

# South Coast Air Quality Management District

## Statement of Basis

### Title V Facility Permit Renewal

Issuance Date: December 21, 2011

|                                       |  |
|---------------------------------------|--|
| <b>Facility Name:</b>                 | LA County Sanitation Districts, Puente Hills Landfill        |
| <b>Facility ID:</b>                   | 25070  |
| <b>SIC Code:</b>                      | 4953   |
| <b>Equipment Location:</b>            | 13130 Crossroads Parkway South<br>City of Industry, CA 91745 |
| <b>Application #(s):</b>              | 522460   |
| <b>Application Submittal Date(s):</b> | 05/11/2011   |
| <b>Permit Renewal:</b>                | Draft  |
| <b>Revision No. Date:</b>             | Not Applicable   |
| <b>Permit Section(s) Affected:</b>    | All  |
| <b>AQMD Contact Person:</b>           | Atul Kandhari, A.Q. Engineer                                 |
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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 a landfill gas (LFG) collection system, landfill condensate/leachate collection and storage systems, multiple LFG flares, and LFG control resource recovery equipment including two boilers, one turbine, and three internal combustion engines. This facility is located at 13130 Crossroads Parkway South, City of Industry, CA 91745

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

An initial Title V permit was issued on October 17, 2006. In September 2009, facility informed that a new Responsible Official is Mr. Robert Ferrante, Head of the Solid Waste Management Department. This is valid for all of the following existing facilities;

Puente Hills Landfill – ID 025070  
Spadra Landfill – ID 042633  
Calabassas Landfill – ID 042514  
Palos Verdes Landfill- ID 024520  
Scholl Canyon Landfill – ID 045262 and,  
Commerce Refuse-to-Energy Facility – ID 037336.

## **4. Regulatory Applicability Determinations**

Applicable legal requirements which are required for this facility 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 NESHAP requirements. NESHAP requirements of 40 CFR Part 63 apply 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 source at this facility. CAM plan for TNMHC emission control using APC (flares, boilers, IC engines, and a gas turbine) is addressed under A/N 526754.

## **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               | 160.96                       |
| NOx              | 103.17                       |
| ROG              | 20.66                        |
| SOx              | 141.58                       |
| TSP              | 35.52                        |

**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        | 6.168                     | PAHs, total                       | 0.020                     |
| Ammonia              | 1.653                     | Perchloroethylene                 | 140.53                    |
| Benzene              | 331.92                    | Trichloroethylene                 | 84.08                     |
| Formaldehyde         | 0.984                     | Trichlorofluoromethane (Freon 11) | 81.76                     |
| Methylene chloride   | 189.27                    | Vinyl chloride                    | 13.25                     |
| Ethylene Dichloride  | 38.865                    | Methyl Chloroform                 | 35.01                     |

**Health Risk from Toxic Air Contaminants**

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The Final Facility Health Risk was approved in 2009 with the following risk factors:

|                      |                     |
|----------------------|---------------------|
| Cancer Risk          | 1.46 in one million |
| Acute Hazard Index   | 0.33                |
| Chronic Hazard Index | 0.08                |

**8. Compliance History**

The facility has been subject to both self-reporting requirements and AQMD inspections. Facility inspection report for July 12, 2011 indicated that permitted equipment operating satisfactorily and facility was determined to be in compliance. As per District's records, there was one NC (Notice of Compliance) issued on Jan 11<sup>th</sup>, 2007 (NC D04517) which was later placed in compliance after requested documents were submitted, no NC or NOV (Notice of Violation) was issued in last two years.

**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