

**larry kennedy**

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**From:** Patrick Mohn  
**Sent:** Wednesday, May 25, 2011 4:46 PM  
**To:** larry kennedy  
**Subject:** FW: Request for Available CEMS RATA Reports or Raw CEMS data - LFG Engines

Larry,

FYI - Spoke with the SCAQMD monitoring specialist this morning (Scott Wilson). Told me that he would look into what data there may be. SCAQMD does not requirement applicants to submit raw met data files, only summary reports. But, he told me that sometimes the compliance branch will ask for limited CEMS data to confirm compliance. He told me he would get back to me after he checked with their permitting and C&E folks, but wanted an e-mail request.

Pat

-----Original Message-----

**From:** Patrick Mohn  
**Sent:** Wednesday, May 25, 2011 9:39 AM  
**To:** 'swilson1@aqmd.gov'  
**Subject:** Request for Available CEMS RATA Reports or Raw CEMS data - LFG Engines

Hello Scott,

Thanks very much for talking with me on the phone this morning regarding the possibility of NDEP obtaining, from SCAQMD, some representative CEMS data for landfill gas internal combustion engines, or possibly snapshot summary reports. As I mentioned, we recently issued a Title V permit revision to a facility for a LFGTE project, requiring CEMS to demonstrate compliance with a CO facility-wide cap, and NOX PSD increment limits. The permit holder appealed formally, and is claiming that CEMS are unnecessary and unwarranted to demonstrate compliance, arguing that, because emissions change slowly over time, annual stack testing alone would be sufficient to demonstrate compliance.

The NDEP is wondering just what the variability of emissions would be for a landfill gas ICE, and we were wondering if SCAQMD could share with us some data, either raw CEMS data (if available) or summary reports that would give us an idea of the variability of the measured pollutant emissions over time, so we can evaluate the permit holder's claim. I appreciate your comments and concerns about the representativeness of data, given that different landfills generate gases of widely differing character in terms of trace contaminants and heating value, and that data for one facility may not be comparable to another.

If it would help you to identify appropriate representative data, the three LFG engines in question are all Caterpillar G3520C (2,233 HP) engines, combusting LFG. The permit holder does not have any add-on controls for NOX or CO.

Again, thanks very much for taking the time to speak with me this morning. I look forward to SCAQMD's response as to whether any representative CEMS data or summary reports may be available for us to look at.

Regards,

Pat Mohn

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Pat Mohn, P.E.  
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