SCAP
SOUTHERN CALIFORNIA ALLIANCE OF PUBLICLY OWNED TREATMENT WORKS

August 14, 2019

Mr. Kevin Orellana, Program Supervisor
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Dear Mr. Orellana:

Re: Comments on Proposed Amended Rule 1110.2

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) appreciates this opportunity to provide comments on Proposed Amended Rule 1110.2. SCAP represents 83 public agencies that provide essential water supply and wastewater treatment to nearly 19 million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties. SCAP's wastewater members provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastes into resources such as recycled water and biogas.

The purpose of this letter is to expand upon comments provided by our members at the July 31, 2019 Public Workshop. We greatly appreciate SCAQMD's acknowledgment that it is challenging for biogas engines to comply with Rule 1110.2. Due to the differences between natural gas and biogas, we believe that the biogas requirements contained in Rule 1110.2 should be moved to Proposed Rule 1179.1. Our specific comments on the July 2019 version of Proposed Amended Rule 1110.2 are outlined below.

Ammonia Limit (d)(1)(B)(vii)

This proposed provision establishes an ammonia limit of 5 ppmv, corrected to 15% O_2 and averaged over 60 minutes for any new or retrofit engine installation with selective catalytic reduction (SCR) pollution control equipment. While we appreciate this requirement would only apply to new installations with an SCR, the lower limit can be challenging for biogas engines to achieve. Biogas contains contaminants derived from waste discharged to the sanitary sewer system and tends to cause accelerated catalyst degradation. Accordingly, SCAP requests the ammonia limit for biogas engines with SCR be established at 10 ppmv, corrected to 15% O_2 and averaged over 60 minutes.

CEMS Applicability (e)(3)

One of our members elected to install an SCR system on their biogas engine at a minor source facility.

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The operation of the SCR and CEMS has proved to be more difficult and time-consuming than anticipated. Rather than shutting-down their engine and flaring biogas from the wastewater treatment process, this facility went the extra mile to beneficially use this waste gas. We would appreciate providing some relief for this facility, which happens to be the only biogas engine non-Title V facility with a CEMS.

CEMS Averaging Time (d)(1)(I)

Longer averaging period would be allowed by proposed provision (d)(1)(I), if the operator demonstrates through CEMS data that the engine meets 90% of the emission limits of Table III-B. Provisions (d)(1)(I) and (f)(1)(D)(i) require facilities with biogas engines using longer averaging period to submit an I&M plan even for those engines that are equipped with NOx and CO CEMS and include all items listed in Attachment 1. At the July 31st Public Workshop, Staff clarified that only Attachment 1, Item G is required for those engines with CEMS utilizing longer averaging period. In order to clarify that no other I&M requirements are triggered, we request that Item G in the Attachment 1 be moved to (d)(1)(I) or referenced as Attachment 2.

Source Testing (f)(1)(C)(i)

This proposed provision requires source testing at least once every two years (within the same calendar month of the previous source test), or every 8,760 operating hours, whichever occurs first. For those facilities with multiple engines, it is less burdensome to test the engines during one event rather than testing at different dates based on each engine's operating hours. Oftentimes the testing of multiple engines can take two months or more. The proposed wording "within the same calendar month of the previous source test" implies that each engine must be tested in the exact same month as the previous test and does not allow any flexibility to accommodate operational or scheduling limitations. We request the deletion of the proposed wording in this provision.

The same provision allows RATA required by Rule 218.1 or 40 CFR Part 75 Subpart E to satisfy the source test requirements for those pollutants monitored by CEMS. NOx and CO RATA is typically conducted at one load (e.g. maximum load) only whereas (f)(1)(C)(ii) requires source testing at three different loads – normal, max and min. Please confirm using one maximum load will satisfy both the RATA and source testing requirements.

Last, but not least, (f)(1)(C)(i) allows an extension of the source test deadline, if the engine has not been operated within three months of the source test due date. We request this provision not be limited to just a long-term shutdown of the engine, but any length of shutdown due to unforeseen maintenance or repair events.

Ammonia Testing (f)(1)(C)(iii)

This proposed provision requires quarterly ammonia source testing during first 12-months of operation of the SCR not utilizing certified ammonia CEMS and annually thereafter. It appears that this requirement applies only to the new or retrofit engine installation. However, during the July 31st Public Consultation meeting, Staff noted that this requirement also applies to the existing engine installation with SCR, if an engine does not pass the annual testing. Source testing engines is not only expensive, but laborious. Source testing requires extensive facility's operations and maintenance resources to execute without disrupting other critical operations. We respectfully

request to require ammonia testing concurrent with existing source test requirements. This is consistent with the statement in page 3-7 of the Preliminary Draft Staff Report which states that "the requirements for ammonia source testing would mirror those that exist and that are proposed for NOx, VOC, and CO (e.g., source testing deadline extension and the source testing interval between tests)".

In addition, biogas engines with NOx CEMS that utilize inlet ammonia analyzers to "estimate" ammonia slip should be not be required to perform additional source testing for ammonia.

Thank you for the opportunity to comment on Proposed Amended Rule 1110.2. If you have any questions regarding our concerns or recommendations, please do not hesitate to contact Mr. David Rothbart of the Los Angeles County Sanitation Districts, SCAP Air Quality Committee Chair at (562) 908-4288, extension 2412.

Sincerely,

Steve Jepsen, Executive Director

cc: Ms. Susan Nakamura, SCAQMD
Mr. Mike Morris, SCAQMD