

TITLE V OPERATING PERMIT STATEMENT OF BASIS

Facility Name: Otay Landfill Inc.
Title V Application Number: APCD2013-APP-002521
Facility ID: APCD1989-SITE-07494
Equipment Address: 1700 Maxwell Rd., Chula Vista, CA
Facility Contact: Tom Gardner
Contact Phone: (619) 449-9156
Permit Engineer: Doug Erwin
Date Completed: 12/10/13

1.0 Purpose/Introduction

The associated permit action is a renewal of the facility's Title V permit and incorporation of the District permit for a demolition materials screen. This statement of basis describes a non-hazardous solid waste landfill and associated screen for onsite processing of construction demolition materials. Below is a listing of the facility emission units/District permits.

Permit Number	Source Category
971112	Active Landfill
000826	Demolition Materials Process Screen

2.0 Permit History

The landfill has been operating under a Title V permit for some years, and it is subject to 40 Code of Federal Regulation (CFR) 60 Subpart WWW *Standards of Performance for Municipal Solid Waste Landfills* (§§60.750 – 60.759), which requires Title V permitting at specific thresholds of landfill capacity mass and volume. The facility was issued a District authority to construct (ATC) and permit to operate (PTO) for each of its existing emission units.

3.0 Facility Description

The facility comprises a non-hazardous solid waste landfill and an associated screen for the processing of construction demolition materials. The landfill has surpassed the waste

volume and/or mass thresholds given in Subpart WWW that require Title V permitting. Additionally, as part of its landfill gas capture and control systems, the facility is equipped with two (2) flares through which the captured gas is routed.

The following table summarizes annual emissions from this facility based on the District’s 2011 emissions inventory (EI). The District’s EI estimates actual facility air emissions.

Emissions Summary (as reported for 2011)	
Criteria Pollutants	tons/yr
NOx	34.2
VOC	6.2
PM10	169
SO2	6.3
CO	1.6
Total Federal HAPs	7.92

4.0 Primary Regulatory Consideration(s)

Emissions of landfill gas comprising mainly methane and non-methane organic compounds (NMOC) account for the bulk of air emissions from the landfill. As mentioned above, the landfill is subject to federal standards. These and other applicable requirements are discussed in the following section.

The construction materials processing screen results in emissions of particulate matter and is therefore subject to the suite of District rules addressing PM as well as NSR under District Rule 20.2 (most notably) and other rules as discussed in the following section.

5.0 Applicable Regulations

Federal Rules: NSPS and NESHAP

The landfill is subject to the New Source Performance Standards (NSPS) at 40 CFR 60 Subpart WWW – *Standards of Performance for Municipal Solid Waste Landfills* (§§ 60.750 – 60.759), which include the general requirements of Subpart A. The permittee has designed, installed and now operates a landfill gas collection and control system (CCS) pursuant to § 60.752(b) of this rule. The permit includes conditions pertaining to the CCS, as well as the other applicable requirements under this rule.

The landfill is also subject to the requirements of 40 CFR 63 Subpart AAAA (§§ 63.1930 – 63.1990) – *National Emission Standards for Hazardous Air Pollutants (NESHAP): Municipal Solid Waste Landfills*. Compliance with the NESHAP is met in large part by complying with the NSPS pursuant to § 63.1955(a). The permit includes conditions requiring compliance with this rule.

The facility is also subject to 40 CFR 63 Subpart ZZZZ – *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE)* for onsite stationary RICE with a power rating less than 50 brake horsepower. Provisions are included in the body of the Title V permit to ensure compliance with applicable requirements under this rule. Because of their size, requirements applicable to these engines are limited to periodic maintenance and record-keeping.

17 CCR Subarticle 6 (AB 32)

California’s greenhouse gas rule pertaining to landfills addresses methane emissions and its provisions borrow extensively from the federal rules discussed above. This rule is commonly referred to as AB 32 – the legislative bill that prefaced its development. Because of the distinctions between this rule and the aforementioned federal landfill rules, conditions for Subarticle 6 are listed almost entirely separate in the permit, beginning at Condition 48 of permit APCD2009-PTO-971112. The permittee is expected to comply with this rule through the same mechanisms it complies with 40 CFR Subpart WWW.

District Rules

District Rules 50 (visible emissions), 52 (particulate matter), 53 (specific air contaminants), 59 (control of waste disposal site emissions) and 62 (sulfur content of fuels) apply to the landfill, and conditions are included in the permit covering these rules. District Rules 20.2 (New Source Review, NSR) and 50 (visible emissions) apply to the construction materials screen, and conditions are included in the permit covering these rules.

Compliance Assurance Monitoring

Compliance Assurance Monitoring (CAM) applicability was considered for this review pursuant to 40 CFR Part 64. Sources that are subject to emissions standards under either Section 111 or 112 of the federal Clean Air Act (CAA) are exempted at § 64.2(b)(1)(i). As discussed above, the landfill is subject to emissions standards under both Sections 111 and 112 (NSPS and NESHAP). Moreover, other applicability criteria are not met at the landfill, most notably, the one pollutant for which the site is a major source (one of the applicability criteria), PM10, is not controlled with an emissions reduction device to meet any applicable emissions standard (another applicability criteria) pursuant to § 64.2(a)(2). On these bases, the landfill is not subject to CAM.

6.0 Permit Shield

Pursuant to District Rule 1410(p) and 40 CFR § 70.6(f), a Title V permit may include a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the permit issuance date. The

applicant requested a permit shield for this renewal, therefore one is not included in the permit.

7.0 Outside Review

In accordance with District Rule 1415, the District will provide notice to the public and notice to the Environmental Protection Agency - Region 9.

8.0 Conclusions / Recommendations

The applicant is expected to comply with all applicable requirements including those cited in the current District permits and those under District Rule 1401 and Title V. Therefore, the recommendation of this report is for the subject Title V permit renewal to be issued following public notice and EPA review.