

South Coast Air Quality Management District

Statement of Basis

Title V Facility Permit Renewal

Facility Name: Bowerman Power LFG, LLC
Facility ID: 157152
SIC Code: 4911
Equipment Location: 11002 Bee Canyon Access Road
Irvine, CA 92602

Application #(s): 568345
Application Submittal Date(s): 9/12/2014

Permit Renewal: Draft
Permit Revision No.: 01
Permit Section(s) Affected: All

SCAQMD Contact Person: Ray Ronquillo, A.Q. Engineer
Phone Number: (909) 396-3049
E-Mail Address: rronquillo1@aqmd.gov

1. Introduction and Scope of Permit

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

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

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, and CO are in attainment with federal standards. Lead (LA County), PM-2.5 and Ozone are in nonattainment. PM-10 is attainment at the federal level but remains non-attainment at the state level.

A Title V renewal permit is proposed to be issued to cover the construction and operation of a landfill gas-to-energy power-generating plant. This facility is subject to Title V requirements because its potential to emit is considered a major source.

2. Facility Description

The facility, which is currently under construction, will be a Landfill Gas-To-Energy (LFGTE) power-generating facility located at the Frank R. Bowerman Landfill (FRBL) site. This facility will utilize the produced landfill gas at FRBL to generate 23.59 MW of power for sale to the grid. Upon completion of construction, the new facility is expected to operate: seven (7) 4650 H.P. landfill gas fired internal combustion engines, driving 3.37 MW electric generators; seven (7) SCR/Oxidation Catalyst units; one (1) landfill gas treatment and sulfur control system; one (1) enclosed flare; and one (1) aqueous urea storage tank.

3. Construction and Permitting History

An initial Title V permit was issued on March 12, 2010 and expired on March 11, 2015. The facility submitted a Title V renewal application in a timely manner on September 12, 2014. There has been one Title V significant permit revision since the initial Title V Permit was issued. The revised Title V permit, which was issued on October 30, 2014, permitted the construction of a new Landfill Gas-To-Energy power-generating facility, as described in the previous section. At the time of this Title V permit renewal, the facility is still undergoing construction.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required are identified in the Title V permit (for example, Section H, E, and K, of the proposed Title V renewed permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is subject to NESHAP requirements applicable to operators of reciprocating internal combustion engines (RICE), 40 CFR Part 63, Subpart ZZZZ, and NSPS 40 CFR Part 60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. The permit terms and conditions may be found in Section H of the Title V permit.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section H and Appendix B of the proposed Title V permit). Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluations. The Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 do not apply to a PSEU that is subject to emission limitations or standards that were proposed by the EPA after November 15, 1990 pursuant to Section 111 (NSPS) or Section 112 (NESHAP) of the Clean Air Act (§ 64.2 (b)(1)(i)). This PSEU is subject to 40 CFR Part 60 Subpart WWW - New Source Performance Standards (NSPS) for MSW Landfills; and to 40 CFR Part 63 Subpart AAAA - NESHAP for MSW Landfills. Both these federal laws were promulgated after 11/15/1990.

6. Permit Features

Permit Shield

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

Streamlining Requirements

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

7. Summary of Emissions and Health Risks

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

Pollutant	Emissions (tons/year)
CO	
NOx	
ROG	
SOx	
TSP	

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

The Following TACs Were Reported	Emissions (lbs/yr)
Benzene	
Carbon tetrachloride	
Methylene chloride	
Perchloroethylene	
Trichloroethylene	
Vinyl chloride	

* Facility has not been constructed. Therefore, there are no criteria and TAC emissions reported for this facility.

Health Risk from Toxic Air Contaminants

Health Risk Assessment was conducted as part of the permit to construct evaluations. MICR measured at < 1-in-a-million; Chronic and Acute Hazard Indices are less than 1.0.

8. Compliance History

Facility has not been constructed. Therefore, there are no records of inspections on file.

9. Compliance Certification

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