

South Coast Air Quality Management District

Statement of Basis Title V Facility Permit Renewal

Issuance Date: 06/06/2012

Facility Name: City of LA, Bureau of Sanitation (Lopez Canyon Facility)
Facility ID: 49805
SIC Code: 4953
Equipment Location: 11950 Lopez Canyon Road
Lake View Terrace, CA 91342

Application #(s): 528819
Application Submittal Date(s): 10/28/2011

Permit Renewal: 05/31/2012
Revision No.: Draft
Permit Section(s) Affected: All

AQMD Contact Person: Abdi Majidifar, A.Q. Engineer
Phone Number: (909) 396-2449
E-Mail Address: amajidifar@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, 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 a closed landfill facility. Main operations include Landfill Gas (LFG) Collection System, Landfill Condensate/Leachate/Collection System, LFG Enclosed Flare Station, Internal Combustion Engine (ICE) Emergency Generator, and a Fuel Storage and Dispensing Facility. The facility is located at 11950 Lopez Canyon Rd., Lake View Terrace, CA 91342.

3. Construction and Permitting History

An initial Title V permit was issued on 4/8/2007, and is due to expire on 4/7/2012. Title V revision No. 1 was issued on June 27, 2007 to correct the facility information.

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 NSPS and NESHAP requirements. NSPS requirements of 40 CFR Part 60 apply 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 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 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 (flare) is addressed under A/N 534031.

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	0.072
NO _x	1.682
ROG	0.35
SO _x	0.198
TSP	0.223

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

<i>TACs Reported</i>	<i>Emissions (lbs/yr)</i>
Benzene	1.151
Formaldehyde	8.463
Naphthalene	0.067
PAHs	0.018

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 report for 4/14/2011 indicated that permitted equipment operating satisfactorily and facility was determined to be in compliance.

As per District's records there were 8 citizen complaints, no NCs or NOV's issued for the facility, for the period 2011 - 2012.

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

The following Section D permit revisions are incorporated into the proposed Title V Permit:

Application No.	Equipment	Description
245157	Landfill Gas Flare Station	Condition added to include CAM requirements
332971	Emergency IC Engine	Condition added to include 40CFR Part 63 Subpart <i>ZZZZ</i> requirements
478490	Fuel Storage and Dispensing Facility	Change of Operator (Administrative Revision)
534031	CAM Plan	Proposed approval to Flare Station