

South Coast Air Quality Management District

Statement of Basis

Title V Facility Permit Renewal

Facility Name:	Gas Recovery Systems, LLC (Coyote Canyon)
Facility ID:	45448
SIC Code:	1389
Equipment Location:	20662 Newport Coast Drive, Newport Coast, CA 92657
Application #(s):	514682
Application Submittal Date(s):	September 10, 2010
Permit Renewal:	Draft
Permit Revision No.:	3
Permit Section(s) Affected:	All
AQMD Contact Person:	Angela Shibata, A.Q. Engineer
Phone Number:	(909) 396-2737
E-Mail Address:	ashibata@aqmd.gov

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. NO₂, SO₂, CO and lead are in attainment with federal standards. 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 landfill gas to energy operations of a closed municipal solids waste landfill. This facility is subject to Title V requirements because it was a major source.

2. Facility Description

This is a landfill gas to energy facility, applying for a Title V renewal permit, consisting of an emergency internal combustion engine for electrical generation, an emergency internal combustion engine for fire pump, landfill gas collection system, resource recovery system (boiler & steam turbine), and landfill gas flare at a closed MSW landfill.

3. Construction and Permitting History

An initial Title V permit was issued on April 28, 2000 and was renewed on April 7, 2006, due to expire on April 6, 2011.

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 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 applicable to operators of reciprocating internal combustion engines (RICE), 40 CFR Part 63, Subpart ZZZZ and applicable to operators of municipal solid waste (MSW) landfills, 40 CFR Part 63, Subpart AAAA. 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 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 sources at this facility. CAM plan for Reactive Organic Gases (ROG) emission control using APCs (boiler & flare) is addressed under Permit F11990, A/N 318060 and Permit F25797, A/N 362547, respectively.

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

Pollutant	Emissions (tons/year)
CO	2.022
NO _x	10.503
ROG	1.277
SO _x	0.024
TSP	1.880

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

TACs Reported	Emissions (lbs/yr)
Ammonia	4915.994
Naphthalene	512.658
Formaldehyde	267.689
Nickel	227.616
Lead	13.558
Cadmium	13.261
Arsenic	7.798
Beryllium	2.177
Chromium (VI)	1.413
Acenaphthene	0.829
Acenaphthylene	0.829
Anthracene	0.829
B[ghi]perylene	0.829
Benz[a]anthracene	0.829
Benzo[a]pyrene	0.829
Benzo[b]fluoranthene	0.829
Benzo[k]fluoranthene	0.829
Chrysene	0.829
Dibenz[a,h]anthracene	0.829
Fluoranthene	0.829
Fluorine	0.829

Indeno[1,2,3-cd]pyrene	0.829
Phenanthrene	0.829
Pyrene	0.829
Benzene	0.353
PAHs	0.007
1,2,3,4,5,6,7,8-Octachlorodibenzo-p-dioxin [POM]	0.002
1,2,3,4,5,6,7,8-Octachlorodibenzofuran [POM]	0.002
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	0.002
1,2,3,4,6,7,8-Heptachlorodibenzofuran	0.002
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	0.001
1,2,3,6,7,8-Hexachlorodibenzofuran	0.001
1,2,3,7,8-Pentachlorodibenzo-p-dioxin	0.001
1,2,3,7,8-Pentachlorodibenzofuran	0.001
2,3,7,8-Tetrachlorodibenzo-p-dioxin	0.001
2,3,7,8-Tetrachlorodibenzofuran	0.001

Health Risk from Toxic Air Contaminants

The facility has been determined to be subject to Air Toxics Information and Assessment Act (AB2588) requirements. The final facility health risk was approved on October 20, 2009 with a cancer risk of 20.10 in a million.

8. Compliance History

The facility has been subject to self-reporting requirements and AQMD inspections. The last AQMD inspection on May 19, 2011 was to observe a source test of flare no. 4. Prior to that the last AQMD inspection on April 12, 2011 indicated the facility was in compliance. As per District's records there were no Notices to Comply, Notices of Violation, or complaints issued for the period (9/2009 through 10/2011).

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.