

STATEMENT OF BASIS
Title V Permit Renewal

Facility Name: Sycamore Landfill, Inc.

Title V Application Number: APCD2018-APP-005293

Title V Permit Number: APCD2008-TVP-971226

Facility ID: APCD1989-SITE-03596

Equipment Address: 8514 Mast Blvd., Santee, CA 92071

Facility Contact: Jordy Bjorkman

Contact Information: (657) 243 4335 JBjorkman@republicservices.com

Permit Engineer: Peter Ossowski

Date: 12/22/2022

Date Reviewed:

Senior Engineer:

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 Sycamore Landfill, Inc. (Title V permit APCD2008-TVP-971226). 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, a minor permit modification Title V application has 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 2, 2018. The Title V permit expires on February 5, 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.

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 Permit				
Application Number	Application Summary	Description	Affected Emission Units	Outcome
APCD2020-APP-006303	An interim expansion for the ultimate expansion	An interim expansion of the landfill from 40,200,000 cubic yards to 43,655,000 cubic yards (an additional 3,455,000 cubic yards)	Landfill	Approved
APCD2021-APP-006740	Risk Reduction Plan (Haul roads watering)	Using a dust suppressant and a watering schedule to reduce the particulate emissions from the unpaved haul roads	Haul roads	ATC Approved and awaiting PTO so this application is not being considered at this time

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			
<u>Application Number</u>	<u>Application Description</u>	<u>Equipment</u>	<u>Approved?</u>
APCD2022-APP-007304	Minor Permit Modification to increase capacity of the landfill and addition of NESHAP conditions	Landfill	Included in current renewal action
APCD2018-APP-005293	Current Title V Renewal	Landfill	Included in current renewal action
APCD2014-APP-003804	Operational Flexibility for engines operated at landfills owned by Republic Services, Inc.	Landfill	Yes
APCD2012-APP-002330	Last Title V Renewal	Landfill	Yes

3. Facility Description

The facility comprises a non-hazardous solid waste landfill. As part of its landfill gas capture and control system, the facility is equipped with two (2) flares through which the captured gas is routed. Additionally, two combustion turbines are operated from landfill gas to generate electricity. These turbines are owned and permitted separately.

Permit Number	Equipment Description
APCD2008-PTO-971111	An active non-hazardous waste landfill operation that includes quarrying, municipal waste disposal, waste compaction, cover material application, haul road activities, and a landfill gas monitoring, collection, and flare system consisting of: Landfill Gas (LFG) collection wells with associated fittings, piping and individual well shut off valves; offsite LFG migration probes with associated fittings and sampling ports; 4 LFG blowers with associated fittings, valves and piping; flame arrestor; liquid knockout vessel; 59 MM BTU/hr enclosed ground flare (approximately 8 ft dia x 30 ft high) and a 54 MM Btu/hr enclosed ground flare (approximately 8 ft dia x 40 ft high) equipped with optical flame detectors, automatic shut off valves and auxiliary fuel. The flares are equipped with condensate injection atomizing gun, stack temperature probes, in-line LFG oxygen analyzers, and LFG flow meters at flare station.

4. Title V Applicability

Sycamore Landfill has a design capacity of approximately 33 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. In 2016, 40 CFR 60 Subpart WWW was updated with Title 40 CFR 60 Subpart XXX -- *Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014* (§§60.760 – 60.769). The landfill is also subject to 40 CFR 63 Subpart AAAA – *National Emission Standards for Hazardous Air Pollutants (NESHAP): Municipal Solid Waste Landfills*.

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. For HAPs (hazardous air pollutants), SO_x, and CO, emissions are well below major source thresholds. The facility is an area source for 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	3.4	6.2	No
Sum of Federal HAPs	25	5.9	10.9	No
NO _x	25	21.6	39.5	Yes
VOC	25	20.5	37.7	Yes
PM ₁₀	100	165.6	303.2	Yes
SO _x	100	3.4	6.1	No
CO	100	3.2	5.8	No

*The actual emissions are from the District's 2017 emission inventory.

**The potential emissions are from the engineering evaluation for APCD2021-APP-006740.

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	20.3	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	1206*	Asbestos Removal, Renovation, and Demolition
40 CFR Part 60	Subpart A	NSPS General Provisions
40 CFR Part 60	Subpart W WW	NSPS - Municipal Solid Waste Landfills
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

* 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-971111	An active non-hazardous waste landfill operation	SDAPCD Reg. IV, Rules 20.3, 21, 40, 50, 51,52, 53, 59.1, 40 CFR 60 Subpart XXX, 40 CFR 63-Subpart AAAA

Primary Limiting Regulations: Active Landfill

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	Rules 1200, 1210
Federal HAPs	Rules 1200, 1210

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

Contact Changes:

The Alternate Responsible Official was changed from Mark Clatt to Jesus Torres and the Facility Contact was changed from Tom Gardner to Jordy Bjorkman. The Permit Information Contact was changed from Tom Gardner to Holly Aasen.

Condition Changes:

The Landfill expansion and associated regulation changes was reviewed as part of the issuance of an ATC (Authority to Construct) under application APCD2020-APP-006303. 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 include 40 CFR 60 Subpart XXX requirements and remove the 40 CFR 60 Subpart WWW requirements. However, the facility informed the District they decided to “opt-in” to comply with 40 CFR 63 Subpart AAAA in lieu of the Subpart WWW. This is allowed as stated in the preamble of 40 CFR 62 Subpart OOO where it states, “... this Federal plan applies the “opt-in” provisions that allows MSW landfills affected by the NSPS and EG to demonstrate compliance with the major

compliance provisions of the MSW NESHAP in lieu of comply with the analogous provisions in the NSPS and EG. The opt-in provisions allow landfills to follow one set of operations, compliance, monitoring, and reporting provisions for pressure and temperature.” The conditions from APCD2020-APP-006303 have been added to the attached Draft Permit.

Actual annual emissions are expected to be well below permit condition limits under normal conditions.

9. Multiple Applicable Requirement Streamlining

The facility does not request Multiple Application 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 Permit
- Public Notice