

YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT
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**TITLE V PERMIT STATEMENT OF BASIS
ADDENDUM**

PERMIT NUMBER: F-01392-3

ENGINEER: René Toledo

DATE: February 3, 2009

Facility Name: Yolo County Central Landfill

Mailing Address: 292 West Beamer Street

Woodland, CA 95695

Location: 44090 County Road 28H

Woodland, CA 95776

Responsible Official: Linda Sinderson, P.E., R.G.

Title: Deputy Director of Yolo County Planning, Resources,
& Public Works Department

Application Contact: Linda Sinderson, P.E., R.G.

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I. Facility Description

The Yolo County Central Landfill (YCCL) is a Class III landfill located in Woodland, California and is proposing to increase their maximum design capacity from 25 million cubic yards to 49.0352 million cubic yards. YCCL began accepting municipal solid waste (MSW) in 1975 and is permitted by the California Integrated Waste Management Board to receive a maximum of 1,800 tons per day of MSW.

The majority of the landfilling process consists of placing waste into active waste management cells that are covered daily with soil or chipped greenwaste. Once a cell is filled to capacity, it is covered with a final layer of soil and the waste is allowed to degrade naturally. In general, as the waste decomposes it produces landfill gases that contain large amounts of methane (CH₄) and carbon dioxide (CO₂), as well as, relatively small amounts of non-methane organic compounds (NMOC) and hazardous air pollutants (HAP's). Overtime these gases migrate upward through the waste cells and are emitted as fugitive

emissions. Conservatively, this evaluation assumes that all of the NMOC emissions are volatile organic compounds (VOC's).

In conjunction with the normal landfilling cells, the facility also operates two types of bioreactors. These bioreactor cells accelerate the degradation of waste by circulating fluids and air within the stored waste, and as a result it increases the cell's landfill methane production rate. In the anaerobic bioreactors, only liquids are circulated within the landfilled waste. While in the aerobic bioreactors both air and liquids are circulated. In order to maximize the amount of landfill gas captured from the existing bioreactor cells, the final soil cover is substituted by a plastic membrane. This allows the facility to minimize the amount of fugitive gas that is released into the atmosphere from the anaerobic bioreactor cells, while maximizing the amount of gas routed to the collection system (assumed to be 75.5% of the total amount of gas produced). Emissions from the existing aerobic cells are currently routed to the gas collection system or a biofilter unit. As part of the construction of the new bioreactors, YCCL is proposing to use a biocover over the intermediate soil cover in these cells.

For reference, two (2) other stationary sources currently operate on landfill property and are considered independent to the YCCL operation. MM Yolo Power LLC (MM Yolo) operates the landfill gas collection system and landfill gas fired flare (currently issued to NEO Yolo LLC), and five (5) landfill gas fired internal combustion (IC) engines (currently issued to MM Yolo). Recycle America Alliance operates one (1) diesel fired IC engine driving a greenwaste trommel screen and one (1) emergency diesel fired IC engine powering a water pump.

It should be noted that although the ownership of the emergency diesel fired IC engine under Permit to Operate (PTO) P-71-06 has been transferred to the Yolo County General Services Department, it will for the purposes of this evaluation be considered part of YCCL's stationary source.

II. Proposed Revisions

As proposed in Authority to Construct (ATC) C-07-164 (and summarized in YCCL's Joint Technical Document, Page 1), the source is proposing to modify Permit to Operate (PTO) P-15-05 by:

- Increasing the overall design capacity of the landfill to 49,035,200 cubic yards;
- Increasing the overall capture and control efficiency of the landfill from 75.0% to 75.5%;

- Increasing the number of waste management units operated as bioreactors;
- Installing a landfill-based anaerobic digester for the specific composting of green-, food-, and other organic wastes;
- Mining landfill waste located in bioreactor cells that have reached the end of their methane generation cycle;
- Use a biocover as intermediate soil cover for the new waste cells; and
- Installing a permanent household hazardous waste collection facility (currently exempt from air district permitting).

As part of the emission evaluation for ATC C-07-164, the District has calculated the landfill's revised potential to emit using U.S. Environmental Protection Agency's (EPA's) Landfill Gas Emissions Model (LandGEM) Version 3.02 (released May 2005) software using revised emissions data received from the source. Any emissions units that are not affected by the proposed changes have been evaluated in a previous Statement of Basis and have not been included here.

III. Significant Emissions Unit Information

It is expected that once YCCL commences operation under the requirements of ATC C-07-164 it will be in accordance with the requirements of District Rules 3.1 (General Permit Requirements) and Rule 3.4 (New Resource Source) as contained in the approved ATC. Upon YCCL demonstrating compliance with the permit, ATC C-07-164 will be implemented into PTO P-15-05(a).

Identification Number: P-15-05(a)

Equipment Description: Municipal solid waste (MSW) landfill not to exceed a total maximum design capacity of 49.0352 million cubic yards

Control Equipment: Negative pressure landfill gas collection system serving the conventional (non-bioreactor) and bioreactor portions of the landfill and LFG Specialties, F-2000 enclosed flare (shared with P-26-98¹)

¹ The gas collection system serves the existing landfill cells but the equipment is not owned or operated by YCCL (see PTO P-26-98(t1) issued to NEO Yolo LLC). Since the collection system's capture efficiency of 75.5% is applied to the landfill's total fugitive emissions calculation, the District will reference the collection system and operating permit number in this permit.

IV. Title V Applicability

The total potential to emit (PTE) for all of the YCCL equipment permitted at this location exceeds the VOC major source threshold of 25 tons per year. Therefore, the YCCL is subject to the requirements of District Rule 3.8 (Federal Operating Permits). The facility’s emission totals are listed below in Table 1 on a per pollutant basis

Table 1 - Total Potential to Emit for Criteria Pollutants

Criteria Pollutant Emissions (tons per year)					
Emission Unit Name	VOC	CO	NOX	SOX	PM10
P-15-05(a)	24.40	-	-	-	-
P-71-06(t)	0.01	0.03	0.15	0.01	Neg.
P-25-07	Neg.	0.02	0.26	Neg.	Neg.
Previous Facility Total	24.78	0.05	0.41	0.01	Neg.
New Facility Total	24.41	0.05	0.41	0.01	Neg.

V. Applicable Federal Requirements

RULE 2.3 Ringelmann Chart

Rule Description

This rule specifies the allowable opacity limit for sources in the District.

Compliance Status

The rule applies to any fugitive emissions associated with the landfilling process. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California State Implementation Plan (SIP). The source is currently in compliance with the requirements of the rule.

Permit Condition

The Permit Holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than three (3) minutes in any one (1) hour which is:

- a. As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart as published by the United States Bureau of Mines; or
- b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection a. of this condition. [District Rule 2.3]

RULE 2.5 Nuisance

Rule Description

This rule requires that sources are not a public nuisance.

Compliance Status

The rule applies to the landfilling operating. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the rule.

Permit Condition

The Permit Holder shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause to have a natural tendency to cause injury or damage to business or property.

It should be noted that this permit condition is Federally enforceable because it derives from District Rule 2.5 (Nuisance) that is currently part of the California SIP. The District is taking steps to remove Rule 2.5 from the SIP. Once the U.S. EPA has taken final action to remove District Rule 2.5 from the SIP, this permit condition will become state-enforceable only.

RULE 2.11 Particulate Matter

Rule Description

This rule specifies the allowable particulate matter (PM) emission rate at standard conditions. For the purposes of this evaluation, the PM emissions are considered to be 100% PM₁₀ (PM with an aerodynamic diameter of 10 microns or less).

Compliance Status

The rule does not apply to any incidental PM emissions from landfilling process (i.e. daily soil cover) since the emissions are fugitive in nature and are not emitted via an exhaust stack or vent.

RULE 2.12 Specific Contaminants

Rule Description

This rule specifies the allowable sulfur dioxide (SO₂) and PM emission rates at standard conditions for an emission unit. For the purpose of this evaluation, the sulfur oxide (SO_x) emissions are considered to be 100% SO₂.

Compliance Status

The rule does not apply to the landfilling process since there is no combustion component associated with the process.

RULE 2.16 Fuel Burning Heat or Power Generators

Rule Description

This rule specifies the allowable nitrogen dioxide (NO₂), SO₂, and combustion particulate matter limits for non-mobile, fuel burning, heat or power generating units in the District. For the purpose of this evaluation, the NO_x emissions are considered to be 100% NO₂.

Compliance Status

The rule does not apply to a the landfilling process since there is no combustion component associated with the process.

RULE 2.17 Circumvention

Rule Description

This rule prevents sources from concealing emissions to the atmosphere.

Compliance Status

The rule applies is applicable to all emission units at the facility. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California State Implementation Plan (SIP). The source is currently in compliance with the rule.

Permit Condition

The Permit Holder shall not build, erect, install or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26, Part 3 and Part 4 of the Health and Safety Code of the State of California or District Rules or Regulations. [District Rule 2.17]

RULE 2.19 Particulate Matter Process Emission Rate

Rule Description

This rule limits the pound per hour PM emission rate of an emission unit based on the hourly amount of material processed.

Compliance Status

The rule does not apply to the landfilling process since there is no hourly process rate associated with the site's fugitive emissions.

RULE 2.38 Standards for Municipal Solid Waste Landfills

Rule Description

The purpose of this rule is to limit NMOC emissions from existing MSW landfills by implementing the provisions of 40 Code of Federal Regulations (CFR) Part 60, Subpart Cc (Emission Guidelines for Municipal Solid Waste Landfills).

Compliance Status

The provisions of this rule apply only to existing MSW landfills for which construction, reconstruction, or modification was commenced before May 30, 1991. Upon modifying the landfill to allow for the capacity expansion, YCCL will become subject to the requirements of 40 CFR Part 60, Subpart WWW

(Standards of Performance for Municipal Solid Waste Landfills). Therefore, per Section 103.1, YCCL is no longer subject to the requirements of this rule.

RULE 3.1 General Permit Requirements

Rule Description

The purpose of this rule is to provide an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of permits.

Compliance Status

The source is currently in compliance with the rule.

Permit Conditions

No person shall build, erect, alter, or replace any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants, without first obtaining an authorization to construct from the Air Pollution Control Officer (APCO) as specified in Section 401 of District Rule 3.1. [District Rule 3.1, §301.1]

No person shall operate any facility, article, machine, equipment, or other contrivance, for which an authorization to construct is required by District Rules and Regulations without first obtaining a written permit from the APCO. [District Rule 3.1, §302.1]

No person shall operate any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, without obtaining a permit from the APCO or the Hearing Board. [District Rule 3.1, §302.2]

The owner or operator of any facility, article, machine, equipment, or other contrivance for which a permit to operate is in effect shall notify the District office whenever a breakdown, malfunction, or operational upset condition exists which would tend to increase emissions of air pollutants or whenever any operating condition contrary to any provision of the permit to operate exists. Such notice shall be given to the District no later than four hours after occurrence during regular workday hours or no later than two hours of the

District workday following an occurrence not during regular District workday hours. The notice shall provide the District information as to causes and corrective action being taken, with a schedule for return to required operating conditions. [District Rule 3.1, §405.3]

RULE 3.4 New Source Review

Rule Description

This rule applies to all new stationary sources and emissions units and all modifications to existing stationary sources and emissions units which are subject to Rule 3.1 (General Permit Requirements), and which, after construction or modification, emit or may emit any affected pollutants. This rule shall not apply to prescribed burning of forest, agriculture or range land, road construction or any other non-point source common to timber harvesting or agricultural practices. The purpose of this rule is to provide for the review of new and modified stationary air pollution sources and to provide mechanisms, including emission offsets, by which authorities to construct such sources may be granted without interfering with the attainment or maintenance of ambient air quality standards.

Compliance Status

The source has satisfied the provisions of New Source Review (NSR) and the applicable requirements are contained in ATC C-07-164. The NSR requirements are shown below:

Permit Conditions

Permitted Emission Limits:

The fugitive VOC emissions from landfilling operation of P-15-05(a) shall not exceed 133.7 lb/day, 12,032 lb/1st calendar quarter, 12,165 lb/2nd calendar quarter, 12,299 lb/3rd calendar quarter, 12,299 lb/4th calendar quarter, and 24.40 tons/year. [District Rule 3.4/C-07-164]

Permitted Process Limits:

The amount of waste received into the landfill shall not exceed 1,800 tons/day, 161,550 tons/1st calendar quarter, 161,550 tons/2nd calendar quarter, 161,550 tons/3rd calendar quarter, 161,550 tons/4th calendar quarter, and 646,200 tons/year. [District Rule 3.4/C-07-164]

Applicable Requirements:

The Permit Holder shall not discharge into the atmosphere from any single source of emissions whatsoever, any air contaminant for a period or periods aggregating more than three (3) minutes in any one (1) hour which is:

- a. As dark or darker in shade than No. 1 on the Ringelmann Chart; or
- b. Greater than 20% opacity. [District Rule 3.4/C-07-164]

The Permit Holder shall perform surface emission testing using a portable hydrocarbon detection test instrument to measure the surface emission concentrations of the landfill and gas collection system. The instrument shall be calibrated before and after each test using zero air and an approximately 500 ppmv methane based standard calibration gas in accordance with the manufacturer's recommendations. The instrument serial number and instrument calibration data shall be recorded for each calibration and maintained as a permanent record. [District Rule 3.4/C-07-164]

The Permit Holder or operator shall perform the surface emission monitoring using the following procedure:

- a. The detector is to be held within three (3) inches of the surface while walking a pattern of parallel paths not more than 90 feet apart over:
 - i. the entire surface area of the landfill site which contains buried refuse;
 - ii. the gas transfer path of the gas collection system;
 - iii. cracks, holes and other breaches in the solid waste disposal site cover; and
 - iv. the WMU perimeters (i.e. accessible areas where buried waste interfaces with undisturbed native soil).
- b. The operator shall monitor the instrument readings at least once every 30 seconds, at normal walking speed (approximately 2 miles per hour), record only the readings that exceed 500 ppmv, and geographically locate the specific area on the landfill surface where the exceedances occur.
- c. Sampling is not required on steep slopes or other areas posing an unavoidable hazard to testing personnel.
- d. Average wind speed shall be determined on a ten-minute average using an on-site anemometer.
- e. Testing shall be terminated when the average wind speed exceeds five (5) miles per hour, or the instantaneous wind speed exceeds ten (10) miles per hour.

- f. Testing shall be conducted when there has been no rain for 72 hours prior to the testing event and no rain is falling. [District Rule 3.4/C-07-164]

The Permit Holder shall perform surface emission testing at the landfill at least once every six (6) consecutive calendar months. The Permit Holder may reduce the testing frequency to a twelve (12) consecutive calendar month period, after the completion of two (2) successive semi-annual tests without an exceedance of the 500 ppmv standard, other than non-repeatable momentary readings. Subsequent exceedances of the 500 ppmv emission concentration shall result in the re-establishment of the six (6) month testing frequency. A non-resettable momentary reading shall be defined as a portable hydrocarbon detection test instrument reading which persist for less than five (5) seconds and does not recur when the sampling probe is placed in the same location. [District Rule 3.4/C-07-164]

The Permit Holder shall install and operate a biofilter that serves the anaerobic digester cell located on WMU 6D-Phase 2 during aerobic composting phase of the waste. [District Rule 3.4/C-07-164]

The Permit Holder shall only mine (e.g. excavate, reclaim, etc.) and sort waste from the aerobic bioreactor cell located in WMU 6D-Phase 1 (WMU 6D-1) and anaerobic digester cell located in WMU 6D-Phase 2 (WMU 6D-2). The mining operations shall only be allowed for waste cells that meet the following criteria:

- a. Waste cells not used in the disposal of asbestos-containing materials;
- b. Waste cells that have achieved the end of their landfill gas production cycle as determined through long term gas sampling and/or emission modeling using EPA's LandGEM program or other approved modeling software;
- c. Waste cells that have not had leachate or other liquids circulated within the cell for more than one (1) calendar year; and
- d. Any other specifications determined significant by the District. [District Rule 3.4/C-07-164]

Whenever buried solid waste is brought to the surface during the installation or preparation of wells, trenches, piping, or other equipment or when landfill solid waste is excavated or moved, the Permit Holder shall cover the excavated solid waste using fresh soil, plastic sheeting, or vapor retarding foam as necessary in order to prevent odorous emissions and to minimize the release of landfill gas. [District Rule 3.4/C-07-164]

The Permit Holder shall monitor the landfill gas emissions from any open faces, active mining surfaces, and/or any liquids present during the mining of a waste cell in order to determine that the NMOC surface emission concentration limit of 500 ppmv (measured as methane) is not exceeded. [District Rule 3.4/C-07-164]

The Permit Holder shall perform surface emission monitoring of the mined cells using the methods contained in 40 CFR Part 60.755(c)(3) at start-up and at least once every fourteen (14) days thereafter. [District Rule 3.4/C-07-164]

The District must be notified prior to any NMOC related sampling event and a protocol must be submitted for approval fourteen (14) days prior to sampling. The results of a sampling event shall be submitted to the District within sixty (60) days of the sample date. The protocol and report shall be mailed to the attention of the Supervising Air Quality Engineer. [District Rule 3.4/C-07-164]

The Permit Holder shall maintain records of all surface emissions tests that include the time, weather conditions, areas sampled, areas not sampled due to steep slopes or other safety hazards, portable hydrocarbon detection test instrument calibration records, and emission test results. [District Rule 3.4/C-07-164]

The Permit Holder shall maintain daily records (in tons) of the total amount of MSW accepted at the landfill. [District Rule 3.4/C-07-164]

The Permit Holder shall maintain daily records (in tons) of the amount of MSW placed in the anaerobic bioreactor portions of the landfill until such time that placement has permanently ceased. [District Rule 3.4/C-07-164]

RULE 3.8 Federal Operating Permits

Rule Description

This rule implements the requirements of Title V of the Federal Clean Air Act (CAA) as amended in 1990 for permits to operate. Title V provides for the establishment of operating permit programs for sources which emit regulated air pollutants, including attainment and non-attainment pollutants.

Compliance Status

The source is in compliance with the requirements of this rule. The source was issued an initial Title V operating permit on March 7, 2006. The source

currently has one application for Authority to Construct being processed according to the District's Enhanced NSR guidelines in District Rule 3.4, Section 404. The District Enhanced NSR program provides that if the provisions of District Rule 3.8, Federal operating Permits are followed at the time of District Permit for construction, including noticing requirements, then the changes to the Title V Permit are administrative changes after the construction is completed and the District permit is issued.

Per Section 228.5 of the rule, the proposed change is a significant permit modification because it involves a case by case determination of several emission standards. This significant permit modification requires that the District provide notice of and opportunity to review the proposed changes in accordance with the requirements of Section 409.1 of the rule.

Permit Conditions

Right of Entry:

The permit shall require that the source allow the entry of the District, California Air Resources Board, or U.S. EPA officials for the purpose of inspection and sampling, including:

- a. Inspection of the stationary source, including equipment, work practices, operations, and emissions-related activity;
- b. Inspection and duplication of records required by the permit to operate; and
- c. Source sampling or other monitoring activities. [District Rule 3.8, §302.10]

Compliance with Permit Conditions:

The Permit Holder shall comply with all Title V permit conditions. [District Rule 3.8, §302.11(a)]

The permit does not convey property rights or exclusive privilege of any sort. [District Rule 3.8, §302.11(b)]

Non-compliance with any permit condition is grounds for permit termination, revocation and re-issuance, modification, enforcement action, or denial of permit renewal. [District Rule 3.8, §302.11(c)]

The Permit Holder shall not use the "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for non-compliance with any permit condition. [District Rule 3.8, §302.11(d)]

A pending permit action or notification of anticipated non-compliance does not stay any permit condition. [District Rule 3.8, §302.11(e)]

Within a reasonable time period, the Permit Holder shall furnish any information requested by the APCO, in writing, for the purpose of determining:

- a. Compliance with the permit; or
- b. Whether or not cause exists for a permit or enforcement action. [District Rule 3.8, §302.11(f)]

Emergency Provisions:

Within two weeks of an emergency event, the owner or operator shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:

- a. An emergency occurred;
- b. The Permit Holder can identify the cause(s) of the emergency;
- c. The facility was being properly operated at the time of the emergency;
- d. All steps were taken to minimize the emissions resulting from the emergency;
- e. Within two (2) working days of the emergency event, the Permit Holder provided the District with a description of the emergency and any mitigating or corrective actions taken; and

In any enforcement proceeding, the Permit Holder has the burden of proof for establishing that an emergency occurred. [District Rule 3.8, §302.12]

Severability

If any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgement shall not affect or invalidate the remainder of these conditions. [District Rule 3.8, §302.13]

Compliance Certification

The responsible official shall submit a compliance certification to the U.S. EPA and the APCO every twelve (12) months unless required more frequently by an applicable requirement. [District Rule 3.8, §302.14(a)]

The compliance certification shall identify the basis for each permit term or condition (e.g. specify the emissions limitation, standard, or work practice) and a means of monitoring compliance with the term or condition consistent with Sections 302.5, 302.6, and 302.7 of Rule 3.8. [District Rule 3.8, §302.14(b)]

The compliance certification shall include a statement of the compliance status, whether compliance was continuous or intermittent, and method(s) used to determine compliance for the current time period and over the entire reporting period. [District Rule 3.8, §302.14(c)]

The compliance certification shall include any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to Sections 114(a) and 504(b) of the Federal Clean Air Act. [District Rule 3.8, §302.14(d)]

Permit Life:

The Title V permit shall expire five (5) years from the date of issuance. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted. [District Rule 3.8, §302.15]

Payment of Fees:

An owner or operator shall pay the appropriate Title V permit fees on schedule. If fees are not paid on schedule, the permit is forfeited. Operation without a permit subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to Section 502(a) of the CAA. [District Rule 3.8, §302.16]

Permit Revision Exemption:

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit. [District Rule 3.8 §302.22]

Application Requirements:

An owner or operator shall submit a standard District application for renewal of the Title V permit, no earlier than eighteen (18) months and no later than six (6) months before the expiration date of the current permit to operate. [District Rule 3.8, §402.2]

An owner or operator shall submit a standard District application for each emissions unit affected by a proposed permit revision that qualifies as a significant Title V permit modification. The application shall be submitted after obtaining any required preconstruction permits. Upon request by the APCO, the owner or operator shall submit copies of the latest preconstruction permit for each affected emissions unit. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. [District Rule 3.8, §402.3]

An owner or operator shall submit a standard District application for each emissions unit affected by the proposed permit revision that qualifies as a minor permit modification. The application shall be submitted after obtaining any required preconstruction permits. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. In the application, the owner or operator shall include the following:

- a. A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply;
- b. Proposed permit terms and conditions; and
- c. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. [District Rule 3.8, §402.4]

Permit Reopening for Cause:

Circumstances that are cause for reopening and revision of a permit include, but are not limited to, the following:

- a. The need to correct a material mistake or inaccurate statement;
- b. The need to revise or revoke a permit to operate to assure compliance with applicable federal requirements;
- c. The need to incorporate any new, revised, or additional applicable federal requirements, if the remaining authorized life of the permit is three (3) years or greater, no later than eighteen (18) months after the promulgation of such requirement (where less than three (3) years remain in the authorized life of the permit, the APCO shall incorporate the requirements into the permit to operate upon renewal); or
- d. Additional requirements promulgated pursuant to Title IV as they become applicable to any acid rain unit governed by the permit. [District Rule 3.8, §413.1]

Monitoring, Testing and Analysis:

No additional monitoring, testing and analysis is required.

Recordkeeping:

The Permit Holder shall record maintenance of all monitoring and support information required by any applicable federal requirement, including:

- a. Date, place, and time of sampling;
- b. Operating conditions at the time of sampling;
- c. Date, place, and method of analysis; and
- d. Results of the analysis. [District Rule 3.8, §302.6a]

The Permit Holder shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of sample collection, measurement, report, or application. [District Rule 3.8, §302.6(b)]

Reporting Requirements:

Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be promptly reported to the APCO. For the purpose of this condition prompt means as soon as reasonably possible, but no later than ten (10) days after detection. [District Rule 3.8, §302.7(a)]

A monitoring report shall be submitted at least every six (6) months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7. a of Rule 3.8. [District Rule 3.8, §302.7(b)]

All reports of deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. [District Rule 3.8, §302.7(c)]

Each monitoring report shall be accompanied by a written statement from the responsible official that certifies the truth, accuracy, and completeness of the report. [District Rule 3.8, §302.7(e)]

40 CFR Part 60, Subpart A General Provisions

Rule Description

The subpart establishes a source's notification, testing, and compliance reporting requirements in respect to the listed New Source Performance Standards (NSPS) of Section 60.4.

Compliance Status

The regulation applies to any affected facility that is subject to the NSPS regulations listed in the 40 CFR Part 60, Subpart A. Specifically, the notification, testing, and compliance standards listed in Subpart A are superseded by the applicable requirements of Subpart WWW (40 CFR Part 60.750). Since the source is not yet subject to the control device provisions of Section 60.752(b)(2) of Subpart WWW, the source is not subject to the general design and operational requirements for control devices contained in Section 60.18 of Subpart A.

Permit Conditions

No permit conditions are required.

40 CFR Part 60, Subpart Cc Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills

Rule Description

The subpart establishes emission guidelines for existing MSW landfills for which construction, reconstruction, or modification was commenced before May 30, 1991.

Compliance Status

As previously discussed in the Rule 2.38 section, YCCL's proposed modification will make the landfill subject to the requirements of 40 CFR Subpart WWW. As such, the requirements of this regulation no longer apply to the source.

40 CFR Part 60, Subpart WWW Standards of Performance for Municipal Solid Waste Landfills

Rule Description

The subpart establishes emission guidelines for existing MSW landfills for which construction, reconstruction, or modification was commenced on or after May 30, 1991.

Compliance Status

The source is subject to the requirements of this regulation, since the facility's most recent proposed modification (to be authorized by ATC C-07-164) will occur after May 1991.

Section 60.752(b) of the Subpart, requires that sources shall either: (1) comply with the requirements for a landfill with an emission rate over 50 Mg/year; or (2) calculate a NMOC emission rate using site specific data and testing (procedures specified in Section 60.754). If the calculated emission rate is determined to be less than 50 Mg/year, Section 60.752(b)(1) requires that the source submit an annual emission report, and recalculate the NMOC emission rate annually (or every 5 years as allowed by Section 60.757(b)(ii)). If the calculated emissions rate ever exceeds 50 MG/year, Section 60.757(b)(1)(ii)(A) requires that the source then install and operate a compliant gas collection and control system. Lastly, Section 60.757(a) requires landfills submit an initial capacity design report, and Section 60.758(a) requires the source to document the design capacity report, the current amount of in-place waste, and the year-to-year waste acceptance rate. The recordkeeping provisions of Section 60.758(a), require that all records be kept on-site, readily accessible, and retained for at least five (5) years.

As part of the information required to process ATC application C-03-226, YCCL submitted the site's initial capacity design report in March 2004. In response to the landfill's capacity increase, Appendix K of YCCL's 2007 Joint Technical Document amends this previous report. Based on the Tier 2 testing results submitted in January 2004, the estimated NMOC emission rate for the landfill was 11.55 Mg/year. These results were reviewed by District staff and approved in a letter dated March 24, 2004. As of the time of this evaluation, the source had not yet submitted the 2008 Tier 2 testing results. It is expected that the landfill's NMOC emissions remain under the 50 Mg/year threshold. As such, YCCL will continue to be subject to the sampling, testing, and reporting requirements of this Subpart, while exempt from the specific landfill gas collection and control requirements.

Permit Conditions

Upon achieving a calculated NMOC emission rate of 50 megagrams or greater per year, the Permit Holder shall comply with the requirements of 40 CFR Part 60.752(b)(2). [District Rule 3.4 and 40 CFR Part 60.752(b)(2)/C-07-164]

Except for active disposal areas, or areas undergoing maintenance, repair, modification or closure, the surface emissions at any point on the surface of the landfill or along the gas transfer path of the gas collection system shall not exceed a NMOC concentration of 500 ppmv (measured as methane). Any reading of 500 ppm or more above background at any location shall be recorded as a monitored exceedance and the actions specified in 40 CFR Part 60.755(c)(4)(i) through (c)(4)(v) shall be taken by the owner or operator of the gas collection system. As long as the specified actions are taken, the exceedance is not a violation of the operational requirements of this permit or 40 CFR Part 60.753(d). [District Rule 3.4 and 40 CFR Part 60.755(c)(4)/C-07-164]

The Permit Holder shall submit a NMOC report to the District using the procedures specified in 40 CFR Part 60.754(a) at least once every twelve (12) months, except as provided in 40 CFR Part 60.757(b)(1)(ii) or 40 CFR Part 60.757(b)(3). [District Rule 3.4 and 40 CFR Part 60.752(b)/C-07-164]

Streamlining Demonstration

The recordkeeping provisions of Section 60.758(a), require that all records be kept on-site, readily accessible, and retained for at least five (5) years. The subpart's retention requirement is streamlined as follows:

Streamlined Requirement: Except as provided in Section 60.752(b)(2)(i)(B), each owner or operator of an MSW landfill subject to the provisions of Section 60.752(b) shall keep for at least 5 years up-to-date, readily accessible, on-site records of the design capacity report which triggered Section 60.752(b), the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable.

The Permit Holder shall maintain daily records (in tons) of the total amount of MSW accepted at the landfill. [District Rule 3.4/C-07-164]

The Permit Holder shall maintain all records on site for a period of five (5) years from the date of entry and these records shall be made readily available to District personnel upon request. [District Rule 3.8, §302.6(b)/C-07-164]

Therefore, the recordkeeping requirements of Subpart WWW have been streamlined by the requirements of District Rule 3.4 and Rule 3.8.

40 CFR Part 61, Subpart M National Emission Standards for Asbestos

Rule Description

The provisions of this subpart apply to each owner or operator of an active waste disposal site that receives asbestos-containing waste material from a source covered under Sections 40 CFR Part 61.149, 61.150, or 61.155.

Compliance Status

The source is subject to this subpart because they receive non-friable asbestos containing waste from construction and demolition sources. The site's Waste Discharge Requirements (WDRs) approved in December 2007, by the California Regional Water Quality Control Board (Order No. R5-2007-0180) prohibits the landfill from accepting any waste containing friable asbestos. Specifically, because the facility only disposes of the asbestos containing waste (e.g. is not a mill, an applicator, or a manufacturer of asbestos), it is subject only to the requirements of Section 61.154.

Section 61.154(a) requires that there be no visible emissions to the outside air from any active waste disposal site where asbestos containing waste material has been deposited, except as allowed by Section 61.154(c) or (d). Because Section 61.154(b) pertains to fencing and warning sign requirements not specifically relating to air quality requirements, the conditions of the section will not be listed on the permit. Also, Sections 61.154(e), (i) and (j), require specific noticing and records be maintained on site covering the acceptance, disposal, and mining of waste at the facility (see 2007 JTD, Appendix E). The source is currently in compliance with this subpart.

Permit Conditions

The Permit Holder shall comply with the applicable requirements for active disposal sites for asbestos-containing materials as set forth in 40 CFR Part 61, Subpart M - National Emission Standard for Asbestos. [40 CFR Part 61.140]

40 CFR Part 63, Subpart A National Emission Standards for HAP's, General Provisions

Rule Description

The subpart establishes the general provisions for major sources of HAP's.

Compliance Status

The regulation applies to any source that emits or has the potential to emit 10 tons per year or more of any single HAP, or 25 tons per year or more of any combination of HAPs. Under the proposed design capacity and waste acceptance rate, the source's HAP emissions are not expected to exceed 10 tons of any single HAP or 25 tons of any combination of HAPs prior to the landfill's closure in 2080. As such, the landfill is not subject to this regulation.

Permit Conditions

No permit conditions are required.

40 CFR Part 63, Subpart AAAA Municipal Solid Waste Landfills

Rule Description

The subpart establishes HAP emission standards for certain landfills. Per Section 63.1935, this subpart applies to all existing or new MSW landfills that have accepted waste since November 8, 1987, and that satisfy at least one of the following conditions:

- a. The landfill is a major source of HAPs that emits any single HAP above 10 tons per year, or any combination of HAPs above 25 tons per year (as defined in 40 CFR Part 63.2);
- b. The landfill is collocated with a major source of HAPs;
- c. The landfill is an area source with a design capacity equal to or greater than 2.5 million megagrams and an NMOC emission rate equal to or greater than 50 megagrams per year; or
- d. The landfill is an area source with a design capacity equal to or greater than 2.5 million megagrams and operates a bioreactor(s) (as defined in Section 63.1990).

Compliance Status

Section 63.1990 of this subpart defines a bioreactor as "a MSW landfill or portion of a MSW landfill where any liquid other than leachate (leachate includes landfill gas condensate) is added in a controlled fashion into the waste mass (often in combination with recirculating leachate) to reach a minimum average moisture content of at least 40% by weight, calculated on a wet weight basis, to accelerate or enhance the anaerobic (without oxygen) biodegradation of the waste."

As evaluated in ATC C-07-164:

- a. The landfill does not currently emit more than 10 tons of a single HAP, or 25 tons of any combination of HAPs;
- b. The landfill is not collocated with a major source of HAPs;
- c. Has a design capacity above 2.5 million megagrams, but is not expected to exceed an NMOC emission rate of 50 Mg per year prior to closure; and
- d. The landfill is not permitted to operate any bioreactor (conventional or non-conventional) waste cells with a moisture content exceeding 40%.

As such, YCCL is not subject to the requirements of this subpart.

In order to ensure that the facility is not subject to this subpart, the District will require the following:

- a. The landfill is prohibited from achieving an average moisture content of 40% or greater (by weight) in any conventional or non-conventional bioreactor cell installed at the facility; and
- b. The landfill must verify the moisture content of an affected cell through the required monitoring and reporting the moisture contents (on a six month basis).

Permit Conditions

The Permit Holder shall operate the anaerobic bioreactor portions of the landfill with an average moisture content of less than 40% by weight. [District Rule 3.4/C-07-164]

The Permit Holder shall submit a moisture report to the District for the anaerobic bioreactor portions of the landfill documenting the average moisture content by weight using the procedures specified in 40 CFR Part 63.1980(g) and (h) or other District approved methods. [40 CFR Part 63.1947/C-07-164]

The Permit Holder shall submit the moisture report to the District for the anaerobic portions of the landfill, in accordance with 40 CFR 63.1980, at least once every six (6) months until such time that liquid addition has permanently ceased.

40 CFR Part 82, Subpart F Protection of Stratospheric Ozone

Rule Description

The subpart requires that these ozone depleting substances be properly removed and handled prior to the equipment being disposed of at the site.

Compliance Status

The source is subject to this subpart because the site accepts certain affected appliances and equipment containing ozone depleting substances. As such, the permit will list a condition that the facility comply with the requirements of this subpart.

Permit Conditions

The Permit Holder shall comply with the applicable requirements for the handling and the disposal of the affected appliances and equipment containing ozone depleting substances, as set forth in 40 CFR Part 82, Subpart F - Recycling and Emission Reduction. [40 CFR Part 82.150/C-07-164]