part 64.9.

**Performance Test:** The engines are required to be tested annually to demonstrate compliance with applicable requirements per Permit Condition No. 12 for both engines.

**Quality Improvement Plan:** If the District or EPA determine that a Quality Improvement Plan (QIP) is required under 40 CFR Part 64.7 (d)(2), the permittee shall develop and implement the QIP in accordance with 40 CFR Part 64.8.

**RULES & REGULATIONS COMPLIANCE**

Proposed CAM plan for TNMOC control using engines 1 & 2 is expected to comply with the following applicable rules & regulations:

Rule 1303 (b)(2) – Offsets

Rule 1303(a)(1) – BACT

40 CFR Part 64

**RECOMMENDATION**

Since the facility is complying with the more stringent limits, compliance with CAM is expected. The facility permit conditions will be revised to incorporate condition # 18.

CAM plan approval is recommended.