

WASHOE COUNTY
HEALTH DISTRICT

ENHANCING QUALITY OF LIFE

Air Quality Management Division

Ambient Air Quality Impact Analysis and
Statement of Basis
for
Title V
Incinerator General Permits

August XX, 2018

Ambient Air Quality Impact Analysis & Statement of Basis for Title V, Incinerator General Permits

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Ambient Air Quality Impact Analysis & Statement of Basis for Title V, Incinerator General Permits

1. Purpose of this Document

This document serves as the Ambient Air Quality Impact Analysis and Fact Sheet for the proposed new Title V Incinerator General Permit to be issued within Washoe County. This document describes the legal and factual basis for the proposed permits as required under the Clean Air Act (CAA), including Title 40 of the Code of Federal Regulations (CFR) Sections 52 and 70.

2. Permit Description

The Washoe County Air Quality Management Division (AQMD) control officer issues new and renewed Air Curtain Incinerator (ACI) General Permits (GP). The ACI GPs are issued by the control officer under the requirements in Washoe County District Board of Health Regulations Governing Air Quality Management 030.900 PART 70 PERMITTING REGULATIONS. The GPs contain a description of the general permit proposed equipment and operations. The GPs will fulfill the obligation to renew every five years.

The sources that would qualify for a general permit must apply to the permitting authority for coverage under the terms of the general permit or must apply for a part 70 permit consistent with 40 CFR 70.5. The procedural requirements for the issuance of a GP by the control officer are in 030.900 Section D, (Permit Issuance). The requirements include a 30-day public comment period with a notice and comment hearing, an affected agency review, and a 45-day United States Environmental Protection Agency (EPA) review. After the initial public comment period the issuance of subsequent GP, provided the proposed facility meets all the criteria of the program do not require additional public review periods. Once issued, the GP will be subject to a 60 day public petition period, during which the public may petition the EPA to object to the GP. During the public notice period a notice and comment hearing will be held at the Washoe County Complex, at 1001 E 9th St, Reno NV. The comment period and the hearing offered the public an opportunity to review and submit comments on the draft GP. Simultaneous with the public comment period, affected agencies will have the opportunity to comment on the draft GP. The control officer may issue the GP after responding to any EPA comments or resolving the objections. From the date of issuance, the GP is subject to public petition for 60 days, as specified in 030.900 Section D. 8 (APPEALS OF THE FINAL PERMIT). If the EPA does not file an objection with the control officer during the EPA review period, any person affected by a decision of the control officer to issue the GP may petition the EPA to make an objection. Petitions shall be based only on objections to the GP that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates in the petition to the EPA that it was not possible to raise the objections within the public comment period, or that the grounds for the objection arose after the public comment period. The petition shall identify all objections. The petitioner shall provide a copy of the petition to the control officer. The control officer shall have 90 days from the receipt of an EPA objection to resolve any objection and, if necessary, terminate or revise the GP. The permitting authority may, in the general permit, provide for applications which deviate from the requirements of 40 CFR 70.5, provided that such applications meet the requirements of title V of the Act, and include all information necessary to determine qualification for, and to assure compliance with, the general permit. Without repeating the public participation procedures required under 40 CFR 70.7(h), the permitting authority may grant a source's request for authorization to

operate under a general permit, but such a grant shall not be a final permit action for purposes of judicial review.

AQMD will issue GPs for use by Title V major and minor, permanent and temporary source ACIs and Small Other Solid Waste Incinerators (SOSWI). ACIs (both fireboxes and trench burners) used for the disposal of 100 percent wood waste, 100 percent clean lumber, or 100 percent mixture of only wood waste and/or clean lumber or clean yard waste that are subject to the following: 40 Part 60, 40 CFR Part 60, Subpart EEEE, Standards of Performance for Other Solid Waste Incineration. Additionally SOSWIs are only used for the disposal of small quantities of Municipal Waste: 40 Part 60, Subpart CCCC, Standards of Performance for Commercial and Industrial Solid Waste Incineration Units, and 40 CFR Part 60, Subpart EEEE, Standards of Performance for Other Solid Waste Incineration. In 40 CFR Parts 60, Standards of Performance for New Stationary Sources and 62, Approval and Promulgation of State Plans for Designated Facilities and Pollutants, ACIs disposing of 100 percent yard waste are required to obtain a Title V permit. All New Source Review (NSR) permits must be codified in the GP. Sources authorized by a case-by-case NSR permit or a standard permit are excluded from the GP.

A complete list of equipment contributing to the permitted emissions will be given as “Attachment A – Equipment Schedule”. Emissions will be listed in “Attachment B - Emissions Inventory Table” and will represent emissions estimates of “actual emissions” which include best engineering practices and of “potential emissions” of equipment subject to regulation and are based on conditions as set forth in the permit application.

3. Regulatory Applicability

The following chart summarizes the applicability of the principal air pollution regulatory programs that may apply to areas permitted under GP:

1) Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment NSR	No
Minor NSR	Yes
40 CFR Part 60 Standards of Performance for New Stationary Sources	Yes
40 CFR Part 61 National Emission Standards for Hazardous Air Pollutants	No
40 CFR Part 62 Approval and Promulgation of State Plans for Designated Facilities and Pollutants	Yes
40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	No

3.1 Operational Flexibility

Operation of incinerators may vary, including temporary location so long as owners or operators meet the terms and conditions of this permit and the requirements of the GP.

3.2 New Source Review Requirements

New source review authorizations are incorporated by reference in the GP application and are enforceable under it. Each application will be accompanied by a Statement of Basis Addendum identifying operator, type of incinerator, proposed use and locations as well as an estimate of annual emissions. Each individual application to operate under a GP can be found in the Accela One Data Base.

3.3 Compliance Status

All owners and operators operating under a GP must report all units in compliance at the time of initial issuance of the ATC and at a renewal of the ATC. After an initial ATC is issued, the owner or operator must certify compliance with the terms and conditions of the permit for at least every 12-month period following the initial issuance of the ATC. Annual compliance certifications should be submitted to the AQMD no later than 30 days after the end of the certification period.

Additionally, the owner or operator shall report, in writing, all instances of deviations, the probable cause of the deviations, and any corrective actions or preventative measures taken for the deviations. A deviation report should be submitted in accordance with District Regulation 020.075. Owners or operators needing information regarding annual compliance certifications or deviation reports should contact the AQMD at (775) 772-7200.

4. Air Quality Impacts

In accordance with local, state, and federal regulations, an authority to construct and/or permit to operate may not be issued for a source of a regulated air pollutant until the facility emissions have been demonstrated to not cause or contribute to an exceedance of a National Ambient Air Quality Standard (NAAQS). If in the future a modification is proposed that would increase the emissions a complete modeling analysis may be required.

5. Streamlining

This permit does not include any streamlined provisions.

6. Enforceability

Unless specifically designated otherwise, all terms and conditions of the GP, including any provisions designed to limit the source's potential to emit, are enforceable by AQMD and EPA, under the Federal Clean Air Act.

7. Conclusion and Proposed Action

The Air Quality Management Division of the Washoe County Health District is proposing to issue the Title V general permits to any qualifying entity. The determination will be made regarding the operation of the facility such that it will comply with regulatory requirements and will not cause or contribute to a violation of the applicable NAAQS. This determination will be made based on the WCAQMD review of the information provided in the application and supporting documentation.

ACRONYMS AND ABBREVIATIONS

AQRV	Air Quality Related Values
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
AQMD	Washoe County Health District, Air Quality Management Division
EPA	Environmental Protection Agency
FLAG	Federal Land Managers' Air Quality Related Values Workgroup
GP	General Permit
HA	Hydrographic Area
HAPs	Hazardous Air Pollutants
hp	Horsepower
hr	Hour
LAER	Lowest Achievable Emission Rate
lb	Pound
MMBtu	Million British Thermal Units
MW	Megawatt
NAAQS	National Ambient Air Quality Standards
NDEP	Nevada Division of Environmental Protection
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOx	Oxides of Nitrogen
NSPS	New Source Performance Standards
NSR	New Source Review
Pb	Lead
Permittee	Entity to which the permit is issued
PM10	Particulate Matter with aerodynamic diameter less than 10 microns
PM2.5	Particulate Matter with aerodynamic diameter less than 2.5 microns
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
RBLC	U.S. EPA RACT/BACT/LAER Clearinghouse
SO2	Sulfur Dioxide
SOx	Oxides of Sulfur
TDS	Total Dissolved Solids
µg/m ³	Microgram per Cubic Meter
USGS	United States Geological Service
UTM	Universal Transverse Mercator
VOCs	Volatile Organic Compounds
WCAQMD	Washoe County Air Quality Management Division