

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Permit Renewal

Facility Name: NP Cogen, INC.
Facility ID: 112853
SIC Code: 4911
Equipment Location: 5605 East 61st Street
Los Angeles, CA 90040

Application #(s): 511603

Application Submittal Date(s): 06/11/10

AQMD Contact Person: Douglas Gordon
Phone Number: (909) 396-2683
E-Mail Address: dgordon@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.

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 requested 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 Title V permit is proposed to be issued to cover the operations of NP Cogen, INC, 5605 East 61st Street, Los Angeles, CA 90040. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

NP Cogen, INC facility is a Title V facility that generates waste heat for a neighboring facility. In addition this facility generates electricity for their use or sells back to the grid. This facility operates one natural gas turbine driving a generator, and one natural gas internal combustion engine driving a generator. The gas turbine is currently in a non-operational status. Emission from the internal combustion engine is vented to a selective catalyst reduction system to control NO_x, CO, VOC, and NH₃ emissions.

3. Construction and Permitting History

The facility has been in operation with a Title V permit at this location since 1999. An initial Title V permit was issued to the facility on November 12, 1999 and one permit revision was subsequently issued to this facility.

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. This facility is subject to the requirements of 40CFR60 Subpart GG-Standards of Performance for Stationary Gas Turbines, and 40CFR63 Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The requirements of these NSPS and NESHAP are reflected in 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 Evaluation. 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).

Since the pre-control potential to emit of VOC and PM10 from the equipment are less than 10 and 70 tons per year, respectively, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 are not applicable to this facility.

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 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 2009**

Pollutant	Emissions (tons/year)
NOx	1.013
CO	0.938
VOC	0.167
PM	0.001
SOx	0.022

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2009
Toxic Pollutants (Pounds/year)**

Pollutant ID	Pollutant Description	Annual Emissions
79345	1,1,2,2-Tetrachloroethane	3.112
79005	1,1,2TRICLETHAN	2.471
95636	1,2,4TRIMEBENZE	1.113
78875	1,2-Dichloropropane {Propylene dichloride}	2.090
106990	1,3-Butadiene	20.748
542756	1,3-Dichloropropene	2.051
91576	2-Methyl naphthalene [PAH, POM]	2.585
83329	ACENAPHTHENE	0.097
208968	ACENAPHTHYLENE	0.430
75070	Acetaldehyde	650.668
107028	Acrolein	399.707
7664417	Ammonia	34.097
191242	B[GHI] PERYLENE	0.032
71432	Benzene	34.249
205992	Benzo[b]fluoranthene	0.012
192972	Benzo[e]pyrene [PAH, POM]	0.032
56235	Carbon tetrachloride	2.852
67663	Chloroform	2.219
218019	Chrysene	0.053
100414	ETHYL BENZENE	3.089
106934	Ethylene dibromide	3.447
107062	Ethylene dichloride	1.838
206440	FLUORANTHENE	0.086
86737	FLUORENE	0.440
50000	Formaldehyde	4111.492
110543	HEXANE	86.196
67561	Methanol	194.514
75092	Methylene chloride	1.556
91203	Naphthalene	5.789
85018	PHENANTHRENE	0.808
129000	PYRENE	0.106
100425	Styrene	1.838
108883	Toluene	31.732
75014	Vinyl chloride	1.159
1330207	Xylenes	14.340

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The District will conduct a review of emission data pending the submittal of their information.

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 1999. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed, Notices to Comply or Notices of Violation issued in the last two 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.