



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov



May 2, 2008

Mr. Gerardo Rios
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: LADWP Valley Generation Station, facility ID 800193

Dear Mr. Rios:

The South Coast Air Quality Management District (AQMD) has received and reviewed an application from Los Angeles Department of Water and Power (LADWP) for a minor permit revision to the Title V permit of its Valley Generation Station (VGS). The proposed permit revision would operate an oil/water separator. The following is a summary of the applications.

Application #	Device #	Section #	Proposed Actions
387103	D167	D	Operation of an oil/water separator
387104			Title V facility permit revision

A copy of our engineering analysis and the proposed revision to the existing Title V permit are enclosed for the 45-day EPA review. If you have any questions or wish to provide comments regarding this project, please call Mr. Li Chen (909) 396-2426 or Mr. John Yee (909) 396-2531.

Very truly yours,

Michael D. Mills, P.E.
Senior Manager
General Commercial and Energy Team
Engineering and Compliance

Attachments

cc: Bruce Moore, LADWP
Energy Unit Files

Cleaning the air that we breathe.

FACILITY PERMIT TO OPERATE

**LA CITY, DWP VALLEY GENERATING STATION
11801 SHELDON ST
SUN VALLEY, CA 91352**

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By 7
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : PETROLEUM STORAGE					
System 1 : Underground Tank					
STORAGE TANK, UNDERGROUND, UNIT NO. 1, FUEL OIL, 4220 BBL; WIDTH: 27 FT 6 IN; HEIGHT: 12 FT; LENGTH: 73 FT A/N: C25882	D17				B22.1
STORAGE TANK, UNDERGROUND, UNIT NO. 2, FUEL OIL, 4220 BBL; WIDTH: 27 FT 6 IN; HEIGHT: 12 FT; LENGTH: 73 FT A/N: C25883	D18				B22.1
STORAGE TANK, UNDERGROUND, UNIT NO. 3, FUEL OIL, 6100 BBL; WIDTH: 36 FT; HEIGHT: 12 FT; LENGTH: 81 FT A/N: C25884	D19				B22.1
STORAGE TANK, UNDERGROUND, UNIT NO. 4, FUEL OIL, 6100 BBL; WIDTH: 36 FT; HEIGHT: 12 FT; LENGTH: 81 FT A/N: C25885	D20				B22.1
System 2 : Aboveground Tank					
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 171002, FUEL OIL, 171000 BBL; DIAMETER: 160 FT; HEIGHT: 48 FT WITH A/N: NR FLOATING ROOF, WELDED SHELL	D22				B22.1, H23.1

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 (9) See App B for Emission Limits (10) See Section J for NESHAP/MACT requirements

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Process 2 : PETROLEUM STORAGE					
PRIMARY SEAL, METALLIC SHOE SECONDARY SEAL, WIPER TYPE					
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 171003, FUEL OIL, 171000 BBL; DIAMETER: 160 FT; HEIGHT: 48 FT WITH A/N: C25878 FLOATING ROOF, WELDED SHELL PRIMARY SEAL, METALLIC SHOE	D23				B22.1, H23.1
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 171004, FUEL OIL, 171000 BBL; DIAMETER: 160 FT; HEIGHT: 48 FT WITH A/N: C25879 FLOATING ROOF, WELDED SHELL PRIMARY SEAL, METALLIC SHOE SECONDARY SEAL, WIPER TYPE	D24				B22.1, H23.1
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 171005, FUEL OIL, 171000 BBL; DIAMETER: 160 FT; HEIGHT: 48 FT WITH A/N: C25880	D25				B22.1, H23.1

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Process 2 : PETROLEUM STORAGE					
FLOATING ROOF, WELDED SHELL PRIMARY SEAL, METALLIC SHOE					
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 171006, FUEL OIL, 171000 BBL; DIAMETER: 160 FT; HEIGHT: 48 FT WITH A/N: C25881 FLOATING ROOF, WELDED SHELL PRIMARY SEAL, METALLIC SHOE SECONDARY SEAL, WIPER TYPE	D26				B22.1, H23.1
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 12501, FUEL OIL, 12858 BBL; DIAMETER: 48 FT; HEIGHT: 40 FT WITH A/N: C25874 FLOATING ROOF, WELDED SHELL PRIMARY SEAL, METALLIC SHOE	D27				B22.1, H23.1

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Process 2 : PETROLEUM STORAGE					
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 12502, FUEL OIL, 12858 BBL; DIAMETER: 48 FT; HEIGHT: 40 FT WITH A/N: C25875 FLOATING ROOF, WELDED SHELL PRIMARY SEAL, METALLIC SHOE	D28				B22.1, H23.1
STORAGE TANK, PONTOON, FIXED ROOF, INTERNAL FLOATING ROOF, DIESEL FUEL, 60300 BBL; DIAMETER: 99 FT; HEIGHT: 48 FT WITH A/N: 415749 FLOATING ROOF, PONTOON, WELDED SHELL PRIMARY SEAL, METALLIC SHOE	D161				B22.1, B59.1, C1.6, H23.1, K67.7
Process 3 : INTERNAL COMBUSTION					
System 2 : Emergency Power					
INTERNAL COMBUSTION ENGINE, EMERGENCY POWER, DIESEL FUEL, CUMMINS, MODEL VTA-1710-P700, WITH AFTERCOOLER, TURBOCHARGER, 700 BHP A/N: 457898	D92		NOX: PROCESS UNIT**	NOX: 469 LBS/1000 GAL DIESEL (1) [RULE 2012,12-7-1995;RULE 2012,4-9-1999] ; PM: (9) [RULE 404,2-7-1986]	C1.1, C1.2, C177.1, D12.2, E116.1, K67.8

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Process 4 : FUEL OIL UNLOADING RACK					
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D40				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D41				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D42				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D43				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D44				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D45				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D72				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D73				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D74				

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Process 4 : FUEL OIL UNLOADING RACK					
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D75				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D76				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D77				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D78				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D79				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D80				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D81				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D82				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D83				

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Process 4 : FUEL OIL UNLOADING RACK					
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D84				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D85				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D86				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D87				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D88				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D89				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D90				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D91				
UNLOADING ARM, TANK TRUCK, DIESEL FUEL, DIAMETER: 6 IN A/N: 415750	D164				

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Process 5 : ABRASIVE BLASTING					
ABRASIVE BLASTING, OPEN, DIAMETER: 0.375 IN; 100 PSIG A/N: 120357	D49			PM: (9) [RULE 1140,8-2-1985;RULE 405,2-7-1986]	D323.1
Process 6 : SPRAY BOOTH					
SPRAY COATING OPERATION, WITH FABRIC FILTER, SPRAY BOOTH A/N: 271535	D50			PM: (9) [RULE 404,2-7-1986] ; ROG: (9) [RULE 1107,5-12-1995;RULE 1107,8-14-1998;RULE 1171,11-7-2003;RULE 1171,5-6-2005]	A63.1, B27.1, C6.1, D12.1, D322.1, E175.1, H23.7, K67.1, K67.2
Process 7 : FUEL STORAGE & DISPENSING					
STORAGE TANK, METHANOL COMPATIBLE, UNDERGROUND, GASOLINE, PHASE I VAPOR CONTROL, 12000 GALS A/N: 431577	D94				C1.8, D330.1, H23.2, J109.1, J110.1, J373.1
STORAGE TANK, METHANOL COMPATIBLE, UNDERGROUND, GASOLINE, DUAL COMPARTMENT, PHASE I VAPOR CONTROL, 12000 GALS A/N: 431577	D95				C1.8, D330.1, H23.2, J109.1, J110.1, J373.1
FUEL DISPENSING NOZZLE, BALANCE TYPE PHASE II CONTROL, GASOLINE, VENTED TO A VAPOR RECOVERY SYSTEM A/N: 431577	D96				C1.8, D330.1, H23.2, J109.1, J110.1, J373.1

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Process 7 : FUEL STORAGE & DISPENSING					
FUEL DISPENSING NOZZLE, BALANCE TYPE PHASE II CONTROL, GASOLINE, VENTED TO A VAPOR RECOVERY SYSTEM A/N: 431577	D97				C1.8, D330.1, H23.2, J109.1, J110.1, J373.1
FUEL DISPENSING NOZZLE, BALANCE TYPE PHASE II CONTROL, GASOLINE, VENTED TO A VAPOR RECOVERY SYSTEM A/N: 431577	D98				C1.8, D330.1, H23.2, J109.1, J110.1, J373.1
FUEL DISPENSING NOZZLE, BALANCE TYPE PHASE II CONTROL, GASOLINE, VENTED TO A VAPOR RECOVERY SYSTEM A/N: 431577	D99				C1.8, D330.1, H23.2, J109.1, J110.1, J373.1
FUEL DISPENSING NOZZLE, BALANCE TYPE PHASE II CONTROL, GASOLINE, VENTED TO A VAPOR RECOVERY SYSTEM A/N: 431577	D100				C1.8, D330.1, H23.2, J109.1, J110.1, J373.1
FUEL DISPENSING NOZZLE, BALANCE TYPE PHASE II CONTROL, GASOLINE, VENTED TO VAPOR RECOVERY SYSTEM A/N: 431577	D102				C1.8, D330.1, H23.2, J109.1, J110.1, J373.1
STORAGE TANK, UNDERGROUND, SPILL CONTAINMENT, NOT METHANOL COMPATIBLE, 4000 GALS A/N: 431577	D109				H23.2

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Process 7 : FUEL STORAGE & DISPENSING					
LOADING ARM, BOTTOM, TANK TRUCK, DIESEL FUEL, WITH 2" DIA VAPOR RECOVERY HOSE A/N: 431577	D165				E178.1
Process 8 : OIL/WATER SEPARATION					
OIL WATER SEPARATOR, FIXED ROOF, HEIGHT: 17 FT 10 IN; DIAMETER: 15 FT 2 IN A/N: 194965	D110				H23.8
SETTLING TANK, COVERED, WITH A HEATING COIL, HEIGHT: 17 FT 10 IN; DIAMETER: 15 FT 2 IN A/N: 194965	D111				H23.8
TANK, RETENTION, HEIGHT: 6 FT 2 IN; DIAMETER: 3 FT 2 IN A/N: 194965	D112				H23.8
FLOATATION UNIT, PARTIALLY UNDER GRADE, WITH A HEATING COIL A/N: 194965	D113				H23.8
SKIMMING POND, WITH 5 FEET UNDER GRADE, WIDTH: 7 FT 6 IN; HEIGHT: 7 FT; LENGTH: 15 FT 5 IN A/N: 194965	D114				H23.8
TANK, HEATED, DECANTING, WIDTH: 10 FT 10 IN; HEIGHT: 3 FT 7 IN; LENGTH: 14 FT A/N: 194965	D115				H23.8

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Process 8 : OIL/WATER SEPARATION					P1.1
SUMP, WASTE WATER, L-SHAPED, WIDTH: 4 FT 5 IN; HEIGHT: 1 FT 8 IN; LENGTH: 32 FT 7 IN A/N: 194965	D116				H23.8
OIL WATER SEPARATOR, FIXED ROOF, HIGHLAND TANK, MODEL HT-4000, 24000 GALS/HR; DIAMETER: 5 FT 4 IN; LENGTH: 24 FT A/N:	D167				B89.1, H23.9
Process 9 : SOLVENT RECOVERY					
TANK, HEATED, SOLVENT, EQUIPPED WITH MICROPROCESSOR- CONTROLLED- THERMOSTAT, 10 GALS; WIDTH: 1 FT 8 IN; HEIGHT: 2 FT 4 IN; LENGTH: 2 FT 11 IN A/N: 294557	D122				C1.3
Process 10 : R-219 EXEMPT EQUIPMENT SUBJECT TO SOURCE-SPECIFIC RULES					
RULE 219 EXEMPT EQUIPMENT, CLEANING EQUIPMENT, SMALL, UNHEATED, NON-CONVEYORIZED	E123			ROG: (9) [RULE 1171,11-7- 2003;RULE 1171,5-6-2005]	H23.6
RULE 219 EXEMPT EQUIPMENT, REFRIGERATION UNITS	E124				H23.4
RULE 219 EXEMPT EQUIPMENT, ABRASIVE BLASTING EQUIPMENT, GLOVE-BOX, <= 53 FT3, WITH DUST FILTER	E125			PM: (9) [RULE 1140,8-2- 1985;RULE 404,2-7-1986;RULE 405,2-7-1986]	D322.2, D381.1, K67.1

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Process 10 : R-219 EXEMPT EQUIPMENT SUBJECT TO SOURCE-SPECIFIC RULES					
RULE 219 EXEMPT EQUIPMENT, REFRIGERANT RECOVERY AND/OR RECYCLING UNITS,	E127				H23.3
RULE 219 EXEMPT EQUIPMENT, COATING EQUIPMENT, PORTABLE, ARCHITECTURAL COATINGS	E128			ROG: (9) [RULE 1113,11-8-1996;RULE 1113,5-14-1999;RULE 1171,11-7-2003;RULE 1171,5-6-2005]	K67.3
RULE 219 EXEMPT EQUIPMENT, COOLING TOWERS	E129				H23.5

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SECTION D: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**

**FACILITY PERMIT TO OPERATE
 LA CITY, DWP VALLEY GENERATING STATION**

SECTION D: DEVICE ID INDEX

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D25	2	2	2
D26	3	2	2
D27	3	2	2
D28	4	2	2
D40	6	4	0
D41	6	4	0
D42	6	4	0
D43	6	4	0
D44	6	4	0
D45	6	4	0
D46	5	4	0
D47	5	4	0
D49	9	5	0
D50	9	6	0
D72	6	4	0
D73	6	4	0
D74	6	4	0
D75	7	4	0
D76	7	4	0
D77	7	4	0
D78	7	4	0
D79	7	4	0
D80	7	4	0
D81	7	4	0
D82	7	4	0
D83	7	4	0
D84	8	4	0
D85	8	4	0
D86	8	4	0

**FACILITY PERMIT TO OPERATE
 LA CITY, DWP VALLEY GENERATING STATION**

SECTION D: DEVICE ID INDEX

Device Index For Section D			
Device ID	Section D Page No.	Process	System
D87	8	4	0
D88	8	4	0
D89	8	4	0
D90	8	4	0
D91	8	4	0
D92	4	3	2
D94	9	7	0
D95	9	7	0
D96	9	7	0
D97	10	7	0
D98	10	7	0
D99	10	7	0
D100	10	7	0
D102	10	7	0
D109	10	7	0
D110	11	8	0
D111	11	8	0
D112	11	8	0
D113	11	8	0
D114	11	8	0
D115	11	8	0
D116	12	8	0
D122	12	9	0
E123	12	10	0
E124	12	10	0
E125	12	10	0
E127	13	10	0
E128	13	10	0
E129	13	10	0
D136	5	3	2
D161	4	2	2
D164	8	4	0
D165	11	7	0
D167	12	8	0

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

(a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[RULE 401, 3-2-1984; RULE 401, 9-11-1998]

F14.1 The operator shall not use fuel oil containing sulfur compounds in excess of 0.05 percent by weight.

[RULE 431.2, 5-4-1990]

F14.2 The operator shall not purchase fuel oil containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

This condition shall become effective on or after June 1, 2004.

[RULE 431.2, 9-15-2000]

F16.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

purchase records of fuel oil and sulfur content of the fuel

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

F18.1 Acid Rain SO2 Allowance Allocation for affected units are as follows:

Device ID	Boiler ID	Contaminant	Tons in any year
1	Boiler No. 1	SO2	121
5	Boiler No. 2	SO2	140
9	Boiler No. 3	SO2	388
13	Boiler No. 4	SO2	349

a). The allowance allocation(s) shall apply to calendar years 2000 through 2009.

b). The number of allowances allocated to Phase II affected units by U.S. EPA may change in a 1998 revision to 40CFR73 Tables 2,3, and 4. In addition, the number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. Neither of the aforementioned conditions necessitate a revision to the unit SO2 allowance allocations identified in this permit (see 40 CFR 72.84)

[40CFR 73 Subpart B, 1-11-1993]

F24.1 Accidental release prevention requirements of Section 112(r)(7):

a). The operator shall comply with the accidental release prevention requirements pursuant to 40 CFR Part 68 and shall submit to the Executive Officer, as a part of an annual compliance certification, a statement that certifies compliance with all of the requirements of 40 CFR Part 68, including the registration and submission of a risk management plan (RMP).

b). The operator shall submit any additional relevant information requested by the Executive Officer or designated agency.

[40CFR 68 - Accidental Release Prevention, 5-24-1996]

PROCESS CONDITIONS

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

P1.1 The operator shall limit the throughput to no more than 210600 gallon(s) per day.

For the purpose of this condition, throughput shall be defined as the treatment of waste-oil mixtures.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Processes subject to this condition : 8]

DEVICE CONDITIONS

A. Emission Limits

A63.1 The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
VOC	Less than or equal to 6 LBS IN ANY ONE DAY
VOC	Less than or equal to 116 LBS IN ANY ONE MONTH

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D50]

B. Material/Fuel Type Limits

B22.1 The operator shall not use this equipment with materials having a(n) true vapor pressure of 0.1 psia or greater under actual operating conditions.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D17, D18, D19, D20, D22, D23, D24, D25, D26, D27, D28, D161]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

B27.1 The operator shall not use materials containing any compounds identified in the SCAQMD Rule 1401, as amended 07-dec-1990.

[RULE 1401, 12-7-1990]

[Devices subject to this condition : D50]

B59.1 The operator shall only use the following material(s) in this device :

diesel which meets the specifications of Rule 431.2

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

[Devices subject to this condition : D136, D161]

B89.1 The operator shall not use oily water with VOC content greater than 0.005 grams per liter, including water and exempt compounds.

[RULE 1176, 5-13-1994; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D167]

C. Throughput or Operating Parameter Limits

C1.1 The operator shall limit the operating time to no more than 8 hour(s) in any one day.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D92]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

C1.2 The operator shall limit the operating time to no more than 125 hour(s) in any one year.

The 125 hours per year shall include no more than 30 hours in any one year for maintenance and testing purposes.

The operation of the engine beyond the 30 hr/yr allotted for engine maintenance and testing shall be allowed only in the event of a loss of grid power or up to 30 minutes prior to a rotating outage, provided that the grid operator or electric utility has ordered rotating outages in the control area where the engine is located or has indicated that it expects to issue such an order at a certain time, and the engine is located in a utility service block that is subject to the rotating outage.

Engine operation shall be terminated immediately after the utility distribution company advises that a rotating outage is no longer imminent or in effect.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D92]

C1.3 The operator shall limit the material processed to no more than 4 gallon(s) per day.

For the purpose of this condition, "materials" shall be defined as organic chemicals.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D122]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

C1.4 The operator shall limit the operating time to no more than 199 hour(s) in any one year.

The 199 hours per year shall include no more than 30 hours in any one year for maintenance and testing purposes.

The operation of the engine beyond the 30 hr/yr allotted for engine maintenance and testing shall be allowed only in the event of a loss of grid power or up to 30 minutes prior to a rotating outage, provided that the grid operator or electric utility has ordered rotating outages in the control area where the engine is located or has indicated that it expects to issue such an order at a certain time, and the engine is located in a utility service block that is subject to the rotating outage.

Engine operation shall be terminated immediately after the utility distribution company advises that a rotating outage is no longer imminent or in effect.

[RULE 1110.2, 2-1-2008; **RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996**; RULE 1470, 6-1-2007]

[Devices subject to this condition : D136]

C1.6 The operator shall limit the throughput to no more than 37000 gallon(s) in any one calendar month.

This condition shall only apply during normal operation. The throughput limit shall be 587,000 gallons for the months during which turbines 6 and 7 are being commissioned. This condition shall not apply during a month in which a natural gas force majeure occurs.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition. Records shall include monthly invoices for all tank truck fuel unloading activities and the monthly fuel oil meter readings from turbines 5, 6 and 7.

[**RULE 1303(b)(2)-Offset, 5-10-1996**; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D161]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

- C1.8 The operator shall limit the gasoline dispensed to no more than 40000 gallon(s) per month.

This limit shall be based on the total combined limit for equipment D94, D95, D96, D97, D98, D99, D100, and D102.

The operator shall maintain written records of the fuel dispensed on a monthly basis. The records shall be kept for a minimum of 5 years and be made available to AQMD personnel upon request.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D94, D95, D96, D97, D98, D99, D100, D102]

- C6.1 The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 0.25 inches water column.

To comply with this condition, the operator shall monitor the differential pressure as specified in condition number 12-1.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D50]

- C177.1 The operator shall set and maintain the fuel injection timing of the engine at 4 degrees retarded relative to standard timing.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D92]

D. Monitoring/Testing Requirements

- D12.1 The operator shall install and maintain a(n) gauge to accurately indicate the differential pressure across the filter.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D50]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D12.2 The operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine.

[RULE 1110.2, 2-1-2008; RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996; RULE 2012, 5-6-2005]

[Devices subject to this condition : D92, D136]

D322.1 The operator shall perform a quarterly inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

[Devices subject to this condition : D50]

D322.2 The operator shall perform annual inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

[Devices subject to this condition : E125]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D323.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a semi-annual basis, at least, unless the equipment did not operate during the entire semi-annual period. The routine semi-annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD. SUGGESTED CHAR

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

[Devices subject to this condition : D49]

D330.1 The operator shall have a person that has been trained in accordance with Rule 461(d)(5) conduct a semi-annual inspection of the gasoline transfer and dispensing equipment. The first inspection shall be in accordance with Rule 461, Attachment B, the second inspection shall be in accordance with Rule 461, Attachment C, and the subsequent inspections shall alternate protocols. The operator shall keep records of the inspection and the repairs in accordance to Rule 461 and Section K of this Permit.

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

[Devices subject to this condition : D94, D95, D96, D97, D98, D99, D100, D102]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D381.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions; and
- 3). Date and time visible emission was abated.

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

[Devices subject to this condition : E125]

E. Equipment Operation/Construction Requirements

E116.1 This engine shall not be used as part of a demand response program using interruptible service contract in which a facility receives a payment or reduced rates in return for reducing its electric load on the grid when requested to do so by the utility or the grid operator.

[RULE 1470, 6-1-2007]

[Devices subject to this condition : D92, D136]

E162.1 The operator shall use this equipment only during utility failure periods, except for maintenance purposes.

[RULE 1110.2, 6-3-2005; RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996]

[Devices subject to this condition : D136]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

E175.1 The operator shall not use this equipment unless all exhaust air passes through the following:

filter media at least 2 inches thick

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D50]

E178.1 The operator shall load diesel into tank trucks using bottom loading.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 462, 5-14-1999]

[Devices subject to this condition : D165]

E193.2 The operator shall operate and maintain this equipment according to the following specifications:

The fuel injection timing of this engine shall be set and maintained at 4 degrees retarded relative to standard production timing at the factory as established by Caterpillar Product News Bulletin "3412 DITTA 500 kw California Configuration" dated July 1993

The equipment may operate for maintenance and testing purpose for up to 30 hours per year.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1470, 3-4-2005]

[Devices subject to this condition : D136]

H. Applicable Rules

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

H23.1 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	463

[RULE 463, 3-11-1994]

[Devices subject to this condition : D22, D23, D24, D25, D26, D27, D28, D161]

H23.2 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	461

[RULE 461, 9-8-1995]

[Devices subject to this condition : D94, D95, D96, D97, D98, D99, D100, D102, D109]

H23.3 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Refrigerants	40CFR82, SUBPART	B
Refrigerants	District Rule	1411

[RULE 1411, 3-1-1991; 40CFR 82 Subpart B, 7-14-1992]

[Devices subject to this condition : E127]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

H23.4 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Refrigerants	District Rule	1415

[RULE 1415, 10-14-1994]

[Devices subject to this condition : E124]

H23.5 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Chromium, Hexavalent	District Rule	1404

[RULE 1404, 4-6-1990]

[Devices subject to this condition : E129]

H23.6 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1122

[RULE 1122, 7-11-1997]

[Devices subject to this condition : E123]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

H23.7 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
PM	District Rule	481
VOC	District Rule	109

[RULE 109, 3-6-1992; RULE 481, 5-5-1978]

[Devices subject to this condition : D50]

H23.8 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	464

[RULE 464, 12-7-1990]

[Devices subject to this condition : D46, D47, D110, D111, D112, D113, D114, D115, D116]

H23.9 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1176

[RULE 1176, 9-13-1996]

[Devices subject to this condition : D167]

J. Rule 461

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

J109.1 The operator shall use, except for diesel transfer, the phase I vapor recovery system in full operation whenever this equipment is in use. This system shall be installed, operated and maintained to meet all CARB certification requirements.

[RULE 461, 4-21-2000; RULE 461, 1-9-2004]

[Devices subject to this condition : D94, D95, D96, D97, D98, D99, D100, D102]

J110.1 The operator shall use, except for diesel transfer, the phase II vapor recovery system in full operation whenever gasoline from this equipment is dispensed to motor vehicles as defined in Rule 461. This system shall be installed, operated and maintained to meet all CARB certification requirements.

[RULE 461, 4-21-2000; RULE 461, 1-9-2004]

[Devices subject to this condition : D94, D95, D96, D97, D98, D99, D100, D102]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

J373.1 The operator shall comply with the following gasoline transfer and dispensing requirements:

a). The Phase II vapor recovery systems shall be installed, operated, and maintained such that the maximum allowable pressure through the system including nozzle, vapor hose, swivels, and underground piping does not exceed the dynamic back pressures described by the California Air Resources Board (CARB) Executive Order by which the system was certified:

Nitrogen Flowrates (CFH)	Dynamic Back Pressure (Inches of Water)
60	0.35
80	0.62

b). Dynamic back pressure tests shall be conducted to determine the Phase II system vapor recovery back pressures. The tests shall be conducted in accordance with CARB Test Procedure Method TP-201.4. Results shall be submitted to the AQMD, Engineering and Compliance, within seventy-two (72) hours of the test.

The AQMD shall be notified by e-mail at r461testing@aqmd.gov or by facsimile at (909) 396-3606 at least 72 hours prior to testing. Such notification shall include the name of the owner or operator; the name of the contractor; the location of the facility; and the scheduled start and completion dates of the dynamic back pressure test.

c). At least seventy-two (72) hours prior to back-filling any underground storage tank or piping, the SCAQMD shall be notified by e-mail at r461backfill@aqmd.gov or by facsimile at telephone number (909) 396-3606. Such notification shall include the name of the owner or operator; the name of the contractors; the location of the facility; and the scheduled start and completion dates of the back-filling procedure. The backfilling procedure shall not commence until inspected by a District representative.

d). A pressure integrity test of the drop tube/drain valve assembly shall be conducted as a reverification test to quantify the pressure integrity of both the drop tube and drain valve seal. The test shall be conducted in accordance with the test procedure method outlined in exhibit 5 of CARB Executive Order VR-101-B. Results shall be submitted to the AQMD, Engineering and Compliance, within seventy-two (72) hours of the test.

The AQMD shall be notified by e-mail at r461testing@aqmd.gov or by facsimile at (909) 396-3606 at least 72 hours prior to testing. Such notification shall include the name of the owner or operator; the name of the contractor; the location of the facility; and the scheduled start and completion dates of the pressure integrity test of drop tube/drain assembly.

e). A static torque test of rotatable Phase I adaptors shall be conducted as a reverification test to quantify the amount of static torque required to start rotation of the rotatable Phase I adaptors. The test shall be conducted in accordance with the test procedure method outlined in exhibit 4 of CARB Executive Order VR-101-B. Results shall be submitted to the AQMD, Engineering and Compliance, within seventy-two (72) hours of the test.

The AQMD shall be notified by e-mail at r461testing@aqmd.gov or by facsimile at (909) 396-3606 at least

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

72 hours prior to testing. Such notification shall include the name of the owner or operator; the name of the contractor; the location of the facility; and the scheduled start and completion dates of the static torque test of rotatable Phase I adaptors.

f). A static pressure leak decay test shall be conducted to demonstrate that the storage tanks, the remote and/or nozzle vapor recovery check valves, associated vapor return piping and fittings are free from vapor leaks. The test shall be conducted in accordance with CARB test procedure method TP-201.3. Results shall be submitted to the AQMD, Engineering and Compliance, within seventy-two (72) hours of the test.

The AQMD shall be notified by e-mail at r461testing@aqmd.gov or by facsimile at (909) 396-3606 at least 72 hours prior to testing. Such notification shall include the name of the owner or operator; the name of the contractor; the location of the facility; and the scheduled start and completion dates of the static leak pressure leak decay test.

g). If the CARB Executive Order requires the installation of a liquid removal device, a liquid removal rate test shall be conducted to demonstrate the removal of gasoline from the vapor passage of the coaxial hose. The test shall be conducted within 30 days of initial installation and in accordance with CARB test procedure Method TP-201.6. Results shall be submitted to the AQMD, Engineering and Compliance, within seventy-two (72) hours of the test.

The AQMD shall be notified by e-mail at r461testing@aqmd.gov or by facsimile at (909) 396-3606 at least 72 hours prior to testing. Such notification shall include the name of the owner or operator; the name of the contractor; the location of the facility; and the scheduled start and completion dates of the liquid removal rate test.

The testing frequency for the above mentioned tests shall be conducted in accordance with the most recent AQMD Rule 461 amendment or CARB Executive Order requirements, whichever is more stringent. All records and test results that are required to be maintained by Rule 461 shall be kept on site and made available to AQMD representatives upon request.

[RULE 461, 4-21-2000; RULE 461, 1-9-2004]

[Devices subject to this condition : D94, D95, D96, D97, D98, D99, D100, D102]

K. Record Keeping/Reporting

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

K67.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

the name of the person performing the inspection and/or maintenance of the filter media

the date, time and results of the inspection

the date, time and description of any maintenance or repairs resulting from the inspection

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

[Devices subject to this condition : D50, E125]

K67.2 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

weekly record of pressure drop across the filter media

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

[Devices subject to this condition : D50]

K67.3 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

For architectural applications where no thinners, reducers, or other VOC containing materials are added, maintain semi-annual records for all coating consisting of (a) coating type, (b) VOC content as supplied in grams per liter (g/l) of materials for low-solids coatings, (c) VOC content as supplied in g/l of coating, less water and exempt solvent, for other coatings.

For architectural applications where thinners, reducers, or other VOC containing materials are added, maintain daily records for each coating consisting of (a) coating type, (b) VOC content as applied in grams per liter (g/l) of materials used for low-solids coatings, (c) VOC content as applied in g/l of coating, less water and exempt solvent, for other coatings.

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

[Devices subject to this condition : E128]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

K67.4 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

date of operation, the elapsed time, in hours, and the reason for operation. Records shall be kept and maintained on file for a minimum of two years and made available to district personnel upon request

An engine operating log listing on a monthly basis the emergency use hours of operation, maintenance and testing hours of operation, and any other hours of use with a description of the reason for operation. Additionally, each time the engine is started manually, the log shall include the date of operation and the timer reading in hours at the beginning and end of operation.

The log shall be kept for a minimum of three calendar years prior to the current year and be made available to District personnel upon request. The total hours of operation for the previous calendar year shall be recorded sometime during the first 15 days of January of each year.

[RULE 1110.2, 2-1-2008; **RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996**; RULE 1470, 6-1-2007]

[Devices subject to this condition : D136]

K67.7 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

monthly throughput, sulfur content and reason for fuel usage

[**RULE 1303(b)(2)-Offset, 5-10-1996**; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D161]

K67.8 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

An engine operating log listing on a monthly basis the emergency use hours of operation, maintenance and testing hours of operation, and any other hours of use with a description of the reason for operation. Additionally, each time the engine is started manually, the log shall include the date of operation and the timer reading in hours at the beginning and end of operation

The log shall be kept for a minimum of three calendar years prior to the current year and be made available to District personnel upon request. The total hours of operation for the previous calendar year shall be recorded sometime during the first 15 days of January of each year

[Devices subject to this condition : D92]

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PERMIT TO OPERATE

COMPANY NAME AND ADDRESS:

LA DWP Valley Generation Station
11801 Sheldon Street
Sun Valley, CA 91352
SCAQMD ID #800193

Contact: Bruce Moore (213) 367-3772

EQUIPMENT LOCATION:

LA DWP Valley Generation Station
11801 Sheldon Street
Sun Valley, CA 91352

EQUIPMENT DESCRIPTION:

Section D of the Facility Permit, ID# 800193

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
Process 6: OIL/WATER SEPARATION					
SEPARATOR, OIL/WATER HIGHLAND TANK, MODEL HT-4000, 5'4" DIAMETER, 24'0" LENGTH, FLOWRATE 400 GAL/MIN A/N: 387103	D167				23-9, 89-1

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BACKGROUND

The Los Angeles Department of Water and Power (LADWP) operates the Valley Generation Station (HGS) to supply electricity to the city of Los Angeles. In 2001 LADWP decided to add one peaking unit so that it could supply more power in peak seasons. The peaking unit is a General Electric LM6000 simple cycle gas turbine. The combustion gas turbine is equipped with a Selective Catalyst Reduction (SCR). LADWP proposes to construct a new oil/water separator to handle the additional wastewater generated by the peaker units.

LADWP submitted a Class I new construction application on 05/31/01. The application was accepted and was deemed completed. While waiting for the District to issue a permit, the LADWP went ahead with the construction. The construction has been completed and the equipment has been in service. Therefore, the application is now a Class III application. LADWP has agreed to pay a higher permit fee.

PROCESS DESCRIPTION

Operation of the gas turbine generator system could have many oil contaminated areas and has the potential of producing oil bearing water. Stormwater or cooling water may be in contact with the oil contaminated areas and may produce oily water. Routine maintenance such as steam cleaning the equipment could also produce oil contaminated water. Sources of oil include the turbine lube oil, generator lube oil, starter motor lube oil, etc. Water sources include cooling tower blowdown and stormwater from equipment containment areas. The oily water must be treated before the water can be discharged into the municipal sewage system. Please refer to the attached flow diagram for a detailed description of the process.

The oil/water separator is a Highland Tank, model HT-4000. It is a cylindrical tank, 5'4" in diameter and 24" in length. Total volume is 4,000 gallons and the spill capacity is 2,000 gallons. Maximum flowrate is 400 gallons per minute.

The basic mechanism of separating oil from water is through gravity, i.e., lightweight oil comes to form a top layer while water remains in the bottom. The separator has parallel corrugated plates to facilitate the oil water separation process. Heavy oil molecules are captured by a screen called Petro-Screen Coalescer. Refer to the manufacturer's web page at <http://www.highlandtank.com/works.htm> for a detail process description. A flow diagram is also attached for illustration. The equipment manufacturer guarantees oil concentration in discharge water to be less than 15 ppm. Such level is presumed to be acceptable by applicable regulations. The oil/water separator has been constructed and it is underground.

EMISSIONS

The oil/water separator has an inlet and a discharge, as well as a port on top of the separator for removal of accumulated oil. Emissions through the inlet and water discharge are not expected. The oil removal port is normally closed and would not emit pollutants. However, the separator does have three ventilation ports for preventing vapor pressure from rising to an unsafe level. VOC can escape through the vent ports and become an air pollution source. The ports exposed directly to the atmosphere.

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In order to calculate VOC emissions the vapor pressure of the oil mixture must be known. Upon request from the District, LADWP conducted two laboratory analyses of the oily water. However, the lab tests were not successful in part due to insufficient sample quantities. Since the tests were not successful, LADWP agrees that the District will use the highest vapor pressure of the oils as published in MSDS. LADWP submitted a list of oils, and their MSDS. The maximum vapor pressure is found to be 0.1 mm Hg.

The following data are provided by LADWP:

Oil level in water:	0.5 mg/L
Vapor pressure according to MSDS:	0.1 mmHg
Flowrate:	400 gal/min

PTE = Vapor Pressure * Oil Concentration * Water Flowrate

$$PTE = \frac{0.1 \text{ mmHg}}{760 \text{ mmHg}} * 0.5 \frac{\text{mg}}{\text{L}} * 400 \frac{\text{Gal}}{\text{min}} * \frac{24 * 60 \text{ min}}{\text{day}} * \frac{3.7854 \text{ L}}{\text{Gal}} = 143.4 \frac{\text{mg}}{\text{day}}$$

$$PTE = 0.0003 \text{ lb/day}$$

It is clear that the potential to emit is less than 1 lb per day.

RULES EVALUATION

Rule 212 – Standards for Approving Permits

There is no school within 1,000 feet of the permit unit and toxic emissions are negligible. No public notice is required.

Rule 401 – Visible Emissions

This equipment is expected to comply with the visible emission limits.

Rule 402 – Nuisance

Nuisance complaints are not expected.

Rule 1176 – VOC Emissions from Wastewater System

This rule governs VOC emissions from wastewater systems, including the oil/water separator. LADWP has provided data indicating oil concentration is 0.5 mg/L in the inlet stream. Therefore, the operation and control requirements are exempted, per Rule 1176(i)(5)(J) as the oil concentration of 0.5 mg/L is less than the 5 mg/L threshold.

Rule 1300 – New Source Review

- **BACT**

The emission increase is less than 1 lb per day, BACT is not triggered.

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- MODELING and OFFSET
Modeling is not required for VOC emissions. Offset is not required

RULE 1401 – Toxic Air Contaminates

A tier I screening test is attached in Appendix A. The screening test is satisfactory.

RECOMMENDATION

The equipment is expected to comply with all the federal, state, and local regulations. It is recommended that a permit to operate be issued with the following conditions.

CONDITIONS

23.9 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1176

[Rule 1176, 9-13-1996]

[Device subject to this rule: **D132**]

89-1 The operator shall not use oily water with VOC content greater than 0.005 grams per liter, including water and exempt compounds.

[Rule 1176, 9-13-1996, Rule 1303(b)(2)-offset, 5-10-1996]

[Device subject to this rule: **D132**]

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- MODELING and OFFSET
Modeling is not required for VOC emissions. Offset is not required

RULE 1401 – Toxic Air Contaminates

A tier I screening test is attached in Appendix A. The screening test is satisfactory.

RECOMMENDATION

The equipment is expected to comply with all the federal, state, and local regulations. It is recommended that a permit to operate be issued with the following conditions.

CONDITIONS

23.9 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1176

[Rule 1176, 9-13-1996]

[Device subject to this rule: **D167**]

89-1 The operator shall not use oily water with VOC content greater than 0.005 grams per liter, including water and exempt compounds.

[Rule 1176, 9-13-1996, Rule 1303(b)(2)-offset, 5-10-1996]

[Device subject to this rule: **D167**]