

South Coast Air Quality Management District

Statement of Basis

Title V Facility Permit Renewal

Facility Name: BKK CORPORATION
Facility ID: 800209 (AEIS), 055449
SIC Code: 562212
Equipment Location: 2210 South Azusa Avenue (Closed BKK Landfill)
West Covina, CA 91792

Application #(s): 509609
Application Submittal Date(s): April 02, 2010

Permit Renewal: Draft
Permit 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. NO₂, SO₂, CO 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 renewal permit covers the operations of a municipal solids waste landfill (BKK is a closed landfill). This facility is subject to Title V requirements because it was a major source.

2. Facility Description

This is a closed landfill facility, under post-closure care. Main operations include LFG collection system, landfill condensate/leachate/collection and storage system, LFG enclosed flare stations, emergency internal combustion engines, waste water treatment facility and gasoline storage and dispensing service station. The facility is located at 2210 South Azusa Avenue (BKK closed LF), West Covina, Ca.

For BKK Corporation, Form 500-A2 is signed by a Responsible Official - Kris L. Kazarian, Treasurer.

3. Construction and Permitting History

An initial Title V permit was issued on 4/28/2004

Title V revision No. 2 (Section D) was issued on March 20, 2008 to modify existing permit F61376 by addition of a new secondary clarifier covered under A/N 467269.

On 8/02/11, BKK Corp. submitted A/N 526097 for addition of a media filtration system to existing landfill leachate and condensate treatment permit (F95999, A/N 467269) to reduce arsenic levels and to meet the current Waste Discharge Requirements (WDRs) imposed by the LARWQCB. A/N 526136 was also submitted for Title V permit revision to incorporate proposed media filtration system. This revision (No. 3, Section D) is pending review and approval (we plan to include under this Title V renewal, A/N 509609).

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 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, 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 emission source at this facility. LFG flare permits conditions are amended with 40 CFR part 64 requirements under this TV renewal.

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	3.59
NOx	6.51
ROG	0.12
Sox	1.15
TSP	2.71

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

<i>TACs Reported</i>	<i>Emissions (lbs/yr)</i>
Benzene	65.7
Formaldehyde	482.72
Naphthalene	4.54
PAHs, total	1.24

Health Risk from Toxic Air Contaminants

Annual report on AB 2588 air toxics "Hot Spots" Program, April 2011 shows cancer risk of 6.90 in a million (reported under BKK Corp, ID 55449), Acute Hazard index = 0.01 and Chronic hazard Index = 0.10. Initial HRA was approved in 2000.

8. Compliance History

The facility has been subject to both self-reporting requirements and AQMD inspections. Facility inspection report for June 3, 2010 indicated that permitted equipment operating satisfactorily and facility was determined to be in compliance. Previous inspection reports indicated that facility was asked to submit Title V permit renewal application.

For the period 01/01/2009 through 11/15/2011,

NC D24121 issued on 6/30/2009 for gasoline storage tank PO M99097- records of gasoline transfers into storage tank (2008), proof of CARB certification for Phase I & II nozzles, inspections and tests done, and operating logs for IC engines 92008).

No NOV is issued for the facility for the above period.

9. Compliance Certification

By virtue of 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