

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b>  <b>PERMIT APPLICATION EVALUATION AND CALCULATIONS</b>	PAGES 8	PAGE 1
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**PERMIT TO CONSTRUCT / OPERATE**

**APPLICANT'S NAME:** BKK CORPORATION

**MAILING ADDRESS:** 2210 SOUTH AZUSA AVENUE  
WEST COVINA, CA 91792  
ATTN: Kelly McGregor, Agent for BKK Landfill

**EQUIPMENT ADDRESS:** SAME AS ABOVE

**FACILITY ID:** 55449 (800209)

- A. LANDFILL LEACHATE AND CONDENSATE TREATMENT FACILITY CONSISTING OF:**
1. SIX INFLUENT EQUALIZATION TANKS (T-1 THROUGH T-6), 20,000 GALLONS EACH, WITH TWO CIRCULATION PUMPS, TWO STRAINERS, AND TWO TRANSFER PUMPS, VENTED TO THE OFF-GAS SYSTEM.
  2. ONE PHOSPHORIC ACID STORAGE TANK AND ONE SODIUM HYDROXIDE STORAGE TANK (T-12 AND T-13), 250 GALLONS EACH, WITH ASSOCIATED PUMPS.
  3. TWO AERATION TANKS (T-10 AND T-11), 73,500 GALLONS EACH, WITH TWO BLOWERS AND POWDERED ACTIVATED CARBON FEED SYSTEM, AND ASSOCIATED PUMPS.
  4. SECONDARY CLARIFIER (ME-5), 1300 CU. FT., 14'-0" DIA. X 12'-0" H., WITH A POLYMER FEED SYSTEM, AN ACTIVATED SLUDGE RECYCLE SYSTEM, AND A WASTE ACTIVATED SLUDGE DISCHARGE SYSTEM.
  5. SECONDARY CLARIFIER (NEW, ME-5A), CENTER FEED, 14'-0" DIA. X 16'-0" H., 50,000 GALLONS PER DAY CAPACITY, WITH A POLYMER FEED SYSTEM, AN ACTIVATED SLUDGE RECYCLE SYSTEM, AND A WASTE ACTIVATED SLUDGE DISCHARGE SYSTEM.
  6. TWO WASTE ACTIVATED SLUDGE TANKS (T-18 AND T-19), AERATED, 9,000 GALLONS EACH, WITH A MECHANICAL MIXER, VENTED TO THE OFF GAS SYSTEM, AND THREE SLUDGE PUMPS.
  7. TWO PLATE AND FRAME FILTER PRESSES, WITH A POLYMER FEED SYSTEM, A FILTRATE DRAINAGE SYSTEM, AND THREE SLUDGE HANDLING AIR COMPRESSORS.
  8. TWO EFFLUENT STORAGE TANKS, (T-16 AND T-17), 45,000 GALLONS EACH WITH TWO CIRCULATION PUMPS AND TWO EFFLUENT TRANSFER PUMPS.
  9. THREE OFF-GAS BLOWERS, VENTING THE LEACHATE AND CONDENSATE TREATING FACILITY AND THE AIR STRIPPING SYSTEM EXHAUSTING TO THE LANDFILL GAS MANAGEMENT SYSTEM.
  10. CHLORINE INJECTION SYSTEM AND ASSOCIATED METERING EQUIPMENT.
  11. NINE CONTAINMENT SUMPS WITH SUMP PUMPS.

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**B. CONTAMINATED GROUNDWATER TREATMENT FACILITY (30,000 GALLON PER DAY) CONSISTING OF:**

1. INFLUENT HOLDING TANK (T-7), 2,500 GALLONS, WITH ASSOCIATED PUMPS, VENTED TO THE OFF-GAS SYSTEM.
2. TWO AIR STRIPPERS (ME-1 AND ME-2), 2'-0" DIA. X 24'-0" H., PACKED COLUMN WITH MIST ELIMINATORS, ASSOCIATED PUMPS AND TWO STRIPPER BLOWERS.
3. EFFLUENT TRANSFER TANK (T-8), 1250 GALLONS, WITH ASSOCIATED PUMPS, VENTED TO THE OFF-GAS SYSTEM.

**C. MEDIA FILTRATION SYSTEM (NEW ADDITION) FOR ARSENIC TREATMENT, CONSISTING OF:**

1. THREE (3) ION EXCHANGE TANKS, IN SERIES, CLOSED PRESSURE VESSELS, EACH TANK 30 CUBIC FEET CAPACITY, CONTAINING GRANULAR ARSENIC ADSORBENT MEDIA AND EQUIPPED WITH TEMPERATURE, PRESSURE GAUGES AND LIQUID SAMPLING VALVES.

**Conditions:**

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE 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]
4. THIS PERMIT SHALL EXPIRE IF CONSTRUCTION OF THE NEW SECONDARY CLARIFIER (ME-5A) IS NOT COMPLETED WITHIN ONE YEAR FROM THE DATE OF ISSUANCE OF THIS PERMIT UNLESS AN EXTENSION IS GRANTED BY THE EXECUTIVE OFFICER.  
[RULE 205]
5. THE FOLLOWING TANKS SHALL BE EQUIPPED WITH VISIBLE LIQUID LEVEL GAUGES APPROVED BY THE EXECUTIVE OFFICER. LIQUID SHALL NOT OVERFLOW FROM TANKS, T-1 THROUGH T-8, T-10 AND T-11.
  - A. SIX INFLUENT EQUALIZATION TANKS, T-1 THROUGH T-6.
  - B. AERATION TANKS (T-10 AND T-11)
  - C. SLUDGE STORAGE TANKS (T-18 AND T-19).

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[RULE 402; RULE 1303(a) (1)-BACT]

6. FLOW INDICATORS SHALL BE MAINTAINED IN EACH OF THE AIR SUPPLY LINES OF THE SLUDGE STORAGE TANK AIR DIFFUSER SYSTEMS.  
[RULE 204; RULE 402]
7. THE INFLUENT FLOW INDICATOR (GPM) AND TOTALIZER APPROVED BY THE EXECUTIVE OFFICER SHALL BE MAINTAINED TO RECORD THE QUANTITY OF INFLUENT TREATED. A STRIP CHART RECORDER SHALL BE MAINTAINED TO CONTINUOUSLY MEASURE AND RECORD INFLUENT FLOW, AND A TOTALIZER SHALL RECORD THE INFLUENT TREATED ON THE CHART RECORDER, AT 0600 HOURS EACH DAY.  
[RULE 204; RULE 1303(b) (2)-OFFSET]
8. FLOW INDICATING AND RECORDING DEVICES APPROVED BY THE EXECUTIVE OFFICER SHALL BE MAINTAINED TO RECORD THE QUANTITY OF OFF GASES VENTED TO THE FLARES. THE FLOW INDICATING AND RECORDING DEVICES SHALL BE SYNCHRONIZED WITH RESPECT TO TIME OF DAY.  
[RULE 204; RULE 1303(a) (1)-BACT; RULE 1303(b) (2)-OFFSET]
9. THE FLOW INDICATOR AND TOTALIZER APPROVED BY THE EXECUTIVE OFFICER SHALL BE MAINTAINED ON THE AIR STRIPPER TANK DISCHARGE TO MEASURE AND RECORD THE QUANTITY OF LIQUID TREATED. A STRIP CHART RECORDER SHALL BE MAINTAINED TO CONTINUOUSLY MEASURE AND RECORD FLOW, AND A TOTALIZER SHALL RECORD THE QUANTITY OF LIQUID TREATED ON THE CHART RECORDER, AT 0600 HOURS EACH DAY.  
[RULE 204; RULE 1303(b) (2)-OFFSET]
10. THE OFF GASES FROM THE STORAGE TANKS OR AIR STRIPPERS SHALL BE DIRECTED TO AN OPERATIONAL FLARE OR TO THE LANDFILL GAS COLLECTION SYSTEM, EACH WITH A VALID PERMIT ISSUED BY THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT.  
[RULE 1303(a) (1)-BACT]
11. SAMPLE PORTS APPROVED BY THE EXECUTIVE OFFICER SHALL BE MAINTAINED IN THE OFF GAS BLOWER HEADER SYSTEM DOWN STREAM OF THE FOLLOWING EQUIPMENT TO ALLOW THE COLLECTION OF A GAS SAMPLE:
  - A. SIX INFLUENT EQUALIZATION TANKS, T-1 THROUGH T-6.
  - B. INFLUENT HOLDING TANK, T-7.
  - C. AIR STRIPPER EFFLUENT TRANSFER TANK, T-8.
  - D. AIR STRIPPER COLUMNS ME-1 AND ME-2.
  - E. AERATION TANKS T-10 AND T-11.
  - F. SLUDGE STORAGE TANKS T-18 AND T-19.
 [RULE 217; RULE 1303(b) (2)-OFFSET]
12. A MINIMUM OF 15 SCFM OF AIR SHALL BE DIRECTED TO EACH SLUDGE STORAGE TANK (T-18 AND T-19) AIR DIFFUSER SYSTEM WHENEVER THE TANK CONTAINS SLUDGE, EXCEPT DURING DECANTING OPERATIONS.  
[RULE 402]

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13. THE AIR STRIPPERS (ME-1 AND ME-2) SHALL NOT BE OPERATED SIMULTANEOUSLY WITH THE LEACHATE AND CONDENSATE TREATMENT FACILITY, EXCEPT WHEN THE AIR STRIPPERS ARE USED TO TREAT THE "GREY WATER" AS DEFINED BY THIS PERMIT.  
[RULE 402; RULE 1303(b) (2)-OFFSET]
14. THE LEACHATE AND CONDENSATE TREATMENT FACILITY SYSTEM SHALL NOT TREAT MORE THAN 100,000 GALLONS OF LIQUID PER DAY.  
[RULE 402; RULE 1303(b) (2)-OFFSET]
15. THE AIR STRIPPERS SHALL NOT TREAT MORE THAN 24,215 GALLONS OF LIQUID PER DAY, EXCEPT WHEN THE SYSTEM IS USED TO TREAT "GREY WATER", AND THEN THE SYSTEM SHALL NOT TREAT MORE THAN 30,000 GALLONS PER DAY. "GREY WATER" SHALL BE AS DEFINED BY THIS PERMIT.  
[RULE 402; RULE 1303(b) (2)-OFFSET]
16. THE TOTAL VOLUME OF OFF GASES COLLECTED AND VENTED TO THE FLARES SHALL NOT EXCEED 2000 SCFM.  
[RULE 1303(b) (2)-OFFSET]
17. LIQUID SHALL NOT BE DIRECTED TO INFLUENT HOLDING TANK "A" (T-7) UNLESS THE OFF GAS BLOWER SYSTEM IS IN FULL OPERATION.  
[RULE 1303(a) (1)-BACT]
18. THE SLUDGE SHALL BE HANDLED AND DISPOSED OF AS A HAZARDOUS MATERIAL UNTIL THE APPROPRIATE AGENCIES MAKE THE DETERMINATION THAT THE SLUDGE IS NOT A HAZARDOUS MATERIAL. BKK CORPORATION SHALL GIVE WRITTEN NOTICE TO AQMD THAT THE APPROPRIATE AGENCIES HAVE MADE THE DETERMINATION THAT THE SLUDGE IS NOT A HAZARDOUS MATERIAL IF AND WHEN THIS OCCURS.  
[RULE 204; RULE 402]
19. ALL STORAGE BINS CONTAINING SLUDGE SHALL BE KEPT COVERED AT ALL TIMES EXCEPT DURING ACTUAL LOADING OPERATIONS FROM THE FILTER PRESSES OR UNLOADING OPERATIONS, AS REQUIRED.  
[RULE 402]
20. THE SLUDGE SHALL BE TRANSPORTED IN SUCH A MANNER AS TO PREVENT ANY EMISSIONS OF HAZARDOUS MATERIALS.  
[RULE 402]
21. THE SLUDGE CONTAINERS SHALL BE LABELED AND PROPERLY MANIFESTED ACCORDING TO THE PROCEDURES OUTLINED IN CCR TITLE 22, 66262.30-47.  
[RULE 204]
22. SAMPLES OF THE INFLUENT TO AND EFFLUENT FROM THE AIR STRIPPERS SHALL BE TESTED FOR ALL COMPOUNDS REQUIRED UNDER BKK LANDFILL GROUNDWATER MONITORING PROGRAM.  
[RULE 1303(b) (2)-OFFSET]

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23. THE TREATED EFFLUENT FROM THE LEACHATE TREATMENT PLANT USED FOR DUST CONTROL AND/OR IRRIGATION PURPOSES SHALL NOT CONTAIN MORE THAN 0.52 mg/l OF TOTAL VOLATILE PRIORITY AND VOLATILE NON-PRIORITY POLLUTANTS, AT ITS POINT OF USE (AT THE DISCHARGE POINT FROM THE CLOSED-TOP MILLION GALLON RESERVOIR WATER TANK), AS SHOWN IN VOLUME I OF THE OPERATION PLAN, APPENDIX C, TYPICAL ANALYTICAL REPORT OF INFLUENT, EFFLUENT AND SLUDGE.  
[RULE 402]
24. THE TREATED EFFLUENT FROM THE LEACHATE TREATMENT PLANT USED FOR DUST CONTROL AND/OR IRRIGATION PURPOSES SHALL NOT CONTAIN MORE THAN 0.1 mg/l OF BASE/NEUTRAL AND ACID EXTRACTABLE PRIORITY POLLUTANTS AS SHOWN, AT ITS POINT OF USE (AT THE DISCHARGE POINT FROM THE CLOSED-TOP MILLION GALLON RESERVOIR WATER TANK), AS SHOWN IN VOLUME I OF THE OPERATION PLAN, APPENDIX C, TYPICAL ANALYTICAL REPORT OF INFLUENT, EFFLUENT AND SLUDGE.  
[RULE 402]
25. THE TREATED EFFLUENT FROM THE LEACHATE TREATMENT PLANT USED FOR DUST CONTROL AND/OR IRRIGATION PURPOSES SHALL NOT CONTAIN MORE THAN 0.01 mg/l OF PRIORITY POLLUTANT PESTICIDES AND POLYCHLORINATED BIPHENYLS, AT ITS POINT OF USE (AT THE DISCHARGE POINT FROM THE CLOSED-TOP MILLION GALLON RESERVOIR WATER TANK), AS SHOWN IN VOLUME I OF THE OPERATION PLAN, APPENDIX C, TYPICAL ANALYTICAL REPORT OF INFLUENT, EFFLUENT AND SLUDGE.  
[RULE 403]
26. THE TREATED EFFLUENT FROM THE LEACHATE TREATMENT PLANT USED FOR DUST CONTROL AND/OR IRRIGATION PURPOSES SHALL NOT CONTAIN MORE THAN 1.5 mg/l OF TOTAL HEAVY METALS, AT ITS POINT OF USE (AT THE DISCHARGE POINT FROM THE CLOSED-TOP MILLION GALLON RESERVOIR WATER TANK), INCLUDING:
- A. ARSENIC
  - B. BERYLLIUM
  - C. CADMIUM
  - D. CHROMIUM
  - E. LEAD
  - F. MERCURY
  - G. NICKEL
  - H. SELENIUM
  - I. SILVER
- [RULE 403]
27. GRANULAR ARSENIC ADSORBENT MEDIA TREATMENT SYSTEM SHALL BE OPERATED AND MONITORED AS PER MANUFACTURER'S RECOMMENDATIONS AND SPECIFICATIONS. SYSTEM OPERATING PARAMETERS MEASURED; SUCH AS TEMPERATURE, PRESSURE DROP ACROSS MEDIA VESSEL, PH, BACKWASH FREQUENCY, MEDIA REPLACEMENT EVENT DATES, ETC., SHALL BE RECORDED AND KEPT ON FILE.  
[RULE 204]

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28. THE EFFLUENT FROM THE MEDIA FILTRATION SYSTEM, FOR ARSENIC CONCENTRATION REDUCTION, SHALL MEET THE CURRENT WASTE DISCHARGE REQUIREMENTS (WDRS) SET BY LARWQCB, AS LISTED BELOW,

ARSENIC (IN EFFLUENT)                      10 MICROGRAMS/LITER (µg/L)  
 [RULE 204]

29. THE TREATED EFFLUENT FROM THE LEACHATE TREATMENT PLANT USED FOR DUST CONTROL AND/OR IRRIGATION PURPOSES SHALL NOT CONTAIN MORE THAN THE FOLLOWING (CURRENT CALIFORNIA DRINKING WATER STANDARDS), AT ITS POINT OF USE (AT THE DISCHARGE POINT FROM THE CLOSED-TOP MILLION GALLON RESERVOIR WATER TANK):

	CONSTITUENT	MAX. LIMIT (mg/l)
A.	CADMIUM	0.005
B.	CHROMIUM	0.05
C.	LEAD	0.015
D.	MERCURY	0.002

[RULE 403]

30. THE TREATED EFFLUENT FROM THE LEACHATE TREATMENT PLANT AT ITS POINT OF USE (AT THE DISCHARGE POINT FROM THE CLOSED-TOP MILLION GALLON RESERVOIR WATER TANK), FOR DUST CONTROL AND/OR IRRIGATION PURPOSES SHALL HAVE NO ODORS AS DETERMINED BY THE ON-SITE AQMD REPRESENTATIVE.  
[RULE 402]

31. THE OPERATION OF THE LEACHATE TREATMENT PLANT SHALL NOT RESULT IN THE EMISSION OF UNTREATED OFF GASES TO THE ATMOSPHERE.  
[RULE 402; RULE 1303(a) (1)-BACT]

32. ALL RECORDS SHALL BE MAINTAINED AND KEPT FOR AT LEAST FIVE YEARS, AND SHALL BE MADE AVAILABLE TO THE AQMD PERSONNEL UPON REQUEST.  
[RULE 204]

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33. FOR PURPOSES OF THIS PERMIT, "GREY WATER" IS DEFINED AS THE WATER PUMPED FROM EXTRACTION WELLS BENEATH AND/OR OUTSIDE OF THE WASTE DISPOSAL AREA THAT MEETS THE TREATED EFFLUENT STANDARDS AS SPECIFIED IN CONDITION NOS. 22 THROUGH 27 ABOVE AND CONTAINS NO MORE THAN THE FOLLOWING:

TOTAL VOLATILE ORGANICS	2 mg/L
METHYLENE CHLORIDE	150 µg /L
CHLOROFORM	150 µg /L
1,2 DICHLOROETHANE	700 µg /L
CARBON TETRACHLORIDE	5 µg /L
TRICHLOROETHYLENE	150 µg /L
BENZENE	550 µg /L
VINYL CHLORIDE	300 µg /L
[RULE 402; RULE 1303(b) (2)-OFFSET]	

**BACKGROUND:**

On 8/2/2011, BKK Corporation submitted this application for addition of a media filtration system to the existing Landfill leachate and condensate treatment permit (F95999, A/N 467269) to reduce Arsenic levels and, to meet the current Waste Discharge Requirements (WDRs) imposed by the Los Angeles Regional Water Quality Control Board (LARWQCB). The application package is prepared and submitted by Geosyntec consultants; on behalf of BKK Corp. LARWQCB had issued a Notice of Violation to BKK regarding an exceedance of arsenic in leachate treatment plant (LTP) effluent. Current arsenic concentration limit in effluent is 10 microgram/liter (µg/L).

Prior to application submittal, Geosyntec representative had contacted AQMD for permit requirement or exemption for such a filtration system per Rule 219. AQMD staff had carefully reviewed the proposal and determined that Rule 219 exemption is not applicable and filtration system (equipment) shall be included under current permit. Based on internal discussions, closed loop filtration operation with no emissions into the atmosphere it was decided that new application can be considered an administrative change that do not require detailed engineering and emission evaluation. As a result this application is evaluated under an administrative permit change (4/20/11 E-mail from AQMD to Geosyntec).

This is a Title V facility (closed LF). Most recent TV Revision (02) was issued March 20, 2008. A Title V Permit Revision A/N 526136 is also submitted to incorporate this new media filtration system for LTP effluent.

Facility inspection (6/3/10) report indicated that facility was operating in compliance.

**EVALUATION & EMISSION:**

The proposed system is a media filtration system, a closed-loop operation, with no emissions into the atmosphere. Filtration system will be used as polishing for the LTP effluent to meet the current arsenic discharge limit, 10 microgram/liter (µg/L), set by the LARWQCB. System consists of three ion exchange vessels, in series, containing granular ferric hydroxide (GFH) media to remove arsenic. Filtration system (SIEMENS) is equipped with temperature and pressure gauges and liquid sampling provision. Operator will be required to monitor operating parameters as recommended by the equipment manufacturer and keep adequate records.

Proposed modification is not expected have an impact on air emission. There is no increase in permitted throughput rate.

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**Note:**

Equipment Description added (to existing permit F95999)

**C. MEDIA FILTRATION SYSTEM (NEW ADDITION) FOR ARSENIC TREATMENT, CONSISTING OF:**

Conditions No. 27 & 28 (new) are added for the media filtration system operation and arsenic concentration limit. Condition No. 29 – Cadmium and Mercury concentration limits have been revised to current California Drinking Water Standards (Ref. 10-6-2011 E-mail from Geosyntec).

AEIS /NSR entries will be same as under current permit, F95999,

R1 = 0.03 lb/hr VOC and R2 = 0.01 lb/hr VOC.

R1 = 1.5 lb/hr SO<sub>x</sub> and R2 = 1.42 lb/hr SO<sub>x</sub>.

Following are the AEIS emissions listed under previous permits (from Liberty records ),

	ROG		SO <sub>x</sub>		
	R <sub>1</sub>	R <sub>2</sub>	R <sub>1</sub>	R <sub>2</sub>	
F61736 / A/N 414542	0.03	0.01	1.5	1.42	Superseded by this A/N 467269 for modification.
F38234 / A/N 377317	0.03	0.01	1.5	1.42	Superseded by A/N 414542 for Admin change.
D94236 / A/N 295520	0.03	0.01	1.5	1.42	Superseded by A/N 377317 for change of condition.
D11717 / A/N 196318	0.03	0.01	1.5	1.42	Superseded by A/N 295520 for modification.
A/N 144134	0.03	0.01	1.5	1.42	Emission info. - See Liberty Records in folder

**RULES EVALUATION:**

**Rule 401:** Visible Emissions:

With proper operation, maintenance and monitoring no violation is expected.

**Rule 402:** Nuisance:

With proper operation, maintenance and monitoring no violation is expected.

**Rule 1150.1:**

Compliance is expected.

**Reg XIII :** New Source Review

Reg XIII does not apply.

No net increase in emission is expected as a result of addition of a media filtration system to reduce arsenic concentration in effluent. AEIS & NSR emission is kept same as before. Reg XIII does not apply.

**Rule 1401:**

There will be no increase in emissions from this modification. This equipment is therefore exempt from the provisions of this rule.

**Regulation XXX:**

Compliance with Title V permit is expected. Proposed installation of filtration system, with no air emission impact, is considered a minor permit revision, and issuance of revised Title V (Revision 3) is recommended.

**CONCLUSION & RECOMMENDATION:**

Compliance with applicable rules and regulations is expected. Permit to construct and operate, with revised TV facility permit (Rev 3) is recommended.

**NOTE:** Upon issuance of this permit, the existing PO F95999, A/N 467269 shall be inactivated as the new permit will replace PO F95999.