

COMPLIANCE PLAN**COMPANY NAME & MAILING ADDRESS**

City of LA, Bureau of Sanitation (Lopez Canyon)
1149 South Broadway
Los Angeles, CA 90015

EQUIPMENT ADDRESS

11950 Lopez Canyon Road
Lake View Terrace, CA

APPLICATION NO. 534031

This compliance assurance monitoring plan (CAM) under Reg. XXX (40 CFR Part 64) for non-methane hydrocarbons (NMHC) emissions generated by a landfill which are collected in a gas collection system and controlled using a landfill gas (LFG) flare system as air pollution control equipment.

BACKGROUND

This application was submitted on December 15, 2011 for a CAM plan for the LFG flare system Permit to Operate No. F38381 (A/N 245157). The Initial Title V permit for this facility was issued on 4/8/2007. The facility submitted their Title V renewal application (A/N 528819) on 11/1/2011. The application is for a Compliance Assurance Monitoring plan under Reg. XXX (40 CFR Part 64). The CAM plan conditions will be incorporated into the Title V renewal.

The above regulation became effective on November 21, 1997. However requirements of the plan were delayed while the Title V program was being implemented. Thus, owners and operators were subject to CAM plan requirements at the time of their initial Title V permit renewal.

CAM Applicability & Requirements:

CAM regulation (40 CFR Part 64) covers emission units that are evaluated on a pollutant by pollutant basis for equipment that meet the definition of pollutant specific emission units (PSUEs). The regulation applies to each PSUE if the unit is located at a major source that is required to obtain a Part 70 or 71 (Title V) permit. The CAM plan requirements are;

1. Describing the indicators to be monitored.
2. Describing ranges or the process to set indicator ranges.
3. Describing the performance criteria for the monitoring, including specifications for obtaining representative data, verification procedures to confirm monitoring operational status, QA/QC procedures and monitoring frequency.
4. Providing justification for the use of parameters, ranges, and monitoring approach.
5. Providing emissions test data, if necessary.
6. Providing an implementation plan, if monitoring requires installation, testing, or other activities prior to implementation.

EVALUATION:

The above facility currently operates LFG flaring system under Permit to Operate No. F38381.

The permit is subject to NMHC limits of 0.63 lb/hr for each flare (total of 4.4 lbs/hr for all flares) based on Rule 1303(b)(2) – Offsets, that are based on volume of LFG burned (1,250 scfm max. per flare), flares operating temperature (1,400 °F min.) and NMOC destruction efficiency (min. of 98% by weight).

MONITORING & PERFORMANCE:

Indicator: Based on the data provided in the this plan, 40 CFR Part 64 requirements, and the permit conditions under P/O # for F38381 for Landfill Gas Flaring System, each flare at this facility is required to be equipped with a temperature indicator and recorder to measure and record the gas temperature in the flare stack whenever the flare is in operation.

The temperature is measured at a location above the flame zone, at least 0.6 second downstream of the burner and minimum of 5 feet from the top of the stack.

Temperature monitor shall have an accuracy of +/- 1% of the temperature being measured. Installation, replacement and preventive maintenance for the temperature monitors shall be in accordance with manufacturer's specifications.

Range: Regarding the plan indicator range, the stack temperature of each flare is maintained at a minimum of 1400 °F. The data recorder shall record at least every 15 minutes.

Upon detecting any deviation from the acceptable range of readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. Excursion is defined as any three-hour period of operation during which average combustion temperature is greater than 50 deg. F below the minimum combustion temperature specified for the flare.

Frequency: Continuous temperature monitoring & recording.

Monitoring Operation

& Maintenance: The permittee shall be conditioned to comply with the compliance assurance monitoring operation & maintenance requirements of 40 CFR Part 64.7.

Recordkeeping

& Reporting The permittee shall be conditioned to comply with the recordkeeping & reporting requirements of 40 CFR Part 64.9.

Performance Test: The flares shall be tested annually to demonstrate compliance with applicable requirements. Based on the recent source test results for flare # 9 conducted on 8/3/2011, the compliance with the above rules & regulations have been demonstrated (see attached copy of the test results).

RULES & REGULATIONS COMPLIANCE

Proposed CAM plan for TNMOC control using gas flaring system is expected to comply with the following applicable rules & regulations:

Reg. 1303 (b)(2) – Offsets

RECOMMENDATION

CAM plan approval is recommended. The permit conditions for the Permit to Operate # F38381 shall be revised to incorporate the following conditions:

1. CONTINUOUS EXHAUST TEMPERATURE MONITORING AND RECORDING SYSTEM SHALL BE PURSUANT TO THE OPERATION AND MAINTENANCE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.7. SUCH A SYSTEM SHALL HAVE AN ACCURACY OF WITHIN PLUS OR MINUS 1% OF THE TEMPERATURE BEING MONITORED AND SHALL BE INSPECTED, MAINTAINED, AND CALIBRATED ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS USING AN APPLICABLE AQMD OR EPA APPROVED METHOD.
2. WHENEVER THE FLARE IS IN OPERATION, A TEMPERATURE OF NOT LESS THAN 1400 DEGREES F., AS MEASURED BY THE TEMPERATURE INDICATOR AND RECORDER' SHALL BE MAINTAINED IN THE FLARE STACK. FOR THE PURPOSE OF THIS CONDITION, A DEVIATION SHALL BE DEFINED AS WHEN A TEMPERATURE OF LESS THAN 1,400 DEGREES F. OCCURS DURING NORMAL OPERATION EXCEPT DURING STARTUPS OR SHUTDOWNS, NOT TO EXCEED 30 MINUTES. THE EXHAUST TEMPERATURE SHALL BE AVERAGED OVER A 15-MINUTE PERIOD, AND HOURLY AVERAGE SHALL BE COMPUTED FROM SUCH DATA POINTS. THE TEMPERATURE RECORDS SHALL BE REVIEWED BY THE OPERATOR ON A DAILY BASIS TO DETERMINE IF A DEVIATION OCCURS OR AN ALARM SYSTEM BE INSTALLED TO ALERT THE OPERATOR WHEN A DEVIATION OCCURS.
3. WHENEVER A DEVIATION OCCURS FROM 1,400 DEGREES F., THE OPERATOR SHALL TAKE IMMEDIATE CORRECTIVE ACTION, AND KEEP RECORDS OF THE DURATION AND CAUSE OF THE DEVIATION AND THE CORRECTIVE ACTION TAKEN.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING AND COMPLIANCE DIVISION

APPLICATION PROCESSING AND CALCULATIONS

PAGES

4

APPLICATION NO.

534031

ENGINEER

AM

PAGE

4

DATE

6/6/2012

CHECK BY

4. ALL DEVIATIONS SHALL BE REPORTED TO THE AQMD ON A SEMI-ANNUAL BASIS PURSUANT TO THE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.9.

5. THE OPERATOR SHALL SUBMIT AN APPLICATION WITH A QUALITY IMPROVEMENT PLAN (QIP) IN ACCORDANCE WITH 40 CFR PART 64.8 TO THE AQMD IF AN ACCUMULATION OF DEVIATIONS EXCEED 5 PERCENT DURATION OF THIS EQUIPMENT'S TOTAL OPERATING TIME FOR ANY SEMI-ANNUAL REPORTING PERIOD. THE REQUIRED QIP SHALL BE SUBMITTED TO THE AQMD WITHIN 90 CALENDAR DAYS AFTER THE DUE DATE FOR THE SEMI-ANNUAL MONITORING REPORT.

6. THE OPERATOR SHALL KEEP ADEQUATE RECORDS IN A FORMAT THAT IS ACCEPTABLE TO THE AQMD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS SPECIFIED IN THIS PERMIT AND 40 CFR PART 64.9 FOR A MINIMUM OF FIVE YEARS.

[40 CFR PART 64]