

# South Coast Air Quality Management District

## Statement of Basis Title V Facility Permit Renewal

Issuance Date: 9/6/2013

**Facility Name:** NM Milliken Genco LLC  
**Facility ID:** 129661  
**SIC Code:** 4953  
**Equipment Location:** 2050 S. Milliken Ave.  
Ontario, CA 91761

**Application #(s):** 538321  
**Application Submittal Date(s):** 05/24/2012

**Permit Renewal:** 12/20/2012  
**Revision No.:** Draft  
**Permit Section(s) Affected:** All

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### 1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO<sub>2</sub> and SO<sub>2</sub> are in attainment with federal standards. The status of CO is designated to attainment status. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment. The status for lead is non-attainment.

A Title V renewal permit is proposed to be issued to cover the operations of NM Ontario Genco LLC located at 2050 S. Milliken Ave., Ontario. This facility is subject to Title V requirements because it is a major source of emissions of NO<sub>x</sub> and ROG, and subject to certain NSPS (New Source Performance Standards) requirements that specifically require obtaining a Title V Permit.

### 2. Facility Description

This is an existing facility that is in the business of operating resource recovery systems. This facility is operating internal combustion engines driving electric generators.

### 3. Construction and Permitting History

The facility has been in constant operation since 2002. An initial Title V permit was issued on 5/16/2002. The Title V permit was renewed on 12/21/2007. The Title V revision No. 2 was issued on March 6, 2012 to change permit conditions, to incorporate inspection and monitoring requirements under Rule 1110.2 Plan, and to revise the facility information.

### 4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and K, of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. NSPS requirements of 40 CFR Part 60 apply to certain units at the facility and the permit terms and conditions may be found in Section D of the Title V permit. NESHAP requirements of 40 CFR Part 63 apply to certain units at the facility and the permit terms and conditions may be found in Sections D and J of the Title V permit.

## 5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D and J and Appendix B of the proposed Title V permit). Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluations. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 apply to equipment operating at this facility. Permit terms and conditions including monitoring requirements, may be found in Section D of the Title V permit.

## 6. Permit Features

### Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

### Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

## 7. Summary of Emissions and Health Risks

### **Criteria Pollutant Emissions (tons/year) Annual Reported Emissions for Reporting Period 2012**

<i>Pollutant</i>	<i>Emissions (tons/year)</i>
CO	49.549
NOx	12.735
ROG	2.416
SOx	1.269
TSP	1.746

### **Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2012**

<i>TACs Reported</i>	<i>Emissions (lbs/yr)</i>
Benzene	4.989
Carbon Tetrachloride	0.427
Methylene Chloride	0.546
Perchloroethylene	0.594
Trichloroethylene	0.451
Vinyl Chloride	0.380

## **Health Risk from Toxic Air Contaminants**

The facility is not subject to review by the Air Toxics Information and Assessment Act (AB2588).

### **8. Compliance History**

As noted, the facility has been in constant operation since 2002. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed for past two years. The facility has been issued one Notice to Comply (NC) and one Notice of Violation (NOV) in the last two calendar years. However, the issues regarding the NC & NOV have been resolved and the facility is determined to be in compliance.

### **9. Compliance Certification**

By virtue of the Title V renewal permit application and issuance of the renewed permit in coming months, the reporting frequency for compliance certification for the facility shall be annual.

### **10. Comments**

N/A