



LANE REGIONAL AIR PROTECTION AGENCY
1010 Main Street, Springfield, Oregon 97477
(541) 736-1056

STANDARD
AIR CONTAMINANT DISCHARGE PERMIT

Issued in accordance with provisions of Title 37, Lane Regional Air Protection Agency's Rules and Regulations, and based on the land use compatibility findings included in the permit record.

Issued To:
Metropolitan Wastewater Management Commission
410 River Avenue
Eugene, Oregon 97404

Information Relied Upon:
Modification Application Number: 67007
Date Received: February 23, 2021

Land Use Compatibility Statement:
From: City of Eugene
Dated: October 3, 2000

Facility Location:
Eugene/Springfield Water Pollution Control Facility
410 River Avenue
Eugene, Oregon 97404

Fee Basis:
B.65 Sewage treatment facilities employing internal combustion engines for digester gases
C.3 Source electing to maintain baseline emission rate or netting basis
C.4 Source requesting a PSEL equal to or greater than the SER

Permit Number: 202537
Permit Type: Standard
Primary SIC: 4952 Sewerage Systems
Secondary SIC: 4922 Natural Gas Transmission
Date Renewed: September 6, 2018
Expiration Date: September 6, 2023
Modified Date: [DATE], 2021

Permitted Sources:
1 Natural Gas/Digester Gas-fired Internal Combustion Engine Generator
2 Digester Gas/Off-specification Gas Burners
1 Digester Gas Upgrade System and RTO
1 Natural Gas/Digester Gas-fired Boiler
1 Diesel-fired Emergency Generator
Liquid Processing and Odor Abatement Equipment

Issued
By: _____
Steven A. Dietrich, Director

Effective
Date: _____

ADDENDUM NO. 2
NON-PSD/NSR MODERATE TECHNICAL PERMIT MODIFICATION

In accordance with 37-0066(4)(b)(B) of LRAPA's Rules and Regulations, Standard Air Contaminant Discharge Permit No. 202537 is hereby amended to add one (1) Digester Gas Upgrade System, EU-5. The cover page is amended to update the legal name of the permittee, add EU-5 equipment to the permitted sources list and include a secondary SIC for natural gas transmission operations. The permit has been modified as follows: Condition 2 has been amended to include EU-5, Conditions 16-18 have been modified to include operation and maintenance requirements for EU-5, and Conditions 17-22 to have been updated and renumbered (now Conditions 19-25) as part of this modification. All new language and permit condition numbers are in **bold**.

Emission Unit Description

2. The emission units regulated by this permit are the following:

Emission Unit (EU) Number	Emission Unit	Description
EU-1	Engine Generator-set	Jenbacher Genset, 1143 BHP, 7.3 MMBtu/hr, biogas and natural gas -fired, installed in 1997 Pollution control device: Miratech "L" CO catalytic converter
EU-2	Boiler	Hurst, 200 HP, 8.2 MMBtu/hr, 4-pass scotch-marine fire tube, biogas and natural gas-fired, installed 2018
EU-3	Biogas Flares	Two (2) Shand & Jurs 97300 waste gas flares, 8" burner, 76,000 scf/hr, biogas, off-specification gas and natural gas-fired, installed 2018
EU-4	Wastewater Treatment Operations	Emissions from wastewater treatment operations Pollution control device: Biofiltration system and four (4) activated carbon filter odor/pollutant control vessels
EU-5	Digester Gas Upgrade System	Pressure Swing Adsorption (PSA) Pollution control devices: Regenerative Thermal Oxidizer (RTO) Biogas Flares (EU-3)
Categorically Insignificant Activity	Emergency Generator	Caterpillar, 200 kW, diesel-fired emergency generator, subject to NSPS Subpart IIII

EU-5 Digester Gas Upgrade System Operation and Maintenance Requirements

16. The permittee must include the following monitoring parameter information for the RTO in EU-5 in the O&M Plan required by Condition 12: [LRAPA 32-007]
 - a. Description of operating and maintenance procedures, including startup and shutdown of the RTO. A schedule of RTO inspections and routine maintenance must be provided in the O&M Plan.
 - b. Corrective actions that will be used in the event that the RTO is not performing at the highest reasonable efficiency and effectiveness to minimize emissions.
 - c. Tail gas flow rate, natural gas flow rate, combustion chamber temperatures, or other physical or chemical parameters related to the operation of the RTO.
17. The operation of the RTO in EU-5 must be in accordance with the emissions provisions in Conditions G11 through G18. [LRAPA Title 36]

- 18. A log of inspections, routine maintenance, and corrective actions for EU-5 must be maintained by the permittee for a period of at least five (5) years. [LRAPA 32-007]**

Monitoring and Recordkeeping Requirements

- 19. By the fifteenth (15th) day of each month, the permittee must record the following information, maintain the records for a period of five (5) years at the plant site, and make the records available for inspection by authorized representatives of LRAPA upon request: [LRAPA 34-016 and 42-0080]**

Emission Unit (EU)	Monitoring Parameter (units)	Minimum Recording Frequency
EU-1	Digester gas burned in the genset (cubic feet)	Monthly
EU-1	Natural gas burned in the genset (cubic feet)	Monthly
EU-1	Hours of operation of the genset (hours)	Monthly
EU-1	Maintenance performed in accordance with the Subpart ZZZZ NESHAP in Condition 9.	Upon occurrence
EU-2	Digester gas burned in the boiler (cubic feet)	Monthly
EU-2	Natural gas burned in the boiler (cubic feet)	Monthly
EU-3	Digester gas burned in the waste gas flares (cubic feet)	Monthly
EU-3	Off-specification gas burned in the waste gas flares (cubic feet)	Monthly
EU-4	Wastewater effluent volume (million gallons)	Monthly
EU-5	Natural gas combusted in the RTO (cubic feet)	Monthly
EU-5	PSA tail gas combusted in the RTO (cubic feet)	Monthly
EU-5	RTO maintenance and inspections performed	Upon occurrence
Categorically Insignificant Activity	Hours of operation of the emergency generator (hours) and classification of the operation	Upon occurrence

20. The permittee must use the following emission factors to estimate emissions in accordance with Condition 5: [LRAPA 34-016 and 42-0080]

Emission Unit ¹	Pollutant	Emission Factor	Emission Factor Units	Reference
Genset (EU-1)	VOC ²	124.2	lb/MMscf digester gas	Jenbacher – March 28, 2000
	NO _x	310.5	lb/MMscf digester gas	Jenbacher – March 28, 2000
	CO	579.6	lb/MMscf digester gas	Jenbacher – March 28, 2000
	VOC²	120.4	lb/MMscf natural gas	AP-42, Table 3.2-2
	NO_x	863.9	lb/MMscf natural gas	AP-42, Table 3.2-2
	CO	568.1	lb/MMscf natural gas	AP-42, Table 3.2-2
Boiler (EU-2)	VOC	5.5	lb/MMscf digester gas or natural gas	AP-42, Table 1.4-2
	NO _x	100	lb/MMscf digester gas or natural gas	AP-42, Table 1.4-1
	CO	84	lb/MMscf digester gas or natural gas	AP-42, Table 1.4-1
Waste Gas Flares (EU-3)	VOC	84	lb/MMscf digester gas/off-spec gas	AP-42, Table 13.5-1
	NO _x	40.8	lb/MMscf digester gas/off-spec gas	AP-42, Table 13.5-1
	CO	186	lb/MMscf digester gas/off-spec gas	AP-42, Table 13.5-2
Wastewater Treatment Operations (EU-4)	VOC	0.715	lb/10 ⁶ gallons	Facility grab sample data (1997-2016)
	Total HAP	0.643	lb/10 ⁶ gallons	Facility grab sample data (1997-2016)
	Single HAP: Phenol	0.266	lb/10 ⁶ gallons	Facility grab sample data (1997-2016)
Digester Gas Upgrade System, RTO (EU-5)	VOC	5.5	lb/MMscf natural gas/tail gas	AP-42, Table 1.4-2
	NO_x	50	lb/MMscf natural gas/tail gas	AP-42, Table 1.4-1
	CO	84	lb/MMscf natural gas/tail gas	AP-42, Table 1.4-1

¹NOTE: Emission factors are not listed for the Categorically Insignificant Activity emission unit since emissions from these types of activities are excluded from PSEL compliance monitoring. [LRAPA 42-0035(5)]

²NOTE: VOC as defined in 40 CFR 51.100(s). For the purposes of Subpart ZZZZ, when calculating emissions of VOC, emissions of formaldehyde should not be included.

Reporting Requirements

22. *By March 15th of each year*, an annual report must be submitted with the information as required per Conditions 5, 13, 19, and G15. The annual report must also include greenhouse gas emissions calculations as required by OAR 340-215-0030. [LRAPA 34-016]
23. Unless otherwise specified, all reports, test results, and notifications required by this permit must be submitted to the following office: [LRAPA 34-016]

Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477
(541) 736-1056

Outdoor Burning

24. The permittee is prohibited from conducting outdoor burning, except as may be allowed by LRAPA Title 47. [LRAPA 47-001]

Fee Schedule

25. In accordance with adopted regulations, the permittee will be invoiced by October 1st of each year for the Annual Fee due December 1st of each year. [LRAPA 37-8020 Table 2]

KE/CMW
5/28/2021