



#### Air Pollution Control Board

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## ADVISORY

### NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP); SUBPART AAAA -- MUNICIPAL SOLID WASTE LANDFILLS

The Environmental Protection Agency (EPA) adopted 40 CFR Part 63 Subpart AAAA – National Emission Standards for Municipal Solid Waste Landfills on January 16, 2003. Subpart AAAA applies to any landfill that has accepted waste at anytime since November 8, 1987, and has a design capacity greater than 2.8 million tons, and an uncontrolled nonmethane organic compound (NMOC) emissions greater than 55 tons/year or is located at a major source of Hazardous Air Pollutants (HAPs). Currently, there are four landfills in San Diego County subject to Subpart AAAA:

1. Otay Landfill, 1700 Maxwell Rd., Chula Vista, 91910
2. Sycamore Landfill, 8514 Mast Blvd., San Diego, 92145
3. Miramar Landfill, 5180 Convoy St., 92111
4. San Marcos Landfill, 1595 Questhaven Rd., San Marcos, 92069.

Subpart AAAA requires the following:

- Preparation and implementation of a startup, shutdown, and malfunction plan (SSMP) for each gas collection and control system and associated monitoring equipment. Owners or operators of landfills and associated landfill functions that collect, transport, treat, or combust landfill gas including, but not limited to, power generation equipment, flares and/or gas treatment systems are responsible for submittal of plans. The SSMP may consist of a facility's standard operating procedures manual, or an Occupational Safety and Health Administration (OSHA) or other plan provided that the plan minimizes emissions consistent with safety and good air pollution control practices and corrects malfunctions as soon as possible. Guidance for preparing a SSMP can be obtained by visiting <http://www.epa.gov/ttn/atw/landfill/landflpg.html> under the Implementation Information section.
- Maintenance of records associated with the SSMP.

- Submittal of semiannual SSMP reports to the District's Compliance Division. In addition, reports required by 40 CFR 60.757 (f) (Subpart WWW) must now be submitted semiannually under Subpart AAAA. (Subpart WWW only required annual submissions.)
- Reporting of any actions taken during a SSM event that were not consistent with the SSMP where an exceedance of an applicable emission limitation included in the landfill NESHAP occurred. Reports must be made within two days by phone or fax and in writing within seven working days after the end of the SSM event identifying:
  1. Name, title, certifying signature of the owner/operator or responsible official.
  2. Explanation of the circumstances of the event.
  3. The reasons why you did not follow the SSMP.
  4. Describe all excess and/or parameter monitoring exceedances that you believe occurred during the SSM event.

Existing sources subject to Subpart AAAA must comply with its requirements by January 16, 2004. The District is requesting a written response by February 16, 2004, from the affected sources stating a SSMP has been prepared and implemented. The District will require submittal of the SSMP for review and approval by March 16, 2004.

A copy of the Subpart AAAA NESHAP is available by contacting the District at (858) 650-4700 or by visiting <http://www.epa.gov/ttn/atw/landfill/lnfillpg.html>, the EPA NESHAP Subpart AAAA website.

For additional information, please contact Cara Bandera, Rule Development section at (858) 650-4592 or Gary M. Hartnett, Compliance Division at (858) 650-4553.