

STATEMENT OF BASIS
Title V Permit Renewal

Facility Name: Otay Landfill
Application Number: APCD2018-APP-005292
Title V Permit Number: APCD2009-TVP-971227
Facility ID: APCD1989-SITE-07494
Equipment Address: 1700 Maxwell Road, Chula Vista, CA 91911
Facility Contact: Neil Mohr
Contact Phone: (619) 733-7525
Permit Engineer: Andrew Bernabe
Date: 12/29/2022

Senior Engineer: Jim Swaney

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 permit for Otay Landfill (Title V permit APCD2009-TVP-971227). The facility is subject to Title V permitting because it is subject to 40 CFR 60 Subpart WWW and 40 CFR 63 Subpart AAAA.

Since the last renewal Title V permit was issued, no additional Title V applications have been submitted to be incorporated into the Title V permit renewal.

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

The renewal application was received on February 2nd, 2018. The Title V permit expired on February 4th, 2019. 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.

Application History for District Modifications				
Application Number	Application Summary	Description	Affected Emission Units	Outcome
No new District applications are associated with this Title V renewal.				

The following table lists applications at this facility to modify the Title V permit.

Title V Application History			
<u>Application Number</u>	<u>Application Description</u>	<u>Equipment</u>	<u>Approved?</u>
APCD2005-APP-982373	Administrative Amendment	Landfill	Yes
APCD2006-APP-984550	Title V Renewal	Landfill	Yes
APCD2013-APP-002521	Title V Renewal	Landfill	Yes
APCD2014-APP-003744	Operational Flexibility	Engines	Yes
APCD2018-APP-005292	Title V Current Renewal	Landfill	Current Renewal

3. Facility Description

The facility has the following active permits:

Permit Number	Equipment Description
APCD2009-PTO-971112	An active non-hazardous waste landfill operation that includes quarrying, municipal waste Disposal, waste compaction, cover material application, and haul road activities with an Associated landfill gas collection and control system consisting of landfill gas (lfg) Collection wells, migration probes, piping, fittings, sampling ports, shut off valves, condensate Traps, and two(2) enclosed flares (a 6 ft diameter x 30 ft high, 48 mm btu/hr perennial flare and a 13 ft diameter x 50 ft high, 150 mm btu/hr john zink flare). Flare station equipment includes Multiple blowers, a flame arrestor on each flare, liquid knockout vessels, condensate Injection equipment, optical flame sensors, stack temperature probes, an in-line lfg oxygen

	Analyzer, an automatic shut-off valve on each flare, propane fuel, a condensate storage tank, And lfg flow meters (971112/971227/973133/973517/979036/980160 db 5/05)
APCD2011-PTO-000826	Screen system for screening construction and demolition debris: Make Krause Manufacturing, Model ADC, S/N 07203, 12' length x 72" width, rated at 30 tons/hour, with infeed conveyor at 15'5" length, inclined conveyor at 26' length, sort line conveyor at 116' length, unloading conveyor at 22' length, and take away conveyor at 28' length.
APCD2014-PTO-002098	CT-01 Prime Use Diesel Engine (ATCM Portable): John Deere; Model 4045HFC93; Serial Number PE4045R010622; 140 bhp; Model Year 2012 EPA Certified, Tier 4i, Engine Family Number CJDXL06.8210; Powering a Truck Tipper
APCD2014-PTO-002099	CT-02 Prime Use Diesel Engine (ATCM Portable): John Deere; Model 4045HFC93; Serial Number PE4045R010809; 140 bhp; Model Year 2012 EPA Certified, Tier 4i, Engine Family Number CJDXL06.8210; Powering a Truck Tipper
APCD2016-PTO-002558	Prime Diesel Engine powering an exempt screen: Caterpillar; model C4.4; serial number 44408081; Engine Family APKXL04.4NJ1; tier 3 certified; 125 bhp rated; turbocharged with charge air cooler, ATCM portable

4. Title V Applicability

Otay landfill has a design capacity of approximately 61 million m³ and therefore is subject to District Rule 59.1 and thereby required to meet many of the requirements of the New Source Performance Standards (NSPS) at 40 CFR 60 Subpart WWW. Otay Landfill is also subject to NSPS at 40 CFR 60 part Cf because it was in operation before July 17, 2014, and did not modify after July 17, 2014. The permittee operates a landfill gas collection and control system (CCS) in conformance with § 60.752(b) of Subpart WWW. The permit includes conditions pertaining to the CCS, as well as the other applicable requirements under Rule 59.1. The landfill is also subject to 40 CFR 63 Subpart AAAA – National Emission Standards for Hazardous Air Pollutants (NESHAP): Municipal Solid Waste Landfills. Compliance with this NESHAP is met in large part by complying with subpart WWW as given in District Rule 59.1. The permit includes conditions requiring compliance with this rule.

Therefore, since the facility has a design capacity over 2.5 million cubic meters and is a major source, the facility is subject to the Title V operating permit program.

5. Potential to Emit and Actual Emissions

The following table shows the actual and potential emissions for the facility. The facility is major source of NO_x, VOC, and PM₁₀.

Potential to Emit Tons per Year				
Pollutant	Thresholds	*Facility Actual Emissions	**Potential to Emit	Major Source
Highest Federal HAP	10	3.5	6.9	No
Sum of Federal HAPs	25	6.7	13.5	No
NO _x	25	26.5	53.3	Yes
VOC	25	25.3	50.6	Yes
PM ₁₀	100	75.9	151.8	Yes
SO _x	100	3.4	6.8	No
CO	100	4.3	8.6	No

*The actual emissions are from the District's Emission Inventory for 2017.

**The potential emissions are from the District engineering evaluation for APCD2021-APP-007030 (APP-007030 is still in District testing and will not be part of this renewal).

6. 40 CFR Part 64 CAM (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) of the CAA.

7. Applicable Requirements

General Permit Program 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	NSR	New Source Review
SDCAPCD Reg. II	PSD	Prevention of Significant Deterioration
SDCAPCD Reg. II	20.1	New Source Review (General)
SDCAPCD Reg. II	20.2	New Source Review (Non-major 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 and Miscellaneous 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	1206*	Asbestos Removal, Renovation, and Demolition
40 CFR Part 60	Subpart A	NSPS General Provisions
40 CFR Part 60	Subpart Cf	NSPS - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills
40 CFR Part 60	Subpart WWW	NSPS - Municipal Solid Waste Landfills
40 CFR Part 61	Subpart M*	NESHAP - Asbestos
40 CFR Part 63	Subpart A	NESHAP General Provisions

40 CFR Part 63 Subpart AAAAA NESHAP - Municipal Solid Waste Landfills

* 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
APCD2009-PTO-971112	Non-hazardous municipal waste landfill with two flares	SDAPCD Reg. IV Rules 40, 50, 51,52, 53, 59.1; 40 CFR 63-Subpart AAAAA
APCD2011-PTO-000826	Screen system for screening construction and demolition debris	SDAPCD Reg. II Rules 19,21; SDAPCD Reg. IV, Rule 50
APCD2014-PTO-002098	CT-01 Prime Use Diesel Engine (ATCM Portable)	SDAPCD Reg. IV, Rules 50, 51, 69.4, 69.4.1
APCD2014-PTO-002099	CT-02 Prime Use Diesel Engine (ATCM Portable)	SDAPCD Reg. IV, Rules 50, 51, 69.4, 69.4.1
APCD2016-PTO-002558	Prime Diesel Engine powering an exempt screen	SDAPCD Reg. II Rules 19, 20.2, 20.3; SDAPCD Reg. IV, Rule 69.4.1

Primary Limiting Regulations: Landfill

Non-Hazardous Municipal Waste Landfill	
Pollutant	Primary Limiting Regulations
NOx	Rule 20.2; 40 CFR 63 Subpart AAAAA, 40 CFR Subpart WWW,40 CFR Subpart Cf
SO2	Rules 20.2, 53, 62
VOC	Rule 20.2; 40 CFR 63 Subpart AAAAA, 40 CFR Subpart WWW, 40 CFR Subpart Cf
CO	Rule 20.2
PM10	Rules 20.2, 53
Toxic Pollutants	Rules 1200, 1210
Federal HAPs	Rules 1200, 1210

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

This action, a renewal of the Title V permit, did not result in any changes in emissions, but rules tables in the Title V permit were revised for clarity and accuracy.

9. Multiple Applicable Requirement Streamlining

The facility does not request Multiple Applicable Requirements Streamlining.

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, and the public notice will be published in a newspaper.

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 Title V Permit
- Public Notice