

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Issue Date: December 30, 2011

Facility Name: USA Waste of Cal (El Sobrante Landfill)
Facility ID: 113674
SIC Code: 4953
Equipment Location: 10910 Dawson Canyon Road
Corona, CA 92883

Application #: 497238
Application Submittal Date(s): 03/18/09

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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.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004 (f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

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. CO, NO₂, SO₂, and lead are in attainment with federal standards. 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 USA Waste of Cal (El Sobrante Landfill) located at 10910 Dawson Canyon Road, Corona, CA. This facility is subject to Title V requirements because it is a major source and is subject to certain NSPS (New Source Performance Standards) and NESHAP (National Emission Standards for Hazardous Air Pollutants) requirements.

2. Facility Description

This is an existing facility that is in the business of waste management (solid waste landfill). This facility is operating a landfill gas collection system, a flaring system (comprised of three flares), and three internal combustion engines. Landfill gas is destroyed in the flares and is also burned in the internal combustion engines to produce electricity (gas to energy process).

3. Construction and Permitting History

USA Waste of Cal (El Sobrante Landfill) is an active municipal waste landfill located in the city of Corona. This facility was issued an initial Title V permit on October 26, 2004. Numerous modifications to the gas collection system and condensate/leachate system have occurred and permits to construct and permits to operate have been issued to the El Sobrante Landfill for these modifications/changes. Additionally, several plans have been approved as required by several regulations (e.g. 1150.1, 1110.2, 1166) affecting operations at the landfill.

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, Sections D and E 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 also 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, Sections 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 certain units at the facility and the permit terms and conditions may be found in Section D of the Title V 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 2009

Pollutant ID	Pollutant Description	Annual Emissions
CO	Carbon Monoxide	65.218
NOX	Nitrogen Oxides	14.684
ROG	Reactive Organic Gases	5.280
SOX	Sulfur Oxides	3.497
TSP	Total Suspended Particulates	4.825

Toxic Pollutants (pounds/year)
Annual Reported Emissions for Reporting Period 2009

Pollutant ID	Pollutant Description	Annual Emissions
106990	1,3-Butadiene	2.890
7664417	Ammonia	38.564
7440382	Arsenic	0.021
71432	Benzene	11.481
7440439	Cadmium	0.019
56235	Carbon tetrachloride	0.755
18540299	Chromium (VI)	0.001
75434	Dichlorofluoromethane {Freon 12}	1.364
106934	Ethylene dibromide	1.153
107062	Ethylene dichloride	0.729
50000	Formaldehyde	885.076
7439921	Lead (inorganic)	0.110
71556	Methyl chloroform	0.792
75092	Methylene chloride	0.003
91203	Naphthalene	2.016
7440020	Nickel	0.051
1151	PAHs, total, with components not reported	0.959
127184	Perchloroethylene	0.778
79016	Trichloroethylene	0.501
75694	Trichlorofluoromethane {Freon 11}	0.541
75014	Vinyl chloride	0.418

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588) and the AQMD is currently tracking the status of this facility.

8. Compliance History

This facility is subject to both self-reporting requirements and AQMD inspections. In the last two years, the facility has had no citizen complaints filed, has had 1 Notice to Comply issued, and has had no Notices of Violation issued.

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

The proposed renewal updates the contact information in Section A, updates facility-wide permit conditions and other equipment specific emission requirements, incorporates requirements of 40 CFR Part 64 (Compliance Assurance Monitoring or "CAM"), and updates the applicable rule table in Section K and emission limits in Appendix B.