

# South Coast Air Quality Management District

## Statement of Basis

### Title V Permit Renewal

**Facility Name:** Riverside County Waste Management Department  
**Facility ID:** 15793  
**SIC Code:** 4953  
**Equipment Location:** 16411 Lamb Canyon Road  
Beaumont, CA 92223

**Application #(s):** 557114  
**Application Submittal Date(s):** 10/16/2013

**Permit Renewal:** Draft  
**Revision No.:** 3  
**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. NO<sub>2</sub>, SO<sub>2</sub>, and lead are in attainment with federal standards. The status of CO is currently serious nonattainment, but AQMD has petitioned to EPA for redesignation to attainment status. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V permit is proposed to be issued to cover the operations of Riverside County Waste Management Department located at 16411 Lamb Canyon Rd., Beaumont. This facility is subject to Title V requirements because it is subject to certain NSPS (New Source Performance Standards) and NESHAP (National Emission Standards for Hazardous Air Pollutants) requirements that specifically require obtaining a Title V permit.

**2. Facility Description**

This is an existing facility that is in the business of operating a municipal landfill. This facility is operating a landfill gas collection system, landfill condensate collection system, landfill gas flaring system.

**3. Construction and Permitting History**

An initial Title V permit was issued on September 09, 2008.

**4. Regulatory Applicability Determinations**

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V 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. 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, 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 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 557928 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**

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

Pollutant	Emissions (tons/year)
NOx	2.250
CO	3.978
VOC	0.099
PM	1.005
SOx	1.756

**Toxic Air Contaminants Emissions (TAC)  
Annual Reported Emissions for Reporting Period 2012**

The Following TACs Were Reported	Emissions (lbs/yr)
1,3-Butadiene	0.177
Ammonia	2.366
Arsenic	0.001
Benzene	1.295
Cadmium	0.001
Carbon tetrachloride	1.73
Chromium (VI)	0.00
Ethylene Dibromide	2.111
Ethylene Dichloride	1.113
Formaldehyde	554.859
Lead (inorganic)	0.006
Methyl chloroform	1.501
Methylene chloride	2.836

Naphthalene	5.223
Nickel	0.003
PAHs, total, with components not reported	1.449
Trichloroethylene	1.479
Vinyl Chloride	0.702

**Health Risk from Toxic Air Contaminants**

The facility is not subject to review by the Air Toxics Information and Assessment Act (AB2588).

**8. Compliance History**

The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had 0 citizen complaints filed, 0 Notices to Comply issued, and 0 Notices of Violation issued in the last two calendar years.

**9. Compliance Certification**

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.

**10. Comments**

N/A