

# South Coast Air Quality Management District

## Statement of Basis Title V Facility Permit Renewal Issuance Date: August 30, 2011

**Facility Name:** Toyon Gas Conversion, LLC  
**Facility ID:** 142417  
**SIC Code:** 4911  
**Equipment Location:** 5050 Mt. Hollywood Drive  
Los Angeles, CA 90027

**Application #(s):** 437596  
**Application Submittal Date(s):** 12/7/2004

**Permit Renewal:** Draft  
**Revision No. Date:** Not Applicable  
**Permit Section(s) Affected:** Various

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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 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 landfill gas to energy facility, applying for Title V renewal permit, consisting of a landfill gas collection system, a portable pressure washer, and two landfill gas-fired internal combustion engines used to drive electrical generators.

### **3. Construction and Permitting History**

An initial Title V permit was issued on 6/02/2000. In March 2005, a revision to the Title V permit was issued under application 437756 including a change of ownership and responsible official, addition of equipment, modification of the two engines, and removal of three engines.

### **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 H, 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. 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 permitted source of emissions at this facility. CAM plan for Reactive Organic Gases (ROG) emission control using APC (engines) is addressed under A/N 526446.

### **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	50.3
NOx	9.0
ROG	5.0
SOx	0.5
TSP	0.5

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

<i>TACs Reported</i>	<i>Emissions (lbs/yr)</i>
Benzene	33.8
Carbon Tetrachloride	0.3
Methylene chloride	45.5
Perchloroethylene	0.4
Trichloroethylene	0.3
Vinyl chloride	0.3

### Health Risk from Toxic Air Contaminants

The facility is determined to be subject to the Air Toxics Information and Assessment Act (AB2588), and the AQMD is tracking the status.

## 8. Compliance History

The facility has been subject to both self-reporting requirements and AQMD inspections. The last AQMD inspection on August 19, 2010 indicated that the facility was in compliance.

As per District's records there were no citizen complaints, NCs or NOV's issued for the facility, for the period 01/2009 through 08/2011).

## 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.