

***ANTELOPE VALLEY***  
***AIR QUALITY MANAGEMENT DISTRICT***

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**Preliminary Determination - Statement of Basis**

*For the Initial Issuance of*

**FOP Number: 297602129**

*For:*

**Waste Management of California**

*Facility:*

**Lancaster Landfill & Recycling Center**

*Facility Address:*

**600 E Avenue F**

**Lancaster, CA 93535**

**Document Date: 6/6/24**

**Submittal date to EPA/CARB for review on or before: 6/6/24**

**EPA/CARB 45-Day Commenting Period ended at COB: 7/21/24**

**Public Notice Posted, on or before: 6/6/24**

**30-Day Public Commenting Period ended at COB: 7/6/24**

**Permit Issue date: On or about 7/22/24**

**Permitting Engineer:**

**Taylor Morais**

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**2551 WEST AVENUE H, LANCASTER, CA 93536**  
**PHONE: (661)723-8070 • EMAIL: ENGINEERING@AVAQMD.CA.GOV**

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**A. FACILITY IDENTIFYING INFORMATION:**

<u>Owner/Company Name:</u>	Waste Management of California
<u>Owner Mailing Address:</u>	Waste Management of California 600 E Avenue F, Lancaster, CA 93535
<u>Facility Name:</u>	Lancaster Landfill & Recycling Center
<u>Facility Location:</u>	600 E Avenue F Lancaster, CA 93535
<u>AVAQMD Federal Operating Permit Number:</u>	297602129
<u>AVAQMD Company Number:</u>	2976
<u>AVAQMD Facility Number:</u>	2129
<u>Responsible Official:</u>	Michael Dudley
<u>Phone Number:</u>	661-223-3418
<u>Email:</u>	Mdudley1@wm.com
<u>Facility "Site" Contacts:</u>	Tracy Freeman
<u>Phone Number:</u>	818-394-5871
<u>Email:</u>	tfreema7@wm.com
<u>Nature of Business:</u>	Sanitary Landfill
<u>NAICS Code:</u>	562212 – Solid Waste Landfill
<u>SIC Code:</u>	4953 – Refuse Systems
<u>Facility Coordinates:</u>	Lat/Long: 34.7474 / -118.1165

**B. INTRODUCTION:**

***1. Description of Facility***

This facility is a Class III municipal solid waste (MSW) landfill as defined by the Resource Conservation and Recovery Act (RCRA) Subtitle D located at 600 East Avenue F in the City of Lancaster, California. The facility is located within a portion of Section 35 and Section 36, Township 8 North, Range 12 West, of the San Bernardino Meridian, Los Angeles County, California. Lancaster Landfill & Recycling Center (LLRC), Waste Management of California, is a municipal solid waste disposal facility that began accepting waste in 1954. The site occupies approximately 276 acres, of which 209 acres are permitted for disposal. The current capacity of the landfill is 27.7 million cubic yards, and the amount of waste-in-place is 13,017,160 cubic yards (9,952,333 cubic meters) as of September 2023. Using a Waste Density of 0.8 tons per Cubic Yard, the design capacity is calculated to be 22.16 million tons (20.1 million megagrams).

LLRC is permitted to receive disposal and recycling of household, commercial, construction, renovation, and demolition wastes and petroleum-contaminated soils; identified as SWIS (Solid Waste Information System) Number 19-AA-0050 and classified as Active.

This Landfill has a Gas Collection and Control System (GCCS) that controls Methane as well as VOC emissions. The facility is subject to the California Regulation to Achieve Greenhouse Gas Emission Reductions - Methane Emissions from Municipal Solid Waste Landfills [17 CCR 95460-95476]. Under this regulation, this facility is defined as an Active MSW Landfill Greater Than or Equal to 450,000 tons of Waste-in-Place [Title 17 Section 95463(b)]. This facility has a calculated landfill gas heat input capacity (HIC) greater than 3.0 MMBtu/hr [Title 17 Section 95463(b)(2)] and shall demonstrate compliance using a Gas Collection and Control System with an enclosed flare with District Permit C012559. The California plan is only partially approved by EPA; therefore, the facility is subject to the following provisions of 40 CFR 62, Subpart OOO: 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); required for Landfills Accepting Waste After November 8, 1987, and Commenced Construction Before July 17, 2014 and have not been modified or reconstructed since July 17, 2014.

Title V applicability is triggered for LLRC by the Emission Guidelines (EG) for Municipal Solid Waste (MSW) Landfills, promulgated under 40 Code of Federal Regulations (CFR) Part 60, Subpart Cf -Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills.

LLRC is also subject to 40 CFR Part 63 Subpart AAAA National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills.

1. LLRC submitted an initial design capacity report and a Tier 1 Emission Rate Survey. The results of the Tier 1 Survey indicated that the NMOC emissions exceeded the standard of 50 megagrams per year, which was the requirement under 40 CFR 60 Subpart WWW.

2. LLRC submitted a Gas Collection and Control System Design Plan prepared by a professional engineer to the Antelope Valley Air Quality Management District (AVAQMD or District). The design plan submittal met the permit modification requirements of Subpart WWW. The design plan included the operational standards, test methods, procedures, compliance measures, monitoring recordkeeping, and reporting provisions as described in 40 CFR 60.754 through 40 CFR 60.758.

3. LLRC installed a landfill gas collection and control system within 30 months of exceeding 50 Mg per year of NMOCs.

4. LLRC will continue to comply with the monitoring, reporting, recordkeeping, and test methods pursuant to requirements in the California LMR; NSPS 40 CFR Part 60, Subpart Cf; and NESHAP Subpart AAAA.

Disposal of MSW at LLRC is accomplished by a variety of on-site processes as described: Microbial degradation of buried refuse generates potential LFG emissions, containing nonmethane organic compounds (NMOCs), VOCs, and hazardous air pollutants (HAPs). These emissions are both fugitive and non-fugitive. These emissions are controlled through a GCCS as required by the New Source Performance Standards (NSPS).

Refuse hauling vehicles deliver refuse to the landfill as well as remove certain materials and byproducts from the site. Refuse hauling vehicles and other on-site vehicles generate fugitive dust (particulate matter) emissions while traveling on haul roads and other portions of the landfill site.

One control measure to mitigate dust at the site is using a water truck. The water truck moves at slow speeds across the site, spraying a wide area with water to reduce particulate emissions. Heavy equipment traffic on roads and the landfill surface generates fugitive dust emissions.

The GAS COLLECTION AND CONTROL SYSTEM (GCCS) consists of collection wells and a piping network, permitted as C006904; GAS CONDENSATE COLLECTION SYSTEM permitted as C006907; ENCLOSED FLARE Permitted as C012559, and HYDROGEN SULFIDE TREATMENT SYSTEM AIR POLLUTION CONTROL DEVICE Permitted as C014889.

The majority of the LFG emissions are destroyed by the flare, which includes HAPs, VOCs, and NMOCs. As a product of combustion, the flare emits nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur oxides (SO<sub>x</sub>), and combustion particulate matter (PM).

Excavation, transportation, stockpiling, and deposition of soil cover material on the landfill surface generate fugitive dust emissions. Control measures include using a water truck. The generation of fugitive dust emissions due to the load-out of cover onto the landfill surface as well as the effects of wind on cover stockpiles also occurs onsite. Landfill condensate is collected and stored in a 10,000-gallon tank. The Dual Containment Condensate tank is vented through a 55-gallon carbon filter drum. Collected liquids can be

injected in the flare, used as dust control, or injected into the active working face of the landfill.

It is noted that the fugitive emissions from this facility are not included in the designation of a New Source Review Major Facility as this facility is not listed as one of the categories listed under 40 CFR 51.165(a)(1)(iv)(C).

Miscellaneous fugitive and non-fugitive sources of emissions include landfill gas generated from microbial degradation of refuse, particulate matter (PM) generated from the use of paved and unpaved roads, PM from construction, excavation, and chipping/grinding activities, and a small amount of Volatile Organic Compounds (VOC)/ Hazardous Air Pollutants (HAPs) emissions from soils used as landfill cover.

C006904, LANDFILL GAS COLLECTION AND CONTROL SYSTEM consisting of: associated Landfill identified as SWIS (Solid Waste Information System) Number 19-AA-0050 and classified as Active.

Facility elevation is 2316 feet above sea level.

Lat/Long: 34.7474 Longitude: -118.1165

Equipment Permitted under C006904

Capacity	Equipment Description
0	Two (2) Blowers, 50 hp, 2000 CFM venting gas collection wells
0	200 maximum landfill gas collection wells, all connected to a main header
0	50 additional LFG wells as needed and 50 wells for removal/decommission as needed
0	Sulfur Adsorption Media consisting of multiple cylindrical containers filled with DARCO H2S Granular Activated Carbon, operating under District Permit C014889

C006907, GAS CONDENSATE COLLECTION SYSTEM, consisting of: Four (4) condensate pumps for condensate level control in the condensate drip legs; Condensate holding tank, 8'-0" dia. x 21'-0" S/S, and 10,000-gallon capacity, with gas blanket system or under vacuum. The dual Containment Condensate tank is vented to a 55-gallon carbon filter drum. Collected liquids can be injected in the flare, used as dust control, or injected into the active working face of the landfill.

C012559, ENCLOSED FLARE, consisting of: associated Landfill identified as SWIS (Solid Waste Information System) Number 19-AA-0050 and classified as Active.

Enclosed Flare is 9-foot in diameter and 45 feet in height. Maximum Inlet flow rate into flare is 2,000 scfm; maximum heat input rate of 60.72 MMBtu/hr; AP-42 destruction efficiencies of 98% for halogenated compounds, and 99.7% for non-halogenated compounds.

This Landfill has a Gas Collection and Control System (GCCS) that controls Methane as well as VOC, and HAP emissions; subject to, NESHAP 40 CFR 63 Subpart AAAAA, and the California Methane Regulation 17 CCR Sections 95460 through 95476.

C014889, HYDROGEN SULFIDE TREATMENT SYSTEM AIR POLLUTION CONTROL DEVICE consisting of: associated Landfill identified as SWIS (Solid Waste Information System) Number 19-AA-0050 and classified as Active.

Quantity: Two (2) carbon adsorber tanks, manufactured by Daniel Company, Size of each: 12' diameter x 19'-6" height. The system also contains associated piping, flanges, hatches, and valves.

**Table 1: Insignificant Emission Sources at LLRC:**

<b>Process Description</b>	<b>Basis for Determination of Insignificant Emissions Unit is made based on AVAQMD Rule 219- Equipment Not Requiring a Permit Pursuant to Regulation II</b>
One 5-horsepower gasoline water pump	Section (E)(2)(a); exempts internal combustion engines with a manufacturer's rating of 50 brake horsepower or less.
One 5-horsepower diesel light plant	Section (E)(2)(a); exempts internal combustion engines with a manufacturer's rating of 50 brake horsepower or less.
Arc-welding equipment	Section (E)(2)(a); exempts arc-welding equipment not used to cut stainless steel and is rated below 30 kilowatts (kW).
Two propane storage tanks	Section (E)(13)(b) each with a capacity of 19,815 gallons or less (approximately 250 and 320 gallons each)
One 240-gallon lubricating oil tank	Section (E)(13)(g) exemption
Two (2) transmission oil tanks (240 and 300 gallons each) and two (2) hydraulic fluid tanks (360 and 125 gallons each)	Section (E)(13)(g) exemption
One 240-gallon waste oil tank	Section (E)(13)(h) exemption

**Table 1: Insignificant Emission Sources at LLRC:**

<b>Process Description</b>	<b>Basis for Determination of Insignificant Emissions Unit is made based on AVAQMD Rule 219- Equipment Not Requiring a Permit Pursuant to Regulation II</b>
Water-based parts cleaning equipment	Section (E)(12)(d) exemption
Leachate collection, storage, and recirculation	Section (D)(1) exempt as calculated potential to emit (PTE) emissions are 0.00068 tons per year (tpy) for VOCs and 0.0043 tpy for HAPs.

**2. Description of Permitting Action(s)**

This Statement of Basis is for the initial issuance of the Title V Federal Operating Permit No. 297602129. The initial Title V Federal Operating Permit application was received on May 9, 2001, and met the Part 70 application deadline for AVAQMD facilities. The District requested that Waste Management submit a new application as there have been modifications to the landfill permits; additional permits issued, and a change in Responsible Official since the original submission. The most recent Title V Federal Operating Permit application was received on November 12, 2014.

The District's approach to the Title V program is to issue a single Federal Operating Permit for the entire facility, which satisfies the federal requirement for a permit under Rule 225 (AVAQMD maintains separate Title V and District permits programs). In the AVAQMD, state, and District requirements are also applicable requirements and are included in the Federal Operating Permit (Title V). These requirements can be federally enforceable or non-federally enforceable. Requirements that are enforceable by the District and State, only, are designated as such.

LLRC is subject to the Operating Permit requirements of Title V of the Federal Clean Air Act, Part 70 of Title 40 of the Code of Federal Regulations (CFR), and AVAQMD Regulation XXX, *Title V Permits*. LLRC is subject to the Title V Program under the Emission Guidelines (EG) for Municipal Solid Waste (MSW) Landfills, promulgated under 40 Code of Federal Regulations (CFR) Part 60, Subpart Cf - *Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills*, as LLRC has a design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters [40 CFR 60.31f(c)].

This evaluation document serves as the Statement of Basis for the Preliminary Determination, pursuant to AVAQMD Rule 3003(B)(1)(a)(i), and is intended to assess the adequacy of the Title V Application and explain the District's basis in issuing LLRC's Federal Operating Permit (Title V aka FOP). The proposed FOP was developed using existing regulatory conditions/requirements and incorporating those requirements as operating conditions. This review includes an analysis of applicability determinations for all sources.

The District will review and consider any comments received from the public and/or CARB and EPA during the commenting/review periods and will address any concerns

prior to the issuance of the proposed permit. Please refer to the cover sheet of this document for the public notice and review period dates.

**A copy of the application is available as a separate file.**

The Federal Clean Air Act Amendments of 1990 established a nationwide permit to operate program commonly known as "Title V". The District adopted Regulation XXX [AVAQMD Rules 3000 - 3011]; Final Title V Program Approval 1/16/04 69 FR 2511.

AVAQMD Rule 225 - *Federal Operating Permit Requirement*; Submitted in conjunction with Title V Program. Final Title V Approval: Title V approval doesn't put a rule in SIP per EPA.

The District will review and consider any comments received from the public and/or CARB and EPA during the commenting/review periods and address any concerns prior to the issuance of the proposed permit. Please refer to the cover sheet of this document for the public notice and review period dates. LLRC is required to operate in compliance with the California Landfill Methane Regulation, 40 CFR Part 63 Subpart AAAA, 40 CFR Part 62 Subpart OOO, specifically: 62.16716(c); 62.16720(a)(4); 62,16722(a)(2) and (a)(3); 62.16724(k); and 62.16726(e)(2) and (5), and New Source Review BACT and Offset Requirements of District Regulation XIII.

## **C. FEDERAL OPERATING/TILE V PERMIT:**

### **PART I: INTRODUCTORY INFORMATION**

This section of the FOP contains general information about the LLRC facility, including facility identifying information (section A), a description of the facility (section B), and a description of the facility's equipment (section C).

### **PART II: FACILITYWIDE APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING, AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS**

This section of the Federal Operating Permit contains requirements applicable to the entire facility and equipment (section A), facility-wide monitoring, recordkeeping, and reporting requirements (section B), and facility-wide compliance conditions (section C).

### **PART III: EQUIPMENT SPECIFIC APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING, AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS**

This section of the Federal Operating Permit contains equipment-specific applicable requirements including emission limitations, monitoring, and recordkeeping, reporting and testing, and compliance plans.



Summary of District State and Federal Landfill Requirements:

No references to 40 CFR 60, Subpart WWW; regulation no longer applies to LLRC, as EPA formally clarified that subpart 40 CFR 60, Subpart Cf (once implemented via a state or federal plan) supersedes subparts WWW and Subpart Cc. The final rule revises the title and applicability of subpart WWW (at 40 CFR 60.750(a)) to distinguish the applicability dates from other landfill subparts. It clarifies that after the effective date of an EPA-approved state or tribal plan implementing subpart Cf, or after the effective date of a federal plan implementing subpart Cf, owners and operators of MSW landfills must comply with the approved and effective state, tribal, or federal plan implementing subpart Cf instead of subpart WWW or the state or federal plan implementing subpart Cc [85 FR 17248].

Title V includes all applicable requirements from California's current, partially approved plan for implementing 40 CFR 60, Subpart Cf. California's plan is the *Regulation to Achieve Greenhouse Gas Emission Reductions - Methane Emissions from Municipal Solid Waste Landfills* (also known as the Landfill Methane Rule or LMR) [17 CCR 95460 – 95476]. Under this regulation, this facility is defined as an Active MSW Landfill Greater Than or Equal to 450,000 tons of Waste-in-Place [§95463(b)]; has a calculated landfill gas heat input capacity (HIC) greater than 3.0 MMBtu/hr [§95463(b)(2)]; and has opted to demonstrate compliance using a Gas Collection and Control System with an enclosed flare as specified under the Equipment Description (Part I, Section C of the FOP). LLRC has previously triggered the initial design plan and installation requirements for a gas collection and control system in sections 17 CCR 95463 and 95464(a) of the LMR; and uses an enclosed flare to meet the control device requirements. LLRC has not requested any Alternative Compliance Options pursuant to section 17 CCR 95468, under the LMR; therefore, no Alternative Compliance Options are included in the proposed permit. 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, referenced above (aka LMR) 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 a fully approved state plan to implement 40 CFR 60, Subpart Cf [86 FR 27756]. When the EPA promulgated Subpart OOO, they concurrently revised 40 CFR part 62, Subpart F, to identify the 40 CFR 62, Subpart OOO requirements that would apply to MSW landfills in California. The EPA identified the following 40 CFR 62, Subpart OOO requirements as applicable to MSW landfills in California: 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.

Operational conditions are included in the Title V Permit pursuant to 40 CFR 62, Subpart OOO, 62.16716, Operational standards for collection and control systems, specifically, section 62.16716(c); the owner or operator shall operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Celsius (131 degrees Fahrenheit). The owner or operator may establish a higher operating temperature value at a particular well. A higher operating value demonstration must be submitted to the Administrator for approval and must include supporting data demonstrating that the elevated parameter neither causes fires nor significantly inhibits anaerobic decomposition

by killing methanogens. The demonstration must satisfy both criteria in order to be approved (*i.e.*, neither causing fires nor killing methanogens is acceptable).

All applicable requirements from 40 CFR 63, Subpart AAAA are included as operational conditions in the Title V Permit. Pursuant to regulation, 40 CFR 63, Subpart AAAA, the facility is defined as an existing, area source, MSW landfill, that has a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters and has estimated uncontrolled emissions equal to or greater than 50 megagrams per year (Mg/yr) NMOC as calculated according to 40 CFR 63.1959. [ 40 CFR 63.1935(a)(3)]; current capacity of the landfill is 27.7 million cubic yards, and the amount of waste-in-place is 13,017,160 cubic yards (9,952,333 cubic meters) as of September 2023. Using a Waste Density of 0.8 tons per Cubic Yard, the design capacity is calculated to be 22.16 million tons (20.1 million megagrams). Therefore, the requirements of 40 CFR 63, Subpart AAAA are applicable to this facility.

Under this regulation, the Gas Collection and Control System as specified under the Equipment Description (Part I, Section C of this permit) is considered an Active Control System. This Gas Collection and Control System was installed prior to the adoption of 40 CFR 63, Subpart AAAA; therefore, some requirements of this regulation were already fulfilled by LLRC under other, previously applicable regulations, including the Initial Design Capacity Report (40 CFR 63.1984(a)), the NMOC Emission Rate Report (40 CFR 63.1981(c)), the Collection and Control System Design Plan (40 CFR 63.1981(d)). LLRC is required by condition to certify that these previous submissions were submitted with their first semi-annual report. Other requirements about the initial design capacity and triggering of the collection and control system are not included as proposed conditions, since this has already occurred under previous applicable regulations. The proposed permit conditions include all applicable requirements for an affected facility that has a gas collection and control system installed to ensure ongoing compliance.

There is no bioreactor located at LLRC; nor, does LLRC have a “bypass” to the enclosed flare; therefore, all requirements from 40 CFR 63, Subpart AAAA specific to bioreactors or “bypassing” are not included in the proposed conditions. All applicable requirements of 40 CFR 63, Subpart AAAA, and CFR 62, Subpart OOO are included to require LLRC’s compliance demonstration with 40 CFR 62, Subpart OOO, which is the federal plan for MSW landfills that lacks a fully approved state plan to implement 40 CFR 60, Subpart Cf [86 FR 27756].

#### **PART IV: STANDARD FEDERAL OPERATING PERMIT CONDITIONS**

This section of the Federal Operating Permit contains standard federal operating permit conditions.

## **PART V: OPERATIONAL FLEXIBILITY**

This section of the Federal Operating Permit contains information on Off Permit Changes.

## **PART VI: CONVENTIONS, ABBREVIATIONS, DEFINITIONS**

This section of the Federal Operating Permit contains information for conventions, abbreviations, and definitions used throughout the FOP.

## **PART VII: DISTRICT SIP HISTORY AND CITATIONS**

This section of the Federal Operating Permit includes the District's SIP table of rules and SIP history for all SIP citations in the FOP.

### **D. NEW SOURCE REVIEW (NSR) ANALYSIS:**

#### **1. Determination of Emissions per AVAQMD Rule 1302(C)(1).**

Based on current and Potential to Emit (PTE) emissions, the facility is designated and will remain a Minor source, not a Major source of criteria emissions; see Table 2 below:

**Table 2: Facility Emissions Source Type Determination**

<b>Criteria Pollutant</b>	<b>Facility PTE (tpy)</b>	<b>Major Source Threshold (tpy)</b>	<b>Major Source (Yes/No)</b>
CO	53.19	100	No
NO <sub>x</sub>	15.96	25	No
VOC	13.30	25	No
SO <sub>x</sub>	22.22	100	No
PM <sub>10</sub>	4.52	15	No

Presently, the AVAQMD has not been designated Prevention of Significant Deterioration (PSD) by the USEPA, nonetheless, emissions from LLRC will Not trigger PSD.

#### **PSD Analysis**

There are two types of "major stationary sources:"

One category is a "Named" stationary source category that is listed in 40 CFR § 52.21(b)(1) with the potential to emit (PTE) 100 tons per year (tpy) or more of a regulated pollutant. These sources must include Fugitive emissions in their total emission rate. ***This facility type is Not Listed in 40 CFR § 52.21(b)(1) and therefore is not required to include fugitive emissions.***

The second type is "Un-Named" and is any stationary source not listed in 40 CFR § 52.21(b)(1) with a PTE of 250 tpy or more of a regulated pollutant. A source that is major for any regulated pollutant, that is, meets the PTE for the source type, is major for all regulated pollutants. A minor source is a named or un-named source with regulated

pollutant emissions that are less than the major source thresholds (that is, 100 or 250 tpy, respectively).

***LLRC is Not Listed in 40 CFR § 52.21(b)(1) and does not have a PTE that exceeds 250 tpy for any regulated pollutant, therefore the facility is Not an existing PSD facility.***

**E. RULE APPLICABILITY ANALYSIS:**

**AVAQMD Rules:**

Rule 109 – *Recordkeeping for Volatile Organic Compound Emissions.* LLRC shall ensure that adequate records of volatile organic compound use are made and maintained. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 201/203 – *Permits to Construct/Permit to Operate.* Any equipment that may cause the issuance of air contaminants must obtain authorization for such construction from the Air Pollution Control Officer (APCO). LLRC is in compliance with this rule as they have appropriately applied for a District permit for all new equipment and maintains District permits for all residing equipment. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 204 – *Permit Conditions.* To ensure compliance with all applicable regulations, the Air Pollution Control Officer (Executive Director) may impose written conditions on any permit. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 205 – *Expiration of Permits to Construct.* Permits to construct issued to LLRC expire one year from the date of issuance unless an extension is approved in writing by the APCO. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 206 – *Posting of Permit to Operate.* Equipment shall not operate unless the entire permit is affixed upon the equipment or kept at a location for which it is issued and will be made available to the District upon request. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 207 – *Altering or Falsifying of Permit.* A person shall not willfully deface, alter, forge, or falsify any issued permit. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 208 – *Permit for Open Burning.* A person required to obtain a permit for burning pursuant to Rule 444 shall not perform any outdoor burning without obtaining the required permit first. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 209 – *Transfer and Voiding of Permits.* LLRC shall not transfer, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another. When equipment that has been granted a permit is altered, changes location, or no longer will be operated, the permit shall become void. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 210 – *Applications*. LLRC is in compliance with this rule, as they currently hold and maintain District permits to operate for all applicable equipment. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 212 – *Standards for Approving Permits*. LLRC is in compliance with this rule, as they currently hold and maintain District permits to operate for all applicable equipment. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 217 – *Provisions for Sampling and Testing Facilities*. This rule stipulates that the APCO may require the applicant to provide and maintain requirements for sampling and testing. If facilities are equipped to accommodate testing, the APCO shall notify the Owner/Operator in writing of the required size, number, and location of sampling ports; the size and location of the sampling platform; the access to the sampling platform, and the utilities for operating the sampling and testing equipment. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 219 – *Equipment not Requiring a Permit*. This rule exempts certain equipment from a District Permit. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 225 – *Federal Operating Permit Requirements*. LLRC will comply with this regulation per Part II, Section A of the FOP.

Rule 301/312 – *Permit Fees/Supplemental Annual Fees for Federal Operating Permits*. LLRC's annual permit fees are due by the applicable amounts. LLRC is currently not delinquent for any fees. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 401 – *Visible Emissions*. This rule limits visible emissions opacity to less than 20 percent (or Ringlemann No. 1). In normal operating mode, visible emissions are not expected to exceed 20 percent opacity. LLRC has specific operating conditions that enforce compliance with this rule. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 403 – *Fugitive Dust*. This rule prohibits fugitive dust beyond the property line of any emission source. LLRC has specific operating conditions to ensure compliance with this condition. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 404 – *Particulate Matter - Concentration*. LLRC shall not discharge into the atmosphere particulate matter (PM), except liquid sulfur compounds, in excess of the concentration at standard conditions, as shown in Rule 404, Table 404 (a).

(a) Where the volume discharged is between figures listed in the table the exact concentration permitted to be discharged shall be determined by linear interpolation.

(b) This condition shall not apply to emissions resulting from the combustion of liquid or gaseous fuels in steam generators or gas turbines.

(c) For this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser period.

LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 405 – *Solid Particulate Matter - Weight*. LLRC shall not discharge into the atmosphere from this facility, solid PM including lead and lead compounds in excess of the rate shown in Rule 405, Table 405(a):

(a) Where the process weight per hour is between the figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.

(b) For this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser period.

LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 407 – *Liquid and Gaseous Air Contaminants*. This rule limits CO emissions from facilities. LLRC is required to adhere to this rule per Part II, Section A.22 of their FOP.

Rule 408 – *Circumvention*. This rule prohibits hidden or secondary rule violations. The proposed renewal as described is not expected to violate Rule 408. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 409 – *Combustion Contaminants*. This rule limits the emissions of combustion contaminants exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12 percent of carbon dioxide (CO<sub>2</sub>) at standard conditions averaged over a minimum of 25 consecutive minutes. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 430 – *Breakdown Provisions*. Any Breakdown that results in a violation of any rule or regulation as defined by Rule 430 shall be properly addressed pursuant to this rule. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 431.1/431.2 – *Sulfur Content of Gaseous Fuels/Sulfur Content of Liquid Fuels*. LLRC shall demonstrate compliance with this rule through records of fuel used at the facility is either CARB-certified diesel or PUC-regulated natural gas. Records, either paper or computerized, shall be kept on-site and available for review at any time by District, State, or Federal personnel. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 441 – *Research Operations*. LLRC is exempt from the provision of AVAQMD Regulation IV, except AVAQMD Rule 402, when the purpose of the operation is to permit investigation, experiment, or research to advance the state of knowledge or the state of the art and the APCO has given written prior approval that shall include limitation of time. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 442 – *Usage of Solvents*. This rule reduces VOC emissions from VOC containing materials or equipment that are not subject to any other rule in Regulation XI. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 444 – *Open Outdoor Fires*. This rule ensures that the ambient air quality is not significantly degraded due to Open Outdoor Fires and applies the District Smoke Management Program to specified applications while minimizing smoke impacts to the public. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 481 – *Spray Coating Operations*. LLRC shall demonstrate compliance with this rule through the use of electrostatic and/or airless spray equipment to be operated inside a control enclosure which is approved by the APCO. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 900 – *Standards of Performance for New Stationary Sources (NSPS)*. Rule 900 adopts all applicable provisions regarding standards of performance for new stationary sources as outlined in 40 CFR 60. LLRC is subject to the state-approved portions of California’s plan, the *Regulation to Achieve Greenhouse Gas Emission Reductions - Methane Emissions from Municipal Solid Waste Landfills* (also known as the Landfill Methane Rule or LMR) [17 CCR 95460 – 95476], which is federally enforceable via 40 CFR 60, Subpart Cf - *Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills*. LLRC will also comply with this regulation per Part II, Section A of the FOP, and via proposed conditions in Part III of their FOP.

Rule 1000 – *National Emission Standards for Hazardous Air Pollutants (NESHAP)*. Rule 1000 adopts all applicable provisions regarding standards of performance for new stationary sources as outlined in 40 CFR 61. LLRC is subject to 40 CFR 63, Subpart AAAAA, the *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills*. LLRC will also comply with this regulation per Part II, Section A of the FOP, and this NESHAP via proposed conditions in Part III, of their FOP.

Rule 1107 – *Coating of Metal Parts and Product*. This rule limits the emission of VOC from coatings associated with Metal Parts and Products. LLRC is required to adhere to this rule. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 1110.2 – *Emissions from Stationary, Non-Road, and Portable Internal Combustion Engines*. LLRC shall comply with this rule for all Stationary, Non-Road, and Portable Internal Combustion Engines over 50 bhp except as exempted under Section H of this rule. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 1113 – *Architectural Coatings*. This rule limits the quantity of VOC in Architectural Coatings. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 1136 – *Wood Products Coatings*. This rule limits the quantity of VOC in Wood Coatings. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 1145 – *Plastic, Rubber, and Glass Coatings*. This rule limits the quantity of VOC in Plastic, Rubber, and Glass Coatings. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 1150 – *Excavation of Landfill Sites*. No person shall initiate excavation of an active or inactive landfill without an Excavation Management Plan approved by the APCO. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 1150.1 – *Control of Gaseous Emissions from Active Landfills*. This rule requires active landfills to install and maintain in good operating condition a landfill gas control system to prevent the concentration of total organic compounds from exceeding 50 ppm by utilizing an integrated air sample on the surface of the landfill, over an area determined to be representative by the APCO on a site-by-site basis, and not allow the maximum concentration of organic compounds from exceeding 500 ppm measured as methane at any point on the surface of the landfill. LLRC is required to comply with this rule by complying with the approved portions of California’s plan, the *Regulation to Achieve Greenhouse Gas Emission Reductions - Methane Emissions from Municipal Solid Waste Landfills* (also known as the Landfill Methane Rule or LMR) [17 CCR 95460 – 95476], which is federally enforceable via 40 CFR 60, Subpart Cf - *Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills*. LLRC will also comply with this regulation per Part II, Section A of the FOP, and via proposed conditions in Part III of their FOP.

Rule 1168 – *Adhesive and Sealant Applications*. This rule limits the emission of VOC from chloroform, ethylene dichloride, methylene chloride, perchloroethylene, and trichloroethylene from the application of Adhesives, Adhesive Primers, Sealants, Sealant Primers, or any other Primers. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 1171 – *Solvent Cleaning Operations*. This rule limits the emissions of VOC from Solvent Cleaning operations and activities from the storage and disposal of these materials used for such operations. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Regulation XIII – *New Source Review*. This regulation sets forth requirements for the preconstruction review of all new or modified facilities. This permitting action does not constitute any NSR actions. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Regulation XVII – *Prevention of Significant Deterioration*. Please take notice that this regulation is not currently used within the AVAQMD because the USEPA has not delegated authority for the PSD Program to the AVAQMD currently.

Regulation XXX – *Federal Operating Permits*. This regulation contains requirements for sources that must have an FOP. LLRC will also comply with this regulation per Part II, Section A of the FOP.

Rule 3003 – *Federal Operating Permits*. This rule outlines the permit term, issuance, restrictions, content, operational flexibility, compliance certification, permit shield, and violations of Federal Operating Permits. LLRC will comply with this rule per Part II, Sections B, and C, and Part IV and V of the FOP.



Rule 3011 – *Greenhouse Gas Provisions of Federal Operating Permits*. LLRC is not a Major GHG Facility pursuant to Rule 3011; the facility has been and will remain in compliance with the requirements pertaining to this regulation.

**State Rules:**

17 CCR 95460 – 95476, *Regulation to Achieve Greenhouse Gas Emission Reductions - Methane Emissions from Municipal Solid Waste Landfills* (also known as the Landfill Methane Rule or LMR). The purpose of this sub-article is to reduce methane emissions from municipal solid waste (MSW) landfills pursuant to the California Global Warming Solutions Act of 2006 (Health & Safety Code, Sections 38500 et. seq.). LLRC is subject to this regulation as they are an MSW landfill that received solid waste after January 1, 1977. LLRC is subject to the approved portions of this California plan, which is federally enforceable via 40 CFR 60, Subpart Cf - *Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills*. LLRC is required to comply with these provisions as proposed conditions in Part III, Section A of their FOP.

**Federal Regulations:**

40 CFR 60, Subpart Cc, *Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills*. This subpart contains emission guidelines and compliance times for the control of certain designated pollutants from certain designated municipal solid waste landfills in accordance with section 111(d) of the Clean Air Act. LLRC is no longer subject to this regulation as it is no longer an applicable requirement since EPA formally clarified that Subpart 40 CFR 60, Subpart Cf (once implemented via a state or federal plan) supersedes subparts WWWW and Subpart Cc.

40 CFR 60, Subpart Cf, *Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills*. This subpart establishes Emission Guidelines and compliance times for the control of designated pollutants from certain designated municipal solid waste (MSW) landfills in accordance with section 111(d) of the Clean Air Act. LLRC is a designated facility under this regulation and complies via the partially approved state plan, i.e. California's LMR [17 CCR 95460 – 95476] in conjunction with certain requirements of 40 CFR 62, Subpart OOO, specifically 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), and opt-in provisions of 40 CFR 63, Subpart AAAA. Because the California LMR is only partially approved, EPA promulgated Subpart OOO, for the requirements that would apply to MSW landfills in California for the portions of the LMR that were lacking. LLRC is expected to comply with the provisions of 40 CFR 60, Subpart Cf by complying with the proposed conditions of Part III, Section A of their FOP.

40 CFR 60, Subpart WWWW, *Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification on or After May 30, 1991, but*

*Before July 18, 2014.* The purpose of this regulation was to regulate non-methane organic compounds (NMOC), methane, hazardous air pollutants (HAPs), and odorous compounds which are VOC emissions that contribute to ozone formation. LLRC is no longer subject to this regulation as it is no longer an applicable requirement since EPA formally clarified that Subpart 40 CFR 60, Subpart Cf (once implemented via a state or federal plan) supersedes subparts WWWW and Subpart Cc.

40 CFR 60, Subpart XXX, *Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014.* This new NSPS subpart is based on EPA's ongoing review of the MSW Landfills. This regulation targets municipal solid waste landfills that commence construction, reconstruction, or modification after July 17, 2014. LLRC is not subject to this regulation as they have not commenced construction, reconstruction, or modification after July 17, 2014.

40 CFR 61, Subpart M – *National Emission Standard for Asbestos.* LLRC is required to comply with this regulation per Part II, Section B.7 of their FOP for any asbestos remediation activities.

40 CFR 62, Subpart OOO, *Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction on or Before July 17, 2014, and Have Not Been Modified or Reconstructed Since July 17, 2014.* This subpart establishes emission control requirements and compliance schedules for the control of designated pollutants from certain designated municipal solid waste (MSW) landfills in accordance with section 111(d) of the Clean Air Act and subpart B of 40 CFR part 60. LLRC is a designated facility under this regulation as they are a municipal solid waste landfill that commenced construction, reconstruction, or modification on or before July 17, 2014, and has accepted waste since November 8, 1987, and the landfill has additional capacity for future waste deposition. LLRC complies with portions of this subpart since the California LMR plan is only partially approved. Specifically, LLRC complies with the LMR and these portions of 40 CFR 62, Subpart OOO: 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). LLRC is expected to comply with the provisions of 40 CFR 62, Subpart OOO by complying with the proposed conditions of Part III, Section A.21 through A.24 of their FOP.

40 CFR 63, Subpart AAAA, *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills.* This NESHAP applies to MSW landfills that have accepted waste since November 8, 1987, or have additional capacity for waste deposition and are major sources, are collocated with major sources, or are area source landfills with a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m<sup>3</sup>) and have estimated uncontrolled emissions equal to or greater than 50 megagrams per year (Mg/yr) of non-methane organic compounds (NMOC). This NESHAP also applies to MSW landfills that have accepted waste since November 8, 1987, or have additional capacity for waste deposition and include a bioreactor and are major sources, are collocated with major sources, or are area source landfills with a design capacity equal to or greater than 2.5 million Mg and 2.5 million cubic meters that were not permanently closed as of January 16, 2003. LLRC is an affected source under this regulation as it is an MSW landfill that has accepted waste since November 8, 1987, and has additional capacity for waste deposition is an area source landfill with a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m<sup>3</sup>)

and have estimated uncontrolled emissions equal to or greater than 50 megagrams per year (Mg/yr) of non-methane organic compounds (NMOC). LLRC is expected to comply with the provisions of 40 CFR 63, Subpart AAAAA by complying with the proposed conditions of Part III, Section B of their FOP.

40 CFR 64, *Compliance Assurance Monitoring*. The Compliance Assurance Monitoring (CAM) rule (40 CFR 64) applies to each Pollutant Specific Emissions Unit (PSEU) when it is located at a Major Facility that is required to obtain Title V, Part 70 or 71 permit, and it meets all of the following criteria. “PSEU” means an emissions unit considered separately concerning each regulated air pollutant. The PSEU must:

- a. Be subject to an emission limitation or standard [40 CFR 64]; AND,
- b. Use a control device to achieve compliance [40 CFR 64.2(a)(2)]; AND,
- c. Have the potential pre-control emissions that exceed or are equivalent to the major source threshold. [40 CFR 64.2(a)(3)]

LLRC is not subject to CAM as this facility does not have the potential pre-control emissions that exceed or are equivalent to the major source threshold for any regulated pollutant (non-fugitive emissions). A summary of LLRC’s non-fugitive, actual, and potential to emit emissions from the enclosed flare, the sole non-fugitive permanent source at LLRC, in comparison with the applicable major source thresholds in tons per year, is shown in Table 3:

**Table 3: Comparison of Emissions; Actual, PTE, and Major Source Thresholds**

Pollutant	Actual (tpy)	PTE (tpy)	Major Source Threshold (tpy)
CO	8.19	53.19	100
NOx	4.99	15.96	25
PM10	0.09	4.52	15
SOx	0.09	22.22	100
VOC <sub>1</sub>	0.04	13.30	25
Single HAP	<<10	<<10	10
Combined HAP	0.77	2.18	25

1. The VOC emissions are based on the non-fugitive emissions of the landfill, the VOC value includes the emissions from the landfill gas (fugitive), after the Hydrogen Sulfide Treatment System. Regardless the PTE for VOC for both fugitive and non-fugitive emissions is 13.30 tpy, which is still below the major source threshold.
2. The Combined HAP emissions are based on the non-fugitive emissions of the landfill, the Combined HAP value includes the emissions from the landfill gas (fugitive), after the Hydrogen Sulfide Treatment System. Regardless the PTE for Combined HAP for both fugitive and non-fugitive emissions is 2.18 tpy, which is still below the major source threshold.

Emissions presented in Table 3 can be found in Appendix C. As a reminder, LLRC only is subject to 40 CFR 70 (Title V) because they are required to obtain one pursuant to 40 CFR 60, Subpart Cf as they are an MSW landfill with a design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters.

**D. CONCLUSIONS AND RECOMMENDATIONS:**

The District has reviewed the Title V application for the Lancaster Landfill & Recycling Center and determined it to be complete pursuant to AVAQMD Rule 3002(D)(1). The proposed FOP is in compliance with all applicable District, State, and Federal rules and regulations when operated in the terms of the operating conditions given herein. The proposed FOP and corresponding statement of legal and factual basis has been or will be, publicly noticed pursuant to AVAQMD Rule 3007. To view the public notice please refer to Appendix A of this document.

**E. PUBLIC COMMENT AND NOTIFICATIONS:**

***1. Public Comment***

This preliminary determination was publicly noticed on or before 6/6/2024, (See Appendix A for Public Notice). The 30-day Public Commenting Period will end at COB on 7/6/2024.

Noticing Methods included the following, per AVAQMD Rule 3007 (A)(1)(a) and AVAQMD Rule 1302(D)(2) and (3):

- Published in a newspaper of general circulation - Antelope Valley Press on or before 6/6/2024.
- Mailed and/or emailed to AVAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notice in Appendix A) on or before 6/6/2024.
- Posted on the AVAQMD Website at the following link: on or before 6/6/2024: <https://avaqmd.ca.gov/public-notices-advisories>

***2. Notifications***

The preliminary determination was submitted via e-mail to EPA and CARB pursuant to AVAQMD Rule 3007 for a forty-five (45) day review period on or before 6/6/2024; pending no objections, the final modified FOP is issued on or about 7/22/2024.

All correspondence as required by AVAQMD Rules 1302 and 3007 was forwarded electronically to the following recipients:

Director, Office of Air Division  
United States EPA, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105  
via EPA's EPS Portal: <https://cdx.epa.gov/>

Chief, Stationary Source Division  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812  
via e-mail at: [Permits@arb.ca.gov](mailto:Permits@arb.ca.gov)

Lancaster Landfill & Recycling Center  
Waste Management  
600 East Avenue F  
Lancaster, CA 93535  
Attn: Collin Pavelchik  
via e-mail at: [cpavelch@wm.com](mailto:cpavelch@wm.com)

## **APPENDIX A PUBLIC NOTICE**

Noticing requirements pursuant to District Rule 1302:

- Published in a newspaper of general circulation – Antelope Valley Press on or before 6/6/2024
- Mailed and/or emailed to AVAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notice in Appendix A) on or before 6/6/2024
- Posted on the AVAQMD Website at the following link: <http://avaqmd.ca.gov/permitting-public-notice>



**Antelope Valley Air Quality Management District**

2551 West Avenue H Lancaster, CA 93536

661-723-8070

[www.avaqmd.ca.gov](http://www.avaqmd.ca.gov)

Barbara Lods, Executive Director

**NOTICE OF PRELIMINARY DETERMINATION**

NOTICE IS HEREBY GIVEN THAT the Lancaster Landfill and Recycling Center (LLRC), located at 600 E Avenue F, Lancaster, CA 93535, has submitted an application package to the AVAQMD for a Federal Operating Permit pursuant to the provisions of AVAQMD Regulation XXX. The applicant operates a facility engaged in municipal waste disposal utilizing a landfill gas collection and control system with an enclosed flare to control emissions generated from waste decomposition. LLRC is subject to the Title V Program under the Emission Guidelines (EG) for Municipal Solid Waste (MSW) Landfills, promulgated under 40 Code of Federal Regulations (CFR) Part 60, Subpart Cf - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills, as LLRC has a design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters [40 CFR 60.31f(c)].

**REQUEST FOR COMMENTS:** Interested persons are invited to submit written comments and/or other documents regarding the terms and conditions of the proposed issuance of LLRC's Federal Operating Permit. If you submit written comments, you may also request a public hearing on the issuance of the Federal Operating Permit. To be considered, comments, documents, and requests for public hearing must be submitted no later than 5:00 P.M. on 7/6/2024, to the AVAQMD at the address listed below.

**PETITION FOR REVIEW:** Federal Operating Permits are subject to review and approval by USEPA and CARE. If USEPA/CARB does not object to the proposed permit and Statement of Legal and Factual Basis, and the AVAQMD has not addressed a public comment adequately, the public may petition the USEPA, Region IX, Operation Permits Section at 75 Hawthorne Street, San Francisco, CA 94105 within 60 days after the end of the USEPA review period for USEPA to reconsider its decision not to object to the permit.

**AVAILABILITY OF DOCUMENTS:** The proposed Federal Operating Permit, as well as the application and other supporting documentation, are available for review at the AVAQMD offices, Antelope Valley Air Quality Management District, 2551 West Avenue H, Lancaster CA 93536. In addition, these documents are available on the AVAQMD website and can be viewed at the following link: <https://avaqmd.ca.gov/permitting-public-notices>. Please contact Taylor Morais at 661-723-8070, extension 24, or at [tmorais@avaqmd.ca.gov](mailto:tmorais@avaqmd.ca.gov) for additional questions about this action and/or corresponding documents.

\*Traducción en español esta disponible por solicitud. Por favor llame: (661) 723-8070

**APPENDIX B**  
**Email List of Persons Requesting Notice of Action**

Appendix B Email List of Persons Requesting Notice of Actions

D. Rothbart	drothbart@lacs.d.org
A. Herath	aherath@cityofpalmdale.org
Alan DeSalvio	engineering@AVAQMD.ca.gov
Alex Saschin	alex.saschin@sonoma-county.org
Ali Reza Ghasem	engineering@vcapcd.org
Anne McQueen	AMcQueen@YorkeEngr.com
Anthony Morales	GTTribalCouncil@aol.com
Ben Beattie	notify@ysaqmd.org
Bill Whitaker	billw@charlesmcmurray.com
Bret Banks	avreporting@avaqmd.ca.gov
Carlene Saxton	csaxton@cityofpalmdale.org
Carrol Kaufman	cykaufman@mwdh2o.com
Colby Morrow	CLMorrow@semprautilities.com
Collin Pavelchik	cpavelch@wm.com
Daniel McGivney	dmcgivney@socalgas.com
El Dorado County AQMD	aqmd@edcgov.us
George Jung	george.jung@ngc.com
Angelica C. Jackson	angelica.c.jackson@nasa.gov
Jocelyn Swain	jswain@cityoflancasterca.org
Judy Rocchio	Judy_Rocchio@nps.gov
Karin Fickerson	kfickerson@semprautilities.com
Kyle Mertens	kmertens@wm.com
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Marci Stepman	Marci.Stepman@Verdant-env.com
Marianne Strange	mstrange@mfsair.com
Marla Hughes	marla@avpaints.com
Mary Giraudo	mgiraudo@mbard.org
McKay (US), Vincent P	vincent.p.mckay@boeing.com
Mitch Haimov	publicnotice@aqmd.gov
Monique Cadle	mcadle@glaze-n-seal.com
Nicole Stetson	nstetson@wm.com
Omar Elfar	oelfar@trinityconsultants.com
Paul Bauer	Paul_Bauer@mthigh.com
Reenu M. Ko	reenu.m.ko@lmco.com
San Diego APCD	APCDEngineering@sdcounty.ca.gov
Sara Head	SHead@YorkeEngr.com
Scott Dickinson	bradley.dickinson@us.af.mil
Stepman, Marci B	marci.b.stepman@lmco.com
Tim Hughes	timothy.hughes.24@us.af.mil
Tonnie Cummings	Tonnie_Cummings@nps.gov



Appendix B Email List of Persons Requesting Notice of Actions

	A	B	C	D	E	F
2	Air Division (Attn: AIR-3)	United States EPA, Region IX	75 Hawthorne Street	San Francisco	CA	94105
3	Andrew Sells	Gabriel Band of Mission Indians - Kith Nation	PO Box 383	Covina	CA	91723
4	Andy Schroot	Wm Bohhouse Farms	7200 E. Brundage Lane	Bakersfield	CA	93307
5	Angelika Jackson	NASA Armstrong Flight Research Center, Safety and Environmental Office	PO Box 270, MC 46228	Edwards AFB	CA	93523
6	Arne McQueen	York Engineering, LLC	31725 Rancho Viejo Road, Suite 218	San Juan Capistrano	CA	92675
7	Anthony Morales	San Gabriel Band of Mission Indians	PO Box 653	San Gabriel	CA	91778
8	Bill Whitaker	Charles McMurray Co.	2801 Land Ave.	Sacramento	CA	95818
9	Brad Pointek	Mojave Desert AQMD	14306 Park Avenue	Victorville	CA	92392-2310
10	Brad Banks	Antelope Valley AQMD	43001 Division St., Suite 206	Lancaster	CA	93535
11	Brian Polson	L.A. County Sanitation Districts	1855 Workman Mill Road	Whittier	CA	90601
12	Carol Naughton	Metropolitan Water District	700 N Alameda Street, 8th Floor Rm 106	Los Angeles	CA	90012
13	Catherine Jacobson	3M Company, Material EHS	3M Center, Building 0220-06-6-02	St. Paul	MN	55144
14	Chris Mastaro	Los Angeles County	5050 Commerce Drive	Baldwin Park	CA	91706
15	Clifford Burg	POCC	3504 Walnut Avenue, Suite A	Carmichael	CA	95606
16	Colby Morrow	Southern California Gas Co.	2088 E. Lester Avenue	Fresno	CA	93720-3962
17	Dan Wilke	Wm Bohhouse Farms	7200 East Brundage Lane	Bakersfield	CA	93307
18	Daniel Pournieu	Lyonel Seal Industries	7221 McKinley Street	Houston	TX	77010
19	David Rothbart	Los Angeles County Sanitation District	1285 Workman Mill Road	Whittier	CA	90601
20	Dennis Sloan		5310 E. Meredith Avenue	Palmdale	CA	93552
21	Donna Termeer	Field Deputy, Supervisor Rarger	42485 10th Street West, Suite 104	Lancaster	CA	93534
22	Doris Lo	United States EPA, Region IX	75 Hawthorne Street	San Francisco	CA	94105
23	Environmental Contact	Delux Financial Service	42855 Business Center Parkway	Lancaster	CA	93535
24	Environmental Contact	Air Force Base Research Laboratory	35 ADW/CDV-5 East Popson Avenue, Building 2652A	Edwards AFB	CA	93524-8060
25	Gary Rubenstein	Sierra Research	1801 J Street	Sacramento	CA	95814
26	George Jung	Northrop Grumman	3503 E. Avenue M, PA1140G	Palmdale	CA	93580
27	Gian Stephens	Eastern Kern Air Pollution Control District	2700 "M" Street, Suite 300	Bakersfield	CA	93301-2370
28	J.J. Murphy	City of Palmdale	33300 Sierra Highway	Palmdale	CA	93550
29	Janet Bell	Metropolitan Water District	700 North Alameda Street	Los Angeles	CA	90012
30	Janet Laurin	Adams Broadcast, Joseph & Cardozo	401 Gateway Blvd., St. 1000	South San Francisco	CA	94080-7037
31	Jason Caudle	City of Lancaster	46333 N Fern Avenue	Lancaster	CA	93534
32	Jenna Lal	CARBI/O Office of Ombudsman	9480 Teiber Avenue, Annex 1	El Monte	CA	91731
33	Judy Roodtrip	National Park Service	333 Bush St. Ste. 300	San Francisco	CA	94104
34	Katherine Tierney	ES&E/energy	1425 N. McDowell Boulevard, Suite 200	Palmdale	CA	93564
35	L.A. County Farm Bureau		41228 12th Street West, Suite A	Palmdale	CA	93586-1400
36	Lashae Newton-Read	California Department of Fish and Game	3883 Huffer Road Ste. A	San Diego	CA	92123
37	Lin Wang	Los Angeles World Airports	7301 World Way West, Room 312	Los Angeles	CA	90048
38	Linna Norby	Air Force Plant 42	412 TW/OJ-ATP 42	Palmdale	CA	93550
39	Lisa Beckham	United States EPA, Region IX	75 Hawthorne Street	San Francisco	CA	94105
40	Marci Slepmann	Verdant Environmental	809 Meridian Avenue, Unit G	South Pasadena	CA	91030
41	Michael Tolstrup	California Air Resources Board	P.O. Box 2815	Sacramento	CA	95812
42	Mike Kirby	US Borax Inc.	14486 Borax Rd.	Boron	CA	93516
43	Monique Cardle	Glaze N Seal Products	18207 E. McDermott St., Suite G	Irwin	CA	92614
44	Nicole Stinson	Waste Management of California, Inc	700 Box 4040	Palmdale	CA	93534
45	Rosal Mayco	Sempra Energy	555 W. 5th St., M. 1703	Los Angeles	CA	90071-1249
46	Rob Duchow	Southern California Gas Co.	3703 Pegasus Drive, Suite 114	Bakersfield	CA	93305
47	Scott Weidt	BRADW/C/VC	6 East Popson Ave. Bldg 3960A	Edwards AFB	CA	93524
48	Sayed Sadreddin	San Joaquin Valley APCD	1990 E. Gettysburg	Fresno	CA	93726
49	Stev Arnold	Antelope Valley Freez	P.O. Box 880	Palmdale	CA	93550
50	Stev Haggard	MDAQMD	14306 Park Ave	Victorville	CA	92392
51	Southern California Edison	Abercromb ESD	P.O. Box 5095	Rosemead	CA	91770-4908

	A	B	C	D	E	F
52	Supervisor Kathryn Rarger	County of Los Angeles	42485 10th Street West, Suite 104	Lancaster	CA	93534
53	Susan Tse	L.A. County Dept. Regional Planning	320 W. Temple St, Room 1348, Hall of Records	Los Angeles	CA	90012
54	Suzanne Johnson	Lockheed Martin Aeronautics Company	1011 Lockheed Way, Mail Zone 0824	Palmdale	CA	93569
55	Sylvia Vandrospak	California Air Resources Board	P.O. Box 2815	Sacramento	CA	95812
56	Thomas Gross	Southern California Edison	2131 Walnut Grove Avenue	Rosemead	CA	91770
57	Torrie Cummings	National Park Service, Pacific West Region	612 E. Reserve Street	Vancouver	WA	98661
58	Tung Le	California Air Resources Board	P. O. Box 2815	Sacramento	CA	95812
59	Vinay McKay	Boeing Company - Site 1 Team Palmdale/Edwards	1800 E. Ave M, MC 841-PL01	Palmdale	CA	93560
60	Vincent Masuraha	Treby Consultants, Inc.	20 Corporate Park Suite 200	Irwin	CA	92606
61	Wayne Nantz	South Coast AQMD	21865 Copley Dr.	Diamond Bar	CA	91765-4182
62		L.A. County Fire	42110 9th Street West	Lancaster	CA	93534

**APPENDIX C**  
**APPLICATION PACKAGE**  
**Is Available as a Separate File**