STATEMENT OF BASIS
Title V Permit Renewal

Facility Name:	City of San Diego: Miramar Landfill
Title V Application Number:	APCD2020-APP-006545
Title V Permit Number:	APCD2002-TVP-961006
Facility ID:	APCD1989-SITE-07515
Equipment Address:	5180 Convoy Street, San Diego, CA 92111
Facility Contact:	Luis Campos
Contact Information:	(858) 492 5035 LCampos@sandiego.gov
Permit Engineer:	Andrew Bernabe
Date:	5/7/2026
Date Reviewed:	5/7/2026
Senior Engineer:	5/7/2026 X Nicholas Horres Nicholas Horres Senior Engineer Signed by: e933f2c8-9225-4b84-9a71-81071ff0330b

Purpose of Statement of Basis – Title V Permit Renewal plus other changes below:

1. **Type of action and summary of changes**

   The applicant requests issuance of a renewal Title V permits for different operations at Miramar Landfill (Title V permits APCD2002-TVP-961006 associated with APCD1989-SITE-07515, and APCD2009-TVP-974746 associated with APCD1996-SITE-09779). The facility is subject to Title V permitting because it is subject to 40 CFR 60 Subpart XXX (NSPS XXX) and 40 CFR 63 Subpart AAAA (NESHAP AAAA) and is a major source.

   In addition to the renewal, this action also includes a minor modification related to an expansion of the landfill, and revisions to permit conditions implementing the newly applicable requirements of NESHAP AAAA.

2. **History of Title V Applications and District Modification Applications Since Previous Renewal.**

The renewal application was received on November 20, 2020. The Title V permit expires on December 4, 2021. This renewal application was submitted at least 12 months but not more than 18 months prior to permit expiration, in accordance with Rule 1410. The application therefore is timely.

The history of District modifications since the last renewal consists of the application in the table below. The application was submitted under the District's local permitting program and is associated with a corresponding Title V application.

Application History for District Permits Since Last Renewal – APCD1989-SITE-07515:				
Application Number	Description	Related Title V App	Affected Emission Units	Outcome
APCD2019-APP-005746	New Portable Diesel generator powering Aerated Static Pile System (Green Waste Facility)	NA (non-road engine not subject to Title V)	Portable Generator	Approved
APCD2019-APP-006142	Landfill Expansion: increase of maximum height/volume of allowed Waste in Place	APCD2023-APP-007673	Approved	Open
APCD2020-APP-006225	Replacement Portable diesel generator to power the aerated static pile system to replace existing permitted generator.	NA (non-road engine not subject to Title V)	Portable Generator	Approved
APCD2021-APP-006835	Replacement of the engine under APCD2019-PTO-003354	NA (non-road engine not subject to Title V)	Approved	Approved
APCD2021-APP-006837	Replacement of the prime diesel engine permitted under APCD2013-PTO-001898 powering wood screen	NA (non-road engine not subject to Title V)	Approved	Approved

APCD2022-APP-007492	New Prime Diesel engine powering exempt track-mounted horizontal grinder	NA (non-road engine not subject to Title V)	Approved	Approved
APP2025-APP-008615	New Tier 4F non-emergency diesel engine powering a coloring trommel machine	NA (non-road engine not subject to Title V)	Approved	Approved

Note: No new applications for District Permits since 2011 for APCD1996-SITE-09779.

The following table lists applications at this facility to modify the Title V permit including the last renewal application.

Application History for Title V Permit APCD2002-TVP-961006			
Application Number	Application Description	Equipment	Approved?
APCD2018-APP-005364	Administrative Amendment: Change of Responsible Official	N/A	Yes
APCD2018-APP-005736	Administrative Amendment: Change of Responsible Official	N/A	Yes
APCD2019-APP-005745	Minor Modification – Installation of equipment under APP-005746	Portable Generator	Cancelled (originally was thought to not be required, but changes are being included in this renewal after reconsideration and determination that some requirements for nonroad engines are federally applicable requirements – specifically 69.4.1 and NSR-related requirements)
APCD2020-APP-006545	Renewal	Entire TVP	Pending – Current action
APCD2021-APP-006836	502(b)(10) Change – Replacement Engine	Diesel Engine	Cancelled (included in this renewal now, for reason listed above for nonroad engines)

APCD2021-APP-006838	502(b)(10) Change – Replacement Engine	Diesel Engine	Cancelled (included in this renewal now, for reason listed above for nonroad engines)
APCD2023-APP-007673	Minor Modification: Increase of Waste in Place Capacity	Active Landfill	Pending – Incorporated with current action
APCD2025-APP-008616	Minor Modification: Incorporate New Tier 4F Engine into Title V Permit	Diesel Engine	Yes

Application APCD2019-APP-005745 was for the installation of the engine under current permit APCD2019-PTO-003354, as were APCD2021-APP-006836 and APCD2021-APP-006838, which affected permits APCD2019-PTO-003354 and APCD2013-PTO-001898. After review, while these are non-road engines from which emissions are not included as part of the Title V major stationary source as specified in Rule 1401(c)(26), applicable requirements for these engines are included in the Title V permit, including the emission-unit specific permits in Appendix A.

Application History for Title V Permit APCD2009-TVP-974746			
Application Number	Application Description	Equipment	Approved?
APCD2018-APP-005637	Administrative Amendment: Ownership Change	N/A	Yes
APCD2019-APP-005735	Administrative Amendment: Responsible Official and Permit Information Contact	N/A	Yes
APCD2022-APP-007561	Renewal	Entire TVP	Current Action – To be incorporated into APCD2002-TVP-961006

3. Facility Description

Miramar Landfill is a municipal non-hazardous waste landfill site that includes two and one partial inactive (South, North, West Phase I) and one active landfill (West Phase II) sites, quarrying, municipal waste disposal, waste compaction, cover material application, haul road activities, green waste management, diesel engines and landfill gas flaring.
The Facility has an LFG management system constructed and operated in accordance with state and local regulations including those of the San Diego Air Pollution Control District (SDAPCD).

South Miramar Landfill is an inactive landfill and is not connected directly to the other landfills. It operates a separate collection grid and flare and is subject to different regulations since it has not accepted waste since 1972. It is permitted under SDAPCD PTO No. APCD2008-PTO-930483.

North Miramar Landfill is also an inactive landfill; however, it is connected to West Miramar Landfill which has an inactive portion (Phase I) and an active portion (Phase II). All areas of this section of the landfill are interconnected to the same collection grid, owned and operated by the City, and are considered one landfill for the purposes of rule applicability. The inactive sections of the landfills are permitted under SDAPCD PTO No. APCD2003-PTO-960630. The active section of West Miramar Landfill (Phase II), is permitted under SDAPCD PTO No. APCD2008-PTO-971254.

LFG from North and West Miramar Phases I and II is collected in a network of extraction wells and pipes which are connected to three separate gas control systems. One includes a thermal flare system operated by the Facility under its permit with the SDAPCD (North Miramar flar station); the other is an energy recovery facility (Minnesota Methane) that is operated by a third party under a separate permit. The gas is also sent to a third facility (North City Water Reclamation Plant) which also combusts landfill gas . The cogeneration facilities are the primary means of gas treatment and disposal. The flares are available to burn LFG in the event of cogeneration plant downtime or if the site has excess LFG. The North Miramar flare station handles gas flow from both North and Phase I and II of West Miramar.

The facility has the following active permits. The permits are broken up based on whether the equipment is subject to federally applicable requirements, with the non-road engines being local-only enforceable and not part of the Title V permit:

Federally Enforceable Permits:

SITE ID	Permit Number	Equipment Description
APCD1989-SITE 07515	APCD2007-PTO-985831	Komptech-Farwick Hurricane Air Knife Material Separator Used In Conjunction With A Wood Waste Trommel Screen. Powered By A Diesel Engine Operating Under PTO 982222.
APCD1989-SITE-07515	APCD2013-PTO-001894	Registration of Portable Gravel Screening Read Screen, Model CV-90-D, S/N 1506, Length 10', Width 6', rating 67.5 tons/hr.
APCD1989-SITE-07515	APCD2008-PTO-930483	South Miramar Landfill. An inactive landfill equipped with a gas collection, monitoring, and flare system consisting of collection wells, migration probes, an enclosed flare, and two blowers. South Flare – Manufacturer: Linklater; S/N: GF-3018; Rated Heat Input Capacity: 19.734 MMBTU/hr; Gas Throughput Capacity: 650 SCFM.

		Flare station control equipment shall include a flame arrestor, an optical flame detector, an automatic shut off device, an in-line oxygen analyzer, a flow meter, and a stack thermocouple.
APCD1989-SITE-07515	APCD2003-PTO-960630	A non-hazardous waste landfill operation that includes quarrying, municipal waste disposal, waste compaction, liner and cover material application and maintenance, and haul road activities conducted at one active location (West Phase II), and two inactive locations (West Phase I, North). Also includes a landfill gas collection and condensate management system consisting of multiple gas collection wells and all associated piping, valves, fittings, sample points, liquid pumps, liquid storage tanks, and landfill gas blower(s). Includes a landfill gas combustion system consisting of two enclosed ground flares (approximately 11 ft diameter and 38 ft height), each equipped with an optical flame detector, automatic shutoff valve, stack thermocouples, flame arrestor, and exhaust gas sampling ports. Flare A – Manufacturer: John Zink; Model: ZTOF; S/N: 901592701; Rated Heat Input Capacity: 91.08 MMBTU/hr; Gas Throughput Capacity: 3,000 SCFM. Flare B – Manufacturer: John Zink; Model: ZTOF; S/N: 901592701; Rated Heat Input Capacity: 91.08 MMBTU/hr; Gas Throughput Capacity: 3,000 SCFM. Flares equipped with monitoring equipment including in-line gas oxygen analyzer, a landfill gas flow meter, an exhaust gas stack temperature recorder, and a supplemental natural gas fuel supply. (950804-CCN-12/97) (APCD2011-APP-001687 DB 7/2011)
	APCD2013-PTO-001898	Prime Diesel Engine: Manufacturer: Perkins, Model: 1204F-E44TTAG2, Serial Number: MU82589*U024615F, Maximum rated (prime) horsepower: 157.4 bhp, Engine Family Number: LPKXL04.4MUI, Model Year: 2020, Tier 4 certified. Driving a wood screen. ATCM Portable
APCD1989-SITE-07515	APCD2014-PTO-001912	Prime Use Diesel Engine (ATCM Portable): John Deere; 4045HF285; Serial Number

		PE4045L027651; 158 bhp; Model Year 2007 EPA Certified, Tier 3, Engine Family Number 7JDXL06.8105; Driving an Electrical Generator - genset primarily powers a Wood Chip Colorizer, but can be detached for emergency use.
APCD1989-SITE-07515	APCD2014-PTO-001913	Prime-Use Diesel Engine (ATCM Portable): Caterpillar; Model C27; Serial Number RAM00189; 1050 bhp; Model Year 2013 EPA Certified, Tier 4i, Engine Family Number DCPXL27.0HZA; Powering a Tub Grinder
APCD1989-SITE-07515	APCD2016-PTO-002545	Prime-Use Diesel Engine (ATCM Portable): Caterpillar; Model C27; Serial Number RAM00114; 1050 bhp; Model Year 2011 EPA Certified, Tier 4i, Engine Family Number BCPXL27.0HZA.
APCD1989-SITE-07515	APCD2015-PTO-002461	Prime Use Diesel Engine (ATCM Portable): Caterpillar, Model C32; Serial Number NST 00140; 1200 bhp; Model Year 2014, EPA Tier 4 Final Certified, Engine Family Number ECPXL32.0HZA, Powering a Tub Grinder
APCD1989-SITE-07515	APCD2019-PTO-003354	Prime Diesel Engine: Caterpillar, Model C4.4, S/N J9G01265; Model Year 2020; Engine Family MPKXL04.4SUI; Tier 4 certified; 173.5 bhp rated; driving a 100 kW generator.
APCD1989-SITE-07515	APCD2024-PTO-004825	Prime Diesel Engine: Make: Caterpillar, Model: C32, S/N: BT400599, Maximum Horsepower Rating: 1200 bhp, Model Year: 2022, EPA Certification: Tier 4 Final, Engine family NCPXL32.0HXG; Driving an exempt track-mounted horizontal grinder.
APCD1989-SITE-07515	APCD2025-PTO-005260	Prime Diesel Engine: Make: Caterpillar; Model: C3.6; S/N: J3706903; Maximum Horsepower Rating: 134 BHP; Model Year: 2022; EPA Certification: Tier 4 Final; Engine Family: NPKXL03.6FX1; Powering trommel screen.

		2.5-inch diameter horizontal exhaust with open endpoint, exhausting 6.5 ft. above ground.

Local-only Enforeceable Registrations:

SITE ID	Permit Number	Equipment Description
APCD1996-SITE-09779	APCD2006-PTO-984491	Emergency standby engine: caterpillar diesel engine, model 3406CDITA, s/n 1LS01267, rated at 587 bhp, model year 2000, turbocharged, aftercooled, driving a generator.

4. Title V Applicability and Acid Rain

The Title V regulation applies to any stationary source that is a major stationary source as defined in Rule 1401(c)(26) or is subject to the acid rain provisions of Title IV of the federal Clean Air Act (CAA).

The District conducted a review of this facility's PTE. Based on an analysis of each permit, the facility is a major source of VOC, NOx, and HAP. It is therefore subject to Title V requirements. See the table below for detailed information on PTE.

Potential to Emit for this facility was calculated from existing permit limits and maximum equipment throughputs. Many of the permits reviewed do not have limitations on operation through permit conditions and potential to emit is based on maximum capacity. In some cases this leads to permits with very high potential to emit due to high capacity, or permits are inherently very low emitting so contribution to potential to emit is unknown, but not significant to total facility-wide PTE.

Additionally, since this action incorporates modifications to the Title V permit under applications previously submitted, the ability for each of these changes to qualify as the indicated application type was reviewed. Each application was found to meet the requirements of the indicated application type as described below. Supporting information for each application is contained in the attached documents as indicated which were prepared during initial evaluation of the change under the District/Local applications.

APCD2018-APP-005364 Administrative Amendment: Change of Responsible Official
Changes to responsible official are considered an acceptable administrative modification. The updated responsible official will be noted in the new permit.

APCD2018-APP-005736 Administrative Amendment: Change of Responsible Official
Changes to responsible official are considered an acceptable administrative modification. The updated responsible official will be noted in the new permit.

APCD2019-APP-005745 Minor Modification – Installation of equipment under APP-005746

This application was for the installation of a portable diesel generator used for landfill gas aeration. This change did not cause a violation of an applicable requirement, did not relax monitoring or recordkeeping requirements, did not affect permit terms which were accepted in order to avoid an applicable requirement, is not a modification under Title I of the Clean Air Act (CAA) and do not trigger federally mandated new source review, and do not trigger any requirements under CAA section 112(g). For these reasons, this application meets the requirements of a minor modification and inclusion of the operating permit into appendix A of the permit is included in this permit action.

APCD2021-APP-006836 502(b)(10) Change – Replacement Engine under APP-006835
This application replaced an existing prime diesel engine used for landfill gas aeration, with no other changes in operation proposed. This change meets the requirements of a (502)(b)(10) change since it does not contravene the express terms and conditions of a permit to operate, does not violate any applicable requirement, and does not affect monitoring requirements. Changes to this permit made under this application are included in the proposed draft operating permit.

APCD2021-APP-006838 502(b)(10) Change – Replacement Engine under APP-006837
This application replaced an existing prime diesel engine powering a wood screen, with no other changes in operation proposed. This change meets the requirements of a (502)(b)(10) change since it does not contravene the express terms and conditions of a permit to operate, does not violate any applicable requirement, and does not affect monitoring requirements. Changes to this permit made under this application are included in the proposed draft operating permit.

APCD2023-APP-007673 Minor Modification: Increase of Waste in Place Capacity
This application was for the vertical expansion of the landfill to increase its designed waste capacity. This change does not cause a violation of an applicable requirement, does not relax monitoring or recordkeeping requirements, does not affect permit terms which were accepted in order to avoid an applicable requirement, are not a modification under Title I of the Clean Air Act (CAA) and do not trigger federally mandated new source review, and do not trigger any requirements under CAA section 112(g). For these reasons, this application meets the requirements of a minor modification and inclusion of the operating permit into appendix A of the permit is included in this permit action.

5. Compliance History

Compliance History for the APCD1989-SITE-07515		
Violation Number	Violation Description	Status
APCD2016-NOV-000183, APCD2017-HBD-00030, APCD2017-NOV-000142, APCD2017-NOV-000226,	Causing a public nuisance due to odors from composting operations.	Resolved. Facility implemented control techniques such as application of odor suppressant to eliminate public nuisance.

APCD2018-HBD-00037		
APCD2017-NOV-000459, APCD2017-NOV-000605, APCD2018-NOV-000827, APCD2019-NOV-001057, APCD2020-NOV-000098, APCD2021-NOV-000545, APCD2022-NOV-000258, APCD2022-NOV-000475, APCD2023-NOV-000076, APCD2023-NOV-000745, APCD2023-NOV-000227, APCD2024-NOV-000356	Surface leaks exceeding 500 ppmv as methane were detected.	Resolved. Violations resulting from surface methane leaks detected during compliance inspections. Note that these would not typically be considered violations of federally applicable requirements because the applicable corrective actions were completed and the leaks eliminated as specified in the applicable federal rule (NSPS WWW/XXX or NESHAP AAAA).
APCD2018-NOV-000290	Failing to have the report certified by a responsible official; failing to submit the summary report for the second 6 months of 2017.	Resolved
APCD2018-NOV-000331	Failure to perform maintenance on Diesel engine	Resolved
APCD2018-NOV-000331	Failure to maintain a negative pressure within each gas extraction well.)	Resolved
APCD2019-NOV-001092	Installing and operating equipment, the use of which may cause the issuance of air contaminants without prior written authorization from the Air Pollution Control District. Specifically, for the unknown daily use of odor neutralizer	Resolved by facility obtaining authorization for such use.
APCD2020-NOV-000497	Three permitted engines had failed to conduct the periodic maintenance in the required timeframe, two pieces of permitted equipment exceeded their allowed daily engine operation run time for a total of 5 days.	Resolved.
APCD2021-NOV-000172	Exceeding the limit specified in 95465(a)(2) average concentration less than 25 ppmv as methane and	Exceedance of integrated surface monitoring standard now resolved.

	failing to achieve compliance no later than 120 calendar days after a third exceedance	
APCD2022-NOV-000258	Operating diesel replacement engine powering a wood screen approximately two and a half months before being permitted.	Resolved. Equipment was permitted.
APCD2023-NOV-000227	Failure to submit a minor permit modification application for the expansion.	Resolved. Facility was unaware that their ATC application is not also considered a Title V application.
APCD2023-NOV-000302	Failure to submit a report for the modification in the design capacity of the west Miramar landfill (the height was increased) and a report for the non-methane organic compound emission rate.	Resolved. This information was also submitted to SDAPCD as part of the expansion application prior to this violation.
APCD2023-NOV-000745	Installing/operating equipment (diesel engine) without District approval	Resolved. Equipment was permitted.
APCD2023-NOV-000861	Failing to pay annual fees in accordance with District Rule 40 for review of the 2021 Monitoring & Recordkeeping Summary Reports and Compliance Certification.	Resolved - Paid
APCD2024-NOV-000609	Operating a landfill gas collection system with methane emissions in exceedance of 500 ppmv	Resolved. Facility has taken remedial action by adding cover soil in areas of exceedances or increasing vacuum to local wells.
APCD2024-NOV-000772	Exceeding the limit specified in 95465(a)(2) average concentration less than 25 ppmv as methane	Resolved. facility has commenced construction on new wells and taken all other remedial actions necessary.
APCD2025-NOV-000094	Operating a landfill gas collection system with methane emissions in exceedance of 500 ppmv; installing unpermitted equipment	Resolved. Remedial action taken: adding soil around well casings; permit application submitted for the unpermitted equipment.
APCD2021-NOV-000347	Failure to submit the 2020 1st semi-annual NSPS report.	Resolved. Report submitted 5/10/2021.

APCD2024-NOV-000610	Operating an enclosed landfill gas flare which emits carbon monoxide (CO) in exceedance of 0.20 pounds per million Btu of heat input.	Facility has developed and implemented a compliance plan and schedule to return to compliance with this requirement. These requirements are also integrated as enforceable requirements of the Title V permit.
APCD2025-NOV-000095	Operating a landfill gas collection system with methane emissions in exceedance of 500 ppmv as determined by instantaneous surface monitoring.	Resolved. Additional dirt cover added to the noncompliant areas.
APCD2025-NOV-000672	Operating a landfill gas fired flare with a methane destruction efficiency less than 99 percent.	Facility has developed and implemented a compliance plan and schedule to return to compliance with this requirement. These requirements are also integrated as enforceable requirements of the Title V permit.

Compliance History for APCD1996-SITE-09779		
Violation Number	Violation Description	Status
APCD2018-NOV-000332	Operating a landfill gas collection system with methane emissions in exceedance of 500 ppmv	Resolved. Additional dirt cover added to the noncompliant areas.
APCD2018-NOV-000751	Failure to submit the TVP renewal application at least 12 months prior to the permit expiration date.	Resolved. TVP renewal application was submitted 5/24/2018.
APCD2017-NOV-000462	Operating a landfill gas collection system with methane emissions in exceedance of 500 ppmv	Resolved. Modification to the GCCS and reinspection were performed.
APCD2017-NOV-000528	Operating a landfill gas collection system with methane emissions in exceedance of 500 ppmv	Resolved. Modification to the GCCS and reinspection were performed.
APCD2024-NOV-000610	Operating an enclosed landfill gas flare which emits carbon monoxide (CO) in exceedance of 0.20 pounds per million Btu of heat input.	Facility has developed and implemented a compliance plan and schedule to return to compliance with this requirement. These

		requirements are also integrated as enforceable requirements of the Title V permit.
APCD2025-NOV-000095	Operating a landfill gas collection system with methane emissions in exceedance of 500 ppmv as determined by instantaneous surface monitoring.	Resolved. Additional dirt cover added to the noncompliant areas.
APCD2025-NOV-000672	Operating a landfill gas fired flare with a methane destruction efficiency less than 99 percent.	Facility has developed and implemented a compliance plan and schedule to return to compliance with this requirement. These requirements are also integrated as enforceable requirements of the Title V permit.

Flare non-compliance and District Rule 69.7:

The gas collected from the North and West landfills is sent to a landfill-gas-to-energy cogeneration facility offsite. Excess landfill gas that is unable to be combusted at the cogeneration facility is sent to a flare station containing two enclosed ground flares. After several years of operation without any violation of federal, state, or local requirements, one of these two flares was found to be operating out of compliance with newly implemented requirements of District Rule 69.7 and the California Landfill Methane Rule. This is after a source test was conducted as part of the recently adopted District rule 69.7 pertaining to landfill-gas-fired flares. The result of the source test indicated that CO emissions were in excess of 0.20 pounds per million BTU of heat input as required by rule 69.7(d)(2). In a separate source test the methane destruction efficiency was found to be 98%, less than the 99% required by the California LMR. Note that the methane destruction efficiency of 98% is still compliant under federal requirements XXX and AAAA, which apply to this landfill. The operator has implemented a compliance plan and schedule which is intended to return the flares to a compliant operational status, while in the meantime minimizing excess emissions by reducing operation of the non-compliant flare as much as possible. District rule 1420(g) specifies that the District "may approve the application provided a compliance plan is included with the application which meets the requirements of Rule 1414 (f)(3)(viii)…". The compliance plan meets the requirements of 1414(f)(3)(viii), which include provisions pertaining to implementing a schedule of remedial measures as well as providing progress reports to ensure the source will return to compliance on a timely basis, the District will issue the Title V permit.

Emissions and Potential to Emit:

The following table shows the actual and potential emissions for the facility. For PM10, SOx, and CO, emissions are well below major source thresholds. The facility is a major source for NOx, VOC, and HAPs (hazardous air pollutants).

Potential to Emit Tons per Year				
Pollutant	Thresholds	*Facility Actual Emissions	**Potential to Emit	Major Source
Highest Federal HAP	10	8.4	12.2	Yes
Sum of Federal HAPs	25	17.7	22.2	No
NOx	25	47.5	103.1	Yes
VOC	25	72.2	74.7	Yes
PM10***	100	11.4	16.4	No
SOx	100	8.4	12.1	No
CO	100	7.4	12.7	No

Potential to Emit (Flares Only) Tons per Year				
Pollutant	Thresholds	*Facility Actual Emissions	**Potential to Emit	Major Source
Highest Federal HAP	10	8.0	12.2	No
Sum of Federal HAPs	25	13.7	17.6	No
NO_x	25	45.7	65.5	Yes
VOC	25	40.5	41.8	Yes
PM_{10}	100	11.4	16.4	No
SO_x	100	8.4	12.0	No
CO	100	4.6	5.3	No

*The actual emissions are from the District's 2021 emission inventory.

**The potential emissions are calculated from the same 2021 inventory assuming 8760 hours per year operation and using the max hourly emission rate.

***Does not include emissions from haul roads and other fugitive open dust sources since these are not considered in the determination of Title V major source status

6. Applicable Requirements

General Facility-wide Applicable Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. II	10(a)	Permits Required - (a) Authority to Construct
SDCAPCD Reg. II	10(b)	Permits Required- (b) Permit to Operate
SDCAPCD Reg. II	19	Provision of Sampling & Testing Facilities

SDCAPCD Reg. II	19.3	Emission Information
SDCAPCD Reg. II	20.1	New Source Review (General)
SDCAPCD Reg. II	20.3	New Source Review (Major & PSD Stationary Sources)
SDCAPCD Reg. II	21	Permit Conditions
SDCAPCD Reg. IV	59	Control of Waste Disposal − Site Emissions
SDCAPCD Reg. IV	60	Circumvention
SDCAPCD Reg. IV	67	Architectural Coatings
SDCAPCD Reg. IV	68	Fuel Burning Equipment - NOx
SDCAPCD Reg. IV	71	Abrasive Blasting
SDCAPCD Reg. V	98*	Breakdown Conditions: Emergency Variance
SDCAPCD Reg. VI	101	Burning Control
SDCAPCD Reg. VIII	131	Stationary Source Curtailment Plan
SDCAPCD Reg. VIII	132	Traffic Abatement Plan

Facility-wide/Other Prohibitory & Misc. Requirements

Regulation	**Rule Citation**	**Title**
SDCAPCD Reg. II	19.2	Continuous Emission Monitoring Systems
SDCAPCD Reg. IV	50	Visible Emissions
SDCAPCD Reg. IV	51	Nuisance
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	53	Specific Contaminants
SDCAPCD Reg. IV	59.1	Municipal Solid Waste Landfills
SDCAPCD Reg. IV	62	Sulfur Content of Fuels
SDCAPCD Reg. IV	67.0.1	Architectural Coatings
SDCAPCD Reg. IV	67.17	Storage of Organic Materials Containing VOC
SDCAPCD Reg. XII	1200**	Toxic Air Contaminants – New Source Review
SDCAPCD Reg. XII	1210	Toxic Air Contaminants – Public Notification and Risk Reduction
SDCAPCD Reg. XII	1206***	Asbestos Removal, Renovation, and Demolition
40 CFR Part 60	Subpart A	NSPS General Provisions
40 CFR Part 60	Subpart XXX	NSPS - Standards of Performance for Municipal Solid Waste Landfills that Commenced Construction, Reconstruction, or Modification after July 17, 2014
40 CFR Part 61	Subpart M***	NESHAP - Asbestos
40 CFR Part 63	Subpart A	NESHAP - General Provisions
40 CFR Part 63	Subpart AAAA	NESHAP - Municipal Solid Waste Landfills

*Rule 98 and variances are not federally enforceable and cannot provide relief from requirements under Title V

**Toxics NSR Rules which are not federally enforceable

*** The District issued its own Asbestos Rule 1206 intended to be as stringent as Subpart M. The facility is subject to the most stringent requirements of either rule, which at the time of this report is ensured by compliance with Rule 1206.

Permit Specific Applicable Requirements:

SDAPCD Permit No.	Permit Description	Applicable Rules
APCD2008-PTO-930483	South Miramar Landfill, including gas collection system and flare (inactive landfill)	SDAPCD Rules 20.3, 21, 40, 50, 51,52, 53, 59.1, 40 CFR 60 Subpart XXX, 40 CFR 63-Subpart AAAA
APCD2003-PTO-960630	North and West Miramar Landfills, including gas collection system and flares (two inactive sections, one active, all connected to one grid)	SDAPCD Rules 20.3, 21, 40, 50, 51,52, 53, 59.1, 40 CFR 60 Subpart XXX, 40 CFR 63-Subpart AAAA
Portable Engines	Includes all portable, non-road engines operated as part of this stationary source and listed in Appendix A	SDAPCD Rules 20.3, 21, 40, 50, 51,52, 69.4.1*

*This rule is pending federal approval, but applicable conditions are included in the individual permits to ensure that subsequent revision to the permit is not required.

Primary Limiting Regulations: South Miramar

Inactive Landfill	
Pollutant	Primary Limiting Regulations
NOx	Rule 20.2; 40 CFR 63 Subpart AAAA, 40 CFR Subpart XXX,40 CFR Subpart Cf
SO2	Rules 20.2, 53, 62
VOC	Rule 20.2; 40 CFR 63 Subpart AAAA, 40 CFR Subpart XXX, 40 CFR Subpart Cf
CO	Rule 20.2
PM10	Rules 20.2, 53
Toxic Pollutants	40 CFR 63 Subpart AAAA
Federal HAPs	40 CFR 63 Subpart AAAA

Primary Limiting Regulations: North & West Miramar

Active Landfill	
Pollutant	Primary Limiting Regulations
NOx	Rule 20.2; 40 CFR 63 Subpart AAAA, 40 CFR Subpart XXX,40 CFR Subpart Cf
SO2	Rules 20.2, 53, 62
VOC	Rule 20.2; 40 CFR 63 Subpart AAAA, 40 CFR Subpart XXX, 40 CFR Subpart Cf
CO	Rule 20.2
PM10	Rules 20.2, 53
Toxic Pollutants	40 CFR 63 Subpart AAAA
Federal HAPs	40 CFR 63 Subpart AAAA

Primary Limiting Regulations: Registered Emergency Engine

Emergency Engine	
Pollutant	Primary Limiting Regulations
NOx	Rule 12, 17 CCR 93115 Stationary ATCM (not federally enforceable)
SO2	Rule 12, 17 CCR 93115 Stationary ATCM (not federally enforceable)
VOC	Rule 12, 17 CCR 93115 Stationary ATCM (not federally enforceable)
CO	Rule 12, 17 CCR 93115 Stationary ATCM (not federally enforceable)
PM10	Rule 12, 17 CCR 93115 Stationary ATCM (not federally enforceable)
Toxic Pollutants	NA
Federal HAPs	40 CFR 63 Subpart ZZZZ (Maintenance Requirements only)

Primary Limiting Regulations: Portable/Non-road Engines

Portable/Non-road Engines	
Pollutant	Primary Limiting Regulations
NOx	Rule 69.4.1, 17 CCR 93116 Portable ATCM (not federally enforceable)
SO2	Rule 69.4.1, 17 CCR 93116 Portable ATCM (not federally enforceable)
VOC	Rule 69.4.1, 17 CCR 93116 Portable ATCM (not federally enforceable)
CO	Rule 69.4.1, 17 CCR 93116 Portable ATCM (not federally enforceable)
PM10	Rule 69.4.1, 17 CCR 93116 Portable ATCM (not federally enforceable)
Toxic Pollutants	Rule 1200

Federal HAPs	NA

Primary Limiting Regulations: Aggregate Screen

Aggregate Screen	
Pollutant	Primary Limiting Regulations
NOx	NA
SO2	NA
VOC	NA
CO	NA
PM10	Rule 50 (opacity), Rule 54
Toxic Pollutants	NA
Federal HAPs	NA

Discussion of Applicable Requirements:

Emergency Engine

The emergency engine is registered under District Rule 12, and is also subject to requirements under the California Stationary ATCM. It is not subject to NSPS IIII as it was constructed prior to the applicability date for this rule; however, it is subject to maintenance and associated recordkeeping and reporting requirements under NESHAP ZZZZ, and these requirements are federally enforceable and are specified in the Title V permit.

Portable/Non-Road Engines

The Portable/Non-road engines are subject to federally enforceable requirements under Rule 69.4.1. These requirements include that the engines be certified and meet emission standards for NOx, CO, VOC and PM10, and that annual maintenance is conducted. Applicable requirements are specified in the equipment unit specific permit included in Appendix A.

Aggregate Screen

The aggregate screen is subject only to general requirements for opacity and PM mass emission rate under Rule 54. It is not subject to NSPS subpart OOO because there are no crushers located at the site, which limits applicability of that regulation.

South Miramar Landfill

Landfill Regulation	**Applicability**
NSPS Subpart WWW	Does not apply because the landfill was closed before the applicability date of 5/30/1991.

NSPS Subpart XXX†	Does not apply because the landfill was closed before the applicability date of 7/17/2014.
NSPS Subpart Cf	Does not apply because the landfill did not accept waste after the applicability date of 11/8/1987.
NESHAP Subpart AAAA†	Does not apply because the landfill was closed before the applicability date of 7/17/2014.
CARB Landfill Methane Rule†	Does not apply because landfill has been closed since 1972, before the applicability date of 1/1/1977.
Part 62 Subpart OOO	Does not apply because the landfill did not accept waste before the applicability date of 11/8/1987.

North & West Miramar Landfills:

Since the previous renewal, there have been changes in applicability of state and federal regulations for landfills, and these requirements are discussed below.

This landfill was modified after 7/17/2014, which means the landfill is subject to the following state and federal regulations:

Landfill Regulation	**Applicability**
NSPS Subpart WWW	Does not apply because the landfill was modified after the applicability date, and instead subpart XXX applies.
NSPS Subpart XXX	Applies because the landfill is over the size threshold (2.5 Million Mg/2.5 Million m^3), and was modified after the applicability date of 7/17/2014)
NSPS Subpart Cf	Does not apply because the landfill was modified after the applicability date.
NESHAP Subpart AAAA	Applies because the landfill is over the size threshold (2.5 Million Mg/2.5 Million m^3), and was modified after the applicability date of 7/17/2014)
CARB Landfill Methane Rule†	Applies because the landfill exceeds 450,000 Tons capacity and is not otherwise exempt.
Part 62 Subpart OOO	Does not apply because the landfill was modified after the applicability date.

†Note: Miramar Landfill comprises three landfills, two of which are closed and inactive. The oldest of these, South Miramar, was closed in 1972. The CARB Landfill Methane Rule (LMR) applies only to landfills that have received waste after January 1, 1977, therefore South Miramar

is exempted from these requirements. Conditions relating to LMR and its implementation have been omitted from South Miramar's permit, however requirements from XXX and AAAA remain. Although South Miramar was closed before the applicability dates of XXX, AAAA, Cf, and OOO, the facility has chosen to maintain the permit requirements pertaining to XXX and AAAA. This is to not only simplify the landfill permits, but to also satisfy permitting requirements pursuant to District Rule 59.1.

Applicability of each federal regulation is discussed below. Notably, the permit implements guidance from the federal EPA for combining requirements of 40 CFR 63 NESHAP AAAA and 40 CFR 60 NSPS subpart XXX, and separately lists requirements under the CARB methane rule (*California Landfill Methane Rule (LMR): Article 4, Subarticle 6, §§ 95460 to 95476, title 17, California Code of Regulations)*.

Landfills NESHAP: 40 CFR part 63 – subpart AAAA:
On February 3, 2022, the US. Environmental Protection Agency (EPA) finalized technical revisions and clarifications for the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Municipal Solid Waste (MSW) Landfills established in the March 26, 2020, final rule. In this action, finalized technical revisions and clarifications for the NESHAP for MSW Landfills established in the March 26, 2020, final rule. Among these changes was the applicability of the General Provisions to affected MSW landfills. While previously Miramar was only subject to the provisions in WWW, this change required compliance with AAAA. Specifically, in 40 CFR 63.1935(a), since Miramar Landfill is a major source of HAP, subpart AAAA applies.

Landfills NSPS: 40 CFR part 60 subpart XXX:
On July 14, 2016, the U.S. Environmental Protection Agency (EPA) issued final New Source Performance Standards (NSPS) to reduce emissions of methane-rich landfill gas from new, modified and reconstructed municipal solid waste (MSW) landfills, updating standards that were issued in 1996. The updated NSPS (subpart XXX) applies to landfills constructed, modified or reconstructed on or before July 17, 2014. This application for a modification was submitted in 2019, therefore Miramar Landfill is subject to XXX.

In summary, the requirements of these regulations include operating a landfill gas collection system and routing all collected gas to control devices. Control devices are subject to operational standards and monitoring requirements. The collection system is required to maintain landfill gas temperatures below specified levels, and surface methane concentrations below applicable concentrations. Periodic monitoring is required. Records must be kept demonstrating compliance with all requirements, along with periodic reporting.

The basis of each requirement is described below:

Requirements to Operate Collection and Control Systems

§ 95464(a) – Design Plan and Installation

This section stipulates requirements for the design plan for the gas collection system. Since the expansion does not involve expanding to areas that currently do not have collection systems, an

update of the plan is not required; however, permit conditions specify that the system must be operated in accordance with the design plan and requirements for revising the design plan as necessary.

§ 60.767(c) Each owner or operator… must submit a collection and control system design plan to the Administrator for approval according to the schedule in paragraph (c)(4) of this section. The collection and control system design plan must be prepared and approved by a professional engineer and must meet the following requirements…

(d)Revised design plan. The owner or operator who has already been required to submit a design plan under paragraph (c) of this section, must submit a revised design plan to the Administrator for approval as follows:
(1) At least 90 days before expanding operations to an area not covered by the previously approved design plan.
(2) Prior to installing or expanding the gas collection system in a way that is not consistent with the design plan that was submitted to the Administrator according to paragraph (c) of this section.

NSPS XXX stipulates requirements for operating in accordance with an approved design plan, requirements for the design plan, and when it must be revised. Since this expansion did not expand to an area not previously covered, an update was not required' however, permit conditions specify these requirements for future required revisions.

§ 63.1959(b)(2)(i) Submit a collection and control system design plan prepared by a professional engineer… within 1 year…

§ 63.1981(d) Each owner or operator… must submit a collection and control system design plan to the Administrator for approval according to.... The collection and control system design plan must be prepared and approved by a professional engineer.

These requirements are the NESHAP AAAA equivalent to the XXX requirement and basis for permit conditions.

§ 60.762(b)(2)(ii)-(iii)
(ii)Collection system. Install and start up a collection and control system that captures the gas generated within the landfill…
(iii)Control system. Route all the collected gas to a control system that complies with the requirements…
(iv)Operation. Operate the collection and control device installed to comply with this subpart in accordance with the provisions of… §§ 63.1958, 63.1960, and 63.1961 of this chapter. Once the owner or operator begins to comply with the provisions of §§ 63.1958, 63.1960, and 63.1961 of this chapter, the owner or operator must continue to operate the collection and control device according to those provisions

This section states requirements to operate a collection system and route all collected gas to a control system, and provides for the ability to comply with the provisions of NESHAP AAAA in

lieu of NSPS XXX. This landfill is operated in accordance with the NESHAP AAAA option and permit conditions will list these requirements and cite NESHAP requirements as the basis.

§ 63.1959(b)(2)(ii) install and start up a collection and control system that captures the gas generated within the landfill as required…

This requirement is the NESHAP AAAA equivalent to the XXX requirement and basis for permit conditions.

Control System Requirements

§ 95464(b) – Gas Collection and Control System Requirements

This permit does not include any control systems, and requirements for control systems are instead specified on the equipment specific permits. Instead, permit condition require demonstration that all collected gas is sent to be combusted in one of the permitted control systems.

40 CFR § 60.762(b)(2)(iii) Route all the collected gas to a control system that complies with the requirements in…

40 CFR § 63.1959(b)(2)(iii) Route all the collected gas to a control system that complies with the requirements in…

These sections specify the requirement to route all gas to a control system. This requirement is stated in the permit, and all requirements for each control system are specified in the requirements for those permits. NESHAP AAAA is used as the basis for the requirement in the permit.

40 CFR 60.763(f) Operate the control system at all times when the collected gas is routed to the system.

40 CFR 63.1958(f) Operate the control system at all times when the collected gas is routed to the system.

These provisions are identical, so NESHAP AAAA is used as basis for requirement which is stated in permit conditions.

40 CFR 60.766/40 CFR 63.1961 Monitoring of Operations

These sections state very similar monitoring requirements for a variety of control devices. The control systems are listed on separate permits and all required monitoring requirements will be stated in the corresponding permits, ensuring compliance.

Collection System Requirements

§ 95464(b) – Gas Collection and Control System Requirements

Specifies the requirement to avoid equipment leaks with methane concentrations in excess of 500 ppmv as methane. This requirement is specified in permit conditions.

§ 95464(c)-(e) Gas Collection and Control System Requirements

Requires that the collection system be operated under negative pressure, except under certain conditions such as during construction of new wells and other temporary shutdowns. Permit conditions specify the details of these requirements.

§ 95469(b)(3) Gas Control System Equipment Monitoring: Components containing landfill gas and under positive pressure must be monitored quarterly for leaks. Any component leak must be tagged and repaired within 10 calendar days, or it is a violation of this subarticle.

Since the permit does not include the separately permitted control systems, the only applicable requirement is quarterly monitoring of any components under positive pressure and repair of any leaks and this is specified in permit conditions.

§ 95469(c) Wellhead Monitoring: The owner or operator must monitor each individual wellhead monthly to determine the gauge pressure. If there is any positive pressure reading other than as provided in sections 95464(d) and 95464(e), the owner or operator must take the following actions…

This section requires monthly monitoring of wellhead pressure, and specifies corrective actions if a positive pressure is found. These requirements are stated in permit conditions.

40 CFR § 60.763(b) Operate the collection system with negative pressure at each wellhead except under the following conditions…

40 CFR 63.1958 Operate the collection system with negative pressure at each wellhead except under the following conditions…

40 CFR 60.763(c) Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Celsius (131 degrees Fahrenheit). The owner or operator may establish a higher operating temperature value at a particular well…

40 CFR 63.1958(c)(1)… operate each interior wellhead in the collection system with a landfill gas temperature less than 62.8 degrees Celsius (145 degrees Fahrenheit).

These sections specify requirements for maintaining a negative pressure in the collection grid and a maximum temperature for XXX and AAAA. The requirements are identical, expect that AAAA allows for a higher allowable gas temperature. The landfill is required to comply with NESHAP AAAA, and therefore this is the limit specified in the permit and the rule used as the basis of the condition and the landfill does not have to comply with the XXX requirements.

40 CFR 63.1961 Each owner or operator… must install a sampling port and a thermometer, other temperature measuring device, or an access port for temperature measurements at each wellhead and:
(1) Measure the gauge pressure in the gas collection header on a monthly basis…
(2) Monitor nitrogen or oxygen concentration in the landfill gas on a monthly basis…
(4) …monitor temperature of the landfill gas on a monthly basis... The temperature measuring device must be calibrated annually using the procedure in Section 10.3 of EPA Method 2 of appendix A-1 to part 60 of this chapter. Keep records specified in § 63.1983(e).
(5) …unless a higher operating temperature value has been approved by the Administrator … you must initiate enhanced monitoring at each well with a measurement of landfill gas temperature greater than 62.8 degrees Celsius (145 degrees Fahrenheit) as follows…
(6) For each wellhead with a measurement of landfill gas temperature greater than or equal to 73.9 degrees Celsius (165 degrees Fahrenheit), annually monitor temperature of the landfill gas every 10 vertical feet of the well…

40 CFR 60.766 (a) Each owner or operator… must install a sampling port and a thermometer, other temperature measuring device, or an access port for temperature measurements at each wellhead and:
(1) Measure the gauge pressure in the gas collection header on a monthly basis…
(2) Monitor nitrogen or oxygen concentration in the landfill gas on a monthly basis…
(3) Monitor temperature of the landfill gas on a monthly basis as provided in 60.765(a)(5). The temperature measuring device must be calibrated annually using the procedure in 40 CFR part 60, appendix A-1, Method 2, section 10.3 such that a minimum of two temperature points, bracket within 10 percent of all landfill absolute temperature measurements or two fixed points of ice bath and boiling water, corrected for barometric pressure, are used.

Monitoring requirements for the two federal rules are similar, except that AAAA adds additional requirements related to enhanced monitoring and bases the standard on the higher temperature maximum of AAAA. Since AAAA is more stringent, it will be used as the basis for requirements which are all stated in the permit including detailed enhanced monitoring requirements and corrective action timelines.

Surface Methane Requirements and Monitoring

§ 95465(a) – Surface Methane Emission Standards
no location on the MSW landfill surface may exceed either of the following methane concentration limits:
(1) 500 ppmv, other than non-repeatable, momentary readings, as determined by instantaneous surface emissions monitoring.
(2) An average methane concentration limit of 25 ppmv as determined by integrated surface emissions monitoring.

Permit conditions specify that surface emissions be maintained in compliance with both instantaneous and integrated concentration standards, except for under limited exceptions. The 500 ppmv limit matches the requirements of the federal rules, and the 25 ppmv limit is unique to the CARB methane rule.

§ 95469(a) – Surface Emissions Monitoring Requirements

This section contains the details of surface monitoring including grid spacing, measurement technique, averaging techniques for integrated monitoring, and other requirements. These ae all specified in permit conditions.

40 CFR 60.763(d) Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill.

40 CFR 63.1958(d) Operate the collection system so that the methane concentration is less than 500 parts per million (ppm) above background at the surface of the landfill.

The surface methane concentration limits for each rules are the same, and AAAA is used as basis for requirement which is stated in permit conditions.

40 CFR 60.763(e) Operate the system such that all collected gases are vented to a control system … In the event the collection or control system is not operating, the gas mover system must be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere must be closed within 1 hour of the collection or control system not operating.

40 CFR 63.1958(e)(1) Operate the system… such that all collected gases are vented to a control system… In the event the collection or control system is not operating: (i) The gas mover system must be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere must be closed within 1 hour of the collection or control system not operating; and (ii) Efforts to repair the collection or control system must be initiated and completed in a manner such that downtime is kept to a minimum, and the collection and control system must be returned to operation.

These provisions are identical except for the additional general requirement in AAAA, so NESHAP AAAA is used as basis for requirement which is stated in permit conditions.

40 CFR 60.763(g) If monitoring demonstrates that the operational requirements… are not met, corrective action must be taken… If corrective actions are taken as specified… the monitored exceedance is not a violation of the operational requirements in this section.

40 CFR 63.1958(g) If monitoring demonstrates that the operational requirements… are not met, corrective action must be taken… If corrective actions are taken as specified… the monitored exceedance is not a deviation of the operational requirements in this section.

These provisions are identical, so NESHAP AAAA is used as basis for requirement which is stated in permit conditions.

40 CFR 60.766(f) Each owner or operator… must monitor surface concentrations of methane...

40 CFR 63.1961(f) Each owner or operator… must monitor surface concentrations of methane…

These sections are similar with the AAAA requirements being more detailed and therefore more stringent. Permit conditions cite the relevant provision of AAAA and list the detailed requirements for monitoring, including grid selection, monitoring locations, determination of background methane levels, and required corrective actions. In most cases, if concentrations above 500 ppmv are detected and corrective actions taken as stated, it will not be considered a violation of the regulation/permit condition.

Other operational requirements

§ 95468 – Alternative Compliance Options

The CARB methane rule allows for request and approval of alternative compliance options, and permit conditions specify these requirements.

Compliance Demonstration

§ 95471 – Test Methods and Procedures

This section outlines test methods and procedures to use to demonstrate compliance with requirements, and these are specified in permit conditions.

Recordkeeping

§ 95463(b) Within 90 days of the effective date of this subarticle or upon reaching 450,000 tons of waste-in-place, each owner or operator of an MSW landfill having greater than or equal to 450,000 tons of waste-in-place must calculate the landfill gas heat input capacity pursuant to section 95471(b) and must submit a Landfill Gas Heat Input Capacity Report to the Executive Officer.

This landfill has previously been subject to the requirements of this rule, and the expansion did not change the applicability requirements. An updated heat input capacity report and calculation was required for the updated landfill design.

§ 95470(a) – Recordkeeping Requirements.

This section specifies all records which must be kept, which includes all monitoring data to show compliance with all requirements, any data used to demonstrate when certain requirements do not apply, and data on operation of the landfill including amount of waste accepted and composition. These requirements are specified in permit conditions.

40 CFR 63.1983 (a) …Each owner or operator of an MSW landfill… must keep for at least 5 years up-to-date, readily accessible, on-site records of the design capacity report… 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.

(b) Each owner or operator of a controlled landfill must keep up-to-date, readily accessible records for the life of the control system equipment of the data… measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring must be maintained for a minimum of 5 years… (1)
(i) The maximum expected gas generation flow rate as calculated…
(ii) The density of wells, horizontal collectors, surface collectors, or other gas extraction devices…
(c) …each owner or operator of a controlled landfill… must keep for 5 years up-to-date, readily accessible continuous records of the equipment operating parameters specified to be monitored… (landfill gas temp, pressure, O2 or N2)… as well as… for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded.
(2) …Readily accessible continuous records of the indication of flow to the control system and the indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines…
(5) …Periods when the collection system or control device is not operating.
(6) …The date, time, and duration of each startup and/or shutdown period, recording the periods when the affected source was subject to the standard applicable to startup and shutdown.
(7) … in the event that an affected unit fails to meet an applicable standard, record the information below in this paragraph:
(i) For each failure record the date, time and duration of each failure and the cause of such events (including unknown cause, if applicable).
(ii) For each failure to meet an applicable standard; record and retain a list of the affected sources or equipment.
(iii) Record actions taken to minimize emissions in accordance with the general duty… and any corrective actions taken to return the affected unit to its normal or usual manner of operation.
(8) …You must keep the written procedures required by § 63.8(d)(2) on record for the life of the affected source or until the affected source is no longer subject to the provisions of this part, to be made available for inspection, upon request, by the Administrator…
(d) …Each owner or operator… must keep for the life of the collection system an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label for each collector.
(e) …Each owner or operator subject to the provisions of this subpart must keep for at least 5 years up-to-date, readily accessible records of the following:
(1) All collection and control system exceedances of the operational standards…, the reading in the subsequent month whether or not the second reading is an exceedance, and the location of each exceedance.
(2) Records of each wellhead temperature monitoring value of greater than …:
(i) …62.8 degrees Celsius (145 degrees Fahrenheit) or above...
(ii) Each owner or operator… must also keep records of all enhanced monitoring activities.
(iii) Each owner or operator required to submit the 24-hour high temperature report… must also keep a record of the email transmission.
(3) For any root cause analysis for which corrective actions are required… keep a record of the root cause analysis conducted, including a description of the recommended corrective action(s) taken, and the date(s) the corrective action(s) were completed.
(4) For any root cause analysis for which corrective actions are required… keep a record of the root cause analysis conducted, the corrective action analysis, the date for corrective action(s)

already completed following the positive pressure reading or high temperature reading, and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates.
(5) For any root cause analysis… keep a record of the root cause analysis conducted, the corrective action analysis, the date for corrective action(s) already completed following the positive pressure reading or high temperature reading, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates, and a copy of any comments or final approval on the corrective action analysis or schedule from the Administrator.
(g) …Each owner or operator… must keep for at least 5 years up-to-date, readily accessible records of all collection and control system monitoring data for parameters...
(h) …you must keep the following records.
(1) Records of the landfill gas temperature on a monthly basis...
(2) Records of enhanced monitoring data at each well with a measurement of landfill gas temperature greater than 62.8 degrees Celsius (145 degrees Fahrenheit)…
(i) Any records required to be maintained by this subpart that are submitted electronically via the EPA's CEDRI may be maintained in electronic format…

This section specifies all recordkeeping requirements under subpart AAAA, and these are reflected in the permit conditions, ensuring compliance. The requirements of subpart XXX are mostly identical, except that they reference the lower maximum allowable temperature and do not include additional requirements related to the standards under AAAA that do not exist under XXX.

Reporting

§ 95470 – Reporting Requirements.

Key reporting requirements include the need to report when the landfill stops accepting waste, proposes to cease operation of the gas collection system (would require an application), and an annual reporting requirement. Details of each report are stated in permit conditions. The annual report includes information about the landfill, total amount of collected gas/composition, details on control systems and how much gas was combusted/treated, and a topographic map showing current state of final cover.

40 CFR 60.767(a)/ 40 CFR 63.1981(a) Initial Design Capacity Report
40 CFR 60.767(a)(3)/40 CFR 63.1981(b) Amended Design Capacity Report
40 CFR 60.767(b)/40 CFR 63.1981(c) NMOC Emission Rate Report

The XXX and AAAA reporting requirements for these reports are identical, and would have already been required to be submitted. Permit conditions do not specify these reports, and others that are not expected to be required without a separate application to modify the permit first.

40 CFR 63.1981(h) Semi-annual Report. The owner or operator of a landfill… must submit to the Administrator semi-annual reports. Beginning no later than September 27, 2021, you must submit the report, following the procedure specified in paragraph (l) of this section.

(1) Number of times that applicable parameters monitored… were exceeded and when the gas collection and control system was not operating… including periods of SSM. For each instance, report the date, time, and duration of each exceedance.
(2) Description and duration of all periods when the gas stream was diverted from the control device or treatment system through a bypass line or the indication of bypass flow...
(3) Description and duration of all periods when the control device or treatment system was not operating and length of time the control device or treatment system was not operating.
(4) All periods when the collection system was not operating.
(5) The location of each exceedance of the 500-ppm methane concentration and the concentration recorded at each location for which an exceedance was recorded in the previous month… for location, you record the latitude and longitude coordinates of each exceedance using an instrument with an accuracy of at least 4 meters. The coordinates must be in decimal degrees with at least five decimal places.
(6) The date of installation and the location of each well or collection system expansion added pursuant to (corrective actions).
(7) For any corrective action analysis for which corrective actions are required… and that take more than 60 days to correct the exceedance, the root cause analysis conducted, including a description of the recommended corrective action(s), the date for corrective action(s) already completed following the positive pressure or high temperature reading, and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates.
(8) Each owner or operator required to conduct enhanced monitoring… must include the results of all monitoring activities conducted during the period.

40 CFR 60.767(g) Annual Report… If complying with the operational provisions of §§ 63.1958, 63.1960, and 63.1961 of this chapter, as allowed at § 60.762(b)(2)(iv), the owner or operator must follow the semi-annual reporting requirements in § 63.1981(h) of this chapter in lieu of this paragraph.

There are two differences in periodic reporting requirements between the two rules – first that AAAA requires semiannual reporting rather than annual, and second that under AAAA some additional information needs to be reported related to the additional standards under that regulation. However, XXX contains a provision stipulating that if complying with AAAA, to follow the semi-annual reporting requirements of that rule instead. For this reason, permit conditions only specify the AAAA requirements and the facility is not subject to annual reporting requirements (under this rule).

40 CFR 63.1981(j) Corrective action and the corresponding timeline. The owner or operator must submit information regarding corrective actions…
40 CFR 63.1981(k) 24-hour high temperature report. Where… a landfill gas temperature measured at either the wellhead or at any point in the well is greater than or equal to 76.7 degrees Celsius (170 degrees Fahrenheit) and the carbon monoxide concentration measured is greater than or equal to 1,000 ppmv, then you must report the date, time, well identifier, temperature and carbon monoxide reading via email to the Administrator within 24 hours of the measurement unless a higher operating temperature value has been approved by the Administrator

Permit conditions specify corrective action reporting and 24-hour high temperature reporting. Subpart XXX also specifies following the reporting requirements of AAAA, so the permit will cite AAAA as the basis for these conditions.

40 CFR 63.1981(l) the owner or operator must submit reports electronically according to… this section.

Permit conditions specify electronic reporting.

7. 40 CFR Part 64 CAM (Compliance Assurance Monitoring)

Compliance Assurance Monitoring (CAM) applicability was considered for this review pursuant to 40 CFR Part 64. The landfill itself is a major source of VOC and uses the gas collection system as a control device. The gas collection system operates according to emission standards pursuant to AAAA, consequently pursuant to 40 CFR Part 64.2(b)(1)(i) CAM does not apply. The flares each have an uncontrolled PTE in excess of the major sources threshold for NOx; however, since they do not rely on control equipment to meet an emission standard, they are not subject to CAM pursuant to 40 CFR Part 64.2(a)(2).

8. Updates to the Title V Permit Incorporated into this Action

Emission Unit Changes:

The landfill has added (and replaced) multiple non-emergency, non-road diesel engines to support ancillary activities. The installation/replacement of these engines was not considered a federal major or major modification of the stationary source, and since they are considered non-road engines are not part of the Title V source and are not subject to any additional federally applicable requirements. See Source Application History in section 2 of this report for further information.

Condition Changes:

The Landfill capacity was expanded in volume and associated requirements were reviewed as part of the issuance of an ATC (Authority to Construct) under application APCD2020-APP-006412. Edits were made to the existing permit conditions to make them the same as conditions that have been approved for another landfill permit application. Specifically, the edits were to Subpart XXX and AAAA requirements and remove the 40 CFR 60 Subpart WWW requirements. The expansion only involved an increase in the height/volume and was not expected to expand waste acceptance rate (i.e. it is intended to extend the life span of the landfill). For this reason, the expansion did not result in a major or federal major modification of any applicable pollutants and the change in the conditions allowing the increase does not alter any federally applicable requirements.

The facility subsequently applied for a minor modification to incorporate this expansion under application APCD2023-APP-007673. Since the expansion does not cause a violation of an applicable requirement, did not trigger federal new source review, does not involve relaxation of monitoring, recordkeeping or reporting requirements, does not involve any of the site-specific emission limits listed under Rule 1401(c)(27)(iii), does not alter any conditions the source accepted to qualify as exempt under any applicable requirement, and does not involve any MACT requirements under section 112(g), it qualifies as a minor modification.

Conversion of Screen Registration to Permit

Other Miscellaneous Changes

The permit descriptions for each of the landfill permits was revised to clarify exactly what is permitted under each separate permit and more thoroughly describe all equipment.

9. Multiple Applicable Requirement Streamlining

The facility did not request Multiple Application Requirements Streamlining. However, as noted in the rules discussion, some requirements of NESHAP AAAA and NSPS XXX were streamlined based on federal guidance. See detailed analysis of applicable requirements in section 7.

10. Permit Shield

The facility does not request any additional Permit Shields.

11. Permit Process-Public Notification and Notice to EPA and Affected States

Before issuing the final permit, The District will provide the opportunity for review by EPA, affected states and bands of Indians through a public notice period and an EPA review period. Notice will be provided to the EPA electronically through the EPS and will be sent electronically to affected states and bands of Indians. The public notice and associated documents will be provided on the District website.

12. Recommendations

The facility is expected to comply with all applicable requirements including those cited in the current District permit as well as those under District Rule 1401 and 40 CFR Part 70. Therefore, the recommendation of this report is for the subject proposed renewal Title V permit to be issued following public notice, EPA review and response to any comments.

13. Attachments

The following are attached:

- Application Package
- Draft Permit
- Public Notice