

**AIR QUALITY  
MANAGEMENT DISTRICT****STATEMENT OF BASIS  
FOR SIGNIFICANT MODIFICATION  
OF TITLE V FEDERAL OPERATING PERMIT**

<b>APPLICATION NO.:</b>	<u>TV2006-10-02</u>
<b>DATE:</b>	<u>December 31, 2009</u>
<b>REVIEWING ENGINEER:</b>	<u>Bruce Nixon</u>

**A. FACILITY INFORMATION:**

**FACILITY NAME:** Kiefer Landfill  
Department of Waste Management & Recycling  
Municipal Services Agency  
County of Sacramento

**LOCATION:** 12701 Kiefer Boulevard and Grantline Road  
Sloughhouse, CA 95683

**MAILING ADDRESS:** 9850 Goethe Road  
Sacramento, CA 95827

**RESPONSIBLE OFFICIAL:** Paul Philleo, Director  
(916) 875-7011

**CONTACT PERSON:** Tim Israel, Senior Engineer  
(916) 876-9431

**B. PURPOSE OF THIS STATEMENT OF BASIS:**

The Title V Federal Operating Permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose of this Statement of Basis is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this Statement of Basis, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

In addition to this Statement of Basis, the information contained in the Statement of Basis for the 01-25-2007 Title V permit renewal, TV2006-10-01, is applicable to the facility.

**C. PERMIT ACTIONS:**

**Previous Permit Actions**

The following permit actions have occurred since the initial Federal Operating Permit No. 1996-10-01 was issued:

<u>Permit Action</u>	<u>Date Issued</u>	<u>Permit No.</u>
Initial Title V Federal Operating Permit	01-25-2002	TV1996-01-01
1st Administrative Amendment	11-12-2002	TV1996-01-01A
1st Significant Modification	08-03-2004	TV1996-10-02
2nd Significant Modification	07-05-2005	TV1996-10-03
1st Permit Renewal	01-25-2007	TV2006-10-01

**Current Permit Action**

This 1st Significant Modification permit to the 1st Permit Renewal will be assigned the following permit number: TV2007-10-02.

The specific changes to the Title V permit are described in Section E below.

#### **D. FACILITY DESCRIPTION:**

Kiefer Landfill is an active municipal solid waste landfill located approximately 15 miles east of the City of Sacramento near the intersection of Kiefer Boulevard and Grant Line Road. The site is operated by the County of Sacramento, Municipal Services Agency, Department of Waste Management & Recycling (DWMR).

The landfill footprint, which is comprised of modules M1, M-1L and M2 through M11, is approximately 660 acres. The module M1 has no bottom liner. All other modules have or will have bottom liners and leachate collection systems. The entire landfill mass will be subject to landfill gas control similar to the system that exists in Module M1 and M1-L. The Kiefer Landfill began accepting waste into Module M1 in 1967 and began accepting waste into Module M1-L in 1994. The Module M2 began receiving waste in 2003. The final module, Module M11, is expected to complete filling operations between the years 2035 and 2060.

Decomposing waste encapsulated within the landfill produces a gas by-product that is primarily composed of methane, carbon dioxide and nonmethane organic compounds (NMOC). Landfill gas (LFG) is primarily emitted through two sources. LFG can be emitted as (1) fugitive gas through cover soils or (2) through a landfill gas collection system. At the Kiefer Landfill, the landfill gas is collected and sent to a set of two flares for destruction and/or to a set of five internal combustion (IC) engines where it is used as a fuel for the IC engines. The IC engines drive electrical generators that produce approximately 15 megawatts of electricity.

During operation of the flares and IC engines various combustion related air pollutants are released into the atmosphere. Additional particulate matter emissions are generated from construction and operation of the landfill which includes vehicle traffic on paved and unpaved roads and the handling of soil cover material.

Additional sources of air pollutants at the facility include:

1. A trommel screen driven by a diesel fueled IC engine used to process green waste for landfill cover.
2. A green waste grinder driven by a diesel fueled IC engine used to process green waste for landfill cover.
3. A diesel fueled auxiliary IC engine on a street sweeper that drives the vacuum system and brushes.
4. Gasoline storage and dispensing equipment.

**E. DESCRIPTION OF TITLE V PERMIT MODIFICATION (continued):**

**1. Change Responsible Official**

**Description of modification requested:**

Change the Responsible Official

from: David Pelser  
Director, Department of Waste Management and Recycling  
(916) 875-6789

to: Paul Philleo  
Director, Department of Waste Management and Recycling  
916-875-7011

**Equipment Modifications:**

There are no additions or deletions to the equipment listed in the Title V permit.

**Emission Modifications:**

There are no changes to the allowable emissions in the Title V permit.

**Basis for the Applicable Federally Enforceable Requirements:**

SMAQMD Rule 207 Title V - Federal Operating Permit Program

**Compliance Status:**

The permittee complies with the applicable federally enforceable requirements.

**Category of Title V Permit Modification (see categories in Attachment B):**

The change of Responsible Official does meet the criteria describing an "Administrative Amendment" to the Title V permit under SMAQMD Rule 207 Section 202.2.

Therefore, the change of Responsible Official is classified as an "Administrative Amendment" to the Title V permit.

**E. DESCRIPTION OF TITLE V PERMIT MODIFICATION (continued):**

**2. Add a new Landfill Gas Flare No. 2**

**Description:**

Related documents:

09-18-2008	A/C No. 21097 Engineering Evaluation	(Attachment D)
11-20-2008	A/C No. 21097 Authority to Construct	(Attachment E)
10-20-2009	Title V permit modification application	(Attachment C)

The permittee requested the addition of a new 120 MMBTU/hour landfill gas flare to destroy collected landfill gas.

The permittee has received SMAQMD Rule 201 Authority to Construct No. 21097 for the Landfill Gas Flare No. 2 but has not yet received Permit to Operate No. 21097 for this modification because it has not yet begun operation. SMAQMD Rule 207 Section 301.7 requires that the Title V permit be modified to include the new equipment before it begins operation because it is considered a significant modification to the Title V permit and the existing Title V permit would prohibit such as change.

**Equipment Modifications:**

Landfill gas flare added to the Title V permit -

Landfill Gas Flare No. 2 -

Manufacturer:	Perennial Energy
Model:	120 MMBTU/hour
Rating:	120 MMBTU/Hr heat input (at 500 BTU/ft <sup>3</sup> of landfill gas)
Capacity:	4,000 ft <sup>3</sup> /min LFG

**Emissions Modifications:**

The following emission increases are associated with the new Landfill Gas Flare No. 2.

Pollutant	Maximum Allowable Emissions Increase from the Modified Landfill Gas Air Pollution Control System consisting of (2) Landfill Gas Flares and (5) IC Engines
	lb/quarter
ROC	0
NOx	0
SO2	0
PM10	0

**E. DESCRIPTION OF TITLE V PERMIT MODIFICATION (continued):**

**2. Add a new Landfill Gas Flare No. 2 (continued)**

Pollutant	Maximum Allowable Emissions Increase from the Modified Landfill Gas Air Pollution Control System consisting of (2) Landfill Gas Flares and (5) IC Engines  lb/quarter
CO	0

**Basis for the Applicable Federally Enforceable Requirements:**

SMAQMD Rule 201 General Permit Requirements  
SMAQMD Rule 202 New Source Review  
SMAQMD Rule 207 Title V - Federal Operating Permit Program  
SMAQMD Rule 401 Ringelmann Chart  
SMAQMD Rule 406 Specific Contaminants  
SMAQMD Rule 420 Sulfur Content of Fuels  
NSPS 40 CFR 60.750 Standards of Performance for Municipal Solid Waste Landfills  
NESHAP 40 CFR 63.1930 National Emission Standards for Hazardous Air Pollutants:  
Municipal Solid Waste Landfills

**Compliance Status:**

The permittee complies with the applicable federally enforceable requirements.

**Category of Title V Permit Modification (see categories in Attachment B):**

The operation of the new landfill gas flare No. 2 does meet one of the criteria describing a "Significant" Title V permit modification. The Title V permit modification meets the criteria of Rule 207 Section 233.3.

*"233.3 Involves case-by-case determination of an emission limit or other standard"*

The case-by-case determination for this permit action is the BACT determination for NO<sub>x</sub>, SO<sub>2</sub> and PM<sub>10</sub>.

Therefore, the permit modification is classified as a "Significant" Title V permit modification under SMAQMD Rule 207 Section 233.

The SMAQMD Rule 201 Authority to Construct No. 21097 was issued following the "enhanced New Source Review" procedures of SMAQMD Rule 207 Sections 401 through 408.

- a. A public notice requesting public comment was published in the Sacramento Bee on 09-22-2008.

**E. DESCRIPTION OF TITLE V PERMIT MODIFICATION (continued):**

**2. Add a new Landfill Gas Flare No. 2 (continued)**

- b. The proposed Authority to Construct and background documents were sent to U.S. EPA Region 9 on 09-18-2008 for their 45 day review period.
- c. No comments were received from the public or U.S. EPA Region 9.
- d. On 11-20-2008, Authority to Construct No. 21097 was issued as proposed.

SMAQMD Rule 207 Section 202.5 states that because the Authority to Construct was reviewed following the "enhanced New Source Review" procedures of SMAQMD Rule 207 Sections 401 through 408 the changes to the Title V permit can be incorporated as an "Administrative Title V Permit Amendment". This means that there is no requirement for additional public notice and public comment or additional U.S. EPA Region 9 review and comment.

**F. APPLICABLE FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS AND EQUIPMENT SPECIFIC REQUIREMENTS:**

Except as noted below, the Applicable Federally Enforceable General Requirements and Equipment Specific Requirements will remain the same as those described in the Statement of Basis for the 01-25-2007 Title V permit renewal, TV2006-10-01. The requirements will not be repeated here (see Title V permit file for Applicable Federally Enforceable General Requirements and Equipment Specific Requirements).

The following Applicable Federally Enforceable Equipment Specific Requirements are those that are modified or added to the permit -

1. Landfill Gas Flare No. 2  
Modified Condition Nos.: None  
New Condition Nos.: All conditions for Landfill Gas Flare No. 2 are new because it is new equipment.

**G. RECOMMENDATION:**

Revise the Title V Federal Operating Permit as described in this Statement of Basis.

See Title V Permit No. TV2006-10-02 for equipment descriptions and permit conditions.

Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

**ATTACHMENT A**

SMAQMD RULES THAT ARE

"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"

FOR KIEFER LANDFILL

SMAQMD RULES THAT ARE  
 "APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"  
 FOR KIEFER LANDFILL

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	101	General Provisions and Definitions 09/03/1998 adoption	<b>Yes</b> - no related conditions are included in the permit because of general nature of the rule.
●	●	102	Circumvention 11/29/1983 adoption	<b>Yes</b> - no related conditions are included in the permit because of general nature of the rule.
	●	103	Exceptions 11/29/1983 adoption	<b>No</b> - source does not operate the type of equipment described in this rule.
	●	104	General Conformity 11/03/1994 adoption	<b>No</b> - the rule's purpose is to have the SMAQMD review federal conformity findings.
	●	105	Emission Statement 09/05/1996 adoption	<b>No</b> - actual facility emissions of ROC and NOx are less than 25 tons/year.
		107	Alternative Compliance	<b>No</b> - it is not a SIP approved rule.
●		108	Minor Violations	<b>No</b> - it is not a SIP approved rule.
●	●	201	General Permit Requirements 11/20/1984 adoption	<b>Yes</b> - no related conditions are included in the permit because of the general nature of the rule.
●	●	202	New Source Review 11/20/1984 adoption	<b>Yes</b> - related conditions are included in the permit.

SMAQMD RULES THAT ARE  
 "APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"  
 FOR KIEFER LANDFILL

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		203	Prevention of Significant Deterioration	<b>No</b> - it is not a SIP approved rule.
		204	Emission Reduction Credits	<b>No</b> - it is not a SIP approved rule.
		205	Community Bank and Priority Reserve Bank	<b>No</b> - it is not a SIP approved rule.
		206	Mobile and Transportation Source Emission Reduction Credits	<b>No</b> - it is not a SIP approved rule.
●	*	207	Title V Federal Operating Permit Program	<b>Yes</b> - related conditions are included in the permit. (*Although this is not a SIP approved rule it is applicable because it is part of the approved Title V Permit Program.)
		208	Acid Rain	<b>No</b> - it is not a SIP approved rule.
		209	Limiting Potential to Emit	<b>No</b> - it is not a SIP approved rule.
		210	Synthetic Minor Source Status	<b>No</b> - it is not a SIP approved rule.
		211	MACT at Major Sources of Hazardous Air Pollutants	<b>No</b> - it is not a SIP approved rule.

SMAQMD RULES THAT ARE  
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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	*	301	Stationary Source Permit Fees	<b>Yes</b> - related conditions are included in the permit. (*Although this is not a SIP approved rule it is applicable because it is part of the approved Title V Permit Program.)
		302	Hearing Board Fees	<b>No</b> - it is not a SIP approved rule.
		303	Agricultural Burning Permit Fees	<b>No</b> - it is not a SIP approved rule.
		304	Plan Fees	<b>No</b> - it is not a SIP approved rule.
		305	Environmental Document Preparation and Processing Fees	<b>No</b> - it is not a SIP approved rule.
		306	Air Toxics Fees	<b>No</b> - it is not a SIP approved rule.
●	●	307	Clean Air Act Fees 09/26/2002 adoption	<b>Yes</b> - no related conditions are included in the permit because of limited applicability.
●	●	401	Ringelmann Chart 04/05/1983 adoption	<b>Yes</b> - related conditions are included in the permit.

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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●		402	Nuisance	<b>No</b> - it is not a SIP approved rule.
●	●	403	Fugitive Dust 11/29/1983 adoption	<b>Yes</b> - related conditions are included in the permit.
●	●	404	Particulate Matter 11/20/1984 adoption	<b>Yes</b> - related conditions are included in the permit.
●	●	405	Dust and Condensed Fumes 11/29/1983 adoption	<b>Yes</b> - related conditions are included in the permit.
●	●	406	Specific Contaminants 11/29/1983 adoption	<b>Yes</b> - related conditions are included in the permit.
●	●	407	Open Burning 11/29/1983 adoption	<b>Yes</b> - no related conditions are included in the permit.
	●	408	Incinerator Burning 11/29/1983 adoption	<b>No</b> - the source does not operate an incinerator.
	●	409	Orchard Heaters 11/29/1983 adoption	<b>No</b> - the source does not operate orchard heaters.

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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●		410	Reduction of Animal Matter 11/29/1983 adoption	<b>No</b> - the source does not operate equipment for the reduction of animal matter.
●		411	Boiler NOx 08/23/2007 adoption	<b>No</b> - the source does not operate a boiler subject to this rule.
●		412	Stationary IC Engines at Major Stationary Sources of NOx 06/01/1995 adoption	<b>Yes</b> - related conditions are included in the permit.
●		413	Stationary Gas Turbines 03/24/2005 adoption	<b>No</b> - the source does not operate a gas turbine.
●		414	Natural Gas Fired Water Heaters 08/01/1996 adoption	<b>No</b> - the source does not operate natural gas fired water heaters.
●	●	420	Sulfur Content of Fuels 11/29/1983 adoption	<b>Yes</b> - related conditions are included in the permit.
●	●	441	Organic Solvents 11/29/1983 adoption	<b>Yes</b> - no related conditions are included in the permit because of limited applicability.

SMAQMD RULES THAT ARE  
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 FOR KIEFER LANDFILL

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	442	Architectural Coatings 09/05/1996 adoption	<b>Yes</b> - related conditions are included in the permit.
	●	443	Leaks from Synthetic Organic Chemical and Polymer Manufacturing 09/05/1996 adoption	<b>No</b> - the source does not operate synthetic organic chemical or polymer manufacturing equipment.
	●	444	Petroleum Solvent Dry Cleaning 08/13/1981 adoption (U.S. EPA lists 11/29/1983 adoption incorrectly)	<b>No</b> - the source does not operate petroleum solvent dry cleaning equipment.
	●	446	Storage of Petroleum Products 11/16/1993 adoption	<b>No</b> - the source does not store petroleum products.
	●	447	Organic Liquid Loading 04/02/1998 adoption	<b>No</b> - the source does not operate organic liquid loading equipment.
●	●	448	Gasoline Transfer into Stationary Storage Containers 02/02/1995 adoption	<b>Yes</b> - related conditions are included in the permit.
●	●	449	Transfer of Gasoline into Vehicle Fuel Tanks 09/26/2002 adoption	<b>Yes</b> - related conditions are included in the permit.
	●	450	Graphic Arts Operations	<b>No</b> - the source does not operate a graphic arts process as

SMAQMD RULES THAT ARE  
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 FOR KIEFER LANDFILL

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
			12/05/1996 adoption	defined in the rule.
●	●	451	Surface Coating of Miscellaneous Metal Parts and Products 11/29/1983 adoption	<b>Yes</b> - no related conditions are included in the permit because of limited applicability.
	●	452	Can Coating 09/05/1996 adoption	<b>No</b> - the source does not operate a can coating process.
	●	453	Cutback and Emulsified Asphalt Paving Materials 11/29/1983 adoption	<b>No</b> - the source does not manufacture or apply cutback or emulsified asphalt paving materials.
	●	454	Degreasing Operations 04/03/1997 adoption	<b>No</b> - the source does not operate degreasers subject to this rule.
	●	455	Pharmaceuticals Manufacturing 11/29/1983 adoption	<b>No</b> - the source does not manufacture pharmaceuticals.
	●	456	Aerospace Coating Operations 09/05/1996 adoption	<b>No</b> - the source does not coat aerospace parts.

SMAQMD RULES THAT ARE  
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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●		458	Large Commercial Bread Bakeries 09/05/1996 adoption	<b>No</b> - the source does not produce bread products.
●		459	Automotive, Truck and Heavy Equipment Refinishing Operations 10/02/1997 adoption	<b>No</b> - the source does not refinish vehicles.
●		460	Adhesives and Sealants	<b>No</b> - it is not a SIP approved rule.
		463	Wood Products Coatings	<b>No</b> - it is not a SIP approved rule.
●		464	Organic Chemical Manufacturing Operations 07/23/1998 adoption	<b>No</b> - the source does not manufacture organic chemicals.
		465	Polyester Resin Operations	<b>No</b> - it is not a SIP approved rule.
		466	Solvent Cleaning	<b>No</b> - it is not a SIP approved rule.
		485	Municipal Landfill Gas	<b>No</b> - it is not a SIP approved rule.
●		501	Agricultural Burning 11/29/1983 adoption	<b>No</b> - the source does not conduct agricultural burning.
●		601	Procedure before the Hearing Board	<b>No</b> - it is not a SIP approved rule.

SMAQMD RULES THAT ARE  
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 FOR KIEFER LANDFILL

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●		602	Breakdown Conditions: Emergency Variance	<b>No</b> - it is not a SIP approved rule.
●	●	701	Emergency Episode Plan 05/27/1999 adoption	<b>Yes</b> - no related conditions are included in the permit because of limited applicability.
		801	New Source Performance Standards	<b>No</b> - it is not a SIP approved rule. Note: there are equivalent federal regulations.
		901	General Requirements	<b>No</b> - it is not a SIP approved rule. Note: there are equivalent federal regulations.
		902	Asbestos	<b>No</b> - it is not a SIP approved rule. Note: there is an equivalent federal regulation.
		903	Mercury	<b>No</b> - it is not a SIP approved rule. Note: there is an equivalent federal regulation.
		904	Airborne Toxic Control Measures	<b>No</b> - it is not a SIP approved rule. Note: there are equivalent federal regulations for some of the listed ATCMs.
		1002	Fleet Inventory	<b>No</b> - it is not a SIP approved rule.

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<b>Rule is Applicable</b>	<b>Rule is SIP Approved</b>	<b>Rule No.</b>	<b>Rule Title</b>	<b>Is the Rule an "Applicable Federally Enforceable Requirement"?</b>
		1003	Reduced-Emission Fleet Vehicles/Alternative Fuels	<b>No</b> - it is not a SIP approved rule.
		1005	Mobile Source Emission Reduction Credits/Banking	<b>No</b> - it is not a SIP approved rule.
		1006	Transportation Conformity	<b>No</b> - it is not a SIP approved rule.

## **ATTACHMENT B**

### **Categories of Title V Permit Modifications in SMAQMD Rule 207**

**Category of Title V Permit Modification:**

The following are the categories of Title V permit modifications as defined in SMAQMD Rule 207. The category of the Title V permit modification is important because it specifies the public and U.S. EPA noticing requirements.

**Category: "Administrative" Title V permit modification**

SMAQMD Rule 207 Section 202 defines a Title V permit modification as an "Administrative" Title V permit amendment if any of the following conditions are met:

- 202.1 Corrects typographical errors.
- 202.2 Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the stationary source;
- 202.3 Requires more frequent monitoring or reporting by the responsible official of the stationary source.
- 202.4 Allows for change in ownership or operational control of a source where the Air Pollution Control Officer determines that no other change in the Title V permit is necessary, provided that a written agreement containing a specific date for transfer of Title V permit responsibility, coverage, and liability between the current and new responsible official has been submitted to the Air Pollution Control Officer.
- 202.5 Incorporates into the Title V permit the conditions of a preconstruction permit that is issued to an existing Title V stationary source through Rule 202, NEW SOURCE REVIEW and meeting the procedural requirements specified in Sections 401 through 408 of this Rule and the compliance requirements in Section 305 of this Rule.

**Category: "Minor" Title V permit modification**

SMAQMD Rule 207 Section 220 defines a Title V permit modification as an "Minor" Title V permit amendment if all of the following conditions are met:

- 220.1 Is not a significant Title V permit modification.
- 220.2 Is not an administrative Title V permit amendment.
- 220.3 Does not violate any applicable requirements which are federally enforceable.

**Category: "Significant" Title V permit modification**

SMAQMD Rule 207 Section 233 defines a Title V permit modification as a "Significant" Title V permit modification if any of the following conditions are met:

- 233.1 Involves any modification under Section 112(g) of Title I (42 U.S.C. Section 412(g) of the Federal Clean Air Act, or under EPA regulations promulgated pursuant to Title I of

- the Federal Clean Air Act, including 40 CFR Part 51, 52, 60, 61 and 63.
- 233.2 Involves relaxation or significant change to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
- 233.3 Involves case-by-case determination of an emission limit or other standard.
- 233.4 Involves a stationary source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis.
- 233.5 Attempts to set or change a Title V permit term or condition which allows a source to avoid an applicable federal requirement including:
- a. A federally enforceable emission cap pursuant to Title I of the Federal Clean Air Act, or
  - b. An alternative HAP emission limit pursuant to Section 112(i)(5) (Section 42 U.S.C. Section 7412(j)(5) of the Federal Clean Air Act.
- 233.6 Involves a modification to a major stationary source which results in an increase in the potential to emit greater than: 25 tons per year of nitrogen oxides, 25 tons per year of volatile organic compounds, 40 tons per year of sulfur dioxide, 100 tons per year of carbon monoxide, or 15 tons per year of PM10 when aggregated with all other increases in potential to emit over the period of five consecutive years before the application for modification, and including the calendar year of the most recent application.

**ATTACHMENT C**

**Application for Title V Permit Modification**

# **ATTACHMENT D**

## **Engineering Evaluation for Authority to Construct**

**ATTACHMENT E**

**SMAQMD Rule 201 Authority to Construct**