

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Permit Renewal

Facility Name: Ripon Cogeneration LLC
Facility ID: 139010
SIC Code: 4911
Equipment Location: 1507 Mount Vernon Ave.
Pomona, CA 91768

Application #(s): 436152

Application Submittal Date(s): 10/26/04

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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.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD 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, CO, and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A renewal Title V permit is proposed to be issued to cover the operations of Ripon Cogeneration LLC., 1507 Mount Vernon Avenue, Pomona, CA 91768. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility that is in the business of providing electricity and steam to other facility. This facility is operating a cogeneration system and other supporting equipment. The NOx and CO emissions from the cogeneration system are controlled by a selective catalytic reduction (SCR) system.

3. Construction and Permitting History

The facility has been in constant operation at this location since 2003. An initial Title V permit was issued to the prior operator, Ripon Cogeneration Inc. on May 9, 2000. Numbers of subsequent revisions were issued to Ripon Cogeneration Inc. on December 5, 2000, December 20, 2000, October 24, 2001 and April 8, 2003.

On February 17, 2005, a new Title V permit was issued to Ripon Cogeneration LLC as a result of change of operator. A permit revision was subsequently issued to Ripon Cogeneration LLC on August 17, 2007.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V 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. NSPS requirements applies to the cogeneration system (40 CFR 60 subpart GG for the gas turbine and 40 CFR 60 subpart Db for the duct burner) at the facility and the permit terms and conditions may be found in Section D and 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 D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

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 piece of 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 compliance 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 2006/2007**

Pollutant	Emissions (tons/year)
NOx	17.5
CO	45.047
VOC	10.015
PM	<0.001
SOx	0.544

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2006/2007**

The Following TACs Were Reported	Emissions (lbs/yr)
1,3-Butadiene	0.018
Ammonia	4466.578
Benzene	0.509
Formaldehyde	30.234
Naphthalene	0.055
PAHs	0.038

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). AQMD is Tracking Status of this facility under AB2588.

8. Compliance History

As noted, the facility has been in constant operation since 2003. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaint filed, no Notice to Comply issued, and no Notice of Violation issued in the last two calendar years.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.