



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT

NOV 06 2012

Don Litchfield  
Browning Ferris Industries  
9999 S. Austin Rd  
Manteca, CA 95336

**Re: Notice of Significant Title V Permit Modification  
District Facility # C-150  
Project # C-1110835**

Dear Mr. Litchfield:

Enclosed for you to review is the District's analysis of an application for significant Title V permit modification for the facility identified above. Browning Ferris Industries is proposing a Title V significant permit modification to incorporate the recently issued Permit C-150-1-7 into the Title V operating permit (see enclosures). The proposed modification consists of removing source test conditions that are not required of the existing flare under 40CFR60.33c.c(2) and (3).

Enclosed are the current Title V permit, recently issued Permit C-150-1-7, proposed modified Title V permit, engineering evaluation, and application. The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

c: Martin Keast, Permit Services

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061  
[www.valleyair.org](http://www.valleyair.org)

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: (661) 392-5500 FAX: (661) 392-5585



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

NOV 06 2012

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St.  
San Francisco, CA 94105

**Re: Notice of Significant Title V Permit Modification  
District Facility # C-150  
Project # C-1110835**

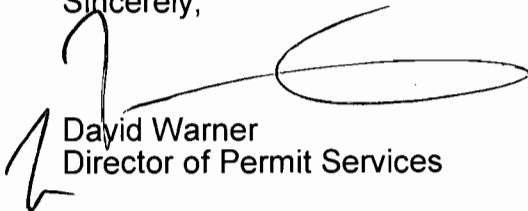
Dear Mr. Rios:

Enclosed for you to review is the District's analysis of an application for significant Title V permit modification for the facility identified above. Browning Ferris Industries is proposing a Title V significant permit modification to incorporate the recently issued Permit C-150-1-7 into the Title V operating permit (see enclosures). The proposed modification consists of removing source test conditions that are not required of the existing flare under 40CFR60.33c.c(2) and (3).

Enclosed are the current Title V permit, recently issued Permit C-150-1-7, proposed modified Title V permit, engineering evaluation, and application. The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

c: Martin Keast, Permit Services

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

NOV 06 2012

Mike Tollstrup, Chief  
Project Assessment Branch  
Air Resources Board  
P O Box 2815  
Sacramento, CA 95812-2815

**Re: Notice of Significant Title V Permit Modification  
District Facility # C-150  
Project # C-1110835**

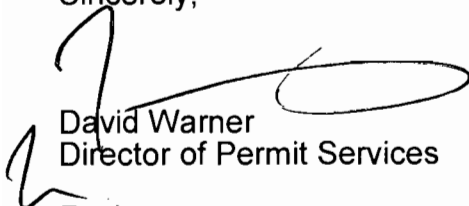
Dear Mr. Tollstrup:

Enclosed for you to review is the District's analysis of an application for significant Title V permit modification for the facility identified above. Browning Ferris Industries is proposing a Title V significant permit modification to incorporate the recently issued Permit C-150-1-7 into the Title V operating permit (see enclosures). The proposed modification consists of removing source test conditions that are not required of the existing flare under 40CFR60.33c.c(2) and (3).

Enclosed are the current Title V permit, recently issued Permit C-150-1-7, proposed modified Title V permit, engineering evaluation, and application. The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

c: Martin Keast, Permit Services

**Seyed Sadredin**

Executive Director/Air Pollution Control Officer

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Fresno Bee

**NOTICE OF PRELIMINARY DECISION  
FOR THE PROPOSED SIGNIFICANT MODIFICATION OF  
FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed significant modification of the Federally Mandated Operating Permit to Browning Ferris Industries for its landfill gas collection system at 8662 W. Muscat Ave, Fresno, CA, California. The proposed modification consists of removing source test conditions that are not required of the existing flare under 40CFR60.33c.c(2) and (3).

The District's analysis of the legal and factual basis for this proposed action, project #C-1110835, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and the District office at the address below. There are no emission increases associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the modification. If requested by the public, the District will hold a public hearing regarding issuance of this modification. For additional information, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900. Written comments on the proposed initial permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CALIFORNIA 93726-0244.

# **TITLE V APPLICATION REVIEW**

Significant Modification

Project #: C-1110835

Engineer: Martin Keast

Date: October 25, 2012

Facility Number: C-150

Facility Name: **Browning Ferris Industries of California, Inc. /  
Chateau Fresno Landfill Facility**

Mailing Address: 9999 S. Austin Road  
Manteca, CA 95336

Contact Name: Don Litchfield (forward landfill)

Phone: 229-982-4298

Responsible Official: Don Litchfield

Title: Environmental Manager

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## **I. PROPOSAL**

Browning-Ferris Industries is proposing a Title V significant permit modification to incorporate the recently issued C-150-1-6 into the Title V operating permit. The proposed modification consists of removing source test conditions that are not required of the existing flare under 40CFR Subpart Cc.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

## **II. FACILITY LOCATION**

Chateau Fresno Landfill Facility @ Fresno is located at 8622 W. Muscat Fresno, CA.

### III. EQUIPMENT DESCRIPTION

A detailed facility printout listing all permitted equipment at the facility is included as Attachment D.

### IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a significant modification and, as such, requires a public notice.

### V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

- District Rule 4311, Flares (amended June 18, 2009)

### VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The proposed modification consists of removing source test conditions that were added during the Title V renewal evaluation. These conditions are not applicable because 40CFR60.33c.c(2) and (3) are only applicable to landfills that accepted waste after November 8, 1987. This landfill was closed in 1985. The facility seeks the modification of the permit by removing the enclosed flare conditions #26 through #30, which pertain to the source testing of a new flare.

C-150-1-7: 54 MMBTU/HR LANDFILL GAS COLLECTION AND TREATMENT SYSTEM WITH MCGILL MODEL EGF-4 ENCLOSED FLARE WITH COMBUSTION AIR CONTROLS, PROPANE-FIRED PILOT FLAME, FLAME ARRESTOR, BLOWERS, CONCRETE CONDENSATE SUMPS, EXHAUST STACK AND 67 EXTRACTION WELLS

Permit conditions 26 through 30 are to be removed from the current Permit to Operate. These conditions specify the source testing of new flare emission units and are not applicable to this existing flare.

## VII. COMPLIANCE

District Rule 2520, Section 6.0 describes the source's ability to make changes including significant permit modification. This modification does not meet the minor permit modification criteria pursuant to Section 3.20 described as follows.

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of Section 11.3 by including;

1. The identification of the source, the name and address of the permit holder, the activities and emissions change involved in the permit action;
2. The name and address of the District, the name and telephone number of District staff to contact for additional information;
3. The availability, upon request, of a statement that sets forth the legal and factual basis for the proposed permit conditions;
4. The location where the public may inspect the complete application, the District analysis, the proposed permit, and all relevant supporting materials;

5. A statement that the public may submit written comments regarding the proposed decision within at least 30 days from the date of publication and a brief description of commenting procedures, and
6. A statement that members of the public may request the APCO or his designee to preside over a public hearing for the purpose of receiving oral public comment, if a hearing has not already been scheduled. The APCO shall provide notice of any public hearing scheduled to address the proposed decision at least 30 days prior to such hearing;

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit No. C-150-1-7
- B. Emissions Increases
- C. Application
- D. Previous Title V Operating Permit No. C-150-1-6



# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
(C-150-1-7)

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-150-1-7

**EXPIRATION DATE:** 04/30/2014

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 54 MMBTU/HR LANDFILL GAS COLLECTION AND TREATMENT SYSTEM WITH MCGILL MODEL EGF-4 ENCLOSED FLARE WITH COMBUSTION AIR CONTROLS, PROPANE-FIRED PILOT FLAME, FLAME ARRESTOR, BLOWERS, CONCRETE CONDENSATE SUMPS, EXHAUST STACK AND 67 EXTRACTION WELLS: REMOVE FLARE SOURCE TESTING CONDITIONS

## PERMIT UNIT REQUIREMENTS

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1. Flares shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. [40 CFR 60.18(c)(1)] Federally Enforceable Through Title V Permit
2. Testing the visible emissions of the flare shall be conducted at least annually, using EPA Method 22. The observation period shall be 2 hours. [40 CFR 60.18(f)(1)] Federally Enforceable Through Title V Permit
3. Landfill gas shall be tested for sulfur content quarterly using Draeger tubes. If source specific historical data (for a period of at least one year) shows seasonal variation of less than 20%, then landfill gas shall be tested annually using Draeger tubes. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
5. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
6. Actual flare emissions shall not exceed 20 tons VOC/year. Process information, including fuel usage data for the flare and process rates for operations controlled by the flare, shall be submitted to the District annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Flares shall only be used with the net heating value of the gas being combusted being 200 Btu/scf or greater if the flare is non-assisted; or with the net heating value of the gas being combusted being 300 Btu/scf or greater if the flare is air-assisted or steam-assisted. [40 CFR 60.18 (c)(3)] Federally Enforceable Through Title V Permit
8. The net heating value of the gas being combusted in a flare shall be calculated annually, pursuant to 40 CFR 60.18(f)(3) and using EPA Method 18, ASTM D1946-77, and ASTM D2382-76. [40 CFR 60.18 (f)(3-6)] Federally Enforceable Through Title V Permit
9. Air-assisted flares shall be operated with an exit velocity less than  $V_{max}$ , as calculated by the equation specified in paragraph 40 CFR 60.18 (f)(6). [40 CFR 60.18 (c)(5)] Federally Enforceable Through Title V Permit
10. Nonassisted and steam-assisted flares shall be operated with an exit velocity, as calculated by the methods specified in 40 CFR 60.18 (f)(4), less than 60 ft/sec, except as provided in 40 CFR 60.18 (c)(4)(ii) and (iii). [40 CFR 60.18 (c)(4)(i)] Federally Enforceable Through Title V Permit
11. Nonassisted and steam-assisted flares may be operated with an exit velocity, as calculated by the methods specified in 40 CFR 60.18 (f)(4), equal to or greater than 60 ft/sec, but less than 400 ft/sec if the net heating value of the gas being combusted is greater than 1,000 Btu/scf. [40 CFR 60.18 (c)(4)(ii)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Nonassisted and steam-assisted flares may be operated with an exit velocity, as calculated by the methods specified in 40 CFR 60.18 (f)(4), less than the velocity,  $V_{max}$ , as determined by the equation specified in paragraph 40 CFR 60.18 (f)(5), and less than 400 ft/sec. [40 CFR 60.18 (c)(4)(iii)] Federally Enforceable Through Title V Permit
13. The actual exit velocity of a flare shall be calculated by dividing the volumetric flowrate (in units of standard temperature and pressure), as determined by Reference Methods 2, 2A, 2C, or 2D as appropriate; by the unobstructed (free) cross sectional area of the flare tip. [40 CFR 60.18 (f)(4)] Federally Enforceable Through Title V Permit
14. Flares shall be operated with a flame present at all times, and kept in operation when emissions may be vented to them. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. [40 CFR 60.18 (c)(2), 60.18 (e), and 60.18 (f)(2)] Federally Enforceable Through Title V Permit
15. Flare shall be equipped with a failure alarm to automatically shut off the blower and landfill gas supply. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Landfill gas flowrate shall be monitored by flow indicator and recorders. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Gas collection system shall be sealed at all times during operation. [District NSR Rule] Federally Enforceable Through Title V Permit
18. All condensate traps shall remain covered unless treatment of condensate is taking place. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Flame temperature indicator and recorder shall be operated whenever gas is flared. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Flare temperature shall be maintained to at least 1400 degree F. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Total volume of landfill gas flared shall not exceed 2600 scf/min (3,744,000 scf/day) and shall be recorded daily. [District Rules 2520, 9.4.2 and NSR] Federally Enforceable Through Title V Permit
22. Emissions shall not exceed any of the following: NO<sub>x</sub> - 0.0616 lb/MMbtu, PM<sub>10</sub> - 2.92 lb/hr, CO - 7.75 lb/hr, SO<sub>x</sub> - 1.1 lb/hr, nor VOC(NHMC) - 1.92 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Daily emissions shall not exceed any of the following: NO<sub>x</sub> - 63.4 lb/day, PM<sub>10</sub> - 70.0 lb/day, CO - 186.0 lb/day, SO<sub>x</sub> - 27.1 lb/day, nor VOC(NMHC) - 47.0 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Interior wells: DEW-04, DEW-06, and DEW-07 may be operated with 15% oxygen concentration or less, provided that the temperature of these wells stays below the 130 °F which would indicate that aerobic decomposition is not occurring. [40 CFR 60.753(c)] Federally Enforceable Through Title V Permit
25. Perimeter wells: EW-01, EW-02, EW-04, EW-05, EW-07, EW-09, EW-10, EW-12, EW-16, EW-17, EW-18, EW-20, EW-22, EW-23, EW-24, EW-25, EW-28, EW-29, EW-31, EW-32, EW-33, EW-35, EW-36, EW-38, EW-40, EW-43, EW-46, EW-47, EW-49, EW-50, EW-53, EW-55, and EW-56 may be operated with 15% oxygen concentration or less, provided that the temperature of these wells stays below the 130 °F which would indicate that aerobic decomposition is not occurring. [40 CFR 60.753(c)] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

# ATTACHMENT B

## Emission Increase

There are no emission changes as a result of this project.

# ATTACHMENT C

Application

## SCS ENGINEERS

April 25, 2011  
File No. 011205165.00 Task 3

Don Ctibor  
San Joaquin Valley Air Pollution Control District  
1990 East Gettysburg Avenue  
Fresno, California 93726-0244  
(559) 230-6000

**SUBJECT: APPLICATION FOR MINOR MODIFICATION OF THE TITLE V PERMIT  
TO OPERATE FOR THE CHATEAU FRESNO LANDFILL, FRESNO,  
CALIFORNIA (FACILITY No. C-150)**

Dear Mr. Ctibor:

On behalf of the Browning-Ferris Industries of CA, Inc. (BFI), a wholly-owned subsidiary of Republic Services, Inc (RSI), SCS Engineers (SCS) is submitting this application for a minor modification of the Title V Permit for the Chateau Fresno Landfill (Chateau) in Fresno, California (Facility No. C-150). This application has been prepared for submission to the San Joaquin Valley Air Pollution Control District (SJVAPCD) in order to modify the Title V permit pursuant to condition changes contained in the Permit to Operate (PTO) issued on July 11, 2010 for permit unit C-150-1-6. A copy of the C-150-1-6 conditions is attached.

During the Title V Permit renewal process, several conditions were added to the final permit for the enclosed flare associated with source testing of the flare. Because the flare at Chateau is not a new flare, has already been source tested after installation, and continues to operate as specified by the manufacturer and as originally permitted, SCS believed these conditions should not have been added. SCS confirmed with the SJVAPCD in telephone communication and an email dated October 14, 2010 that these conditions were inadvertently added to the enclosed flare and should be removed.

In accordance with PTO Condition #16, and your previous communications with SCS about this matter, the facility is required to submit an application to modify the Title V permit. The facility seeks the modification of the Permit by removing the enclosed flare conditions #26 through #30, which pertain to the source testing of a new flare. We wish to note that the new Title V permit was apparently issued on April 5, 2010; however, it appears that neither SCS nor RSI had an opportunity to review a draft of the permit prior to its issuance, and therefore were not able to request this modification during the permit renewal process.

Pursuant to SJVAPCD requirements, the following required forms have been completed and are enclosed:

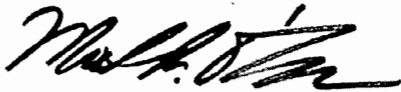
- TVFORM-008 (Title V Modification Application)
- TVFORM-009 (Title V Compliance Certifications for Modifications)

SCS and RSI believe this request may be eligible for a fee waiver, given the absence of review prior to issuance of the permit; however, if the District determines there are any fees associated with this request, please provide an invoice for fees to the following individual:

Don Litchfield  
Forward Landfill  
9999 S. Austin Road  
Manteca, Ca 95336

Should you have any question or require additional information, please contact the Michael O'Connor at (707) 546-9461.

Sincerely,



Michael O'Connor  
Senior Project Manager  
**SCS ENGINEERS**



Christopher J. Heiny  
Staff Professional  
**SCS ENGINEERS**

cc Don Litchfield, RSI  
John Copp, SJVAPCD

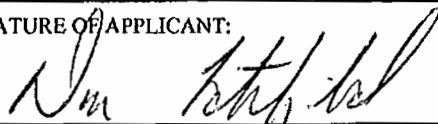
Enclosures: TVFORM-008 (Title V Modification Application)  
TVFORM-009 (Title V Compliance Certifications for Modifications)  
Permit Conditions for C-150-1-6

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: BROWNING FERRIS INDUSTRIES	
2. MAILING ADDRESS:  STREET/P.O. BOX: <u>9999 S. AUSTIN ROAD</u>  CITY: <u>MANTECA</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95336</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>8662 W. MUSCAT AVE</u> CITY: <u>FRESNO</u>  _____ ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: CLOSED MUNICIPAL SOLID WASTE LANDFILL	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  REMOVAL OF ENCLOSED FLARE CONDITIONS #26 THROUGH #30 (C-150-1-6)	
6. TYPE OR PRINT NAME OF APPLICANT: DON LITCHFIELD	TITLE OF APPLICANT: ENVIRONMENTAL MANAGER
7. SIGNATURE OF APPLICANT: 	DATE: <u>4/25/11</u> PHONE: (209) 982-4298 FAX: (209) 982-1009 EMAIL: DL.litchfield@republicservices.com

### For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: _____ FACILITY ID: _____



**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: BROWNING FERRIS INDUSTRIES	FACILITY ID: C-130
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: REPUBLIC SERVICES, INC	
3. Agent to the Owner: DON LITCHFIELD	

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):**

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

*Don Litchfield*  
Signature of Responsible Official

4/25/11  
Date

Don Litchfield  
Name of Responsible Official (please print)

Environmental Manager  
Title of Responsible Official (please print)

# ATTACHMENT D

Previous Title V Operating Permit No.  
C-150-1-6

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-150-1-6

**EXPIRATION DATE:** 04/30/2014

**EQUIPMENT DESCRIPTION:**

54 MMBTU/HR LANDFILL GAS COLLECTION AND TREATMENT SYSTEM WITH MCGILL MODEL EGF-4 ENCLOSED FLARE WITH COMBUSTION AIR CONTROLS, PROPANE-FIRED PILOT FLAME, FLAME ARRESTOR, BLOWERS, CONCRETE CONDENSATE SUMPS, EXHAUST STACK AND 67 EXTRACTION WELLS

## PERMIT UNIT REQUIREMENTS

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1. Flares shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. [40 CFR 60.18(c)(1)] Federally Enforceable Through Title V Permit
2. Testing the visible emissions of the flare shall be conducted at least annually, using EPA Method 22. The observation period shall be 2 hours. [40 CFR 60.18(f)(1)] Federally Enforceable Through Title V Permit
3. Landfill gas shall be tested for sulfur content quarterly using Draeger tubes. If source specific historical data (for a period of at least one year) shows seasonal variation of less than 20%, then landfill gas shall be tested annually using Draeger tubes. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
5. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
6. Actual flare emissions shall not exceed 20 tons VOC/year. Process information, including fuel usage data for the flare and process rates for operations controlled by the flare, shall be submitted to the District annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Flares shall only be used with the net heating value of the gas being combusted being 200 Btu/scf or greater if the flare is non-assisted; or with the net heating value of the gas being combusted being 300 Btu/scf or greater if the flare is air-assisted or steam-assisted. [40 CFR 60.18 (c)(3)] Federally Enforceable Through Title V Permit
8. The net heating value of the gas being combusted in a flare shall be calculated annually, pursuant to 40 CFR 60.18(f)(3) and using EPA Method 18, ASTM D1946-77, and ASTM D2382-76. [40 CFR 60.18 (f)(3-6)] Federally Enforceable Through Title V Permit
9. Air-assisted flares shall be operated with an exit velocity less than  $V_{max}$ , as calculated by the equation specified in paragraph 40 CFR 60.18 (f)(6). [40 CFR 60.18 (c)(5)] Federally Enforceable Through Title V Permit
10. Nonassisted and steam-assisted flares shall be operated with an exit velocity, as calculated by the methods specified in 40 CFR 60.18 (f)(4), less than 60 ft/sec, except as provided in 40 CFR 60.18 (c)(4)(ii) and (iii). [40 CFR 60.18 (c)(4)(i)] Federally Enforceable Through Title V Permit
11. Nonassisted and steam-assisted flares may be operated with an exit velocity, as calculated by the methods specified in 40 CFR 60.18 (f)(4), equal to or greater than 60 ft/sec, but less than 400 ft/sec if the net heating value of the gas being combusted is greater than 1,000 Btu/scf. [40 CFR 60.18 (c)(4)(ii)] Federally Enforceable Through Title V Permit
12. Nonassisted and steam-assisted flares may be operated with an exit velocity, as calculated by the methods specified in 40 CFR 60.18 (f)(4), less than the velocity,  $V_{max}$ , as determined by the equation specified in paragraph 40 CFR 60.18 (f)(5), and less than 400 ft/sec. [40 CFR 60.18 (c)(4)(iii)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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13. The actual exit velocity of a flare shall be calculated by dividing the volumetric flowrate (in units of standard temperature and pressure), as determined by Reference Methods 2, 2A, 2C, or 2D as appropriate; by the unobstructed (free) cross sectional area of the flare tip. [40 CFR 60.18 (f)(4)] Federally Enforceable Through Title V Permit
14. Flares shall be operated with a flame present at all times, and kept in operation when emissions may be vented to them. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. [40 CFR 60.18 (c)(2), 60.18 (e), and 60.18 (f)(2)] Federally Enforceable Through Title V Permit
15. Flare shall be equipped with a failure alarm to automatically shut off the blower and landfill gas supply. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Landfill gas flowrate shall be monitored by flow indicator and recorders. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Gas collection system shall be sealed at all times during operation. [District NSR Rule] Federally Enforceable Through Title V Permit
18. All condensate traps shall remain covered unless treatment of condensate is taking place. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Flame temperature indicator and recorder shall be operated whenever gas is flared. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Flare temperature shall be maintained to at least 1400 degree F. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Total volume of landfill gas flared shall not exceed 2600 scf/min (3,744,000 scf/day) and shall be recorded daily. [District Rules 2520, 9.4.2 and NSR] Federally Enforceable Through Title V Permit
22. Emissions shall not exceed any of the following: NO<sub>x</sub> - 0.0616 lb/MMbtu, PM<sub>10</sub> - 2.92 lb/hr, CO - 7.75 lb/hr, SO<sub>x</sub> - 1.1 lb/hr, nor VOC(NHMC) - 1.92 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Daily emissions shall not exceed any of the following: NO<sub>x</sub> - 63.4 lb/day, PM<sub>10</sub> - 70.0 lb/day, CO - 186.0 lb/day, SO<sub>x</sub> - 27.1 lb/day, nor VOC(NMHC) - 47.0 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Interior wells: DEW-04, DEW-06, and DEW-07 may be operated with 15% oxygen concentration or less, provided that the temperature of these wells stays below the 130 °F which would indicate that aerobic decomposition is not occurring. [40 CFR 60.753(c)] Federally Enforceable Through Title V Permit
25. Perimeter wells: EW-01, EW-02, EW-04, EW-05, EW-07, EW-09, EW-10, EW-12, EW-16, EW-17, EW-18, EW-20, EW-22, EW-23, EW-24, EW-25, EW-28, EW-29, EW-31, EW-32, EW-33, EW-35, EW-36, EW-38, EW-40, EW-43, EW-46, EW-47, EW-49, EW-50, EW-53, EW-55, and EW-56 may be operated with 15% oxygen concentration or less, provided that the temperature of these wells stays below the 130 °F which would indicate that aerobic decomposition is not occurring. [40 CFR 60.753(c)] Federally Enforceable Through Title V Permit
26. The landfill gas control system shall reduce NMOC by 98 weight percent; or reduce the outlet NMOC concentration to 20 ppm as hexane by volume, dry basis at 3 percent oxygen. [40 CFR 60.33c(c)(2) & (3)] Federally Enforceable Through Title V Permit
27. Source testing for NO<sub>x</sub> and CO shall be conducted utilizing EPA Method 7E and EPA Method 10 respectively, or CARB Method 100. [District Rule 1080] Federally Enforceable Through Title V Permit
28. Source testing for VOC control efficiency and VOC concentration shall be conducted utilizing EPA Method 25A or 25C. [District Rule 1080] Federally Enforceable Through Title V Permit
29. Source test plan shall be submitted at least 30 days prior to source test date. [District Rule 1080] Federally Enforceable Through Title V Permit
30. Source test within 90 days of permit renewal. [District Rule 1080] Federally Enforceable Through Title V Permit

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