

South Coast Air Quality Management District

Statement of Basis Title V Facility Permit Renewal Issuance Date: TBD

Facility Name:	San Bernardino County Solid Waste Management Division – Mid Valley Landfill
Facility ID:	50299
SIC Code:	4953
Equipment Location:	2390 N Alder Avenue, Rialto, CA 92377
Application #(s):	539571
Application Submittal Date(s):	06/15/2012
Permit Renewal:	Draft
Revision No.:	1
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 **San Bernardino County Solid Waste Management Division – Mid Valley Landfill** located at 2390 Alder Avenue, Rialto, CA 92377. 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, groundwater treatment system, and one landfill gas flare station. 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 December 14, 2007.

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 Flares) is addressed under Application Number 539570 and the permit terms and conditions may be found in Sections D 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 2011 reporting period:

Criteria Pollutant Emissions (tons/year) Annual Reported Emissions for Reporting Period 2012

<i>Pollutant</i>	<i>Emissions (tons/year)</i>
Carbon Monoxide	1.495
Nitrogen Oxides	6.656
Reactive Organic Gases	1.78
Sulfur Oxides	2.266
Total Suspended Particulates	3.849

TAC Emissions - Annual Reported Emissions for Reporting Period 2012

<i>TACs Reported</i>	<i>Emissions (lbs/yr)</i>
Benzene	167.356
Carbon tetrachloride	14.042
Ethylene dibromide	21.065
Ethylene dichloride	36.932
Formaldehyde	8.325
Methyl chloroform	12.165
Methylene chloride	72.355
Naphthalene	0.001
PAHs, total, with components not reported	0.006
Perchloroethylene	59.775
Trichloroethylene	37.514
Trichlorofluoromethane {Freon 11}	29.794
Vinyl chloride	20.372

Health Risk from Toxic Air Contaminants

Pursuant to Air Toxic Information and Assessment Act (AB 2588) the facility is being tracked under AB 2588, based on the emissions inventory presented by the facility, the facility is required to present a HRA (health risk assessment). SCAQMD staff is looking for possible anomalies in the flare source test reports and the flares may be source tested again to confirm the emissions numbers.

8. Compliance History

The facility has been subject to both self-reporting requirements and AQMD inspections. Facility was not issued any NOV's and NC's in the last 2 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

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

Appl. No.	Existing Application/Permit No.	Equipment	Description
539570	N/A	FLARES	CAM Plan