

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES 18	PAGE 1
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PERMIT(S) TO CONSTRUCT EVALUATION

(Change of condition for SOx Emission)

APPLICANT'S NAME: SUNSHINE GAS PRODUCERS, L.L.C.

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FACILITY ID: 139938

EQUIPMENT DESCRIPTION:

A/N 571762:

RESOURCE RECOVERY/LANDFILL GAS-TO-ENERGY SYSTEM CONSISTING OF:

1. PRETREATED LANDFILL GAS (LFG) SUPPLY.
2. GAS TURBINE, NO. 1, SOLAR, MERCURY 50, LANDFILL GAS (LFG) FIRED, DRIVING A NOMINAL 4.9 MEGAWATT (MW) ELECTRIC GENERATOR.
3. EXHAUST STACK, 4'- 7" DIA. X 26' - 6" HIGH.

A/N 571763:

RESOURCE RECOVERY/LANDFILL GAS-TO-ENERGY SYSTEM CONSISTING OF:

1. PRETREATED LANDFILL GAS (LFG) SUPPLY.
2. GAS TURBINE, NO. 2, SOLAR, MERCURY 50, LANDFILL GAS (LFG) FIRED, DRIVING A NOMINAL 4.9 MEGAWATT (MW) ELECTRIC GENERATOR.
3. EXHAUST STACK, 4'- 7" DIA. X 26' - 6" HIGH.

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A/N 571764:

RESOURCE RECOVERY/LANDFILL GAS-TO-ENERGY SYSTEM CONSISTING OF:

1. PRETREATED LANDFILL GAS (LFG) SUPPLY.
2. GAS TURBINE, NO. 3, SOLAR, MERCURY 50, LANDFILL GAS (LFG) FIRED, DRIVING A NOMINAL 4.9 MEGAWATT (MW) ELECTRIC GENERATOR.
3. EXHAUST STACK, 4'- 7" DIA. X 26' - 6" HIGH.

A/N 571767:

RESOURCE RECOVERY/LANDFILL GAS-TO-ENERGY SYSTEM CONSISTING OF:

1. PRETREATED LANDFILL GAS (LFG) SUPPLY.
2. GAS TURBINE, NO. 4, SOLAR, MERCURY 50, LANDFILL GAS (LFG) FIRED, DRIVING A NOMINAL 4.9 MEGAWATT (MW) ELECTRIC GENERATOR.
3. EXHAUST STACK, 4'- 7" DIA. X 26' - 6" HIGH.

A/N 571765:

RESOURCE RECOVERY/LANDFILL GAS-TO-ENERGY SYSTEM CONSISTING OF:

1. PRETREATED LANDFILL GAS (LFG) SUPPLY.
2. GAS TURBINE, NO. 5, SOLAR, MERCURY 50, LANDFILL GAS (LFG) FIRED, DRIVING A NOMINAL 4.9 MEGAWATT (MW) ELECTRIC GENERATOR.
3. EXHAUST STACK, 4'- 7" DIA. X 26' - 6" HIGH.

Conditions: (Gas Turbines, A/Ns 511762, 63, 64, 65 and 67)

1. CONSTRUCTION AND OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED, UNLESS OTHERWISE NOTED BELOW.
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
3. THIS EQUIPMENT SHALL BE OPERATED BY PERSONNEL PROPERLY TRAINED IN ITS OPERATION.
[RULE 204]

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4. THIS EQUIPMENT SHALL BE FIRED ONLY WITH LANDFILL GAS EXCEPT WHEN PROPANE IS USED TO IGNITE THE TURBINE DURING START-UP.
[RULE 204]
5. A CONTINUOUS FLOW INDICATING AND RECORDING DEVICE SHALL BE INSTALLED AND MAINTAINED IN THE LANDFILL GAS SUPPLY LINE TO THE GAS TURBINE TO MEASURE AND RECORD THE QUANTITY OF LANDFILL GAS (IN SCFM) SUPPLIED.
[RULE 1303(b) (1)-MODELING, 1303(b) (2)-OFFSET, 3004(a) (4)]
6. THE TOTAL HEAT INPUT OF LANDFILL GAS BURNED IN THE GAS TURBINE SHALL NOT EXCEED 48.1MMBTU/HR (HHV), BASED ON A 24 -HOUR AVERAGE. THE OPERATOR SHALL MONITOR THE TOTAL HEAT INPUT RATE OF THE LANDFILL GAS ON A CONTINUOUS BASIS. THE OWNER OR OPERATOR OF THIS EQUIPMENT SHALL INSTALL AND MAINTAIN A REMOTE NOTIFICATION SYSTEM TO NOTIFY THE FACILITY IF AN EXCEEDANCE OF 48.1 MMBTU/HR LIMIT OCCURS.
[RULE 1303(b) (1)-MODELING, 1303(b) (2)-OFFSET, 3004(a) (4), RULE 1401]
7. THE OPERATOR SHALL SYNCHRONIZE ALL RECORDING DEVICES WITH RESPECT TO THE TIME OF DAY.
[RULE 204]
8. THE OPERATOR SHALL DIRECT ALL LANDFILL GAS WHICH IS NOT BURNED IN THIS EQUIPMENT TO ANOTHER COMBUSTION OR PROCESSING FACILITY WHICH IS IN FULL USE, AND CAN ADEQUATELY PROCESS THE VOLUME OF GAS COLLECTED AND WHICH HAS BEEN ISSUED A VALID PERMIT BY THE SCAQMD.
[RULE 1303(a) (1)-BACT]
9. THE OPERATION OF THIS EQUIPMENT SHALL NOT RESULT IN THE RELEASE OF RAW LANDFILL GAS INTO THE ATMOSPHERE. ANY BREAKDOWN OR MALFUNCTION WHICH RESULTS IN EMISSION OF LANDFILL GAS SHALL BE REPORTED TO THE SCAQMD WITHIN ONE HOUR AFTER OCCURRENCE OR WITHIN ONE HOUR OF THE TIME THE OPERATING PERSONNEL KNEW OR REASONABLY SHOULD HAVE KNOWN OF THE OCCURRENCE AND, IMMEDIATE REMEDIAL MEASURES SHALL BE UNDERTAKEN TO CORRECT THE PROBLEM AND PREVENT FURTHER EMISSIONS INTO THE ATMOSPHERE.
[RULE 402, AND 430]
10. THE OPERATOR SHALL INSTALL AND MAINTAIN AN ADEQUATE NUMBER OF SAMPLING PORTS AND WELDED NIPPLES WITH CAPS, IN THE EXHAUST STACK AND PROVIDE SAFE ACCESS TO THESE SAMPLING PORTS IN ACCORDANCE WITH RULE 217 AND SCAQMD APPROVAL.
[RULE 217]
11. A CONTINUOUS COMBUSTION TEMPERATURE MONITORING AND RECORDING SYSTEM SHALL BE MAINTAINED, TO DETERMINE EXHAUST TEMPERATURE OF LAST POWER TURBINE (T7) AND CALCULATE THE COMBUSTION CHAMBER TEMPERATURE (TPZ) PER MANUFACTURER'S RECOMMENDATIONS, PURSUANT TO THE OPERATION AND MAINTENANCE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.7. SUCH A SYSTEM SHALL HAVE AN ACCURACY OF WITHIN $\pm 1\%$ OF THE TEMPERATURE BEING MONITORED AND SHALL BE INSPECTED, MAINTAINED, AND CALIBRATED ON AN ANNUAL BASIS IN

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ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS USING AN APPLICABLE SCAQMD OR EPA APPROVED METHOD.

[40 CFR 64]

12. THE COMBUSTION CHAMBER TEMPERATURE OF LAST POWER TURBINE (T7) SHALL BE RECORDED AT LEAST EVERY 15 MINUTES, AND THE HOURLY AVERAGE SHALL BE COMPUTED FROM SUCH DATA POINTS. THE OPERATOR SHALL REVIEW THE RECORDS OF TEMPERATURE ON A DAILY BASIS TO DETERMINE IF A DEVIATION OCCURRED OR SHALL INSTALL AN ALARM SYSTEM TO ALERT THE OPERATOR WHEN A DEVIATION OCCURS.
[40 CFR 64]
13. ALL DEVIATIONS SHALL BE REPORTED TO THE SCAQMD ON A SEMI-ANNUAL BASIS PURSUANT TO THE REQUIREMENTS SPECIFIED IN 40 CFR 64.9 AND CONDITION NOS. 22 AND 23 IN SECTION K OF THIS PERMIT. FOR THE PURPOSE OF THIS CONDITION, A DEVIATION SHALL BE DEFINED AS WHEN THE LAST POWER TURBINE (T7) EXHAUST TEMPERATURE IS LESS THAN 1100 DEGREES FAHRENHEIT OR GREATER THAN 1300 DEGREES FAHRENHEIT, OR AS OTHERWISE APPROVED BY SCAQMD, OCCURS AVERAGED OVER ONE HOUR DURING OPERATION EXCEPT DURING START UP AND SHUTDOWN EVENTS LASTING FOR A MAXIMUM OF ONE HOUR. MULTIPLE START UP AND SHUTDOWN EVENTS CAN OCCUR CONSECUTIVELY.
[40 CFR 64]
14. FOR EACH SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K, WHENEVER A DEVIATION OCCURS FROM THE TEMPERATURE, THE OPERATOR SHALL TAKE IMMEDIATE CORRECTIVE ACTION, AND KEEP RECORDS OF THE DURATION AND CAUSE (INCLUDING UNKNOWN CAUSE, IF APPLICABLE) OF THE DEVIATION AND THE CORRECTIVE ACTION TAKEN.
[40 CFR 64]
15. A SEMI-ANNUAL MONITORING REPORT SHALL BE SUBMITTED TO SCAQMD, WHICH SHALL INCLUDE BUT MAY NOT BE LIMITED TO THE TOTAL OPERATING TIME OF THIS EQUIPMENT AND THE TOTAL ACCUMULATED DURATION OF ALL DEVIATIONS FOR EACH SEMI-ANNUAL REPORTING PERIOD.
[40 CFR 64]
16. THE OWNER OR OPERATOR SHALL SUBMIT AN APPLICATION WITH A QUALITY IMPROVEMENT PLAN (QIP) IN ACCORDANCE WITH 40 CFR PART 64.8 TO THE SCAQMD IF AN ACCUMULATION OF DEVIATIONS EXCEEDS 5% DURATION OF THIS EQUIPMENT'S TOTAL OPERATING TIME FOR ANY SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT. THE REQUIRED QIP SHALL BE SUBMITTED TO THE SCAQMD WITHIN 90 CALENDAR DAYS AFTER THE DUE DATE OF THE SEMI-ANNUAL MONITORING REPORT.
[40 CFR 64]
17. THE OPERATOR SHALL INSTALL, MAINTAIN AND OPERATE A CONTINUOUS EMISSION MONITORING SYSTEM (CEMS), WHICH IS APPROVED BY THE EXECUTIVE OFFICER, TO MEASURE THE EXHAUST CONCENTRATION FOR NO_x, AND O₂ ON A DRY BASIS. IN ADDITION, THE SYSTEM SHALL CONVERT THE ACTUAL NO_x CONCENTRATION TO A

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CORRECTED NO_x CONCENTRATION AT 15% O₂, DRY, AND RESULTS SHALL BE CONTINUOUSLY RECORDED.

[RULE 218, 1303(b) (1) MODELING, 1303(B) (2)-OFFSET, 3004(a) (4)]

18. OPERATOR SHALL CONDUCT ANNUAL PERFORMANCE TESTS, AT FULL LOAD, IN ACCORDANCE WITH THE APPROVED TEST PROCEDURES AND SOURCE TEST PROTOCOL, AND WITHIN 45 DAYS OF ANNIVERSARY OF INITIAL TEST. THE WRITTEN RESULTS OF SUCH PERFORMANCE TESTS SHALL BE SUBMITTED WITHIN 60 DAYS AFTER TESTING. NOTICE SHALL BE PROVIDED TO THE SCAQMD 10 DAYS PRIOR TO THE TESTING SO THAT AN OBSERVER MAY BE PRESENT. ALL SOURCE TESTING AND ANALYTICAL METHODS SHALL BE SUBMITTED TO THE SCAQMD FOR APPROVAL AT LEAST 30 DAYS PRIOR TO START OF THE TESTS. THE TESTS SHALL INCLUDE, BUT MAY NOT BE LIMITED TO, A TEST OF THE INLET LANDFILL GAS AND THE GAS TURBINE EXHAUST FOR:
- A. METHANE AND TOTAL NON-METHANE HYDROCARBONS (TNMHC)
 - B. CARBON MONOXIDE (EXHAUST ONLY)
 - C. OXIDES OF NITROGEN (EXHAUST ONLY)
 - D. CARBON DIOXIDE
 - E. PARTICULATE MATTER/PM10 (EXHAUST ONLY)
 - F. C1 THROUGH C3 SULFUR COMPOUNDS AND TOTAL REDUCED SULFUR, AS H₂S (SPECIATED, INLET ONLY)
 - G. TOXIC AIR CONTAMINANTS (TAC) INCLUDING, BUT NOT LIMITED TO, BENZENE, CHLOROBENZENE, 1, 2-DICHLOROETHANE, 1, 1-DICHLOROETHENE, DICHLOROMETHANE, TETRACHLOROETHYLENE, TETRACHLOROMETHANE, TOLUENE, 1, 1, 1-TRICHLOROETHANE, TRICHLOROETHYLENE, TRICHLOROMETHANE, VINYL CHLORIDE, AND XYLENE ISOMERS.
 - H. OXYGEN AND NITROGEN
 - I. MOISTURE CONTENT
 - J. TEMPERATURE
 - K. FLOW RATE
 - L. VOLATILE ORGANIC COMPOUNDS (VOCS) CONTROL EFFICIENCY, WT% (BASED ON INLET AND EXHAUST VOCS)
 - M. KW GENERATED.

THE REPORT SHALL ALSO PRESENT THE EMISSIONS DATA IN UNITS OF POUNDS PER HOUR (LB/HR), POUNDS PER MILLION BTU (LB/MMBTU), AND PARTS PER MILLION (PPMV) ON A DRY BASIS AT 15% O₂ (CO, NO_x, TNMHC, AND TAC.) AND GAS TURBINE'S OVERALL TNMHC DESTRUCTION EFFICIENCY (WT %). TOTAL PARTICULATE/PM10 SHALL BE REPORTED IN GR/SCF AND LBS/HR. THE REPORT SHALL PROJECT THE TOTAL DAILY SO₂ AND HCL EMISSIONS BASED ON THE TEST RESULTS. IN ADDITION, THE REPORT SHALL PROVIDE GAS TURBINE'S DEMONSTRATED EFFICIENCY AT FULL LOAD, IN BTU/KW-HR, CORRECTED TO THE HIGHER HEATING VALUE (HHV) OF THE FUEL.

[RULE 1303 (a) (1)-BACT, 1303(b) (1)-MODELING, 1303(b) (2)-OFFSET, 1150.1, 1401, 3004 (a) (4), 40 CFR PART 60 SUBPART WWW]

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19. EMISSIONS FROM THE GAS TURBINE SHALL NOT EXCEED THE FOLLOWING:

CONTAMINANT	LBS/DAY
CO	77.6
NOx (AS NO2)	76.5
PM10	17.3
TNMOC (AS CH4)	21.1

[RULE 1303(b) (1)-MODELING, 1303(b) (2)-OFFSET]

20. EMISSION OF OXIDES OF NITROGEN SHALL NOT EXCEED 15 PPMV, CALCULATED AT 15% O2, DRY BASIS, EXCEPT DURING PERIODS OF STARTUP AND SHUTDOWN NOT TO EXCEED 30 MINUTES PER INCIDENT.

[RULE 1303 (a) (1)-BACT, 1303(b) (1)-MODELING, 1303(b) (2)-OFFSET]

21. EMISSION OF CARBON MONOXIDE SHALL NOT EXCEED 25 PPMV, CALCULATED AT 15% O2, DRY BASIS, EXCEPT DURING PERIODS OF STARTUP AND SHUTDOWN NOT TO EXCEED 30 MINUTES PER INCIDENT.

[RULE 1303 (a) (1)-BACT, 1303(b) (1)-MODELING, 1303(b) (2)-OFFSET]

22. ALL RECORDS SHALL BE KEPT FOR A PERIOD OF AT LEAST FIVE YEARS AND SHALL BE MADE AVAILABLE TO AQMD PERSONNEL UPON REQUEST.

[RULE 3004 (a) (4)]

Emissions and Requirements:

THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS.

- 23.
- CO: 2000 PPMV, DRY, 15 MIN. AVG., RULE 407.
 - CO: 25 PPMV, @ 15% O2, DRY, MAJOR SOURCE – LAER
 - NOx: 15 PPMV, @ 15% O2, DRY, MAJOR SOURCE - LAER
 - NOx: 96 PPMV, @ 15% O2, DRY, OR 5.5 LB/MWh, NSPS, 40CFR60 SUBPART KKKK
 - PM: COMBUSTION CONTAMINANT, 0.1 GRAIN/DSCF OF GAS, CALCULATED @ 12% CO2, AVERAGED OVER 15 CONSECUTIVE MINUTES, RULE 409.
 - ROG: 20 PPMV, AS HEXANE, @ 3% O2, DRY OR 98% (BY WT) DESTRUCTION EFFICIENCY, RULE 1150.1, 40 CFR60 SUBPART WWW, 40 CFR 63 SUBPART AAAA.
 - SOx: BASED ON MAXIMUM 150 PPMV H2S CON. IN LFG, RULE 431.1
 - SOx: FACILITY WIDE TOTAL SOx EMISSION SHALL NOT EXCEED 375.1 LBS/DAY, FROM FIVE GAS TURBINES AND A REGENERATION FLARE.
 - SOx: 0.90 LB/MWh OR 0.15 LB/MMBTU, NSPS, 40 CFR 60 SUBPART KKKK.
 - SOx: 0.2% RULE 53

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A/N 571766:

LANDFILL GAS (LFG) FUELED REGENERATION FLARE CONSISTING OF:

1. EXHAUST GAS FROM THE LFG TREATMENT AND COMPRESSION SYSTEM (A/N 482510).
2. FLARE, JOHN ZINK, MODEL ZULE ULTRA LOW EMISSION, LANDFILL GAS AND PURGE –AIR, RATED AT 6,400,000 BTU PER HOUR BURNER, WITH A FLAME ARRESTER, PROPANE PILOT WITH AN AUTOMATED TRU-LITE IGNITER, COMBUSTION AIR BLOWER, AUTOMATIC IGNITION, FLARE SHUT DOWN, AND WITH A PROGRAMMABLE LOGIC CONTROLLER (PLC) SYSTEM.
3. EXHAUST STACK, 4'- 0" DIA. X 40'- 0" H.

Conditions:

1. CONSTRUCTION AND OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
3. THIS EQUIPMENT SHALL BE OPERATED AND MAINTAINED BY PERSONNEL PROPERLY TRAINED IN ITS OPERATION.
[RULE 204]
4. THE OPERATOR SHALL INSTALL AND MAINTAIN AN ADEQUATE NUMBER OF SAMPLING PORTS AND WELDED NIPPLES WITH CAPS, IN THE INLET GAS AND EXHAUST STACK AND PROVIDE SAFE ACCESS TO THESE SAMPLING PORTS IN ACCORDANCE WITH RULE 217 AND SCAQMD APPROVAL.
[RULE 217]
5. A FLOW INDICATOR AND RECORDING DEVICE SHALL BE MAINTAINED IN THE LANDFILL GAS SUPPLY LINE TO THE FLARE TO MEASURE AND RECORD THE QUANTITY OF LANDFILL GAS (IN SCFM) BURNED IN FLARE.
[RULE 1303(b) (2)-OFFSET, 3004 (a) (4)]
6. THE OPERATOR SHALL MEASURE AND RECORD THE BTU CONTENT OF THE LANDFILL GAS BURNED IN THE FLARE AT LEAST ONCE PER WEEK USING AN INSTRUMENT APPROVED BY THE SCAQMD.
[RULE 1303(b) (1)-MODELING, 1303(b) (2)-OFFSET, 3004(a) (4)]
7. THE TOTAL VOLUME OF LANDFILL GAS BURNED IN FLARE SHALL NOT EXCEED MAXIMUM HEAT INPUT RATE OF 6.4 MMBTU PER HOUR. A LOG SHALL BE KEPT INDICATING THE TOTAL HEATING VALUE OF LANDFILL GAS BURNED IN FLARE BASED ON

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THE RECORDED FLOW RATE (SCFM) AND THE LATEST WEEKLY BTU CONTENT (BTU/SCF) READING.

[RULE 1303(b) (1) AND (b) (2)-MODELING AND OFFSET, 1401]

8. OPERATION OF THIS EQUIPMENT USING LFG SHALL BE LIMITED TO NO MORE THAN 16 HOURS IN ONE DAY, DURING WHICH PERIOD EXHAUST FROM THE LFG TREATMENT'S MEDIA REGENERATION CYCLE IS TREATED.
[RULE 1303(b) (1) AND (b) (2)-MODELING AND OFFSET, 1401]
9. THIS EQUIPMENT SHALL BE EQUIPPED WITH A TEMPERATURE INDICATOR AND RECORDER WHICH MEASURES AND RECORDS THE EXHAUST GAS TEMPERATURE IN THE FLARE STACK. THE TEMPERATURE INDICATOR AND RECORDER SHALL OPERATE WHENEVER THE FLARE IS IN OPERATION. THE TEMPERATURE SHALL BE MEASURED AT A LOCATION ABOVE THE FLAME ZONE, AT LEAST 0.6 SECOND DOWNSTREAM OF THE BURNER, AND NOT LESS THAN TWO (2) FEET BELOW THE TOP OF THE STACK.
[RULE 1303(a) (1)-BACT, 3004 (a) (4)]
10. WHENEVER THE FLARE IS IN OPERATION, A TEMPERATURE OF NOT LESS THAN 1400 DEGREES F, 15 MINUTE AVERAGE, AS MEASURED BY THE TEMPERATURE INDICATOR AND RECORDER SHALL BE MAINTAINED EXCEPT DURING PERIODS OF STARTUP AND SHUTDOWN. STARTUP IS DEFINED AS THE PERIOD FROM FLARE IGNITION TO THE TIME WHEN 1400 DEGREES F IS ACHIEVED, NOT TO EXCEED 30 MINUTES. SHUTDOWN IS THE PERIOD FROM WHEN THE GAS VALVE BEGINS TO BE SHUT AND COMPLETELY SHUTS OFF, NOT TO EXCEED 30 MINUTES.
[RULE 1303(a) (1)-BACT]
11. ALL RECORDING DEVICES SHALL BE SYNCHRONIZED WITH RESPECT TO TIME OF THE DAY.
[RULE 204]
12. THE AUTOMATIC SHUTDOWN SAFETY SYSTEM SHALL BE TESTED ANNUALLY FOR PROPER OPERATION AND THE RESULTS RECORDED.
[RULE 1303(a) (1)-BACT]
13. OPERATOR SHALL CONDUCT ANNUAL PERFORMANCE TESTS, AT FULL LOAD, IN ACCORDANCE WITH THE APPROVED TEST PROCEDURES AND SOURCE TEST PROTOCOL, AND WITHIN 45 DAYS OF ANNIVERSARY OF INITIAL TEST. WRITTEN NOTIFICATION OF THE SCHEDULED TEST DATE SHALL BE PROVIDED TO THE AQMD AT LEAST SEVEN (7) DAYS PRIOR TO THE DATE SO THAT THE TESTING MAY BE OBSERVED BY AQMD PERSONNEL. THE TESTING SHALL BE CONDUCTED WHEN THE EQUIPMENT IS IN FULL OPERATION, AND SHALL INCLUDE, BUT NOT LIMITED TO, A TEST OF THE INLET TO THE FLARE AND THE FLARE EXHAUST FOR:
 - A. METHANE
 - B. TOTAL NON-METHANE ORGANIC COMPOUNDS (TNMOC)
 - C. TOXIC AIR CONTAMINANTS (TAC) INCLUDING, BUT NOT LIMITED TO,

BENZENE, CHLOROBENZENE, 1, 2-DICHLOROETHANE, 1, 1-DICHLOROETHENE, DICHLOROMETHANE, TETRACHLOROETHYLENE, TETRACHLOROMETHANE, TOLUENE, 1, 1, 1-TRICHLOROETHANE, TRICHLOROETHYLENE,

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TRICHLOROMETHANE, VINYL CHLORIDE, AND XYLENE ISOMERS (EXHAUST ONLY).

- D. NOX, AS NO2 (EXHAUST ONLY)
- E. SOX, AS S02 (EXHAUST ONLY)
- F. CO (EXHAUST ONLY)
- G. TOTAL PARTICULATES/PM10 (EXHAUST ONLY)
- H. OXYGEN
- I. MOISTURE CONTENT
- J. TEMPERATURE
- K. FLOW RATE

[RULE 1303(b) (1) AND (b) (2)-MODELING AND OFFSET, 1401, 1150.1, 3004 (a) (4), 40 CFR PART 60 SUBPART WWW]

14. THE SOURCE TEST REPORT FOR THE FLARE TESTED SHALL INCLUDE: EMISSIONS OF CO, NO_x, TNMOCs, TOTAL PARTICULATES/PM10, SO_x AND TAC, IN UNITS OF LBS/HR AND PPMV (EXCEPT TOTAL PARTICULATES/PM10 WHICH SHALL BE IN LBS/HR AND GR/SCF), OVERALL TNMOC DESTRUCTION EFFICIENCY (WT %), ACETALDEHYDE, FORMALDEHYDE, EMISSIONS (LBS/HR AND PPMV), AND TNMOC EMISSIONS (PPMV), DRY BASIS, AS HEXANE AT 3% OXYGEN. THE REPORT SHALL ALSO PROJECT THE TOTAL DAILY SO2 AND HCL EMISSIONS BASED ON THE RESULTS
[RULE 1303(b) (1) AND (b) (2)-MODELING AND OFFSET, 1401, 1150.1, 3004 (a) (4), 40 CFR PART 60 SUBPART WWW, RULE 1150.1]

15. THE MAXIMUM FLARE SKIN TEMPERATURE AT ANY LOCATION SHALL NOT EXCEED 250 DEGREES FAHRENHEIT.
[RULE 217]

16. EMISSIONS FROM THE FLARE SHALL NOT EXCEED THE FOLLOWING:

POLLUTANT	LBS/DAY
CO	6.15
NOX AS NO2	2.60
PM10, AS PM2.5	26.1
ROG	1.88

[RULE 1303(a) (1) -BACT, RULE 1303(b) (1) AND (b) (2)-MODELING AND OFFSET, 1401]

17. THE OPERATOR SHALL OPERATE AND MAINTAIN THIS EQUIPMENT ACCORDING TO THE FOLLOWING REQUIREMENTS:

THE EXHAUST TEMPERATURE SHALL BE MAINTAINED AT A MINIMUM OF 1,400 DEGREES FAHRENHEIT WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION.

CONTINUOUS EXHAUST TEMPERATURE MONITORING AND RECORDING SYSTEM SHALL BE PURSUANT TO THE OPERATION AND MAINTENANCE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.7. SUCH A SYSTEM SHALL HAVE AN ACCURACY OF WITHIN ± 1% OF THE TEMPERATURE BEING MONITORED AND SHALL BE INSPECTED, MAINTAINED, AND CALIBRATED ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS USING AN APPLICABLE AQMD OR EPA APPROVED METHOD.

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FOR THE PURPOSE OF THIS CONDITION, A DEVIATION SHALL BE DEFINED AS WHEN A TEMPERATURE OF LESS THAN 1,400 DEGREES FAHRENHEIT OCCURS DURING NORMAL OPERATION. THE OPERATOR SHALL REVIEW THE RECORDS OF TEMPERATURE ON A DAILY BASIS TO DETERMINE IF A DEVIATION OCCURS OR SHALL INSTALL AN ALARM SYSTEM TO ALERT THE OPERATOR WHEN A DEVIATION OCCURS.

SEMI-ANNUAL REPORTING SPECIFIED IN CONDITION NO. 23 IN SECTION K, WHENEVER A DEVIATION OCCURS IN WHICH THE TEMPERATURE OF THE FLARE FALLS BELOW 1,400 DEGREES FAHRENHEIT, THE OPERATOR SHALL TAKE NECESSARY CORRECTIVE ACTIONS AS EXPEDITIOUSLY AS PRACTICABLE IN ACCORDANCE WITH GOOD AIR POLLUTION CONTROL PRACTICES FOR MINIMIZING EMISSIONS. RECORDS OF THE DURATION AND CAUSE (INCLUDING UNKNOWN CAUSE, IF APPLICABLE) OF THE DEVIATION AND THE CORRECTIVE ACTIONS TAKEN SHALL BE INCLUDED IN THE SEMI-ANNUAL REPORTING.

ALL DEVIATIONS SHALL BE REPORTED TO THE AQMD ON A SEMI-ANNUAL BASIS PURSUANT TO THE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.9 AND CONDITION NOS. 22 AND 23 IN SECTION K OF THIS PERMIT.

THE OPERATOR SHALL SUBMIT AN APPLICATION WITH A QUALITY IMPROVEMENT PLAN (QIP) IN ACCORDANCE WITH 40 CFR PART 64.8 TO THE AQMD IF AN ACCUMULATION OF DEVIATIONS EXCEEDS 5 PERCENT DURATION OF THIS EQUIPMENT'S TOTAL OPERATING TIME FOR ANY SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT. THE REQUIRED QIP SHALL BE SUBMITTED TO THE AQMD WITHIN 90 CALENDAR DAYS AFTER THE DUE DATE FOR THE SEMI-ANNUAL MONITORING REPORT.

THE OPERATOR SHALL KEEP ADEQUATE RECORDS IN A FORMAT THAT IS ACCEPTABLE TO THE AQMD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS SPECIFIED IN THIS CONDITION AND 40 CFR PART 64.9 FOR A MINIMUM OF FIVE YEARS.
[RULE 3004(A) (4)-PERIODIC MONITORING, 40CFR PART 64]

18. OPERATION OF THIS EQUIPMENT SHALL NOT RESULT IN THE RELEASE OF RAW LANDFILL GAS INTO THE ATMOSPHERE. ANY BREAKDOWN OR MALFUNCTION OF THIS EQUIPMENT RESULTING IN THE EMISSION OF RAW LANDFILL GAS SHALL BE REPORTED TO THE AQMD WITHIN TWENTY-FOUR HOURS AFTER OCCURRENCE AND IMMEDIATE REMEDIAL MEASURES SHALL BE UNDERTAKEN TO CORRECT THE PROBLEM AND PREVENT FURTHER EMISSIONS INTO THE ATMOSPHERE.
[RULE 430]
19. ALL RECORDS SHALL BE KEPT AND MAINTAINED FOR AT LEAST FIVE YEARS AND SHALL BE MADE AVAILABLE TO AQMD PERSONNEL UPON REQUEST.
[RULE 3004 (a) (4)]

Emissions and Requirements:

20. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:
 - CO: 2000 PPMV, RULE 407
 - CO: 0.06 LB/MMBTU HEAT INPUT- BACT/LAER
 - NOx: 0.025 LB/MMBTU HEAT INPUT- BACT/LAER

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NMOC: 98% DESTRUCTION OR 20 PPMV, AS HEXANE, RULE 1150.1, 40CFR60 SUBPART WWW
 PM: RULE 404, SEE APPENDIX B FOR EMISSIONS LIMITS
 PM: 0.1 gr/scf @ 12% CO2, RULE 409
 SOx: BASED ON MAXIMUM 150 PPMV H2S CON. IN LFG, RULE 431.1
 SOx: FACILITY WIDE TOTAL SOx EMISSION SHALL NOT EXCEED 375.1 LBS/DAY, FROM FIVE GAS TURBINES AND A REGENERATION FLARE.

BACKGROUND AND HISTORY:

Sunshine Gas Producers, LLC (SGP), a Title V facility, was initially issued permits to construct for the above described five gas turbines (under A/Ns 480567 through 480571) and a LFG fueled flare (Regeneration flare, under A/N 480572) on May 2, 2012. SGP is a landfill gas to energy (LFGTE) facility, located on Sunshine Canyon Landfill, designed to produce 24.5 MW gross power by combusting landfill gas in five gas turbines. The facility is operating near capacity generating net 19 MW to the grid. Electricity produced is sold to Pacific Gas & Electric (PG & E).

- On 1/20/15, SGP submitted the following applications for change of conditions for the existing equipment with an expedited processing review request. Facility has requested to change SOx, as SO2, emission from each of the gas turbine and a flare to a facility wide total SOx emission with no net increase for the permitted SOx emission.

Application #	Equipment	Current PC
571762	Gas Turbine #1	480567
571763	Gas Turbine #2	480568
571764	Gas Turbine #3	480569
571767	Gas Turbine #4	480570
571765	Gas Turbine #5	480571
571766	LFG Regen. Flare	480572

- SGP has also submitted A/N 571768 for the Title V permit revision to include above permits with requested change of condition.
- Most recent Title V facility permit was issued July 3, 2012.
- Facility had provided notification of gas turbine start up as of July 21, 2014.
- September 12, 2014 Title V inspection report had no adverse comment for the facility equipment and operations. As per District records there are no Notice to comply (NC) or Notice of Violation (NOV) issued for this new facility.
- Source tests protocol evaluation for the five gas turbines (480567 - 480571) is under review, request submitted 12/16/14.
- Source tests protocol for the flare (480572) has been conditionally approved under ST ID P15025, 01/23/2015.

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Proposed change of condition for permitted SOx Emission:

SGP receives raw LFG from the Sunshine Canyon Landfill (ID #49111) and treats the LFG gas to remove siloxanes and impurities, using LFG Treatment and compression System permitted under A/N 482510, prior to LFG combustion in gas turbines. The siloxane removal vessels contain three layers of media consisting of activated alumina, silica gel and molecular sieve. The siloxane removal system is regenerated on site using heated air by desorbing captured siloxane. The off gas produced during media regeneration cycle is combusted in a regenerative flare fueled by raw LFG (480572 PC).

The facility believes that an unforeseeable design flaw for the siloxane treatment system caused a greater portion of total sulfur compounds adsorbed by a media component (molecular sieve). Theoretically, H2S in LFG is supposed to pass through the media without adsorption except siloxane. This was revealed during recent studies conducted by the facility. As a result, during regeneration cycle sulfur compounds are desorbed and off gas containing sulfur compounds is combusted in flare (LFG treatment system should have removed siloxane only). The treated LFG used for combustion in gas turbines, therefore, contain less sulfur compounds generating reduced SOx emission, whereas flare is expected to have higher SOx emission. SGP first became aware in June 2014 during discussions with the vendor that siloxane removal system could divert H2S to the flare. However, SGP first became aware on November 14, 2014 that the flare would not be in compliance with SO2 limit for the flare and at that time SGP conducted study for SO2 emission.

On 12/23/14 SGP representatives met with the District staff to present their findings of their study and higher SOx emission for the flare. SGP stated that the facility wide total SOx emissions from the gas turbine and regenerative flare is expected to remain same and, therefore, no net increase for SOx emission. As suggested by the District and agreed by both parties, SGP submitted above applications for change of conditions; from individual equipment SOx emission limit to a facility wide total SOx daily emission with no net increase in emission. District also advised SGP to file for a variance while flare is expected to generate excess SOx emission than the permitted limit.

On 1/20/15, SGP filed for a short variance Case # 5880-2 seeking relief from operating flare with excess emission while District is evaluating permit applications filed for change of condition.

On 2/18/2015, Hearing Board had approved Short variance for the SGP to continue operations while these new permit applications for change of conditions are approved and reviewed by EPA.

SOx EMISSION:

Five identical gas turbines, current PCs (480567 - 480571),
SO2 emission = 73.7 lb SO2/day per turbine x 5 turbines = 368.5 lbs.

Flare current PC (480572),
SO2 emission = 6.6 lbs SO2/day

Cumulative SO2 emission = 368.5 + 6.6 = 375.1 lbs SO2/day

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Proposed facility wide total SOx emission = 375.1 lbs/day for the new applications (571762, 63, 64, 65, 67 (GTs) and 571766 (Regen. Flare).

Remove daily SO2 emission limit condition for the each equipment (480567 - 480571)

To comply with the facility wide SO2 emission, SGP is required to monitor and record total landfill gas (SCFM) received from Sunshine Canyon Landfill, average monthly H2S concentration for LFG, operating hours and calculated daily SO2 emission, lbs/day. Daily facility wide SO2 emission shall not exceed 375.1 lbs (which is same as under current GT and flare permits). Records shall be kept on file and maintained.

AEIS / NSR:

There is no net increase in emission as a result of revised permit condition reflecting facility wide total daily SO2 emission from the current SO2 emission for individual equipment.

No change in equipment design and specs, or process changes are proposed an all criteria pollutants' emissions are same as under current PCs.

Proposed SOx (as SO2) Emission Conditions:

Gas Turbines:

Remove daily emission limit of 73.7 lbs SOx per day for each gas turbine (Condition #20 listed under current PCs for A/Ns 480567 through 480571).

Revise condition No. 24, above, for the gas turbines to include facility wide SOx emission;

SOx: FACILITY WIDE TOTAL SOx EMISSION SHALL NOT EXCEED 375.1 LBS/DAY, FROM FIVE GAS TURBINES AND A REGENERATION FLARE.

Regeneration Flare:

Remove daily emission limit of 6.6 lbs SOx per day for the flare (Condition #17 listed under current PC, A/N 480572).

Revise condition No. 20, above, for the flare to include facility wide SOx emission;

SOx: FACILITY WIDE TOTAL SOx EMISSION SHALL NOT EXCEED 375.1 LBS/DAY, FROM FIVE GAS TURBINES AND A REGENERATION FLARE.

AMEND FACILITY WIDE CONDITION (S), SEC. H. FOR THE TV REVISION, A/N 571768

8. THE OPERATOR SHALL MONITOR TOTAL VOLUME OF RAW LANDFILL GAS PROCESSED BY THIS FACILITY, PRIOR TO LFG TREATMENT AND COMPRESSION SYSTEM, AND MONTHLY AVERAGE H2S CONCENTRATION (PPMV) FOR THE LFG. THE OPERATOR SHALL CALCULATE DAILY SOX, AS SO2, FACILITY WIDE EMISSION. ALL RECORDS REQUIRED SHALL BE KEPT ON FILE TO COMPLY WITH THIS CONDITION.

9. THE FACILITY WIDE TOTAL SOX EMISSION, AS SO2, SHALL NOT EXCEED 375.1 LBS PER DAY.

[RULE 204]

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RULES EVALUATION: (From PC evaluation with changes as applicable)

RULE 212: This are no net emission increase in emissions, no impact on health risk and no school within 1000' of emission source. No public notice is required
Compliance is expected.

RULE 218: CEMS. Exempt per Rule 218 (b) (1), as equipment is subject to Reg. IX – NSPS. However, permit condition requires installation and operation of approved CEMS by the SCAQMD.
On 1/27/15, SCAQMD has issued final certification for CEMS for all five gas turbines.

RULE 401: With proper operation, control and maintenance, equipment is expected to comply with this rule.

RULE 402: With proper operation, control and maintenance nuisance complaints are not expected from each GT and flare operation.

RULE 404: Gas turbine is exempt from provisions of this rule per 404 (c).

FIARE: There is no net change in emissions from the current permits for the proposed change of condition. Compliance is expected.

RULE 407: Compliance is expected with the 2000 ppmv CO limit.
Gas turbine and LFG flare are subject to Regulation XI and complies with gaseous fuel sulfur limit of Rule 431.1.
Therefore, exempt from SOx, 500-ppmv limit, per 407(c) (2).

RULE 409: Rule compliance with combustion contaminants con. of 0.1 grains/cu. ft. at 12% CO2, over 15 minutes can be expected as there is no net change in emissions.

RULE 431.1: Compliance with LFG Sulfur content limit of 150 ppmv is expected.

RULE 474: This rule is not applicable since the turbine heat input rating is less than 555 MMBtu/hr and NOx emission will be < 300 ppmv limit.

RULE 475: This rule is not applicable since the turbine rating is less than 10 MW.

REGULATION IX: SOx emission is revised from equipment based daily emission to facility wide total daily Sox emission. Therefore, no net increase in emission is considered. Compliance is expected.

RULE 1134: This rule is applicable to only existing gas turbines, ≥ 0.3 MW, as of August 4, 1989. Gas turbines and flare are new equipment with operation start up in July 2014. Therefore rule is not applicable.

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RULE 1150.1: Pretreated and conditioned LFG will be combusted in Solar Turbine, Mercury 50 and LFG flare. Similar type of turbines are issued PCs. Proposed GTs and flare are expected to meet NMOC destruction efficiency, 98% by wt., or 20 ppmv ROG as Hexane in exhaust @ 3% O₂, dry. Also, methane destruction efficiency can be expected 99% (wt) – Rule 1150.1 amended April 1, 2011. Compliance can be determined upon completion of the source tests and final report.

Gas combustion turbines and flare will produce hydrochloric acid (HCl) as combustion product. However, HCl is not listed under Rule 1150.1 Table 1 & 2 and no source testing is required for HCl. (Note: HCl is subject to Rule 1401 HIC, HIA).

REG XIII: There is no net increase in criteria pollutants' emissions as a result of the proposed change in condition. Compliance is expected.

RULE 1325: Federal PM_{2.5} New Source Review Program
This rule is not applicable based on definition of the Major Polluting Facility (i.e. PTE 100 TPY or more of PM_{2.5}, or its precursor-for this rule means NO_x and SO₂).
For this new facility, total estimated emissions -71 TPY NO_x, 70 TPY SO₂ and 20.6 TPY PM_{2.5}.

RULE 1401: Exempt, as there is no net change in emissions or health risk.

RULE 1401.1: Exempt. This is an existing facility. No impact on emissions for the proposed change in condition.

REG. XVII: Preventative Significant Deterioration (PSD): Not applicable as there is no net change in permitted emissions.

REG. XX: Regional Clean Air Incentive Market (RECLAIM)

This facility is exempt from RECLAIM per Rule 2001(i)(1)(C) – construction and operation of landfill gas control, processing or landfill gas energy recovery facilities, and such facility is prohibited from electing to enter RECLAIM.

REG. XXX: Title V

No change in emissions from permitted equipment is expected for the proposed change in condition (SO_x emission).

SGP has submitted A/N 571768 for the Title V permit revision to include above permits with requested change of condition.

Recent Title V facility inspection report, 9/12/14, has no adverse comments for the facility operations.

Compliance is expected.

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FEDERAL REGULATIONS:

Municipal Solid Waste Landfill NSPS, 40 CFR Part 60, Subpart WWW

§60.752 (b) (2) requires the owner or operator of MSW landfill to route all of the collected gas to a control system that complies with either;

- To an open flare
- A control system designed and operated to reduce TNMOC by 98 wt% or TNMOC concentration in exhaust to less than 20 ppmvd, as hexane at 3% O₂.
- Route the collected gas to a treatment system that processes the collected gas for subsequent sale or use.

Sunshine Canyon landfill (Id # 49111) complies with the applicable requirements. Collected LFG will be treated by Sunshine gas producers (A/N 482510- compressing, de-watering, and filtering and Siloxane removal), thus may meet definition of gas treatment and complying with §60.752 (b) (2) (iii) (C). Therefore, Sunshine Gas Producers facility may comply with the provisions of MSW landfill NSPS up to, and including, the gas treatment system. As the SGP utilizes treated LFG, the combustion equipment may not be subject to emission control compliance demonstration and equipment parameter monitoring and recordkeeping requirements of the MSW landfill NSPS. However, the SGP facility shall comply with all applicable requirements until SGP has obtained EPA approval for meeting the LFG treatment definition and exemption criteria listed under 40 CFR §60.751 and air emissions standards under 40 CFR §60.752(b)(2)(iii)(C).

NSPS Requirements 40CFR Part 60- subpart KKKK

(Stationary Combustion GT > 10 MMBtu/hr)

SO_x:

There is no net change in permitted SO_x emission for the gas turbines.
Compliance is expected with subpart KKKK.

NO_x:

Compliance is expected with subpart KKKK as there is no net change in emission.

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NESHAPS - 40CFR Part 63- Subpart AAAA (Reference from PC evaluation)

Sunshine Canyon MSW Landfill facility is subject to the requirements of this regulation and to comply with start-up, shutdown and malfunction (SSM), deviation reporting (§63.1965) and notification (§63.1980).

Sunshine Gas Producers (SGP) facility's combustion equipment (gas turbines) will use treated gas that meets requirements of the regulation, then the combustion device may not have to meet any emission limits or monitoring requirements. However, the SGP facility shall comply with all applicable requirements until SGP has obtained EPA approval for meeting the LFG treatment definition and exemption criteria listed under 40 CFR §60.751 and air emissions standards under 40 CFR §60.752(b) (2) (iii) (C).

SGP is considered a major HAP facility based on single pollutant (HCl), PTE > 10 TPY. This will be verified based on source tests results. TAC emissions and requirements are addressed under Title V permit, Section J- Air Toxics.

NESHAPS - 40CFR Part 63- Subpart YYYY

LFGTE facility's PTE for any single HAP is estimated at > 10 TPY and combination of HAP at < 25 TPY. As the facility is considered a major source of HAP (single pollutant's PTE), per §63.6085 (b) compliance with this regulation is applicable for combustion gas turbines.

Lean premix gas-fired stationary new gas turbine construction is subject to the following emission limitations requirement;

§63.6100, Table 1 – Formaldehyde concentration of ≤ 91 ppbvd at 15% O₂.

§63.6150, Table 6 – Annually report (1) fuel flow rate, heating value, and % of heat input from LFG fuel (2) operating limits provided in federally enforceable permit and, (3) Any problems or errors suspected with the meters.

A source test protocol for the gas turbines is under review. A source test condition requires Formaldehyde emission determination.

Compliance can be determined once source tests results are reviewed and approved.

Compliance Assurance Monitoring (CAM) - 40CFR Part 64

Combustion gas turbines do not use any add-on controls (e.g. catalytic oxidizer, SCR, etc) to achieve a specified emission limit. However, each GT is required to have a CEMS that qualifies as a continuous compliance determination method in accordance with 40 CFR 64.1. Thus, GT is exempt from CAM requirements.

A/N 518031 was approved for CAM plan for NMHC emissions control using an ultra low emission enclosed LFG flare which treats exhaust generated from the LFG treatment and compression system, during media regeneration.

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40CFR Parts 51, 52, 70 and 71: (CO2 emission deferral from Bioenergy sources)

On July 1, 2011, US EPA approved final rule – Deferral for CO2 emissions from bioenergy and other biogenic sources under the prevention of significant deterioration (PSD) and Title V programs.

Estimated CO2e for this project is greater than 100 TPY. However, approval by US EPA for final rule action defers for a period of three (3) years the application of PSD and TV to biogenic CO2 emissions from bioenergy and other biogenic sources. The category Sources/users of biogas – Solid waste landfills, NAICS 562212 is one of the affected entities by category. Therefore, this facility is exempt from CO2e requirement until final rule is applicable and enforceable.

Acid Rain Program - 40CFR Part 72

This is a “non-utility Unit” and do not supply more than 25 MWe output to any power distribution system for sale (Gross 24.5 MWe will be produced by five GTs). Therefore, exempt from the provisions of 40CFR Part 72.

CONCLUSION/RECOMMENDATION:

Issue permits to construct for the above equipment with revised facility wide SOx emissions, and upon completion of 45-day EPA review. No public notice is required.

Title V permit revision can be issued under A/N 571768.