Permit No. V-2625
October 20, 2023

IMPERIAL COUNTY AIR POLLUTION CONTROL DISTRICT

150 S. 9th St.
El Centro, CA 92243
(442) 265-1800

MAJOR FACILITY PERMIT REVIEW

Facility Name:	Imperial Landfill, Inc.
Parent Company"	Republic Services
SIC Code:	4953 (Class III Solid Waste)
Applied For:	Renewed Title V Operating Permit
Source Type:	Municipal Solid Waste Disposal
Mailing Address:	104 E. Robinson Rd. Imperial, CA 92251
Facility Location:	104 E. Robinson Rd. Imperial, CA 92251
Responsible Official:	Peter Sterenberg General Manager (928) 388 6336
Plant Site Contact:	Steven Hall Operations Supervisor (760) 353-1100
Permit Reviewer:	Jesus Ramirez, APC Division Manager

TABLE OF CONTENTS

I. Introduction

Pursuant to Rule 900, of the Imperial County Air Pollution Control District (APCD) Rules and Regulations, the Air District intends to issue a renewal Title V Operating Permit to the Imperial Landfill, Inc. (Imperial Landfill) for the waste disposal operation which is located at 104 E. Robinson Rd. in Imperial, CA. Imperial Landfill operates an active landfill gas recovery and control system consisting of landfill gas recovery wells, distribution lines, and a flare station for the destruction of landfill gases produced from the covered sections of the landfill. The facility operates under Title V Operating Permit Number V-2625. The renewal Operating Permit includes conditions to ensure that all Federal, State and District requirements are satisfied.

II. Facility Description

Imperial Landfill is located in the City of Imperial, approximately 0.5 miles west of Highway 111 and 5.6 miles north of I-8. The surrounding land uses are agricultural and residential. The landfill is made up of Landfill No.1 (31-acre landfill inactive (closed) section), Landfill No. 2 (42-acre inactive (closed) section) and an 89-acre active section. House-hold and green waste are primarily disposed at the site, along with smaller commercial nonhazardous waste streams. Hazardous waste of any form is not accepted at the facility.

Landfill No. 1 (31-acre section) is closed and capped, containing an estimated 1,670,000 tons of waste. The landfill opened up to accept waste in 1972 and was continuously active receiving waste until it was closed and capped in 2003. Landfill No.1 is a pre-Subtitle D Resource Conservation and Recovery Act (RCRA) landfill and has no bottom liner. In 2004, a gas collection and control system comprising of 23 vertical wells and an enclosed combustor was installed to control landfill gas from the closed Landfill No.1. The gas control system is sized to also control gas from other sections of the landfill. The gas control system commenced operation in early 2005. The gas control system was installed at Landfill No. 1 because of the possibility that gas may intrude into the water table, as the site has no bottom liner. The installed flare controls landfill gas (LFG), predominantly methane and NMOC, but as a result of the flare combustion secondary emissions are created. Additionally, trace gases are being destroyed, which could present adverse acute and chronic exposure to workers and nearby residents.

The Landfill No. 2 (42-acre inactive) has a design capacity of approximately 2.56 million tons of MSW. Landfill No. 2 was constructed in full accordance with federal regulatory RCRA Subtitle D. Imperial Landfill under their current CUP is allowed to increase disposal rates, which they have done substantially as the landfill has gone from a limit of 666 tons per day (TPD) to a limit of 1135 TPD. This has taken place mainly due to the

increase of demolition wastes, as well as some maquiladora wastes from Mexicali, Mexico which must be returned to the United States as required by law. The Landfill No. 2 reached design capacity in 2012. The Landfill No. 2 gas collection system includes approximately 23 vertical landfill gas extraction wells, gas collection piping, a flare station, a condensate sump with pneumatic pump, and a condensate storage tank. The existing monitoring system includes landfill gas probes surrounding the landfill to monitor for subsurface landfill gas migration. The landfill gas collection system continues to be built, adding wells on an as-needed basis to ensure adequate collection as the landfill gas generation rate increases.

In 2012, Imperial Landfill expanded the capacity for the landfill, from 3.8 million tons capacity to a capacity greater than 5 million tons. An 89-acre landfill section was added to the Facility and the maximum daily waste acceptance rate was increased from 1,135 to 1,700 tpd. The construction was completed in 2012, with the new landfill sector accepting waste until at least 2034. The 89 acres landfill gas extraction and collection system was designed and operated similar to the 42-acre system, with the exception that the Imperial Landfill committed up to 90% collection efficiency for the 89-acre section. The 89-acre section required an expansion of the collection system, including the installation of additional vertical wells, gas collection piping, condensate traps, and perimeter landfill gas probes. The collection system is constructed to ensure that methane concentrations at the landfill surface are less than 500 ppm above background. Monitoring reports throughout the lifetime of the collection system have demonstrated continuous compliance with this limit.

The Landfill Gas Flare Abatement System has a John Zink Company Flare Unit, with a 16.4 MMBtu/hr capacity. The unit has an exhaust stack that is 5 ft. in diameter and 40 feet tall, with 5 burners. The flare has a 600 SCFM blower fan, including a Condensate Organic Vapor Granulated Carbon Control Unit. The system includes gas flow, pressure, and temperature gauges and recorders to ensure that the system is working effectively and data can be properly recorded.

Imperial Landfill operates one Ingersoll Rand P185 air compressor, which is used to blow out equipment radiators. The air compressor is powered by a John Deere Model 4042TF281 diesel engine, which has a rating of 49 hp at 2,800 rpm. The engine is certified as a Tier 4.

III. Current Emission Status

Imperial Landfill is not a major facility either for hazardous air pollutants (HAP) or for regulated pollutants. Emissions of HAP are well below the 10 tons per year individual HAP and/or 25 tons per year of any combination of HAPs. However, per the requirements

of 40 CFR Part 63 Subpart AAAA, the landfill is defined as an existing, area source, Municipal Solid Waste (MSW) landfill, that has a design capacity equal or greater than 2.5 million megagrams (Mg) and uncontrolled non-methane organic compounds (NMOC) exceeding 50 Megagrams per year limit which is subject to Title V requirements.

The total annual emissions and non-methane organic compounds (NMOCs), of the facility are included in the table below. The table displays the emissions produced from the various combustion sources at the facility, as well as the landfill gas surface emission sources of Imperial Landfill:

Potential Yearly Emissions (tons/yr)

Equipment	PM10	VOC	SOx	NOx	CO	NMOC
Flare	0.83	2.25	1.19	4.61	14.17	
Air Compressor	0.011	0.018	0.089	0.262	0.205	
Landfill Gas Surface Emissions		0.13				0.33
Fugitive Emissions	30.59					
Total	31.43	2.39	1.27	4.87	14.37	0.33

Landfills generate gas from anaerobic and aerobic decomposition of organic waste. The landfill gas at Imperial Landfill, under anaerobic decomposition, is composed of approximately 50% methane (CH_4) and 50% carbon dioxide (CO_2). The gas will also contain small amount of non-methane organic compounds, hazardous air pollutants (HAP), and inorganic compounds. Particulate emissions due to traffic from waste haulers, waste dumping, waste cell movement, application of soil cover, waste and soil compaction and wind erosion make up a significant amount of fugitive PM10 pollution.

IV. Applicable Requirements

In Accordance with information submitted in the Title V application and the Air District review, the following are the District requirements that apply to Imperial Landfill.

Applicable Requirement	**Equipment Affected**	**Adoption Date**
Rule 101, Definitions	Facility Wide	09/11/18
Rule 201, Permits Required	Facility Wide	10/10/06
Rule 207, Standards for Permit to Construct	#1 31 Acre Landfill #2 42 Acre Landfill 89 Acre Landfill Flare Station, Air Compressor	09/11/18

Rule 208, Standards for Permit to Operate	#1 31 Acre Landfill #2 42 Acre Landfill 89 Acre Landfill Flare Station, Air Compressor	09/14/99
Rule 400, Fuel Burning Equipment – Oxides of Nitrogen	Flare Station, Air Compressor	09/14/99
Rule 401, Opacity of Emissions	Facility Wide	11/19/85
Rule 403, Quantity of Emissions	Flare Station, Air Compressor	05/18/04
Rule 405, Sulfur Compounds Emission Standards, Limitations, and Prohibitions	Air Compressor	05/18/04
Permit to Operate No. 2625B-5	#1 31 Acre Landfill #2 42 Acre Landfill 89 Acre Landfill Flare Station Air Compressor	N/A
Rule 900-Operating Permits	Facility Wide	12/20/11

The following are Federal requirements that apply to Imperial Landfill and are incorporated into this Title V Operating Permit.

Requirement	Description/Notes
40 CFR Part 60, Subpart WWW	All refences from 40 CFR Part 60, Subpart WWW were removed from the Operating Permit. This regulation no longer applies to Imperial Landfill as EPA clarified that 40 CFR 60, Subpart Cf once implemented via a state or federal plan supersedes Subpart WWW.
40 CFR Part 60, Subpart Cf	In 2016, the EPA published the EPA's municipal solid waste (MSW) landfill guidelines and compliance timelines for MSW landfills (Emission Guidelines) to reduce both methane and NMOC emissions from existing MSW landfills at 40 CFR 60, subpart Cf. The Emission Guidelines require the installation of a landfill gas collection and control system (GCCS) at MSW landfills that exceed a specified design capacity and NOMC emission threshold. Many California landfills subject to the Emission

	Guidelines were already subject to the State's Landfill Methane Regulation (LMR), and were already required to install and operate a GCCS. Due the Emission Guidelines require that states submit plans that identify how each state intends to meet the federal requirements, California utilized the LMR for California's State Plan to implement the Emission Guidelines. In 2020, EPA partially approved and partially disapproved California's State Plan. While LMR's provisions are equivalent to or more stringent than the Emission Guidelines, EPA's partial disapproval concerns the omission of certain provisions related to wellhead monitoring. In May 2021 the EPA finalized a Federal Plan to implement the Emission Guidelines which includes specific reporting requirements (40 CFR 60, Subpart OOO) in addition to those required by LMR.
AB 32 Landfill Methane Rule (LMR)	AB32 LMR applies to active MSW landfills that received waste after January 1, 1977 and have a capacity greater than 450,000 tons of waste-in-place. Imperial Landfill has already triggered the initial design plan and installation requirements for a gas collection and control system of the LMR and uses an enclosed flare to meet the control device requirements.
40 CFR Part 62, Subpart OOO	In May 2021, U.S. EPA finalized a Federal Plan at Subpart OOO to implement the Emission Guidelines for existing municipal solid waste (MSW) landfills for states that lack a fully approved plan under Subpart Cf, which includes specific reporting requirements in addition to those required by CARB under LMR. The EPA identified the following Subpart OOO requirements that a landfill in California needs to meet: 40 CFR 62.16716(c); 62.16720(a)(4); 62.16722(a)(2); and (a)(3); 62.16724(k); and 62.16726(e)(2) and (5). Imperial Landfill is therefore subject to these requirements and they are included in the proposed Operating Permit to compliment LMR requirements.
40 CFR Part 63, Subpart AAAA	This regulation requires landfills with design capacity greater than 2.5 million mega-grams and that has estimated uncontrolled emissions equal or greater

	than 50 megagrams of NMOC per year, to install a landfill gas recovery and control system. Imperial Landfill is therefore subject to this requirement, as the landfill design capacity is greater than 2.5 million megagrams and the calculated maximum emissions rate exceeds 50 megagrams of NMOC per year.

V. Statements of Basis

The proposed Operating Permit includes conditions to ensure that all Federal requirements will be fully satisfied. Additionally, the permit has been designed to have adequate monitoring, recordkeeping and reporting requirements to demonstrate continuous compliance with the permit conditions.

The proposed Operating Permit includes all applicable requirements from California's current, partially approved plan for implementing 40 CFR 60, Subpart Cf. California's plan is the Landfill Methane Rule or LMR)[17 CCR 95460-95476]. Under LMR, Imperial Landfill is defined as an active MSW landfill greater than or equal to 450,000 tons of waste-in-place, has a calculated landfill gas heat input capacity greater than 3.0 MMBtu/hr, and has opted to demonstrate compliance using a gas collection and control system with an enclosed flare. The proposed permit conditions reflect the requirements for ongoing compliance with the gas collection and control system using an enclosed flare as the control device. Since the California plan is only partially approved by EPA, requirements of 40 CFR 62, Subpart OOO were also added, which is the federal plan for MSW landfills that lack fully approved state plan to implement 40 CFR 60 Subpart Cf. The EPA identified the following Subpart OOO requirements that a landfill in California needs to meet: 40 CFR 62.16716(c); 62.16720(a)(4); 62.16722(a)(2); and (a)(3); 62.16724(k); and 62.16726(e)(2) and (5). As such, these specific provisions were added as operating conditions. Lastly, the proposed Operating Permit included all applicable requirements from 40 CFR 63, Subpart AAAA. Under this regulation, Imperial Landfill is defined as an existing, area source, MSW landfill, that has a design capacity equal to greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m^3) and has estimated uncontrolled emissions equal to or greater than 50 megagrams per year (Mr/yr) NMOC.

The following provides additional clarification on the various sections of the permit, as well as certain requirements listed within the permit conditions.

A. Equipment/Source List

This section of the permit lists all permitted sources, with each one considered to be a significant source. Permitted sources are those that require an Air District operating

permit pursuant to Air District Rule 201. Each source has the potential to emit more than two pounds per day (uncontrolled) of any affected pollutant, and several also have the potential to emit toxic air contaminants (TACs). All abatement (control) devices that control permitted sources are listed as well in this section. An abatement device may also be a source of secondary emissions. If the primary function of a device is to control emissions, it is considered an abatement device.

B. General Conditions

The first section of the permit contains administrative requirements and conditions which apply to all facilities. This permit does not include Title IV or accidental release provisions.

1. Original Authority to Construct (ATC) and Permit to Operate (PTO) No. 2625 was issued to Imperial Landfill in 1997 for a landfill expansion of 2.8 million tons of MSW. Among the permit conditions of PTO No. 2625, a landfill gas control system was required if NMOC emissions were calculated to be greater than 17 megagrams per year, using 40 CFR Part 60 WWW, Tier 2 methodology. The permit was later acquired by the Allied Waste Company in 2000. In 2002, Allied applied for an amendment to Permit No. 2625, as the landfill planned to install and operate an active landfill gas control system, with an enclosed flare. In 2003, a green waste shredder was later added to the landfill requiring a permit revision to ATC No. 2625B. Finally in 2010, PTO No. 2625B-2 was amended in order to reflect the removal of two combustion units, a trommel screen and a water pump.

2. 40 CFR Part 60, WWW, required landfills constructed after 1991 with design capacity greater than 2.5 million mega-grams, and that emit or will emit greater than 50 megagrams of NMOC, to install a landfill gas recovery and control system. Imperial Landfill was therefore subject to this requirement, as the landfill design capacity is greater than 2.5 million megagrams and the calculated maximum emissions rate was 100 megagrams per year when the landfill reached capacity in 2011-2012. Air District Permit 2625B-2, was designed to complied with subpart WWW and required that Imperial Landfill install and maintain a landfill gas recovery system once the total NMOC of the site was equal to or above 17 megagrams per year.

3. In 2012, the permittee submitted an application to modify Permit to Operate # 2625B-2 to expand the footprint of the landfill. The project consisted of the addition of a new 89 acres landfill section and an increase in the daily waste acceptance rate for the facility, with the new landfill sector accepting waste until at least 2034. The Air District Permit was still required to complied with subpart

WWW and required that Imperial Landfill install and maintain a landfill gas recovery system. The Permit to Operate #2625B-2 was amended following the District's NSR procedures. The Permit to Operate number was changed to 2625B-3. The permit is presently held by Republic Services.

4. In 2011, Republic solicited Geo-Logic Associates (GLA) to perform a silt content analysis on site access roads at Imperial Landfill. In 2013, the permittee submitted an application to modify Permit to Operate # 2625B-3 to revise the PM10 emissions inventory for unpaved roads at the landfill since the silt content analysis results show that actual silt content is lower than the default values used in permit review 2625B-3. The new fugitive PM10 emissions resulted in a reduction of yearly PM10 emission offsetting requirements. The Permit to Operate #2625B-3 was amended following the District's NSR procedures. The Permit to Operate number was changed to 2625B-4.

5. Imperial Landfill has submitted an application for a modification to Permit to Operate (PTO) No. 2625B-4 to change key permit conditions in order to ensure Imperial Landfill can stay in full compliance with the Authority to Construct and Permit to Operate conditions. In addition, the Air District will update the permit conditions to remove all references from 40 CFR 60, subpart WWW due to this regulation no longer applies to Imperial Landfill, instead new conditions will be added to assure that the permit is in compliance with 40 CFR 63, Subpart AAAA and the Methane Emissions from Municipal Solid Waste Landfills (LMR) regulation. The Authority to Construct #2625B-4 will be amended following the District's NSR procedures (a complete review of this application is attached). Public notice of this amendment will be published along with the Title V Operating Permit. The Permit to Operate number will be changed to 2625B-5. The amended Permit to Operate #2625B-5 will become federally enforceable; therefore, the Permit to Operate conditions will be incorporated into the Title V Operating Permit.

C. Landfill Controls and Emissions Standards

1. 40 CFR Part 63, Subpart AAAA, and AB 32 LMR

All applicable landfills are required to install a gas recovery and control system that complies with 40 CFR '63.1959(b)(2)(ii). As previously mentioned, the landfill installed a gas collection and control system that is in compliance with Subpart AAAA in 2004. As per 40 CFR 63.1959(b)(2), the recovery and control systems, whether active or passive, must be designed to handle the maximum landfill gas flow expected to be generated from the entire landfill area. Control systems shall reduce NMOC by 98 weight-percent or reduce the outlet NMOC concentration to

less than 20 parts per million by volume, dry basis as hexane at 3 percent oxygen. In addition, LMR (17 CCR 95464(b)(2)) requires the MSW to route the collected gas to an enclosed flare that achieves a methane destruction efficiency of at least 99 percent by weight. The Subpart AAAA and LMR requirements are included as Permit Conditions in Section III.A of Imperial Landfill's proposed Operating Permit.

2. ATC 2625 B-5 Emission Standards

Section III.A of the proposed Operating Permit contains conditions which set forth emissions standards that lead to the permittee being in compliance with the aforementioned control requirements for NMOC. Additionally, per BACT requirements of Air District Rule 207, emission limits are established in Air District Permit No. 2625B-5 for an active flare (enclosed combustor). The flare shall not exceed 0.065 lbs/MMbtu for NOx and 0.20 lbs/MMbtu for CO, along with the NMOC destruction efficiency of minimum 99.2%, which is listed as conditions in Section VI of ATC No. 2625B-5. The landfill gas control system must also comply with Air District's Prohibitory rules: a stack opacity no greater than 20 percent for no more than 3 minute in any 1 hour, a stack sulfur compound concentration of less than 0.2% by volume (2,000 ppmv), and a grain loading of less than .2 gr/scf. Small concentrations (33ppm) of hydrogen sulfide and mercaptan can be in the landfill gas, and when oxidized to SO_2, will be substantially less than the 0.2% volume limit. The grain loading will be substantially less than 0.2 grains/scf (solid particles). A typical flow rate for an enclosed combustor, using the turndown design, is in the 2500 to 3000 scfm range. Concentrations are expected to be in the 0.005 gr/scf.

D. Operational Standards

1. The proposed Operating Permit contains operating parameters, in Section IV, for the landfill gas control system to ensure the minimum destruction level of 99.2% for NMOC landfill gas. The temperature control system contains thermocouples that will shut the system down if combustion temperatures cannot be maintained between 1400 and 1800 degrees Fahrenheit. The system light alarm will come on to alert operators while simultaneously notifying the maintenance contractor by telephone. Monitoring requirements, with the varying methods and procedures, are listed under Section VI of the proposed Operating Permit.

2. As mentioned earlier, the EPA identified the following Subpart OOO requirements that a landfill in California needs to meet: 40 CFR 62.16716(c); 62.16720(a)(4); 62.16722(a)(2); and (a)(3); 62.16724(k); and 62.16726(e)(2) and (5). As such, these specific provisions were added as operating conditions in the Title V permit.

Of these five added conditions, any requirements specific to the wellhead temperature was cited from 40 CFR 63,1958(c)(1), as allowed by 40 CFR 62.16716, 62.16720, and 62.16722. The basis for this change is due to the fact that EPA allows an option for MSW landfills to operate their gas collection and control systems in compliance with the similar provisions in 40 CFR 63, Subpart AAAA in lieu of the provisions specified in 40 CFR 62, Subpart OOO. If a landfill "opts in" to this compliance method, it allows landfills to follow one set of operating, compliance, and monitoring requirements for the gas collection and control system. Imperial Landfill "opted in" to the compliance method of complying with 40 CFR 63, Subpart AAAA in lieu of the provisions specified in 40 CFR 62, Subpart OOO. Therefore, the APCD is proposing the higher temperature requirement from 40 CFR 63,1958(c)(1) (Subpart AAAA) which requires each interior wellhead in the collection system must operate with a landfill gas temperature less than 62.8 degrees Celsius (145 degrees Fahrenheit). Higher operating levels may be established by the permittee, however supporting data must demonstrate that the elevated parameter does not cause fires or significant disruption of the anaerobic decomposition by killing methanogens [40CFR 62.16716(c))]. The APCD has not approved higher wellhead temperature for Imperial Landfill other than 62.8 degrees Celsius, although the option for the facility to request a higher temperature with demonstration remains pursuant to conditions IV.3.c and IV.18 of the proposed Operating Permit.

E. Fugitive Dust Control

In Imperial Landfill's Permit, PTO No. 2625B-5, conditions are included in Section IV to ensure that fugitive dust is sufficiently controlled on the premises. Fugitive dust must be controlled on all active roadways through the application of wet suppression techniques, such as water. Imperial Landfill operates a dedicated water truck to meet the minimum surface moisture content level of 4%. The proposed Operating Permit contains conditions in Sections I.8 and VIII mandating that the permittee shall conduct EPA 22 visual emissions (VE) observations for all dust producing sources. Additional conditions have been inserted to monitor fugitive dust, such as the permittee having a CARB certified visible emissions reader determine compliance with opacity standards.

F. Periodic Monitoring

Compliance with the Landfill Gas Flare Station emissions limits will be demonstrated through annual source testing. Source test results carried out in November 10, 2022 confirmed compliance with the NOx, CO, and NMOC limits in the proposed Operating Permit, Section III.A.2 and PTO No. 2625B-5.

Section VI.1 and 2 of the proposed Operating Permit contains monitoring provisions that require the permittee on a monthly basis to measure gauge pressure in the gas collection header at each well, as well as the temperature and nitrogen or oxygen for each well to determine if excess air infiltration into the landfill is occurring. It is critical to sustain levels in the landfill under an anaerobic state in order to maintain a steady generation of methane, and subsequent biodegradation, thereby reducing surface off-gassing of methane.

Applicable landfills must meet certain requirements and standards for fugitive surface landfill gas. Surface landfill gas (3 inches above the surface) must be maintained at less than 500 ppm methane above background and is accomplished by maintaining a well design gas recovery and control system. This item is addressed in the proposed Operating Permit, Section IV.3.d per the requirement in 40 CFR ' 63.1958(d)(1). In addition, LMR requires to operate the gas collection and control system so that there is no landfill gas leak that exceeds 500 ppmv, measured as methane. This item is addressed in the proposed Operating Permit, Section IV.11(b) per the requirement in 17 CCR 95464(b)(1). The permittee shall monitor on a quarterly basis with an approved portable monitor which meet the requirements of Section V.5 of the proposed Operating Permit, thereby meeting the requirements of 40 CFR ' 63.1958(d). Emissions greater than 500 ppm above background shall be recorded as a monitored exceedance, with the permittee implementing cover maintenance or making adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance. The location in question shall then be re-monitored within 10 calendar days of detecting the exceedances.

G. Recordkeeping

Under the proposed Operating Permit Section VIII, the permittee must maintain the following records, updated and readily accessible, for at least 5 years:

1. The landfill design capacity
2. Year to year waste acceptance rate
3. Information of wells, well flow rates, NMOC gas concentration, flare station test reports.
4. Equipment operating parameters for all data sets.
5. A record of all exceedances for all limits under the operating permit.

These conditions will satisfy the requirements listed in 40 CFR '63.1983.

H. Reporting Requirements

Under the proposed Operating Permit Section X., the permittee must report the following information:

1. Initial landfill(s) design capacity report containing a map or plot of the landfill, providing the size location of the landfill.
2. Submit every six months a written monitoring report to the APCD and U.S. EPA, identifying all deviations from permit requirements.
3. Submit quarterly landfill methane surface monitoring reports.
4. Annual flare station source test report.
5. An initial and annual NMOC emission report shall be calculated in accordance with the applicable Attachment A equations.
6. If the estimated emissions rates are consistently less than 50 Mg/yr, then the Permittee may elect to report estimated emissions rates every 5 years.
7. The permittee may submit a wastes closure report provided that no more waste dumping occurs at the landfill(s).

These conditions will satisfy the requirements listed in 40 CFR '63.1981(e) through (l).

I. Federal Enforceability of Authority to Construct Conditions.

1. Authority to Construct Permit # 2625B-5, Condition XVI.1 requires the Permittee to relinquish PM10 Stationary Emission Reduction Credits before a Permit to Operate is issued. Since Imperial Landfill is not a major source of PM10 emissions, the source has the option of satisfying this requirement by relinquishing Agricultural Burning PM10 Emission Reduction Credits. This requirement is not part of any Federal, State or SIP District Regulation, therefore, this condition is not considered federal enforceable and it will be included in the Title V Operating Permit as “District Only” Enforceable.

j. Insignificant Sources/Activities

The permittee operates several emission units and carries out some activities which are not included in the Tile V Permit due to the fact that the air emissions from these units and activities are considered insignificant. These emission units and activities are still required to comply with all federal requirements, as applicable. The Title V exclusion was granted following the guidance of the California Air Pollution Control Officers Association’s (CAPCOA) Model List of Insignificant Activities for Tile V Permit Programs, dated June 28, 2000. The emission units exempt, and the basis for their exemption, are listed in the Insignificant Activities Section, Section VI, which follows.

VI. Insignificant Activities

The following types of activities and emission units will not be included in the Title V Permit:

1. Diesel Above Ground Storage Tank. Unheated diesel aboveground storage tank, 1,000 gal capacity, Diesel storage tanks will be excluded due to the low volatility of diesel, vapor pressure < 0.1 psia. Exclusion is based on the CAPCOA Model List of Insignificant Activities for Title V Permit Programs, dated June 28, 2000.

2. Waste Oil Above Ground Storage Tank. Unheated waste oil aboveground storage tank, 1,000 gal capacity, waste oil storage tank will be excluded due to the low volatility of waste oil, vapor pressure < 0.1 psia. Exclusion is based on the CAPCOA Model List of Insignificant Activities for Title V Permit Programs, dated June 28, 2000.

3. Two Internal Combustion Engines. One Honda Air Compressor, 11 HP engine, and one Deutz 6-in Water Pump, 37 HP engine. Internal combustion engines less than 50 hp, will be exempt based on Rule 202.E.1.a and the guidelines of the Title V Operating Permit Program Submittal, Attachment C – List of Trivial Activities.

VII. Supplemental Annual Fee

The supplemental annual fee for the facilities will be determined according to the guidelines of Rule 900.G. The supplemental annual fee will be calculated according to the following equation:

s = [$58.55

per ton (CPI adjusted) x e] - f

Where:

s =supplemental annual fee in dollars
e = fee-based emissions in tons per year

The Actual emission inventory for which fee-based emission schedule applies:

Nitrogen Oxides	=	4.87
Sulfur Dioxide	=	1.27
Particulate Matter (PM-10)	=	31.43
Volatile Organic Compounds	=	2.39

Total = 39.96

f = sum (in dollars) of annual fees under Regulation III:

Source	Permit #	Fee Paid
Landfills (Based on Power/BTU)	2625B-5	$10,939.00
TOTAL		$ 10,939.00

Total Emissions of Fee Pollutants	39.96 tons/yr
Emissions of Fee Pollutants x $58.55/ton	$2,339.65
Annual Fees under Reg. III	$10,939.00
Estimated supplemental Title V Program Fee	$2,339.65 – $10,939.00 = - $8,599.35 ($0.00)

These calculations demonstrate that the annual fee paid by the facilities under Regulation III exceeds the emission fee pollutant schedule under Rule 900. Therefore, no supplemental fee will be required from Imperial Landfill.