

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 4	PAGE 1
	APPL. NO. 575123	DATE June 22, 2015
	PROCESSED BY Jon Uhl	CHECKED BY

Deminimis Significant Title V/RECLAIM Permit Revision

COMPANY NAME, LOCATION ADDRESS:

DeMenno/Kerdoon, SCAQMD ID # 800037
 2000 N. Alameda Street
 Compton, CA 90222

BACKGROUND:

DeMenno/Kerdoon operates this waste oil/waste glycol/wastewater processing facility in the city of Compton. The facility is a NOx RECLAIM facility. The Title V permit was issued effective 7/1/2011.

DeMenno/Kerdoon submitted application number 575123 for a deminimis significant revision to their Title V facility permit. This application was received 5/14/2015 and deemed complete 6/11/2015. Four applications are included in this permit revision:

Table 1-Applications included in Permit Revision

	A/N	Equipment	Device ID	Permit Action	Section	Process	System
1	528472	Centrifuge	D64	<ul style="list-style-type: none"> Cancel permit to construct for a replacement centrifuge 	H	5	2
2	575121	Sludge Dewatering	D580 D581 D582 D583 D64 D584 D585 D586	Modify the existing sludge dewatering system: <ul style="list-style-type: none"> Add a rotary solids screen Add a portable solids bin Add a centrifuge feed pump Add a sealed solids grinder Modify the existing centrifuge Add a portable solids bin Add a wastewater holding tank Add pump P-700 	H	5	2
3	571942	Vapor Recovery System – Sludge Dewatering	C578 C579	<ul style="list-style-type: none"> Move from Section H to Section D with no changes - two Vapor Return Lines venting vacuum truck pump exhaust to the facility afterburners via the Vapor Recovery System – Sludge Dewatering 	H D	9 9	12 12
4	575122	Vapor Recovery System – Sludge Dewatering	D322 D324	<ul style="list-style-type: none"> Delete vent connection from the centrifuge [D64] Add vent connection from rotary solids screen [D580] Replace blower Add vent connection from the centrifuge [D64] 	H	9	12

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A/N	Equipment	Device ID	Permit Action	Section	Process	System
	Pump AP-301	D496	• Move from P5:S1 to P5:S2	D	5	1
				D	5	2
				H	5	2

FEE EVALUATION:

The fees paid for this application are:

Table 2 – Application Fees Paid

A/N	Equipment	BCAT	Type	Status	Fee Schedule	Fees Required, \$	Fees Paid, \$
575123	Facility Permit Revision – RECLAIM/Title V	555009	86	21	--	1,909.72	1,909.72

RULES EVALUATION:

PART 1 SCAQMD REGULATIONS

REG XXX	Title V	November 5, 2010				
	DeMenno/Kerdoon was issued a Title V permit effective on July 1, 2011. This is a de minimis significant permit revision as defined in Rule 3000(b)(7), where the cumulative emission increases of non-RECLAIM pollutants or hazardous air pollutants (HAP) from all de minimis significant permit revisions during the term of the Title V permit are not greater than the threshold levels given in this rule.					
		Air Contaminant	Prior revisions	This revision	Total	Threshold level
		HAP	0.	0.	0.	30. lb/day
		VOC	2.91	0.01	2.92	30. lb/day
		PM10	0.04	0.	0.04	30. lb/day
		SOx	0.	0.	0.	60. lb/day
		CO	0.	0.	0.	220. lb/day
Rule 3000 (b)(15)(A)(i)	This revision does not require or change a case-by-case evaluation of: reasonably available control technology (RACT) pursuant to Title I of the federal Clean Air Act; or maximum achievable control technology (MACT) pursuant to 40 CFR Part 63, Subpart B.					
(b)(15)(A)(ii)	This revision does not violate a regulatory requirement.					
(b)(15)(A)(iii)	This revision does not require any significant change in monitoring terms or conditions in the permit.					
(b)(15)(A)(iv)	This revision does not require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit.					
(b)(15)(A)(vii)	This revision does not result in an increase in GHG emissions of >75,000 tpy CO ₂ e.					

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(b)(15)(A)(viii)	This revision does not establish or change a permit condition that the facility has assumed to avoid an applicable requirement.
(b)(15)(A)(ix)	This revision is not an installation of a new permit unit subject to a New Source Performance Standard (NSPS) pursuant to 40 CFR Part 60, or a National Emission Standard for Hazardous Air Pollutants (NESHAP) pursuant to 40 CFR Part 61 or 40 CFR Part 63.
(b)(15)(A)(x)	This revision is not a modification or reconstruction of an existing permit unit, resulting in new or additional NSPS requirements pursuant to 40 CFR Part 60, or new or additional NESHAP requirements pursuant to 40 CFR Part 61 or 40 CFR Part 63.
	A de minimis significant permit revision is subject to a 45-day EPA review {Rule 3003(j)}, 30-day Review by Affected States {Rule 3003(m)} and not subject to public participation requirements {Rule 3006(b)}. The Pechanga Band of Luiseno Mission Indians and the Pala Band of Mission Indians are treated as Affected States.
3003(b)(2)	D/K has submitted Forms: 500-A2 : Title V Application Certification (dated 5/66/2015) 500-C1 : Compliance Status Report
3003(f)	D/K has submitted a process flow diagram (PFD) under a claim of confidentiality.
3003(i)	Operation under the permit will comply with all regulatory requirements.
3003(j)	The EPA cover letter, proposed revision to the Title V permit, and Engineering Evaluation are submitted electronically to EPA.
3003(m)	The Pechanga Band of Luiseno Mission Indians and the Pala Band of Mission Indians are treated as Affected States.
3004(a)	Section E lists the administrative terms and conditions. Section K lists the Title V administrative terms and conditions. Sections B, F and G list the RECLAIM terms and conditions. Sections D and H list the facility, process, system and device level terms and conditions. Section I lists the approved compliance plans and schedules. These terms and conditions assure compliance with all regulatory requirements, including monitoring, recordkeeping and reporting requirements.
	The permit expiration date, June 30, 2016, is listed in Section A.
	The origin and authority (Rule or Regulation) is listed for each permit term and condition, including permit conditions which are not federally enforceable.
	No alternative operating scenarios have been submitted by D/K.
3004(b)	The general RECLAIM provisions are included in Sections B, F and G. Device specific provisions are included with the affected device under RECLAIM Source Type/Monitoring Unit, Emissions and Requirements, and Conditions.
3004(c)	No permit shield was requested by D/K.
3004(f)(1)	The Title V permit will expire 5 years from the date of issuance unless renewed. The permit expiration date, June 30, 2016, is listed in Section A.

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REVIEW OF COMPLIANCE DATABASE:

On 6/16/2015, the SCAQMD Compliance Database shows no open Notice of Violation (NOV).

RECOMMENDATION

A/N	Recommendation
575123	After the 45-day EPA review and 30-day review by Affected States, issue a minor revision to Title V Facility Permit, Sections D and H.

ATTACHMENTS

1. Form 500-A2 : Title V Application Certification, dated 5/6/2015
2. Form 500-C1 : Compliance Status Report

To EPA – Region IX:

EPA 45-day review ends:

To Pechanga Band of Luiseno Mission Indians & Pala Band of Mission Indians:

Affected States 30-day review ends: