

2024 MAY 28 PM 1:56

PETITION FOR VARIANCE
BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

PETITIONER: Eco Services Operations Corp. (Petitioner)

CASE NO: 6258-1

FACILITY ID: 180908

FACILITY ADDRESS: 20720 S. Wilmington Avenue

[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: Long Beach, CA 90810

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

INTERIM SHORT REGULAR EMERGENCY EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

Mark Panger
Plant Manager
Mark.Panger@eco-services.com
310-885-6719

Aron Potash
Latham & Watkins LLP
355 S. Grand Avenue, Suite 100
Los Angeles, CA 90071-1560
213-485-1234
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3. RECLAIM Permit Yes No Title V Permit Yes No

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

Good cause exists to grant the emergency variance petition. If the Board does not grant the emergency variance petition, the Petitioner (Eco Services) would be, through no fault of its own, in violation of District Rules and Facility Permit conditions requiring it to operate an SO₂ stack emissions analyzer as the analyzer unexpectedly failed and is currently being repaired by the manufacturer.

The circumstances leading to the potential violation of District Rules and Facility Permit conditions, including Rule 2011(c)(2)(A), could not reasonably have been avoided by Eco Services because an SO₂ analyzer at the facility (located at Stack S151 at the outlet of Scrubber C148, which controls emissions from the facility's Sulfuric Acid Plant No. 4 (Process 1, System 1)) unexpectedly failed calibration at approximately 5:27 a.m. on May 21, 2024. The Petitioner could not have reasonably anticipated the failure of the analyzer, and despite extensive efforts by the Petitioner, the Petitioner has been unable to repair the analyzer to avoid a potential violation. Aware of the 96-hour repair period in Rule 2011, the Petitioner immediately took action to troubleshoot, attempt to repair, and address the cause of the analyzer failure, as further described herein.

On May 21, 2024, after the failed calibration, the Petitioner's instrumentation and electrical (I&E) technicians immediately initiated attempts to diagnose and repair the issue, including multiple attempts at calibration, unsuccessful attempts to obtain a SCAQMD-approved temporary analyzer during the diagnostic and repair period, as well as checking associated equipment and receiving remote support from a third-party equipment service technician, Monitoring Solutions, an ESC Spectrum Company (ESC Spectrum). The technician determined that the issue could not be fixed remotely, and Petitioner immediately requested that ESC

Spectrum send a technician to the facility. The technician arrived onsite at 4:30 a.m. on May 23, 2024. The ESC Spectrum technician attempted to diagnose and repair the analyzer using the Petitioner's spare parts inventory, which included manufacturer-recommended spare parts onsite, as well as the technician's own spare parts inventory, but the third-party technician ultimately determined that the necessary repair requires a replacement part that must be fabricated by the analyzer manufacturer. This repair must be made by the analyzer manufacturer at its Massachusetts repair facility. The Petitioner expects that it will take at least 7 days and most likely longer for the analyzer manufacturer to check the analyzer and identify the specific problem or issue, and then make the necessary repairs if at all possible. This may entail producing a replacement part, which may be a custom part, completing the repair, and returning the repaired analyzer to Petitioner.

As soon as the Petitioner's third-party technician determined that a custom part was needed and that the analyzer manufacturer is in the best position to perform this repair at its facility, the Petitioner began drafting its petition for an emergency variance and notified District compliance staff of its intent to do so. The Petitioner has filed this variance petition as soon as feasible, on the first District business day following the expiration over a holiday weekend of the repair period allowed by Rule 2011. The Petitioner has advised the assigned SCAQMD air quality engineer of the issues, discussed this petition with SCAQMD staff, and will keep SCAQMD staff apprised of the analyzer manufacturer's findings and the estimated timeline for return to the Petitioner and to service.

The Petitioner has taken additional steps to ensure that SO₂ emissions are adequately monitored and controlled in the absence of the analyzer. Specifically, the Petitioner is continuously monitoring exhaust gas flow rate and will continue to do so during the period the variance is in effect. The Petitioner is also continuously monitoring the pH of the scrubber solution in Scrubber C148, based on the strong correlation between scrubber pH and SO₂ emissions control. As shown in the attached figure (Exhibit 1), over six years of data at the facility demonstrates that when scrubber pH exceeds 7 s.u., SO_x concentrations are almost always below 10 ppm. Petitioner will continue to monitor the scrubber solution pH to ensure it remains at or above 7 s.u. during the variance period. The Petitioner has also obtained a rental analyzer that is due to be delivered on May 28, 2024. Although the rental analyzer has not been certified by the SCAQMD, it will provide another line of evidence as to SO₂ emissions while the facility's certified analyzer is being repaired.

The Petitioner respectfully requests that this short/emergency variance petition be granted as good cause exists for the reasons stated herein. If Petitioner does not receive a short/emergency variance to temporarily operate without its SO₂ analyzer while repairs are made, there would be an unreasonable and unavoidable adverse impact to the Petitioner as it would be forced to shut down, which would disrupt gasoline production at our customers' refineries, including those local refineries owned and operated by Chevron Corporation and Marathon Petroleum Corporation, and could result in a subsequent disruption in gasoline distribution to consumers. This shut down would be without a corresponding benefit in reducing air contaminants as there will be no excess emissions if the facility operates under variance coverage while adhering to the conditions proposed in this petition. Without a variance, the Petitioner would suffer significant economic losses through no fault of its own as shutting down the facility would result in a breach of longstanding contracts with various customers, who will in turn likely suffer their own economic losses. These economic losses are explained in further detail in response to Question #17, below.

5. Briefly describe the type of business and processes at your facility.

The Eco Services Dominguez facility is a sulfuric acid production and regeneration facility. Our sulfuric acid products are used by petroleum refineries, including refineries within the SCAQMD footprint, to produce alkylate, a key blending stock for cleaner burning gasoline.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach only the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
SO2 Analyzer located at Stack S151 downstream of Scrubber C148	180908		

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

The stack SO2 analyzer is a necessary component of the sulfur dioxide continuous emissions monitoring required by Rule 2011 and RECLAIM Permit No. 180908, dated January 1, 2024 ("Facility Permit").

The SO2 analyzer at issue monitors emissions from Stack S151, which vents emissions from the facility's Sulfuric Acid Plant No. 4 (Process 1, System 1) after being controlled by Scrubber C148. The SO2 analyzer is located after Scrubber C148 at Stack S151.

The relevant sections of the Facility Permit, copies of which are attached to this Petition as Exhibit 2, further identify and describe this equipment.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes No

If yes, how often: Daily Date of last maintenance and/or inspection May 21, 2024

Describe the maintenance and/or inspection that was performed.

On the morning of May 21, 2024, Petitioner conducted its daily calibration on the SO2 analyzer to verify proper operation. The analyzer failed this calibration, alerting the Petitioner to the analyzer problem, after which the Petitioner's I&E technician team was deployed to start troubleshooting. See the response to Question #4 for more information.

In addition to daily calibrations, the Petitioner performs routine inspections and maintenance on the SO2 CEMS, including the analyzer. More specifically, ESC Spectrum performs onsite quality assurance/quality control and preventative maintenance on the SO2 CEMS, including the analyzer.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
Rules 2011(c)(2)(A)	Rule 2011(c)(2)(A) requires that the Facility Permit holder of a major SOx source install, maintain, and operate a direct monitoring device for each major SOx source to continuously measure the concentration of SOx emissions or fuel sulfur content. The facility will be unable to meet the requirements of Rule 2011(c)(2)(A) for a period exceeding 96 hours because the SO2 analyzer failed and needed to be shipped to the Massachusetts-based manufacturer for repair.
Section F(III), Condition D(1)	Section F(III), Condition D(1) requires that Petitioner install, maintain, and operate a monitoring device or an approved alternative monitoring device for each major SOx source to continuously measure the concentration of SOx emissions or fuel sulfur content and all other applicable variables specified in Rule 2011, Table 2011-1 and Rule 2011, Appendix A, Table 2-A to determine the SOx emissions rate from each source. The Facility will not be able to operate the SOx analyzer until it has been repaired, so emissions from a SOx major source (Furnace D1, a device that is part of Sulfuric Acid Plant No. 4) cannot be monitored.

<p>District Rules 203(b), 2004(f)(1) and 3002(c)(1)</p>	<p>District Rule 203(b) states that permitted equipment "shall not be operated contrary to the conditions specified in the permit to operate." Similarly, RECLAIM Rule 2004(f)(1) requires compliance with all facility permit conditions. In addition, Rule 3002(c)(1) requires compliance with Title V permit conditions. The Facility Permit includes conditions requiring operation of the SO2 analyzer. The Facility will not be able to operate the analyzer until it has been repaired.</p>
<p>Administrative Condition No. 2 (Section E)</p>	<p>The Facility Permit includes Administrative Condition No. 2, which requires that the operator maintain all equipment and ensure proper operation of the equipment. The Facility will not be able to operate the SO2 analyzer in compliance with all applicable rules and permit conditions while the repair is being performed.</p>
<p>Condition No. S42.1 (Section D)</p>	<p>Facility Permit Condition No. S42.1 requires the SO2 analyzer at Stack S151 to show compliance with the Plant 4 SO2 emissions limit of 3.5 lbs per ton of sulfuric acid produced on a 3-hour rolling average. The Facility will not be able to operate the SO2 analyzer until it has been repaired.</p>
<p>Condition No. D82.3 (Section D)</p>	<p>Facility Permit Condition No. D82.3 requires the operator install and maintain a CEMS at Stack S151 to demonstrate compliance with Condition No. S42.1. The condition also requires the CEMS to remain in operation at all times. The CEMS cannot be used to demonstrate compliance with Condition No. S42.1 while the analyzer is being repaired.</p>

10. Are the equipment or activities subject to this request currently under variance coverage? Yes No
11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes No
12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes No

If yes, you must attach a copy of each notice.

Please find attached as Exhibit 3 copies of Notices to Comply E57165, issued December 22, 2023, and E57614, issued December 27, 2023. Notice to Comply E57165 served as an information request, and the Petitioner promptly provided the requested information, while Notice to Comply E57614 addresses timely reporting of RECLAIM data.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes No

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

As explained above, the circumstances leading to the potential violation of the above-described rules and Facility Permit conditions are beyond the Petitioner's reasonable control because the SO2 analyzer at the facility unexpectedly failed calibration at approximately 5:27 a.m. on 5/21/24. Prior to the event on 5/21/24, facility staff cannot recall an incident where the SO2 analyzer failed calibration for a period exceeding the timeframe allowed by Rule 2011. Since the failed calibration, the Petitioner has made various attempts at repairing the analyzer to bring it back online within the timeframe allowed by Rule 2011. Those attempts include efforts by the Petitioner's I&E technicians as well as its third-party equipment service technician, ESC Spectrum. After numerous attempts to repair the analyzer onsite using the available replacement parts kept on-hand by the Petitioner and those brought to the site by the ESC Spectrum technician, ESC Spectrum concluded that the equipment must be sent offsite to the analyzer manufacturer, Thermo Fisher Scientific, to be repaired with a custom replacement part. Petitioner shipped the analyzer to the manufacturer on May 24, and the manufacturer will need to repair the analyzer before it can be shipped back to the facility and brought back online. Accordingly, compliance with the aforementioned rules and permit conditions is outside of the Petitioner's reasonable control while the analyzer is being repaired offsite.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

The SO2 analyzer failed its calibration on May 21, 2024, at approximately 5:27 a.m. After internal attempts at repair on May 21 and 22, 2024, the facility's third-party technician arrived onsite at approximately 4:30 a.m. on May 23, 2024 and attempted repair. When it became clear on May 23, 2024 that onsite repair would not be possible, Petitioner determined it may be out of compliance with Rule 2011(c)(2)(A).

16. List date(s) and action(s) you have taken since that time to achieve compliance.

5/21: The SO2 analyzer failed its daily calibration. The facility's I&E technicians attempted to reset the instrumentation and perform a passing calibration. The facility also checked equipment associated with the analyzer to ensure that the issue was stemming from the analyzer itself. A third-party technician then remotely attempted to diagnose the issue. When the technician could not address the issue remotely, the facility requested that a technician visit the facility. The Petitioner also sought to obtain a SCAQMD-approved temporary analyzer during this diagnostic and repair period, but was unsuccessful.

5/22: The SO2 analyzer again failed its daily calibration. The third-party technician arrived in Los Angeles at approximately 7:30 p.m.

5/23: The third-party technician arrived onsite at 4:30 a.m. to attempt to repair the analyzer. The SO2 analyzer again failed its daily calibration. The technician attempted repairs with spare parts that the facility kept onsite and those brought by the third-party technician. After exhausting attempts at repair with onsite resources and spare parts, the technician concluded that the equipment must be sent off site to the analyzer manufacturer, Thermo Fisher Scientific, to be repaired with a custom replacement part.

5/24: The equipment was sent offsite via overnight FedEx to Thermo Fisher Scientific for delivery on May 25, 2024, to diagnose and repair the issue.

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses: The facility would suffer a loss in sales of approximately \$200,000 per day if the variance were not granted.

Number of employees laid off (if any): At least 10 employees (if there is an extended shutdown period because the variance was not granted).

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

As explained above, the facility's product is used by various refineries, including nearby refineries owned and operated by Chevron Corporation and Marathon Petroleum Corporation, to produce alkylate for cleaner burning gasoline. Disruptions to the supply of the facility's product will affect gasoline prices and availability as the product is needed by refineries to produce alkylate. Eco Services' failure to supply its product to its customers is a breach of contract, and estimated losses for Eco Services are approximately \$200,000 per day. The economic loss to the Chevron Corporation and Marathon Petroleum Corporation refineries is estimated to be over \$1,000,000 per day per refinery.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

The Petitioner has considered curtailment or termination of operations, and although the facility could terminate operations if directed to by SCAQMD, it would lead to significant economic losses without any air emissions benefit. Specifically, as noted above, the plant will ensure there are no excess emissions by utilizing scrubber pH as a control parameter such that there would not be a corresponding benefit in reducing air contaminants in the event of curtailment or closing. Please see the response to Question #4 above. Also, the facility and its customers would suffer significant economic loss as a result of any shutdown. Further, we expect that local gasoline customers would also be negatively impacted by a cessation of production at the facility, as we understand that shutting down production at our facility could reduce gasoline supply and increase prices.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
N/A			

* Column A minus Column B = Column C

Excess Opacity: _____ %

20. Show calculations used to estimate quantities in No. 19, or explain why there will be no excess emissions.

Eco Services does not expect any excess emissions.

While the facility's stack analyzer is being repaired, the Petitioner is requesting a variance from the SO2 continuous emissions monitoring provision of Rule 2011 and permit conditions requiring operation of the analyzer. During the stack analyzer downtime, the facility will estimate SO2 emissions using approved SCAQMD data substitution methods pursuant to Rule 2011, Appendix A, Chapter 2 (Major Sources). As such, Eco Services does not expect any excess emissions during the variance period.

The facility operates an SO2 analyzer and a NOx analyzer. The facility's caustic scrubber effectively controls SO2 using scrubber pH as a control parameter. As discussed above in response to Question #4, the facility has established a strong correlation between scrubber pH and SO2 emissions. Based on this correlation and its experience, the Petitioner is continuously monitoring the pH of the scrubber solution to ensure that it is at or above 7 s.u.

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

Not applicable (there will be no excess emissions).

Nonetheless, we will apply RECLAIM missing data procedures pursuant to Rule 2011, Appendix A, Chapter 2

(Major Sources). As such, we will be overreporting actual emissions and be obligated to retire more RTCs than we would if our analyzer were functioning, which will decrease the credit supply in the overall RTC market.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

We will quantify and report emissions using RECLAIM missing data procedures pursuant to Rule 2011, Appendix A, Chapter 2 (Major Sources). In addition, as discussed above, Petitioner is continuously monitoring exhaust gas flow rate from Scrubber C148. The Petitioner is also continuously monitoring the pH of the scrubber solution in Scrubber C148. There is a strong correlation between scrubber pH and SO₂ emissions control. As shown in the attached figure (Exhibit 1), over six years of data at the facility demonstrates this strong correlation: when scrubber pH exceeds 7 s.u., SO_x concentrations are almost always below 10 ppm. Petitioner will continue to monitor the scrubber solution pH to ensure it remains at or above 7 s.u. on a one hour rolling average basis.

The Petitioner has also obtained a rental analyzer that is due to be delivered on May 28, 2024. Although, the rental analyzer has not been certified by the SCAQMD, if Eco Services is able to connect and operate the analyzer, the analyzer will provide another line of evidence as to SO₂ emissions while the facility's certified analyzer is being repaired.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

The facility will return to compliance with Rule 2011(c)(2)(A) and (C)(iii) when the analyzer is repaired by the manufacturer, Thermo Fisher Scientific. At this time, we are uncertain how long this will take. Preliminary discussions between ESC Spectrum and Thermo Fisher Scientific led to an estimate that the repair will take, at a minimum, seven days because a custom replacement part is likely required.

The Petitioner proposes that this matter be heard on the consent calendar, and the Petitioner intends to contact District counsel to discuss the preparation of consent calendar documents. If agreement is reached with the District as to consent calendar documents, the Petitioner intends to work with District counsel to submit such documents to the Hearing Board.

Petitioner proposes the following variance conditions:

1. The petitioner shall maintain the scrubber solution pH in Scrubber C148 to ensure it remains at or above 7 s.u. on a one hour rolling average basis during the variance period.
2. The petitioner shall keep records of scrubber solution pH in Scrubber C148 during the variance period and provide them to the District upon request
3. The petitioner shall conduct and document daily system inspections to confirm that the pH analyzer is operating and that continuous feedback is received during the variance period.
4. The petitioner shall immediately notify the South Coast AQMD of any complaints received during the variance period by calling 1-800-CUT-SMOG.
5. In the event that pH in Scrubber C148 drops below 7 s.u. on a one hour rolling average basis during the variance period, Petitioner shall notify the District within 60 minutes via 1-800-CUT-SMOG.
6. The petitioner shall achieve final compliance no later than June 24, 2024.
7. The petitioner shall notify the Clerk of the Hearing Board (ClerkofBoard@aqmd.gov) and District by calling 1-800-CUT-SMOG within twenty-four (24) hours after achieving final compliance.

Petitioner shall pay all applicable fees, including excess emissions fees if applicable, to the Clerk of the

Hearing Board within fifteen days upon notification in writing that the fees are due or the variance shall be invalidated pursuant to Rule 303 – Hearing Board Fees, subsection (k).

24. State the date you are requesting the variance to begin: May 25, 2024 (as provided by Rule 2011); and the date by which you expect to achieve final compliance: Eco Services expects the SO2 analyzer to return to normal operation within 30 days, and if the analyzer cannot be repaired during the emergency variance period, Eco Services intends to have a better understanding of the manufacturer's repair timeframe prior to the short variance hearing.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

On May 24, 2024, we spoke with Stephen Jiang, our Air Quality Engineer in the Engineering and Compliance Division to discuss this matter and our intent to petition for variance coverage.

On May 24, 2024, we left voicemail messages with Marissa Osaki and Ryan Maxwell with the Office of Compliance and Enforcement to advise them of the analyzer breakdown and compliance efforts. We then spoke with Mr. Maxwell later that same day about our intent to file a variance petition with the Hearing Board no later than Tuesday, May 28. We also transmitted to Ms. Osaki and Mr. Maxwell on May 24 a letter confirming our intent to file this variance petition.

If the petition was completed by someone other than the petitioner, please provide their name and title below.

Name	Company	Title
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The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on May 28, 2024, at Eco Services Long Beach, California

[Signature]
Signature

Mark Panger
Print Name

Title: Plant Manager

26. SMALL BUSINESS and TABLE III SCHEDULE A FEES: To be eligible for reduced fees for small businesses, individuals, or entities meeting small business gross receipts criterion [see District Rule 303(h)], you must complete the following:

Declaration Re Reduced Fee Eligibility

1. The petitioner is
a) an individual, or
b) an officer, partner or owner of the petitioner herein, or a duly authorized agent of the petitioner authorized to make the representations set forth herein.

If you selected 1a, above, skip item 2.

2. The petitioner is
a) a business that meets the following definition of Small Business as set forth in District Rule 102:

SMALL BUSINESS means a business which is independently owned and operated and meets the following criteria, or if affiliated with another concern, the combined activities of both concerns shall meet these criteria:

- (a) the number of employees is 10 or less; **AND**
- (b) the total gross annual receipts are \$500,000 or less **or**
- (iii) the facility is a not-for-profit training center.

-OR-

b) an entity with total gross annual receipts of \$500,000 or less.

3. Therefore, I believe the petitioner qualifies for reduced fees for purpose of filing fees and excess emission fee calculations, in accordance with Rule 303(h).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____, at _____, California

Signature

Print Name

Title _____

Exhibit 1

Correlation Between Tailgas Scrubber pH and SO2 Concentration

Dominquez Facility

Tailgas Scrubber pH vs. ppm SO2 2018-2024

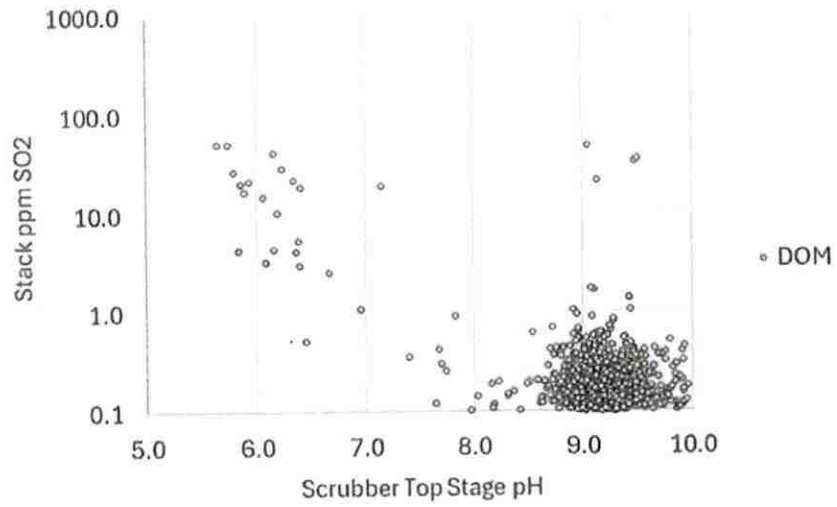


Exhibit 2
Relevant Facility Permit Sections



**FACILITY PERMIT TO OPERATE
ECO SERVICES OPERATIONS CORP.**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: CHEMICAL MANUFACTURING, INORGANIC CHEMICAL					
System 1: SULFURIC ACID PLANT NO.4					
					S13.1, S42.1, S42.2
FURNACE, WITH TWO LOW NOX BURNERS, FUEL OIL, NATURAL GAS, 2 SULFUR, 13 ACID BURNERS, 1 NOZZLE FOR VENT GAS FROM THE SPENT H2SO4 TANKS WITH A/N: 585633	D1	D18 D19 D20 D21 D86 D87 D88 D89 D90 D91 D115 D116 C124	NOX: MAJOR SOURCE**; SOX: MAJOR SOURCE**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; H2SO4 MIST: 0.15 LBS/TON PRODUCED (8A) [40CFR 60 Subpart H, 10-17-2000]; H2SO4 MIST: 0.3 LBS/TON PRODUCED (4) [RULE 469, 5-7-1976; RULE 469, 2-13-1981]; H2SO4 MIST: 10 PERCENT OPACITY (8B) [40CFR 60 Subpart H, 10-17-2000]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 2011, 5-6-2005; RULE 2011, 12-4-2015; RULE 409, 8-7-1981]; SO2: 3.5 LBS/TON PRODUCED (4) [RULE 2005, 6-3-2011; RULE 2005, 12-4-2015] SO2: 4 LBS/TON PRODUCED (8A) [40CFR 60 Subpart H, 10-17-2000]	D82.1, D323.1, E448.4
BURNER, FUEL OIL, NATURAL GAS, JOHN ZINK, TWO LOW NOX BURNERS, 75 MMBTU/HR EACH					
BOILER, WASTE HEAT AND 12 SOOT BLOWERS A/N: 585633	D2				
TOWER, GAS QUENCH A/N: 585633	D3				
COLUMN, STRIPPER, QUENCH ACID A/N: 585633	D6				

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



**FACILITY PERMIT TO OPERATE
ECO SERVICES OPERATIONS CORP.**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: CHEMICAL MANUFACTURING, INORGANIC CHEMICAL					
TOWER, GAS COOLING, PACKED TYPE A/N: 585633	D4				
COLUMN, STRIPPER, EFFLUENT WATER A/N: 585633	D5				
ELECTROSTATIC PRECIPITATOR, IN SERIES WITH DEVICE NO 8 A/N: 585633	D7	D8			
ELECTROSTATIC PRECIPITATOR, IN SERIES WITH DEVICE NO 7, COMBINED LOAD 160 KW A/N: 585633	D8	D7			
ABSORBER, DRYING, PACKED TYPE, WITH INTERNAL MIST ELIMINATOR A/N: 585633	D10	C149			
COMPRESSOR, MAIN PROCESS, CENTRIFUGAL A/N: 585633	D9				D82.2
REACTOR, CATALYTIC CONVERTER, HEIGHT: 66 FT ; DIAMETER: 32 FT 6 IN A/N: 585633	D15				
ABSORBER, INTERMEDIATE, PACKED TYPE WITH INTERNAL MIST ELIMINATOR A/N: 585633	D11				
COLUMN, STRIPPER, PACKED TYPE, PRODUCT ACID A/N: 585633	D14				
ABSORBER, FINAL, PACKED TYPE, WITH INTERNAL MIST ELIMINATOR A/N: 585633	D13	C148			

- * (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
- (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
- (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
- (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



**FACILITY PERMIT TO OPERATE
ECO SERVICES OPERATIONS CORP.**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: CHEMICAL MANUFACTURING, INORGANIC CHEMICAL					
COOLING TOWER, WATER A/N: 585633	D16				
PIT, SULFUR, WIDTH: 24 FT ; DEPTH: 6 FT 6 IN; LENGTH: 26 FT A/N: 585633	D130				
System 2: HEAVY SLUDGE/FUEL OIL LOADING/UNLOADING					
LOADING AND UNLOADING ARM, BOTTOM, TANK TRUCK, HEAVY SLUDGE, WITH NITROGEN BLANKET A/N: 585631	D18	D1 C121			E57.2
LOADING AND UNLOADING ARM, BOTTOM, TANK TRUCK, HEAVY SLUDGE, WITH NITROGEN BLANKET A/N: 585631	D19	D1 C121			E57.2
LOADING AND UNLOADING ARM, TANK TRUCK, TOP, HEAVY SLUDGE, WITH NITROGEN BLANKET A/N: 585631	D20	D1 C121			E57.2
LOADING AND UNLOADING ARM, TANK TRUCK, TOP, HEAVY SLUDGE, WITH NITROGEN BLANKET A/N: 585631	D21	D1 C121			E57.2
System 4: ACID LOADING/UNLOADING FACILITY					
UNLOADING ARM, BOTTOM, SPENT ACID, DIAMETER: 3 IN A/N: 585628	D24	C124			
UNLOADING ARM, TOP, SPENT ACID, DIAMETER: 3 IN A/N: 585628	D25	C124			

- * (1) (1A) (1B) Denotes RECLAIM emission factor
 - (3) Denotes RECLAIM concentration limit
 - (5) (5A) (5B) Denotes command and control emission limit
 - (7) Denotes NSR applicability limit
 - (9) See App B for Emission Limits
 - (2) (2A) (2B) Denotes RECLAIM emission rate
 - (4) Denotes BACT emission limit
 - (6) Denotes air toxic control rule limit
 - (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 - (10) See section J for NESHAP/MACT requirements
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



**FACILITY PERMIT TO OPERATE
ECO SERVICES OPERATIONS CORP.**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: CHEMICAL MANUFACTURING, INORGANIC CHEMICAL					
TANK, SCRUBBER SEAL POT SP-2, HEIGHT: 6 FT 7 IN; DIAMETER: 3 FT 6 IN A/N: 585614	C125	D87 D88 D89 D90 D91 D115 D116 C121			
SCRUBBER, VENTURI, ENVIRONMENTAL SYSTEMS TECHNOLOGY A/N: 585614	C121	D18 D19 D20 D21 D86 C122 C124 C125			A72.1, C8.3, C8.4
SCRUBBER, PACKED BED, SCR-246, ENVIRONMENTAL SYSTEMS TECHNOLOGY A/N: 585614	C122	C121 C123			A72.1, C8.3, C8.5
MIST ELIMINATOR A/N: 585614	C123	C122 C126		PM: (9) [RULE 404, 2-7-1986]	D323.1
FLARE, ELEVATED WITHOUT STEAM, F-2, NATURAL GAS, NAO INC., WITH ONE BURNER, CENTER GAS ASSISTED TYPE, LENGTH: 1.09 MMBTU/HR A/N: 585614	C126	C123		CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]	D90.1, D323.1
System 9: AIR POLLUTION CONTROL SYSTEM					
SCRUBBER, SO2 SCRUBBER, 2 PACKED BEDS TOTAL, FIBER REINFORCED PLASTIC VESSEL, WITH MIST ELIMINATOR, HEIGHT: 61 FT ; DIAMETER: 15 FT A/N: 585634	C148	D13			A63.1, E193.1, H23.2
STACK, 130 FT ABOVE GRADE, 6 FT DIAMETER A/N: 585634	S151				D82.3, E448.4

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
(5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



**FACILITY PERMIT TO OPERATE
ECO SERVICES OPERATIONS CORP.**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: CHEMICAL MANUFACTURING, INORGANIC CHEMICAL					
SCRUBBER, PACKED BED, ACIDULATION STRIPPER, FIBER REINFORCED PLASTIC VESSEL, WITH MIST ELIMINATOR, HEIGHT: 43 FT ; DIAMETER: 3 FT 8 IN A/N: 585634	C149	D10			C8.7, C12.1, D12.3, E57.3, E193.1
TANK, CAUSTIC SOLUTION, ELECTRICALLY HEATED, 7000 GALS; DIAMETER: 10 FT ; HEIGHT: 12 FT A/N: 585634	C150				E193.1
Process 2: CHEMICAL MANUFACTURING, ALUMINUM SULFATE					
System 1: ALUMINUM SULFATE MANUFACTURING					
HOPPER, WEIGH, 17 TONS A/N: 585624	D37			PM: (9) [RULE 405, 2-7-1986]	D323.2
COOKER, R-101, CAPACITY 25,000 GALLONS A/N: 585624	D38	C54		PM: (9) [RULE 405, 2-7-1986]	C6.2, D323.2
TANK, HOLDING, T-102, FLOCCULENT ADDITIVE, 300 GALS A/N: 585624	D39				
TANK, HOLDING, T-115, SLUICE WATER, 3500 GALS A/N: 585624	D40				
TANK, HOLDING, T-109, PRECOAT, 300 GALS A/N: 585624	D41				
TANK, HOLDING, T-103, LIQUOR, LIQUOR, 120000 GALS A/N: 585624	D43				
TANK, HOLDING, T-120, 16000 GALS A/N: 585624	D44				

- * (1) (1A) (1B) Denotes RECLAIM emission factor
 - (3) Denotes RECLAIM concentration limit
 - (5) (5A) (5B) Denotes command and control emission limit
 - (7) Denotes NSR applicability limit
 - (9) See App B for Emission Limits
 - (2) (2A) (2B) Denotes RECLAIM emission rate
 - (4) Denotes BACT emission limit
 - (6) Denotes air toxic control rule limit
 - (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 - (10) See section J for NESHAP/MACT requirements
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



**FACILITY PERMIT TO OPERATE
ECO SERVICES OPERATIONS CORP.**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Sulfuric Acid Mist	40CFR60, SUBPART	A
Sulfuric Acid Mist	40CFR60, SUBPART	H

except when superseded by alternative requirements and/or procedures specified in the EPA-approved Alternative Monitoring Plan (AMP).

[40CFR 60 Subpart A, 6-3-2016; 40CFR 60 Subpart H, 10-17-2000]

[Systems subject to this condition : Process 1, System 1]

S13.2 All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1166

[RULE 1166, 7-14-1995; RULE 1166, 5-11-2001]

[Systems subject to this condition : Process 11, System 1]

S42.1 The operator shall limit emissions from this system as follows:

CONTAMINANT	EMISSIONS LIMIT
SO2	Less than or equal to 3.50 lbs/ton of 100% sulfuric acid produced (3-hr rolling average)



**FACILITY PERMIT TO OPERATE
ECO SERVICES OPERATIONS CORP.**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

For the purposes of this condition, the emission limit(s) shall not apply to periods of Startup, Shutdown, and Malfunction.

"Startup" means the 24-hour period beginning when the feed of sulfur or sulfur-bearing materials (excluding conventional fossil fuels such as natural gas or fuel oils) to the furnace commences after a main gas blower shutdown.

"Shutdown" means the cessation of operation of the sulfuric acid plant for any reason, and begins at the time sulfur or sulfur-bearing feeds (excluding conventional fossil fuels such as natural gas or fuel oils) to the furnace ceases.

"Malfunction" shall have the same meaning as found in 40 CFR 60.2.

For the purpose of this condition, "100% sulfuric acid produced" (which includes scrubber byproduct) means the stoichiometric quantity of sulfuric acid that would be produced at the sulfuric acid plant if all sulfur trioxide exiting the converter were used to produce anhydrous sulfuric acid.

For the purposes of this condition, the emission limit(s) shall not be relaxed.

Compliance with the SO₂ emission limit shall be demonstrated using SO₂ analyzers at the converter inlet and exit stack using the following equations in accordance with the requirements of the facility's EPA-approved Alternative Monitoring Plan:

$$X_e = (M1 - M2) / (M1 - 1.5 \times M1 \times M2)$$

$$E = (K / X_e) - K$$

Where:

X_e = the rolling 3 hour average fractional conversion efficiency

M1 = the fractional concentration of SO₂ entering the converter (3-hour arithmetic average)



**FACILITY PERMIT TO OPERATE
ECO SERVICES OPERATIONS CORP.**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

M2 = the fractional concentration of SO2 at the stack (3-hour arithmetic average)

E = the rolling 3 hour average SO2 emission rate in lb/ton of 100% sulfuric acid produced

K = 1306

[RULE 2005, 6-3-2011; RULE 2005, 12-4-2015; RULE 2011, 5-6-2005; RULE 2011, 12-4-2015]

[Systems subject to this condition : Process 1, System 1]

S42.2 The operator shall limit emissions from this system as follows:

CONTAMINANT	EMISSIONS LIMIT
H2SO4 MIST	Less than or equal to 0.15 lbs/ton of 100% sulfuric acid produced

For the purposes of this condition, the emission limit(s) shall not be relaxed.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; 40CFR 60 Subpart H, 10-17-2000]

[Systems subject to this condition : Process 1, System 1]

DEVICE CONDITIONS

A. Emission Limits



**FACILITY PERMIT TO OPERATE
ECO SERVICES OPERATIONS CORP.**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D82.3 The operator shall install and maintain a CEMS to measure the following parameters:

SO₂ concentration (by volume on a dry basis, 3-hour arithmetic average)

The SO₂ concentration shall be used to demonstrate compliance with Condition S42.1

The operator shall sample stack emissions in accordance with the requirements of the facility's EPA-approved Alternative Monitoring Plan.

The operator shall take all steps necessary to avoid CEMS breakdowns and minimize CEMS downtime. This shall include, but is not limited to, operating and maintaining the CEMS in accordance with best practices and maintaining an on-site inventory of spare parts or other supplies necessary to make rapid repairs of the equipment.

The CEMS shall be in operation at all times during which sulfur or sulfur-bearing compounds, excluding conventional fossil fuels such as natural gas or fuel oil, are being fed to the device D1, except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments).

The CEMS shall be installed, certified, calibrated, operated and maintained in accordance with the applicable requirements of 40 CFR 60.11, 60.13, and Part 60, Appendices B and F (except as otherwise provided in the EPA-approved Alternative Monitoring Plan), and SCAQMD Rule 2011 Appendix A.

For every hour of invalid data, missing data must be substituted following the procedures in District Rule 2011, Appendix A, Chapter 2, Section E - Missing Data Procedures.

[**RULE 2005, 6-3-2011; RULE 2005, 12-4-2015; RULE 2011, 5-6-2005; RULE 2011, 12-4-2015**]



FACILITY PERMIT TO OPERATE ECO SERVICES OPERATIONS CORP.

SECTION E: ADMINISTRATIVE CONDITIONS

The operating conditions in this section shall apply to all permitted equipment at this facility unless superseded by condition(s) listed elsewhere in this permit.

1. The permit shall remain effective unless this permit is suspended, revoked, modified, reissued, denied, or it is expired for nonpayment of permit processing or annual operating fees. [201, 203, 209, 301]
 - a. The permit must be renewed annually by paying annual operating fees, and the permit shall expire if annual operating fees are not paid pursuant to requirements of Rule 301(d). [301(d)]
 - b. The Permit to Construct listed in Section H shall expire one year from the Permit to Construct issuance date, unless a Permit to Construct extension has been granted by the Executive Officer or unless the equipment has been constructed and the operator has notified the Executive Officer prior to the operation of the equipment, in which case the Permit to Construct serves as a temporary Permit to Operate. [202, 205]
 - c. The Title V permit shall expire as specified under Section K of the Title V permit. The permit expiration date of the Title V facility permit does not supercede the requirements of Rule 205. [205, 3004]
2. The operator shall maintain all equipment in such a manner that ensures proper operation of the equipment. [204]
3. This permit does not authorize the emissions of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the Rules and Regulations of the SCAQMD. This permit cannot be considered as permission to violate existing laws, ordinances, regulations, or statutes of other governmental agencies. [204]
4. The operator shall not use equipment identified in this facility permit as being connected to air pollution control equipment unless they are so vented to the identified air pollution control equipment which is in full use and which has been included in this permit. [204]



FACILITY PERMIT TO OPERATE ECO SERVICES OPERATIONS CORP.

SECTION F: RECLAIM MONITORING AND SOURCE TESTING REQUIREMENTS

1. Install, maintain, and operate a totalizing fuel meter or any device approved by the Executive Officer to measure quarterly fuel usage or other applicable variables specified in Rule 2012, Table 2012-1, and Rule 2012, Appendix A, Table 4-A. The sharing of totalizing fuel meters may be allowed by the Executive Officer if the fuel meter serves process units which have the same emission factor or emission rate. The sharing of totalizing meter shall not be allowed for process units which are required to comply with an annual heat input limit. [2012]

II. NOx Source Testing and Tune-up conditions

1. The operator shall conduct all required NOx source testing in compliance with an SCAQMD-approved source test protocol. [2012]
2. The operator shall, as applicable, conduct source tests for every large NOx source no later than December 31, 1996 and every 3 years thereafter. The source test shall include the determination of NOx concentration and a relative accuracy audit of the exhaust stack flow determination (e.g. in-stack flow monitor or fuel flow monitor based F-factor calculation). Such source test results shall be submitted per the schedule described by APEP. In lieu of submitting the first source test report, the facility permit holder may submit the results of a source test not more than 3 years old which meets the requirements when conducted. [2012]
3. All NOx large sources and NOx process units shall be tuned-up in accordance with the schedule specified in Rule 2012, Appendix A, Chapter 5, Table 5-B. [2012]

III. SOx monitoring conditions

- D. The Operator of a SOx Major Source, as defined in Rule 2011, shall, as applicable:



FACILITY PERMIT TO OPERATE ECO SERVICES OPERATIONS CORP.

SECTION F: RECLAIM MONITORING AND SOURCE TESTING REQUIREMENTS

1. Install, maintain, and operate an SCAQMD certified direct or time-shared monitoring device or an approved alternative monitoring device for each major SOx source to continuously measure the concentration of SOx emissions or fuel sulfur content and all other applicable variables specified in Rule 2011, Table 2011-1 and Rule 2011, Appendix A, Table 2-A to determine the SOx emissions rate from each source. The time-sharing of CEMS among SOx sources may be allowed by the Executive Officer in accordance with the requirements for time sharing specified in Appendix A. [2011]
2. Install, maintain, and operate a totalizing fuel meter approved by the Executive Officer for each major source. [2011]
3. If the facility is operating existing CEMS and fuel meters, continue to follow recording and reporting procedures required by SCAQMD Rules and Regulations in effect prior to October 15, 1993 until the CEMS is certified pursuant to Rule 2011. [2011]
4. Use valid data collected by an SCAQMD certified or provisionally certified CEMS in proper operation that meets all the requirements of Appendix A of Rule 2011, unless final certification of the CEMS is denied, to determine mass emissions for all purposes, including, but not limited to, determining: [2011]
 - a. compliance with the annual Allocation;
 - b. excess emissions;
 - c. the amount of penalties; and
 - d. fees.
5. Follow missing data procedures as specified in Rule 2011 Appendix A whenever valid data is not available or collected to determine mass emissions for all purposes, including, but not limited to, determining: [2011]
 - a. compliance with the annual Allocation;

Exhibit 3
Notices to Comply



South Coast Air Quality Management District
18601 HARVEY LANE, P.O. BOX 10447, THERMOPHILUS, CA 92584-0447

NOTICE TO COMPLY

12/11/23

Facility Name Eco Services Operations Corp.	County Carson	City Long Beach	APN 180408	LA 9080410
Address 20720 S Wilmington Ave				
Address 20720 S Wilmington Ave				90810

For Source ID, visit www.aqmd.gov

- Regular scheduled inspections needed. Schedule inspections at least once every 30 days.
- Facility is not subject to scheduled inspections.

Failure to respond or take corrective action or providing false statements in response to this Notice to Comply can lead to issuance of a Notice of Violation pursuant to the California Health and Safety Code. The facility cited above is subject to re-inspection at any time to achieve compliance.

YOU ARE HEREBY DIRECTED TO COMPLY WITH:

#	AGM# (Blue) MAGM# (Gold)	REQUIREMENT	COMPLIANCE DUE DATE	COMPLIANCE ACHIEVED DATE
1	42303	Please provide a summary of which Missing Data Procedures were applied and for what reason for the RECLAIM major source.	12/27/23	
2				
3				
4				
5				
6				

Name of Facility Arin Arakelian		Name of Inspector Jacob Bernal		
Title Environmental Specialist		Inspection Date 12/22/2023	Phone 909.396.2129	Fax
Email Address Arin.Arakelian@Eco-Services.com	Phone 310.885.6788	Facility Address jbernal	@aqmd.gov	Facility Application/Title Available at www.aqmd.gov

- Instructions:**
- For each major violation cited above, compliance must be achieved by the compliance deadline specified for that particular violation.
 - Within 5 working days of receiving this Notice for each respective violation, the owner/responsible officer of the cited facility must complete and return a signed copy of this Notice to Comply to the South Coast Air Quality Management District at the address listed above.
 - For each copy and return this Notice to Comply as many times as necessary to provide the required information. On each copy, include the date on which compliance was achieved. Date, sign, and send all completed copies to the attention of the inspector named above.

I hereby certify that the facility cited in this Notice to Comply has achieved compliance with the requirements listed above.

NAME OF OWNER/RESPONSIBLE OFFICIAL _____ TITLE _____ SIGNATURE _____ DATE _____

NOTICE#: E 57615 FEE COPY (Blue) FACILITY COPY (Gold) INSPECTOR COPY (White)



South Coast Air Quality Management District
 1000 West 10th Street, Long Beach, CA 90801-3000
 (562) 490-2000

NOTICE TO COMPLY

ECO Services Operations Corp

20770 S Wilmington Ave

20770 S Wilmington Ave

Carson

Long Beach

130708

1.0

70810

70810

The RUC is issued to the registrant by:

- Request written or electronic copy of RUC from compliance officer or air quality consultant
- Request RUC for a facility found non-compliant

Failure to respond or take corrective action, or providing false statements in response to this Notice to Comply can lead to issuance of a Notice of Violation pursuant to the California Health and Safety Code. The facility cited above is subject to re-inspection at any time to ensure compliance.

YOU ARE HEREBY DIRECTED TO COMPLY WITH:

ACQUAILITY CAL HAS CODE	REQUIREMENT	COMPLIANCE DEAD DATE	COMPLIANCE ACHIEVED DATE
2004 (b)(1)	Quarterly Certification of Emissions (QCEER) was submitted late for quarter 1.	12/27/23	12/27/23
2011 (c)(3)(A)	Report daily SOx emissions by 5 pm the following day		
2012 (c)(3)(A)	Report daily NOx emissions by 5 pm the following day		

Name: Mark Ponger		Name: Jacob Bernal	
Title: Plant Manager		Date: 12/27/2023	Phone: (909) 396-2129
Email: mark.ponger@ECO Service	Phone: 562.972.3836	Email: jbernal@aqmd.gov	Website: www.aqmd.gov

- Instructions:**
- For each violation cited above, compliance shall be achieved by the compliance deadline specified for that particular violation.
 - With a 30-day grace period following compliance for each respective violation, the major responsible officer of the rated facility must complete and return a signed copy of this Notice to Comply to the South Coast Air Quality Management District at the address listed above.
 - Please copy and retain this Notice to Comply as many times as necessary to provide the required information. On each copy, include the date on which compliance was achieved. Date, sign, and send all completed copies to the attention of the inspector named above.

I hereby certify that the facility cited in this Notice to Comply has achieved compliance with the requirements listed above.





NAME OF OFFICER RESPONSIBLE FOR COMPLIANCE: _____ TITLE: _____ SIGNATURE: _____ DATE: 12/28/23

NOTICE#: E 57614 FURTHER COPIES FACILITY COPY (Gold) INSPECTOR COPY (White)