

# South Coast Air Quality Management District

## Statement of Basis

### Title V Facility Permit Renewal

Issuance Date: August 16, 2011

**Facility Name:** OC Waste & Recycling, Prima Deshecha  
**Facility ID:** 52753  
**SIC Code:** 4953  
**Equipment Location:** 32250 La Pata Avenue. (Prima Deshecha LF)  
San Juan Capistrano, Ca 92675

**Application #(s):** 491771  
**Application Submittal Date(s):** 10/28/2008

**Permit Renewal:** Draft  
**Revision No. 2 Date:** April 23, 2010  
**Permit Section(s) Affected:** Various

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#### 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.

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. NO<sub>2</sub>, SO<sub>2</sub>, and lead are in attainment with federal standards. The status of CO is designated to attainment status. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of a municipal solids waste landfill. This facility is subject to Title V requirements because it is a major source.

## **2. Facility Description**

This is an active landfill facility. Main operations include LFG collection system, landfill condensate/leachate/collection and storage system, and LFG enclosed flare station. The facility is located at 32250 La Pata Avenue (Prima Deshecha Landfill), San Juan Capistrano, Ca.

## **3. Construction and Permitting History**

An initial Title V permit was issued on 4/28/2004, and was due to expire on 4/27/2009.

Title V revision No. 1 was issued on July 26, 2006 to include a permit to operate F83427 (A/N 456274) for the modifications to the landfill gas condensate system.

Title V revision No. 2 was issued April 23, 2010, that included permits to construct and operate - fuel storage and dispensing gasoline equipment (A/N 497358), and installation of an emergency IC engine for power generation (A/N 503282), permit to construction for modification to the LFG collection system (A/N 492235), and permit to construct for modification to the landfill leachate and LCRS collection and storage system (A/N 499317).

## **4. Regulatory Applicability Determinations**

Applicable legal requirements for which this facility is required are identified in the Title V permit (for example, Section D, E, and H, K, of the proposed Title V renewed 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 NSPS and NESHAP requirements. NSPS requirements of 40 CFR Part 60 applies to certain units at the facility and the permit terms and conditions may be found in Section D of the Title V permit. NESHAP requirements of 40 CFR Part 63 applies to certain units at the facility and the permit terms and conditions may be found in Sections D and J of 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 monitoring and operational requirements can be found in the Engineering Evaluations. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 apply to the permitted emission control source at this facility. CAM plan for TNMHC emission control using APC (flare) is addressed under A/N 505368.

## **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 2010**

<i>Pollutant</i>	<i>Emissions (tons/year)</i>
CO	1.29
NOx	0.85
ROG	0.11
SOx	0.33
TSP	0.06

**Toxic Air Contaminants Emissions (TAC)  
Annual Reported Emissions for Reporting Period 2010**

<i>TACs Reported</i>	<i>Emissions (lbs/yr)</i>	<i>TACs Reported</i>	<i>Emissions (lbs/yr)</i>
1,3-Butadiene	0.18	Lead (inorganic)	0.001
Ammonia	0.67	Methyl chloroform	0.24
Arsenic	0.00	Methylene chloride	0.21
Benzene	0.96	Naphthalene	0.034
Cadmium	0.00	Nickel	0.001
Carbon Tetrachloride	0.28	PAHs, total	0.015
Chromium (VI)	0.00	Perchloroethylene	0.30
Ethylene dibromide	0.45	Trichloroethylene	0.18
Formaldehyde	66.84	Vinyl chloride	0.15

**Health Risk from Toxic Air Contaminants**

The facility is determined to be exempt from the Air Toxics Information and Assessment Act (AB2588).

## **8. Compliance History**

The facility has been subject to both self-reporting requirements and AQMD inspections. Facility inspection reports for 4/28/2011, 4/29/11 and 5/5/11 indicated that permitted equipment operating satisfactorily and in compliance.

As per District records, for the period 01/01/2009 through 7/26/2011, there were no citizen complaints, notice to comply (NC) and/or Notice of Violation (NOV) were issued.

## **9. Compliance Certification**

By virtue of the Title V renewal permit application and issuance of the renewed permit in coming months, the reporting frequency for compliance certification for the facility shall be annual.

## **10. Comments**

None.