

STATEMENT OF BASIS
Initial Title V Permit

Facility Name: Hanson Aggregates Pacific Southwest, LLC

Title V App. Number: APCD2018-APP-005657

Title V Permit Number: APCD2020-TVP-00045 (new)

Facility ID: APCD2003-SITE-04824
(Same Stationary Source as Sycamore Landfill APCD1989-SITE-03596)

Equipment Address: 8514 Mast Blvd.
Santee, CA 92071

Permitting Contact: Erika Guerra, (858)715-5667

Site Contact: Ron Thompson, (760)802-5365

Responsible Official: Ian Firth, Vice President General Manager, (858)715-5699

Permit Engineer: Nicholas Horres

Date: 12/16/2022

 Recoverable Signature

X Nicholas Horres

Nicholas Horres
Senior Engineer
Signed by: Nicholas Horres

Senior Engineer:

1.0 Type of Action and Summary of Changes

This is an application for a new Title V permit for an existing mineral processing plant that operates to support a landfill. The District intends to issue a separate Title V permit to the primary operator of the rock plant (Hanson) and the primary operator of the landfill (Sycamore landfill Inc./Republic Services) for simplicity.

2.0 History of Title V Applications and Modifications/Applications since previous Renewal:

The application was received on 12/18/2018. The equipment was already in operation and is being required to obtain a permit based on new information that indicated this facility should be considered part of the permitted landfill stationary source. The district does not consider this application to be timely because it was not submitted in accordance with Rule 1414 deadlines.

This section will discuss the facility history including that of the host landfill since they are part of the same stationary source and the Title V applicability for the landfill is why this facility is subject to Title V permitting.

The following table summarizes all previous applications at this facility affecting the Title V permit.

Title V Application History – Sycamore Landfill				
Application Number	Title V Permit Number	Application Description	Equipment	Approved
APCD1998-APP-971226	APCD2008-PTO-971226	Initial Title V Application	Landfill	Approved
APCD2012-APP-002330	APCD2008-PTO-971226	Renewal	Landfill	Approved
APCD2018-APP-005293	APCD2008-PTO-971226	Renewal	Landfill	Open

The District has received applications from this facility as shown in the following table for the Hanson equipment. These applications are submitted under the District’s local permitting program (see appendix A of the permit).

Relevant Application History for facility				
Application Number	Affected Permit to Operate(s)	Description	Affected Emission Units	Outcome
APCD2003-APP-979270	APCD2009-PTO-979270	Initial application for rock plant in 2003, has undergone numerous modifications since	Rock Plant	Amended & Approved
APCD2015-APP-004051	APCD2009-PTO-979270	Application to increase production rate of rock plant – cancelled after initially being informed of need for Title V permit and other new requirements	Rock Plant	Cancelled
APCD2019-APP-006021	APCD2020-PTO-003620	New sand plant installed after Title V initial application filed – permit issued and will be included in Title V permit	Sand Plant	Approved
APCD2022-APP-007372	APCD2020-PTO-003620	Like Kind Replacement of Screen	Sand Plant	Approved

3.0 Facility Description

This facility is a rock, sand and gravel mining and processing operation. It is co-located with a landfill and is interrelated with the operation of the landfill through contracts and a process line to provide cover material for the landfill and through the expectation that the mined area will be utilized for landfill space in the future.

Permit Number	Equipment Description
APCD2009-PTO-979270	<p>Rock Plant (1500 tons hr capacity) consisting of:</p> <p>one (1) pit conveying system consisting of one (1) Telsmith apron feeder, 42" x 10", one (1) single-deck scalping screen, Hewitt Robbins, 4'x12', and various belt conveyors; and</p> <p>one (1) primary cone crusher, Sandvick, Model S4800 Hydrocone; one (1) secondary cone crusher with water spray, Sandvik, Model H6800 Hydrocone; one (1) vertical shaft impact (VSI) crusher, Remco, Model Sandmax 100; four (4) triple deck vibrating screens with water spray, Deister 8' x 20", one (1) triple deck horizontal wet screen, Deister 7' x 20"; one (1) pulse jet baghouse, LMC Wets, Model 100-FDT-12, 2000 sq. ft. area with 100 bags, venting the primary cone crusher and belt conveyor C7. One (1) baghouse, Donaldson / Torit, Model 81-PJD-810, 997 sq. ft. filter area with 81 bags, venting the secondary crusher and belt conveyor C-2N; one (1) LMC baghouse, Model 81-FSD-8, 1080 sq. ft. filter area with 81 bags, venting the VSI crusher; one (1) reclaiming tunnel conveyor with three Jeffrey vibrating feeders, one (1) coarse material scrubber, 44" x 20' double screw; one (1) fine material screw conveyor, 44" x 33' single screw, one (1) stacker conveyor, 150' x 36"; one (1) stacker conveyor, 100' x 36"; and various belt conveyors with water sprays.</p>
APCD2020-PTO-003620	<p>Sand wash plant, 450 tons/hour, consisting of:</p> <p>a. Dry sand handling system consisting of:</p> <ul style="list-style-type: none"> . Three identical blending hoppers. . Three under hopper sand transfer conveyors. . Four sand transfer conveyors. . One dry sand stockpile . All transfer points have water spray bars for control of dust emissions. <p>b. Wet sand screen and wash system, consisting of: a triple deck wash screen, a single screw fine material washer, a dewatering screen, a slurry pump, a cyclone, a cyclone slurry feed pump, two transfer conveyors, one stacker conveyor, two stockpiles.</p> <p>(Construction starts after April 22, 2008)</p>

4.0 Title V Applicability

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). This facility operates as part of a major stationary source which makes it subject to Title V permitting. Specifically, District Rule 1401 contains the following definition:

(b)(46) "Stationary Source" means an emission unit, or aggregation of emission units which are located on the same or contiguous properties and which units are under common ownership or entitlement to use. Stationary sources also include those emission units or aggregation of emission units located in the California Coastal Waters.

This facility is a rock plant that is located on the same/contiguous property as a landfill. The two facilities do not share ownership, however the District determined that because of the interrelation between the process lines and contract language dictating the terms of Hanson's operations, the rock plant meets the criteria of being under "common... entitlement to use". As stated in the District's July 30, 2018 letter, Hanson is operating as an excavation operation for the landfill producing air space and daily cover, which makes it part of the central function of the stationary source (this is in contrast to biogas processing facilities, which typically are not considered part of the landfill stationary source as they do not have the functional interrelationship).

The landfill is also a major source for HAP as shown in the emissions summary section and subject to Title V permitting for this reason as well.

5.0 Potential to Emit and Actual Emissions

The following table shows the actual and potential emissions for the facility that are used to establish the major source status for Title V. Potential to emit is used to establish Title V applicability, but for pollutants where actual emission data shows actual emissions above major source thresholds, the PTE was not directly assessed because it is outside the scope of what is required to fully analyze facility requirements.

Pollutant	Thresholds (tpy)	Facility Actual Emissions (Landfill+flares+Engines)	Facility Actual Emissions (Hanson)	Facility Actual Emissions (Total)	Facility Potential to Emit (Landfill+Flares)	Facility Potential to Emit (Engines)	Facility Potential to Emit (Hanson)	Facility Total PTE	Major Source
Highest Federal HAP	10	6.28	<1	6.28	>10	<1	<1	>10	Y
Sum of Federal HAPs	25	23.52	<1	23.52	>25	<1	<1	>25	Y
NOx	100 (25*)	20.6	0	20.60	29.70	11.72	0	41.42	Y*
VOC	100 (25*)	89.1	0	89.10	89.69	0.43	0	90.12	Y*
PM10	100	335.2	139.5	335.20	>100	0.28	52.4**	>100	N
SOx	100	3.4	0	3.40	6.05	3.47	0	9.52	N
CO	100	8.5	0	8.50	1.24	0.01	0	1.25	N

*EPA has indicated that it intends to officially find San Diego in Severe non-attainment for ozone. Once the District finalizes its Title V rule update for this redesignation, the major source threshold will drop to 25 tpy for NOx and VOC, which will result in Sycamore Landfill stationary source becoming major for both NOx and VOC.

**PTE was last estimated for the Hanson plant as part of APCD2015-APP-004051, however this estimate has been superseded by the emission inventory from 2017 showing actual emissions above 100 tpy. However, many of these emissions are fugitive from haul roads and not considered for Title V applicability.

Actual emissions were obtained from the 2017 emission inventory. Potential to emit for the landfill+flares was calculated using estimates from application APCD2020-APP-006303 plus estimates of PTE for the flares using equipment capacity and emission factors from the original permit evaluation. PTE for the engines was determined using the original application data.

Sycamore Landfill is considered a major source of both HAP and PM-10. It may be a major source of VOC at a level of 100 tpy, but detailed calculations have not recently been conducted to evaluate an exact PTE as it has not been needed for any permit evaluation and will be irrelevant once the threshold drops to 25 tpy VOC.

6.0 40 CFR Part 64 CAM (Compliance Assurance Monitoring)

This facility operates crushers subject to NSPS OOO which are controlled by baghouses and subject to emission limits, which potentially means these units are subject to CAM. However, none of these processes have uncontrolled emissions in excess of major source thresholds by themselves, so CAM does not apply. Other PM-10 emitting equipment also is not subject to CAM due to the emissions being fugitive.

7.0 Applicable Requirements

This section summarizes the major types of requirements for this facility. These types of requirements include facility-wide, and permit specific applicable requirements. Additionally for each emission unit, the rule that results in the primary emission limitation is listed.

General Facility-wide Applicable Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. II	10(a) 10(b)	Permits Required – (a) Authority to Construct Permits Required – (b) Permit to Operate
SDCAPCD Reg. II	11	Exemptions
SDCAPCD Reg. II	19	Provision of Sampling & Testing Facilities
SDCAPCD Reg. II	19.3	Emission Information
SDCAPCD Reg. II	20	New Source Review
SDCAPCD Reg. II	20.1	New Source Review
SDCAPCD Reg. II	20.2	New Source Review
SDCAPCD Reg. II	20.3	New Source Review
SDCAPCD Reg. II	21	Permit Conditions
SDCAPCD Reg. II	24	Temporary Permit to Operate
SDCAPCD Reg. II	25	Appeals
SDCAPCD Reg. IV	60	Circumvention
SDCAPCD Reg. V	98***	Breakdown Conditions: Emergency Variance
SDCAPCD Reg. VI	101	Burning Control

Facility-wide/Other Prohibitory & Misc. Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. IV	50	Visible Emissions
SDCAPCD Reg. IV	51	Nuisance
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	54	Dust and Fumes

SDCAPCD Reg. IV	67.0.1	Architectural Coatings
SDCAPCD Reg. X	40 CFR 60 Subpart A*	NSPS General Provisions
SDCAPCD Reg. XI	40 CFR 63 Subpart A*	NESHAP General Provisions
SDCAPCD Reg. XII	1200**	Toxic Air Contaminants – New Source Review
SDCAPCD Reg. XII	1206****	Asbestos Removal, Renovation, and Demolition
40 CFR Part 61	Subpart M****	NESHAP – Asbestos
SDCAPCD Reg. X	Subpart OOO*	NSPS OOO – Standards of Performance for Non-metallic Mineral Processing Plants
40 CFR Part 60	Subpart OOO*	NSPS OOO – Standards of Performance for Non-metallic Mineral Processing Plants

**The District has adopted these rules by reference; however, any changes made to these regulations at the federal level are not immediately adopted. In the event this creates a conflict between the District adopted and federal rules, the more stringent requirements will apply.*

***Not federally enforceable*

****Breakdowns/variances are not recognized by EPA and cannot grant relief from federal enforcement of requirements*

***** 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.	Title V Permit No.	Permit Description	Applicable Rules
APCD2009-PTO-979270	APCD2020-TVP-00045	Rock Plant	50, 51, 52, 54, 20.2, NSPS OOO
APCD2020-PTO-003620	APCD2020-TVP-00045	Sand Wash Plant	50, 51, 52, 54, 20.2, NSPS OOO

Emission Limitations

Rock Plant and Sand Wash Plant	
Pollutant	Primary Limiting Regulations
NOx	NA (Not emitted)
SO2	NA (Not emitted)
VOC	NA (Not emitted)
CO	NA (Not emitted)
PM10	Rule 20.2, NSPS OOO
Toxic Pollutants*	NA

**Toxic pollutants are not subject to specific limiting requirements; however, are controlled through limitations on PM10 emissions*

8.0 Updates to the Title V Permit Incorporated into this Action

The following changes are being made to the emission unit specific permits as indicated below.

In addition to the issuance of the initial permit, the District permits will be revised to contain additional applicable requirements of NSPS OOO as described below. The District expects that the facility has been in compliance and will continue to be in compliance with the emission limits and opacity standards; however, the facility has never demonstrated compliance through performance testing or an initial set of opacity observations, so these will be required through conditions requiring testing within 60 days of issuance of the Initial Title V Permit.

60.672 Emission/Opacity standards

Each baghouse is subject to the emission standards from table 2. Since each affected facility was constructed prior to 4/22/2008, the applicable limit is 0.022 gr/dscf from each stack, and opacity of 7% conducted according to procedures of NSPS OOO. The operator will also be required to conduct a performance test in accordance with 60.675(a) within 60 days of the issuance of the Title V permit on each baghouse as one has never been conducted as required by subpart OOO.

All other process equipment is subject to the fugitive opacity standard of NSPS OOO for facilities constructed prior to 4/22/2008 listed in table 3. This includes each screen and conveyor transfer point a (except for static grizzlies), which are subject to a 10% opacity standard. Additionally, a performance test conducted according to 60.675(c)(1) will be required within 60 days of the issuance of the permit.

There are no other applicable requirements of NSPS OOO other than the requirement to submit final test reports of performance testing after completion. No monitoring requirements apply, however the permit requires monitoring and daily recordkeeping of baghouse pressure drop.

9.0 Permit Shield and Streamlining

The facility did not request any permit shields or streamlining as part of the Title V application.

The equipment specific permits contained in Attachment A also do not contain any streamlined requirements with the exception that emission limits and other requirements of NSPS OOO also have the effect of serving as requirements for operation of control equipment which was installed in accordance with BACT requirements.

10.0 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 and affected states and a public notice period. Notice will be provided to the EPA electronically through the EPS and will be sent electronically to affected states and tribes. The public notice and associated documents will be provided on our website and the public notice will be published in a newspaper. The District will incorporate any suggested changes made by EPA or the public if necessary and will re-notice if significant changes are made.

11.0 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 renewal Title V permit to be issued following public notice, EPA review, and response to any comments.

12.0 Attachments

The following are attached:

- Application Package
- Draft Permit
- Public Notice