

Public Hearing on Proposed Renewal of Title V Permit for Avenal Regional Landfill

June 16, 2022

San Joaquin Valley Air Pollution
Control District

Translation

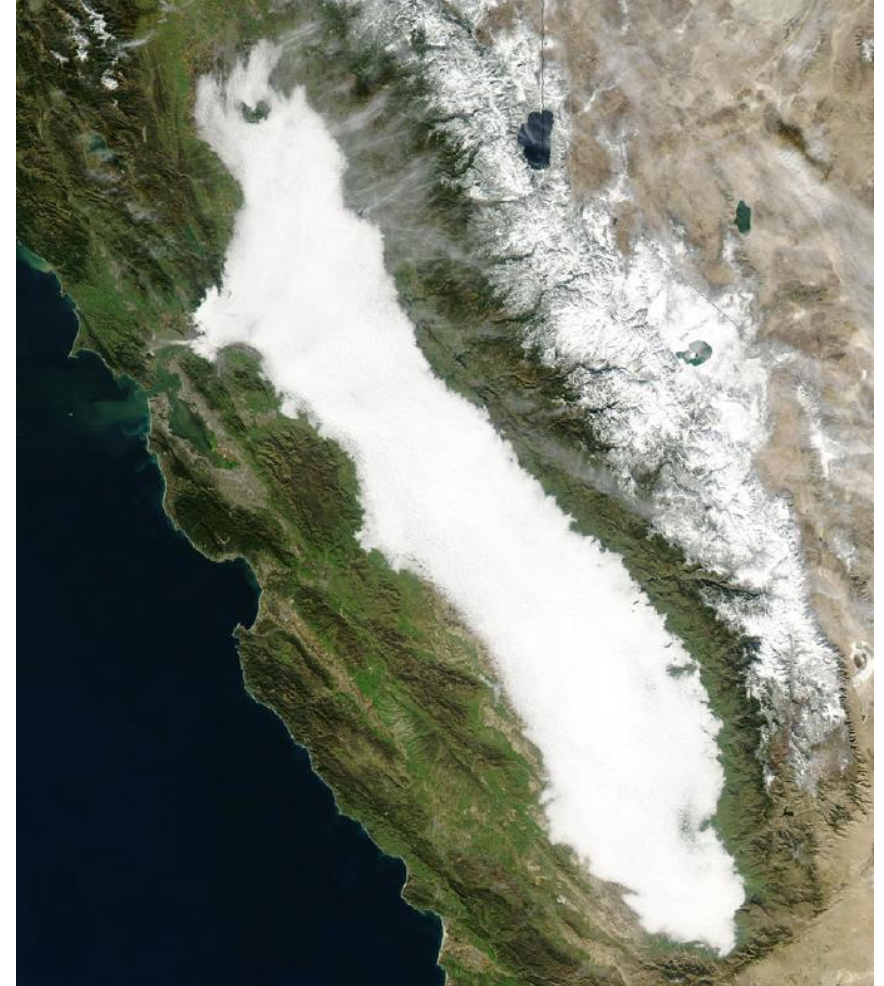
- Interpretation in Spanish is being provided
- Interpretación al Español esta siendo proveido

Hearing Agenda

- Valley's Air Quality Challenges and Clean Air Efforts
- What Is Title V?
- Title V Renewal Process
- Avenal Regional Landfill and Title V
- Next Steps
- Public Comments
 - Submit comments remotely via webcast@valleyair.org

Valley's Air Quality Challenges

- Valley's challenges in meeting federal air quality standards unmatched due to unique combination of topography and meteorology
- Valley faced with variety of challenges including role as major goods movement corridor, high population growth, pollution transport from other areas, wildfires
- Conditions require substantially greater emissions reductions in Valley to meet clean air targets than other regions



Clean Air Efforts in the San Joaquin Valley

- Toughest air regulations on businesses, cars and trucks, consumer products, and Valley residents
- Reduction of health risk from existing and new businesses through District's permitting and air toxics hot spots programs
- District regulations enforced through permitting and enforcement programs (permitting, inspection activities, compliance assistance, community engagement/complaint response)
- Air quality throughout the Valley has improved significantly
- Grant programs: over \$4.5 billion public/private investment in clean air projects resulting in over 220,000 tons of emissions reductions
- Clean air efforts must continue

What is Title V?

- Established through the Clean Air Act
- Title V is a federally mandated operating permit program which requires major sources to maintain permits which can be enforced by the Environmental Protection Agency (EPA) and the public
- This is in addition to any local permits required by the Air District

What is Title V? *cont.*

- These are combined into one operating permit, with the Title V conditions identified as “Federally Enforceable through Title V Permit”
- Title V permits include appropriate conditions for all Federally applicable rules that apply to the source
- Title V permits are issued for up to a five-year period

Title V Renewal Process

- Source submits application per the timelines in Rule 2520, *Federally Mandated Operating Permits*
- Renewal applications submitted 6 to 18 months before the current permit expires qualify for application shield
 - Source can continue to operate while the Title V permit renewal is being processed
- District reviews permits and prepares evaluation

Title V Renewal Process *cont.*

- Evaluate new and amended rules since the last Title V permit was issued
- Update permits to ensure they contain all appropriate Federally applicable conditions
- The proposal to renew the permit is sent to the Federal EPA and California Air Resources Board (CARB) for their review and approval

Title V Renewal Process *cont.*

- The proposal is posted on the District's website (www.valleyair.org)
- The applicant, CARB and the public have 30-days from date posted on the website to submit written comments on the draft permits
- The EPA has 45-days to comment on the draft permits

Title V Renewal Process *cont.*

- The District makes changes to conditions based on comments received, if appropriate
- Under Rule 2520, the public may also request to have a public hearing, during which verbal comments may be given
 - The California Rural Legal Assistance on behalf of HEAL, requested a public hearing for the proposed renewal of Avenal Regional Landfill's Title V permit
- The final permit, if approved, will be sent to the applicant with copies to CARB, EPA, and anyone who commented or wishes to be notified of the permitting action

Avenal Regional Landfill and Title V

- Only one permit unit at this facility
- C-3839-1-13:
 - One municipal solid waste receiving and landfill operation with a condensate storage tank and gas collection and control system with a sulfur scrubber system served by a flare
- Facility is a Major Source for Volatile Organic Compounds (VOCs) (i.e. Potential VOC emissions are greater than 10 tons/year)

Federally Enforceable Requirements

- As part of the Title V renewal process, the District reviewed all federally applicable regulations for Avenal Regional Landfill's operation
- Some of the Federally enforceable regulations Avenal Regional Landfill is subject to include:
 - District Rule 1081, Source Sampling
 - 40 CFR 62 Subpart OOO, Standards of Performance for Municipal Solid Waste Landfills
 - 40 CFR 63 Subpart AAAA, National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills
- Although not part of the Title V renewal, District also reviewed all non-federally applicable regulations

Preliminary Decision

- Based on the District's evaluation, the proposed renewed Title V permit satisfies all Federally and non-Federally enforceable regulations
- The proposal to renew the permit was sent to EPA and CARB on May 10, 2022, and posted on the District's website on May 9, 2022
- The District will accept public comments until June 30, 2022
 - Public comments will be accepted for an additional two weeks after this hearing

Next Steps

- Will review all comments received by June 30th and prepare responses, including changes to conditions, if appropriate
- Will issue renewed permits, or deny renewal, and send our final decision to applicant, CARB, EPA, and commenters
- Post final decision on District's website

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Public Comments