

South Coast Air Quality Management District

Statement of Basis Title V Facility Permit Renewal

Issuance Date: 02/29/2012

Facility Name: Sunshine Canyon Landfill
Facility ID: 49111
SIC Code: 4953
Equipment Location: 14747 San Fernando Road,
San Fernando, CA 91342
Application #(s): 497632
Application Submittal Date(s): 04/07/2009
Revision No. /Date: Draft / 01/27/2012
Permit Section(s) Affected: All
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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. NO₂, SO₂, 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 Sunshine Canyon landfill located at 14747 San Fernando Road, Sylmar, CA 91342. This facility is subject to Title V requirements because it is a major source and is subject to certain New Source Performance Standards (NSPS) and National Emissions Standards for Hazardous Air Pollutants (NESHAP) requirements.

2. Facility Description

This is an active municipal solid waste landfill facility. The facility operates a landfill gas collection system, landfill condensate/leachate collection, storage and treatment systems, and three landfill gas flare stations. This facility is required to conduct landfill surface monitoring, subsurface probe monitoring and ambient air monitoring in order to detect and remediate offsite migration of landfill gas.

3. Construction and Permitting History

An initial Title V permit was issued on September 22, 2004. Revision no. 1 was issued on December 22, 2006 to revise the ROG emissions limit for Flare # 8 and add a storage tank to the leachate/condensate collection system. Revision no. 2 was issued on Jan 15, 2010 to reflect a change in responsible official and relocate/modify the leachate/condensate treatment system. Revision no. 3 was issued on December 10, 2010 to finalize permit to operate a new landfill leachate/condensate collection and treatment system. Revision no. 4 was issued on May 10, 2011 to include an approved Rule 1150 excavation management plan.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are identified in the Title V permit (for example, Sections D, E, H, and K, of the proposed Title V renewal 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. 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, H, and J of the Title V permit. NSPS requirements of 40 CFR Part 60 Subpart WWW are applicable to this site.

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, Sections D, 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 flares at this facility. CAM plan for Total Non-Methane Hydrocarbons (TNMHC's) emission control using air pollution control devices (existing Flare Nos. 1, 3, and 8, and the proposed new Flare No. 9) is addressed under Application Number 527679 and the permit terms and conditions may be found in Sections D and H of the proposed renewal permit.

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

The following tables summarize the criteria pollutant and Toxic Air Contaminants (TAC) emissions as reported by the facility during 2010 reporting period (currently under AQMD review):

**Criteria Pollutant Emissions (tons/year)
Annual Reported Emissions for Reporting Period 2010**

<i>Pollutant</i>	<i>Emissions (tons/year)</i>
CO	23.844
NOx	26.02
ROG	6.00
SOx	25.68
TSP	4.79

TAC Emissions - 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>
Hydrochloric acid	1.28	Ethyl Benzene	115.84
1,3-Butadiene	1.677	Trichloroethylene	169.955
Acrolein	5.761	Diesel Exhaust	230.212
Chloroform	7.375	Ethylene Dichloride	253.955
Naphthalene	7.848	Trichlorofluoromethane	277.564
PAHs, Total,	7.933	Methylene Chloride	374.88
Acrylonitrile	11.8	Methyl Isobutyl Ketone	464.256
Carbon tetrachloride	14.255	Formaldehyde	654.209
1,2-Dichloropropane	16.054	Benzene	1063.229
Ethylene Dibromide	17.41	Hexane	1237.765
Ammonia	19.928	Perchloroethylene	1441.302
Acetaldehyde	29.151	Xylenes	3618.423
Carbonyl Sulfide	44.222	Methyl Ethyl Ketone	4702.906
Methyl Chloroform	63.242	Toluene	5306.796
1,1,2,2-Tetrachloroethane	72.585	Hydrogen Sulfide	13752.757
Vinyl Chloride	73.747		

Health Risk from Toxic Air Contaminants

The facility has not filed a Health Risk Assessment pursuant to Air Toxic Information and Assessment Act (AB 2588) and is currently under District's tracking to determine when an HRA must be prepared.

8. Compliance History

The facility has been subject to both self-reporting requirements and AQMD inspections. 40 Notice of Violations (NOV's) and 8 Notice to Comply (NC's) have been issued to this site during the last two years (February 2010 – February 2012). The facility is currently operating under an Order of Abatement (OA, case # 3448-13) issued on 04/22/2010 and three subsequent amendments issued on 07/15/2010, 01/20/2011, and 12/6/2011 respectively. The facility is in compliance with the requirements of these OA's.

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

In addition to Title V Permit Renewal, this proposed permit action includes permit revisions as summarized in table below. The engineering evaluations for each respective revisions can be found in the identified application files.

Appl. No.	Existing Application/Permit No.	Equipment	Description
527409	330383/F9412	Flare No. 1	Equipment description change - replacement of one of the landfill gas blowers (Minor Revision)
527410	457396/F86506	Flare No. 8	Equipment description change - to reflect changes in landfill gas blowers (Minor Revision)
527411	207173/F23230	Flare No. 3	Equipment description change – to reflect changes in landfill gas blowers and increase in ROG emissions limit from 0.25 lb/hr to 0.63 lb/hr (De-Minimis Significant Revision)
526972	N/A	Proposed Flare No. 9	New flare to supplement the existing landfill gas combustion capacity (Significant Revision)
527679	N/A	All Flares	CAM Plan