

**YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT**  
1947 Galileo Court, Suite 103; Davis, CA 95618  
(530) 757-3650

**TITLE V PERMIT RENEWAL  
STATEMENT OF BASIS**

**PERMIT NUMBER:** F-00536-4  
**ENGINEER:** Rene Toledo  
**DATE:** May 31, 2012

**Facility Name:** MM Yolo Power LLC  
**Mailing Address:** 5087 Junction Road  
Lockport, NY 14094

**Location:** 44090 County Road 28H  
Woodland, CA 95776

**Responsible Official:** Anthony Falbo  
**Title:** Vice President & General Manager

**Application Contact:** Suparna Chakladar  
**Title:** Vice President  
**Phone:** 916) 789-2250 ext. 104

**I. FACILITY DESCRIPTION**

MM Yolo Power LLC (MM Yolo) operates an electrical power production facility at the Yolo County Central Landfill (YCCL). The source is permitted to operate a total of five (5) landfill gas fired internal combustion (IC) engines at the site. Each of the permitted IC engines produces electricity by driving a dedicated electric generator, and each engine is capable of operating independently of any other engine. Landfill gas is supplied to the engines by the landfill's active gas collection system currently owned and operated by NEO Yolo LLC (NEO Yolo) under Permit to Operate (PTO) P-26-98(a1). The produced electricity is transferred off-site for sale on the utility grid.

As explained by Fortistar Vice President Anthony Falbo in a letter dated May 4, 2010 (see file), MM Yolo and NEO Yolo are independent companies that are commonly operated on a day-to-day basis by staff provided by "Fortistar Services LLC." As detailed later in this document for District Rule 3.4 (New Source Review), the District considers NEO Yolo LLC and MM Yolo a single stationary source that is independent of YCCL's landfilling operation. Historically, each of these three companies has held its own separate local and federal operating permits for their individual equipment.

**II. PROPOSED REVISIONS**

The source has submitted an approved Yolo-Solano Air Quality Management District (District) application requesting the renewal of Title V operating permit F-00536-3 (effective July 9, 2010). The permit will be renewed to incorporate any new, revised, or additional federally enforceable rule requirements.

**III. EMISSIONS UNIT INFORMATION**

**A. INSIGNIFICANT EMISSIONS UNIT INFORMATION**

Insignificant emissions units or exempted equipment may be supplemented, replaced or modified with non-identical equipment without notice provided that the exemption status of a unit, as defined in current District or Federal rules, has not changed. Table 1 provides a complete listing of the equipment currently identified as exempt or insignificant and not required to obtain an operating permit pursuant to District Rule 3.2 (Exemptions).

**Table 1 - Exempted and Insignificant Emissions Units**

Exempt Equipment Description	Basis for Exemption
Janitorial Services (Non-solvent) Cleaning Supplies	District Rule 2.31, Section 117 (SIP Approved Version 04/27/1994)
Transport Vehicles	District Rule 3.2, Section 101
Air Conditioning System	District Rule 3.2, Section 103
Internal Combustion (IC) Engine Repair and Maintenance	District Rule 3.2, Section 108
Compressed Oxygen Gas Tank	District Rule 3.2, Section 109.1
Compressed Acetylene Gas Tank	District Rule 3.2, Section 109.1
800 Gallon New Oil Storage Tank	District Rule 3.2, Section 109.2
800 Gallon Used Oil Storage Tank	District Rule 3.2, Section 109.2
IC Engine Cooling Tower	District Rule 3.2, Section 112
Steam Cleaner	District Rule 3.2, Section 113
Miscellaneous Welding Equipment	District Rule 3.2, Section 113

**B. SIGNIFICANT EMISSIONS UNIT INFORMATION**

Each of the following emission units has been constructed pursuant to the requirements of an approved ATC that has been issued in accordance with District Rule 3.1 (General Permit Requirements) and District Rule 3.4 (New Source Review).

**Identification Number: P-78-98(a2)**

Equipment Description: 805 BHP landfill gas fired Caterpillar IC engine, Model No. G-399, Serial No. 49C01390; Engine No. 1A

Control Equipment: Automatic air/fuel ratio controller, aftercooler, and turbocharger

**Identification Number: P-79-98(a1)**

Equipment Description: 805 BHP landfill gas fired Caterpillar IC engine, Model No. G-399, Serial No. 49C728; Engine No. 2

Control Equipment: Automatic air/fuel ratio controller, aftercooler, and turbocharger

**Identification Number: P-80-98**

Equipment Description: 805 BHP landfill gas fired Caterpillar IC engine, Model No. G-399; Engine No. 3

Control Equipment: Low pressure fuel delivery system, and turbocharger with electronic controls

**Identification Number: P-81-98(a1)**

Equipment Description: 1306 BHP landfill gas fired Caterpillar IC engine, Model No. G-3516 SITA, Serial No. 4EK01652; Engine No. 4A

Control Equipment: Automatic air/fuel ratio controller, aftercooler, and turbocharger

**Identification Number: P-87-98(a1)**

Equipment Description: 1306 BHP landfill gas fired Caterpillar IC engine, Model No. G-3516 SITA, Serial No. 4EK01693; Engine No. 5A

Control Equipment: Automatic air/fuel ratio controller, aftercooler, and turbocharger

**IV. TITLE V APPLICABILITY**

MM Yolo is subject to District Rule 3.8 pursuant to Section 102.5 of the rule, since NEO Yolo and MM Yolo are part of the same stationary source whose combined yearly total potential to emit exceeds the nitrogen oxide (NO<sub>x</sub>) major source threshold of 25 tons per year (Section 111 of the Federal Clean Air Act). MM Yolo’s emission totals are listed below in Table 2 on a per pollutant basis. For clarity, NEO Yolo’s potential to emit has not been included in this evaluation since it is contained in their Title V Permit F-01348-2 (effective February 28, 2012).

**Table 2 - Total Potential to Emit for Criteria Pollutants**

<b>Criteria Pollutant Emissions (tons per year)</b>					
<b>Emission Unit Name</b>	<b>VOC</b>	<b>CO</b>	<b>NO<sub>x</sub></b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>
P-78-98(a2)	4.11	20.19	8.26	3.88	3.65
P-79-98(a1)	4.11	20.19	8.26	3.88	3.65
P-80-98	4.28	20.21	9.33	1.55	0.47
P-81-98(a1)	4.22	37.89	9.28	5.08	3.66
P-87-98(a1)	4.22	37.89	7.67	5.08	3.66
Maximum Facility PTE	20.94	136.37	42.80	19.47	25.09

**V. APPLICABLE FEDERAL REQUIREMENTS**

**A. RULE 2.3 - Ringelmann Chart**

**Rule Description**

This rule specifies the allowable opacity limit for sources in the District.

**Compliance Status**

The rule applies to any visible emissions associated with the operation. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California State Implementation Plan (SIP). The source is currently in compliance with the requirements of the rule.

**Rule Requirement #1 (Facility Wide Permit Condition) - Opacity Limit**

The Permit Holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than three (3) minutes in any one (1) hour which is:

- a. As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart as published by the United States Bureau of Mines; or
- b. Of such opacity as to obscure an observer’s view to a degree equal to or greater than does smoke described in subsection a. of this condition. [District Rule 2.3] *(Title V Condition III.A.1)*

**Subsuming Demonstration:** Table 3 (below) summarizes the subsuming of District Rule 2.3 by the requirements of Rule 3.1. The table also lists the applicable permit condition numbers.

**Table 3:** Subsuming of District Rule 2.3 Requirements

Rule Citation	Description	Comment & Permit Condition	PTO Cond.	Title V Cond.
Rule 2.3	The SIP approved rule requires that all visible emissions comply with a Ringelmann No. 2 opacity limit for a period (or periods) aggregating more than three (3) minutes in any one (1) hour.	The Rule 2.3 requirements have been subsumed by the more stringent requirements of Rule 3.1, §402.  “The Permit Holder shall not discharge into the atmosphere from any single source of emissions whatsoever, any air contaminant for a period or periods aggregating more than three (3) minutes in any one (1) hour which is: a. As dark or darker in shade than No. 1 on the Ringelmann Chart; or b. Greater than 20% opacity.	9	II.A.7
Rule 3.1, §402	Requires that all visible emissions comply with Ringelmann No. 1 opacity limit for a period (or periods) aggregating more than three (3) minutes in any one (1) hour.			

**B. RULE 2.5 - Nuisance**

**Rule Description**

This rule requires that sources are not a public nuisance.

**Compliance Status**

The rule applies to all emission units at the stationary source. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the requirements of the rule. The operation is expected to continue to comply with the rule.

This permit condition is federally enforceable because it derives from District Rule 2.5 - Nuisance that is currently part of the California State Implementation

Plan (SIP). The District is taking steps to remove District Rule 2.5 from the SIP. Once the U.S. EPA has taken final action to remove District Rule 2.5 from the SIP, this permit condition will become state-enforceable only.

**Rule Requirement #1 (Facility Wide Permit Condition) - Nuisance**

The Permit Holder shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause to have a natural tendency to cause injury or damage to business or property. [District Rule 2.5] *(Title V Condition III.B.1 / P-78-98(a2) Condition 2, P-79-98(a1) Condition 2, P-80-98 Condition 2, P-81-98(a1) Condition 2, P-87-98(a1) Condition 2)*

**C. RULE 2.11 - Particulate Matter**

**Rule Description**

This rule specifies the allowable particulate matter (PM) emission rate at standard conditions. For the purposes of this evaluation, the PM emissions are considered to be 100% PM<sub>10</sub> (PM with an aerodynamic diameter of 10 microns or less).

**Compliance Status**

The rule applies to all of the stationary IC engines permitted to operate at the facility. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the requirements of the rule.

**Subsuming Demonstration:** Table 4 (below) summarizes the subsuming of District Rule 2.11 (and Rule 12(b) - see below) by the requirements of District Rule 3.4. The table also lists the applicable permit condition numbers.

**Table 4:** Subsuming of District Rule 2.11 and Rule 2.12(b) Requirements

Rule Citation	Description	Comment & Permit Condition	PTO Cond.	Title V Cond.
Rule 2.11	The SIP approved rule requires that the PM emission concentration from an affected unit not exceed 0.3 grains per standard cubic foot of exhaust.	The Rule 2.11 and Rule 2.12(b) requirements have been subsumed by the more stringent mass emission limit requirements of Rule 3.4 (as previously calculated in each unit's respective emission evaluations - see file).	Daily PM <sub>10</sub> Emission Limits	II.A.1
Rule 2.12(b)	The SIP approved rule (see below) requires that the PM emission concentration from an affected unit not exceed 0.3 grains per standard cubic foot of exhaust calculated to 12% carbon dioxide (CO <sub>2</sub> ) at standard conditions.			
Rule 3.4, §409.2	Requires that each engine not exceed a PM <sub>10</sub> mass emission limit.			

**D. RULE 2.12 - Specific Contaminants**

**Rule Description**

This rule specifies the allowable sulfur dioxide (SO<sub>2</sub>) and PM emission rates at standard conditions for an emission unit. For the purpose of this evaluation, the sulfur oxide (SO<sub>x</sub>) emissions are considered to be 100% SO<sub>2</sub>.

**Compliance Status**

The rule applies to the stationary IC engines at the facility. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the requirements of the rule.

**Subsuming Demonstration PM:** Since the PM requirements of Rule 2.12(b) are equivalent to the requirements of Rule 2.11, please see Rule 2.11 for the subsuming demonstration of the PM specific requirements.

**Subsuming Demonstration SO<sub>2</sub> Only:** Table 5 (below) summarizes the subsuming of District Rule 2.12(a) by the mass emission limits of District Rule 3.4. The table also lists the applicable permit condition numbers.

**Table 5: Subsuming of District Rule 2.12(a) Requirements**

Rule Citation	Description	Comment & Permit Condition	PTO Cond.	Title V Cond.
Rule 2.12(a)	The SIP approved rule requires that the SO <sub>x</sub> (as SO <sub>2</sub> ) concentration from an affected unit not exceed 0.2% by volume at standard conditions.	The Rule 2.12(a) requirements have been subsumed by the more stringent mass emission limit requirements of Rule 3.4 (as previously calculated in each unit's respective emission evaluations - see file).	Daily SO <sub>x</sub> Emission Limits	II.A.4
Rule 3.4, §409.2	Requires that each engine not exceed a SO <sub>x</sub> mass emission limit.			

**E. RULE 2.16 - Fuel Burning Heat or Power Generators**

**Rule Description**

This rule specifies the allowable nitrogen dioxide (NO<sub>2</sub>), SO<sub>2</sub>, and combustion particulate matter limits for non-mobile, fuel burning, heat or power generating units in the District. For the purpose of this evaluation, the NO<sub>x</sub> emissions are considered to be 100% NO<sub>2</sub>.

**Compliance Status**

The rule applies to all of the stationary IC engines permitted to operate at the facility. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the requirements of the rule.

**Subsuming Demonstration:** Table 6 (below) summarizes the subsuming of District Rule 2.16 by the mass emission limits of District Rule 3.4. The table also lists the applicable permit condition numbers.

**Table 6:** Subsuming of District Rule 2.16 Requirements

Rule Citation	Description	Comment & Permit Condition	PTO Cond.	Title V Cond.
Rule 2.16	<p>The SIP approved rule requires that power generating units not discharge into the atmosphere more than the following rates:</p> <ul style="list-style-type: none"> <li>a. 200 pounds per hour of sulfur compounds, calculated as SO<sub>2</sub>;</li> <li>b. 140 pounds per hour of NO<sub>x</sub>, calculated as NO<sub>2</sub>; and</li> <li>c. 40 pounds per hour of combustion particulate derived from the fuel.</li> </ul>	<p>The maximum daily SO<sub>2</sub>, NO<sub>2</sub>, and PM emission concentrations for each of the engines are less than the hourly limits of the rule. Therefore, a Rule 2.16 specific permit condition is streamlined by the more stringent Rule 3.4 requirements.</p>	<p>Daily NO<sub>x</sub>, SO<sub>x</sub>, and PM<sub>10</sub> Emission Limits</p>	<p>II.A.1</p>
Rule 3.4, §409.2	<p>Requires that each engine not exceed their respective permitted NO<sub>x</sub>, SO<sub>x</sub>, and PM<sub>10</sub> mass emission limits.</p>			

**F. RULE 2.17 - Circumvention**

**Rule Description**

This rule prevents sources from concealing emissions to the atmosphere.

**Compliance Status**

The rule is applicable to all of the emission units at the facility. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the requirements of the rule.

**Permit Condition**

The Permit Holder shall not build, erect, install or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26, Part 3 and Part 4 of the Health and Safety Code of the State of California or District Rules or Regulations. *(Title V Condition III.C.1)*

**G. RULE 2.19 - Particulate Matter Process Emission Rate**

**Rule Description**

This rule limits the pound per hour PM emission rate of an emission unit based on the hourly amount of material processed.

**Compliance Status**

The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is exempt from the requirements of the rule pursuant to Rule 2.19, Section A, which requires the

use of Rule 1.1 (General Provisions and Definitions), Section 226 to define process weight. District Rule 1.1, Section 226 states, “solid fuels charged will be considered as part of the process weight, but liquid and gaseous fuels and combustion air will not.” Since the facility’s IC engines can only fire landfill gas as fuel, all of the units are exempt from the requirements of this rule.

**Permit Condition**

No condition required.

**H. RULE 2.32 - Stationary Internal Combustion Engines**

**Rule Description**

The purpose of this rule is to limit the emission concentrations of carbon monoxide (CO) and NO<sub>x</sub> from stationary IC engines, as well as to require the ongoing emission testing of all affected units.

**Compliance Status**

The rule applies to all of the stationary IC engines permitted to operate at the facility. The version of the rule used in this evaluation is the rule revised on October 10, 2001, and is part of the California SIP. As verified through emission source testing, each affected four-stroke spark-ignited engine operates with an exhaust oxygen concentration greater than 2%. Each unit meets the definition of “lean-burn engine” as contained in Section 204 of the rule, and for the purpose of this rule will be evaluated as such. The source is currently in compliance with the rule.

**Streamlining and Subsuming Demonstrations:** Table 7 (below) summarizes the streamlining and subsuming of District Rule 2.32 requirements with other rule requirements. The table also lists the applicable permit condition numbers.

**Table 7:** Streamlining and Subsuming of District Rule 2.31 Requirements

Rule Citation	Description	Comment & Permit Condition	PTO Cond.	Title V Cond.
Rule 2.32, §301.4(b)	The SIP approved rule requires the owner or operator of a lean burn stationary IC engine with a rating greater than 100 BHP, limit the emission concentrations from the engine to no more than 150 ppmv of NO <sub>x</sub> and no more than 2,000 ppmv of CO (calculated at 15 percent	For each affected engine, the Rule 2.32 requirements have been subsumed by the more stringent Rule 3.4 emission limit requirements.		
		The requirements of P-78-98(a2) and P-79-98(a1) are: a. VOC (measured as methane): 93.0 ppmv @ 15% O <sub>2</sub> ; b. CO: 261.0 ppmv @ 15% O <sub>2</sub> ; and c. NO <sub>x</sub> (as NO <sub>2</sub> ): 65.0 ppmv @	10	II.A.2

	oxygen (O <sub>2</sub> ) on a dry basis).	15% O <sub>2</sub> .  The requirements of P-80-98 limits the engine emission concentrations to the following: a. CO: 2,000 ppmv @ 15% O <sub>2</sub> ; and b. NO <sub>x</sub> (as NO <sub>2</sub> ): 65 ppmv @ 15% O <sub>2</sub> .	10	II.A.3
Rule 3.4	Requires that the individual engines meet the individual emission concentration limits based on the Best Available Control Technology (BACT) or Offset requirements in place during each engine's last permitting actions (see file).	The requirements of P-81-98(a1) are: a. VOC (measured as methane): 68.0 ppmv @ 15% O <sub>2</sub> ; b. CO: 349.0 ppmv @ 15% O <sub>2</sub> ; and c. NO <sub>x</sub> (as NO <sub>2</sub> ): 52.0 ppmv @ 15% O <sub>2</sub> .	10	II.A.4
		The requirements of P-87-98(a1) limits the engine emission concentrations to the following: a. VOC (measured as methane): 68.0 ppmv @ 15% O <sub>2</sub> ; b. CO: 349.0 ppmv @ 15% O <sub>2</sub> ; and c. NO <sub>x</sub> (as NO <sub>2</sub> ): 43.0 ppmv @ 15% O <sub>2</sub> .	10	II.A.5
Rule 2.32, §302	The SIP approved rule requires that each affected engine operator submit to the District for approval an "Engine Operator Inspection Plan" that contains at minimum the information listed in Sections 302.1 through 302.5.	As required by the rule, the supplemental application requires that an owner/operator list all of the applicable identification and performance information for the affected IC engine and its equipped control device(s). The form also requires that the owner/operator identify the maintenance procedure for the equipment (see file). The completion and submission of District Supplemental Application Form 310 satisfies the requirements of Rule 2.32, Section 302. As such, the permit does not require a specific condition pertaining to the Engine Operator Inspection Plan.		
Rule 3.1, §401	As part of the processing of PTO's P-78-98(a2), P-79-98(a1), P-80-98, P-81-98(a1), and P-87-98(a1) the source submitted the required engine inspection plan as part of the District's Supplemental Application Form 310 (Internal Combustion Engines).			

Rule 2.32, §303.1	The SIP approved rule requires that each affected engine be source tested using the methods specified in Section 502 of this Rule at least once in every 24 months.	<p>For each affected engine, the Rule 2.32 requirements have been subsumed by the more stringent Rule 3.4 testing frequency requirements.</p> <p>The streamlined requirement of P-78-98(a2), P-79-98(a1), P-81-98(a1), and P-87-98(a1) is:</p> <p>The Permit Holder shall perform a source test at least once every 12 months to demonstrate compliance with the VOC, CO, and NO<sub>x</sub> emission limits.</p>	15	II.C.2
Rule 3.4	Requires that each affected engine be source tested at least once every 12 months.	<p>The streamlined requirement of P-80-98 is:</p> <p>The Permit Holder shall conduct annual compliance source tests of the permitted equipment to verify equipment emissions. A source test protocol shall be provided to the District for review at least 14 days prior to the scheduled testing date. Source testing shall utilize District Rule 2.32 methods or other District approved methods. The Permit Holder shall provide the District with a 72-hour notice so that District staff can be present to witness the compliance source test. Testing shall be conducted to verify VOC, CO, and NO<sub>x</sub> emission rates, as well as, VOC destruction efficiency.</p>	16	II.C.5
Rule 2.32, §303.2	The SIP approved rule requires that during any year which a source test is not performed, a screening analysis be performed for NO <sub>x</sub> and CO.	As discussed above, the Rule 3.4 condition requires that a source test be performed of each engine at least once every 12 months (annually) to verify the equipment's compliance with the permitted NO <sub>x</sub> and CO emission limits.	See Above	See Above
Rule 3.4	Requires that each affected engine be source tested at least once every 12 months.	Therefore, the screening analysis requirement is subsumed by the more stringent source testing requirement of Rule 3.4.		

<p>Rule 2.32, §304</p>	<p>The SIP approved rule requires that the owner or operator of an affected IC engine install and operate a non-resettable totalizing fuel meter on each affected engine no later than March 7, 2003.</p>	<p>For each affected engine, the Rule 2.32 requirements have been streamlined with the more stringent Rule 3.4 requirements.</p>		
		<p>The streamlined requirement of P-78-98(a2), P-79-98(a1), P-81-98(a1), and P-87-98(a1) is:</p> <p>A non-resettable, totalizing gaseous fuel flow meter shall be installed and utilized to measure the quantity (in cubic feet) of landfill gas combusted in the IC engine. The meter shall be accurate to plus or minus five percent and shall be calibrated at least once every 12 months.</p>	<p>13</p>	<p>II.B.5</p>
<p>Rule 3.4</p>	<p>Requires that each engine fuel flow meter also comply with additional calibration tolerances and re-calibration frequency requirements.</p>	<p>Since PTO P-80-98 has no fuel meter specific requirement, the following condition will be placed on the Title V permit in order to reflect the requirements of Section 304 of this rule.</p>		
		<p>An owner or operator of an engine subject to this Rule shall install a non-resettable totalizing fuel meter and/or a non-resettable hour meter that measures elapsed operating time, as determined appropriate by the APCO.</p>	<p>-</p>	<p>II.B.7</p>
<p>Rule 2.32, §402</p>	<p>The SIP approved rule requires that an existing IC engine comply with the applicable emission limit requirements of Section 301 by the applicable compliance schedule, and that the Permit Holder provide the APCO with an annual report of the actual usage of each affected engine.</p>	<p>For each affected engine, the Rule 2.32 requirements have been streamlined with the requirements of Rule 3.4.</p>		
		<p>The streamlined requirement for P-78-98(a2), P-79-98(a1), P-81-98(a1), and P-87-98(a1) is:</p> <p>The Permit Holder shall monitor and record the cumulative quarterly and annual landfill gas fuel usage (in cubic feet) from the totalizing meter. The records shall be updated quarterly and made available to the District upon</p>	<p>18 for P-78-98 (a2) and P-79-98 (a1)  19 for P-81-98 (a1) and P-87-98</p>	<p>II.D.1</p>

		request.	(a1)	
		The District must be notified prior to any emissions testing event and a protocol must be submitted for approval 30 days prior to testing. The results of an emissions testing event shall be submitted to the District within 60 days of the test date. The protocol and report shall be mailed to the attention of the Supervising Air Quality Engineer.	17	II.C.4
Rule 3.4	Requires that each affected engine submit the required usage and emission reports on a specific schedule and includes additional requirements concerning the submittal of these reports.	The streamlined requirement of P-80-98 is:  The Permit Holder shall submit to the District annually a report specifying the actual annual operating hours. The report shall identify each engine by permit number. The report shall include a summary of maintenance and testing activities.	11	II.D.2
		Source test results shall be submitted to the District within 30 days of the test date.	17	II.C.6
Rule 2.32, §501	The SIP approved rule requires that all required records be maintained for a minimum period of five (5) years.	For each affected engine, the Rule 2.32 requirements have been streamlined with the Rule 3.8 record retention requirements.  The streamlined requirement of P-78-98(a2), P-79-98(a1), P-81-98(a1), and P-87-98(a1) is:  The Permit Holder shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of sample collection, measurement, report, or application.	19 for P-78-98 (a2) and P-79-98 (a1)  20 for P-81-98 (a1) and P-87-98 (a1)	IV.K.2

<p>Rule 3.8, §302.6(b)</p>	<p>The SIP approved rule requires that all records be maintained for a minimum period of five (5) years.</p>	<p>The streamlined requirements of P-80-98 are:</p> <p>The Permit Holder shall maintain an inspection log containing at a minimum, the following data:</p> <ol style="list-style-type: none"> <li>a. Identification and location of the engine;</li> <li>b. Date and results of each emission inspection;</li> <li>c. A summary of any corrective emissions maintenance actions taken to ensure compliance with the emissions limits; and</li> <li>d. Any additional information required in the Engine Operator Inspection Plan.</li> </ol> <p>The Permit Holder shall maintain the inspection log for a period of five (5) years after the date of each entry. The log shall be available for inspection by the APCO upon request.</p>	<p>12</p>	<p>II.D.3</p>
		<p>The Permit Holder shall record gas consumption for all five engines on a daily, quarterly and yearly basis. Annually updated records shall also be kept of the higher heating value (BTU content) of fuel. Records shall be kept for five (5) years and available to the District upon request.</p>	<p>14</p>	<p>II.D.4</p>
<p>Rule 2.32, §501.1, §501.2, §501.3, and §501.5</p>	<p>The SIP approved rule requires that emission concentration be determined using specific EPA or California Air Resources Board (CARB) reference methods.</p>	<p>For each affected engine, the Rule 2.32 requirements have been streamlined with the more stringent Rule 3.4 requirements.</p> <p>The streamlined requirement of P-78-98(a2), P-79-98(a1), P-81-98(a1), and P-87-98(a1) is:</p> <p>Source testing shall be conducted using the following test methods:</p> <ol style="list-style-type: none"> <li>a. VOC - EPA Method 18;</li> <li>b. CO - EPA Method 10 or CARB Method 100;</li> <li>c. NO<sub>x</sub> (as NO<sub>2</sub>) - EPA Method 7E</li> </ol>	<p>16</p>	<p>II.C.3</p>

		or CARB Method 100; and d. Stack gas oxygen - EPA Method 3A or CARB Method 100.		
Rule 3.4	The language combines the various test method requirements in to a single condition.	The streamlined requirement of P-80-98 is:  The Permit Holder shall conduct annual compliance source tests of the permitted equipment to verify equipment emissions. A source test protocol shall be provided to the District for review at least 14 days prior to the scheduled testing date. Source testing shall utilize District Rule 2.32 methods or other District approved methods. The Permit Holder shall provide the District with a 72-hour notice so that District staff can be present to witness the compliance source test. Testing shall be conducted to verify VOC, CO, and NO <sub>x</sub> emission rates, as well as, VOC destruction efficiency.	16	II.C.5

**I. RULE 3.1 - General Permit Requirements**

**Rule Description**

This rule provides an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of operating permits.

**Compliance Status**

The source is currently in compliance with the rule. The version of the rule used in this evaluation is the rule adopted on February 23, 1994, and is part of the California SIP. For reference, Page 67068 of the Federal Register, Vol. 69, No. 220 documents that the SIP approved version of Rule 3.1 was "deleted without replacement Rule 3.1, paragraphs 403 and 406." No part of the proposed Title V permit has references to either Section 403 (dealing with Denial of Applications) or Section 406 (dealing with Appeals).

**Rule Requirement #1 (Facility Wide Permit Condition) - Authorization to Construct**

No person shall build, erect, alter, or replace any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants, or the use of which may eliminate or reduce or control the

issuance of air contaminants, without first obtaining an authorization to construct from the APCO as specified in Section 401 of District Rule 3.1. [District Rule 3.1, §301.1] *(Title V Condition III.D.1)*

**Rule Requirement #2 (Facility Wide Permit Condition)** - Approved Operation  
No person shall operate any facility, article, machine, equipment, or other contrivance, for which an authorization to construct is required by District Rules and Regulations without first obtaining a written permit from the APCO. [District Rule 3.1, §302.1] *(Title V Condition III.D.2)*

**Rule Requirement #3 (Facility Wide Permit Condition)** - Approved Operation  
No person shall operate any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, without obtaining a permit from the APCO or the Hearing Board. [District Rule 3.1, §302.2] *(Title V Condition III.D.3)*

**Rule Requirement #5 (Facility Wide Permit Condition)** - Breakdown/Malfunction Notification  
The owner or operator of any facility, article, machine, equipment, or other contrivance for which a permit to operate is in effect shall notify the District office whenever a breakdown, malfunction, or operational upset condition exists which would tend to increase emissions of air pollutants or whenever any operating condition contrary to any provision of the permit to operate exists. Such notice shall be given to the District no later than four hours after occurrence during regular workday hours or no later than two hours of the District workday following an occurrence not during regular District workday hours. The notice shall provide the District information as to causes and corrective action being taken, with a schedule for return to required operating conditions. [District Rule 3.1, §405.3] *(Title V Condition III.D.7 / P-78-98(a2) Condition 4, P-79-98(a1) Condition 4, P-80-98 Condition 4, P-81-98(a1) Condition 4, and P-87-98(a1) Condition 4)*

**J. RULE 3.4 - New Source Review**

**Rule Description**

This rule provides a procedure for the review for new and modified stationary emission units.

**Compliance Status**

The source is currently in compliance with the rule. The version of the rule used in this evaluation is the rule adopted on December 11, 1996, and is part of the California SIP.

**Rule Requirement #1 - Stationary Source Definition**

As defined in Section 238 of the rule, a stationary source includes all permitted emission units that: 1) belong to same industrial grouping; 2) are located on one

property (or on two contiguous properties); and 3) are under the same or common ownership, operation, or control. Due to the complex relationship that exists between MM Yolo, NEO Yolo, and YCCL, the District has also expanded this stationary source determination to include EPA's recommended stationary source evaluation points in an effort to clearly define the stationary source requirements that affect the three companies and their equipment.

The MM Yolo and NEO Yolo facilities are located on property owned by YCCL. Fortistar owns the rights to the landfill gas produced by YCCL, and owns and operates all of the gas collection equipment serving the landfill with the exception of the equipment located in the non-conventional waste management units (i.e., full-scale "bioreactor"). However, all of the gas collected from the YCCL's conventional and non-conventional units is currently ducted to NEO Yolo's main gas collection system. The collected gas can either be ducted to NEO Yolo's enclosed flare or MM Yolo's landfill gas-to-energy site.

Although YCCL's landfill itself is not yet subject to the landfill gas collection and control provisions of 40 CFR Part 60 - Subpart WWW (Standards of Performance for Municipal Solid Waste Landfills), the District considers NEO Yolo's gas collection system and enclosed flare part of the YCCL's control equipment (see Control Equipment Inventory of PTO P-15-05(a)). The maximum rating of NEO Yolo's enclosed flare has the capacity to control the total amount of landfill gas currently generated on site and is therefore considered the primary control equipment for the landfill. Conversely, the MM Yolo engines are not considered to be part of the landfill's control system and are not deemed essential in order for the landfill to achieve its permitted landfill gas collection and control requirements.

As documented in a letter dated May 3, 2011, Mr. Falbo states in "Comment No. 5" that MM Yolo and NEO Yolo are independent companies that are commonly operated on a day-to-day basis by staff provided by "Fortistar Services LLC". It is unclear if the companies share the same corporate executive officers or board of directors, or other administrative functions (e.g., payroll activities, employee benefits, health plans, retirement funds, insurance coverage, etc.). However, it is clear that MM Yolo's permitted equipment is completely dependent on NEO Yolo's landfill gas collection equipment for its fuel. It is expected that the energy produced by the MM Yolo equipment will continue to be sold to the serving utility and will not be shared or distributed on site to either NEO Yolo or YCCL. NEO Yolo and MM Yolo share the same Responsible Official (provided by Fortistar) that oversees each company's compliance with their respective federal and local air quality permit requirement. YCCL is responsible for its own air quality permitting requirements and independent from NEO Yolo and MM Yolo. Therefore, MM Yolo and NEO Yolo will continue to be considered a single stationary source that is separate from the YCCL stationary source.

The following conditions reflect rule requirements that have not previously been discussed in the streamlining or the subsuming demonstrations for other rules.

**Rule Requirement #2 (Permit Condition) - Permitted Emission Limits**

The emissions for each stationary IC engine shall not exceed the limits contained in Table 8:

**Table 8 - Permitted Emission Limits for Each Stationary IC Engine**

Permit	Pollutant	Daily [lb]	Qtr #1 (Jan 1- Mar 31) [lb]	Qtr #2 (Apr 1- June 30) [lb]	Qtr #3 (July 1- Sept 30) [lb]	Qtr #4 (Oct 1- Dec 31) [lb]	Yearly [tons]
P-78-98(a2) (C-07-35) Engine 1A	VOC	22.5	2,028	2,050	2,073	2,073	4.11
	CO	110.7	9,959	10,070	10,180	10,180	20.19
	NO <sub>x</sub>	45.3	4,075	4,120	4,165	4,165	8.26
	SO <sub>x</sub>	21.3	1,915	1,936	1,958	1,958	3.88
	PM <sub>10</sub>	20.0	1,800	1,820	1,840	1,840	3.65
P-79-98(a1) (C-07-36) Engine 2	VOC	22.5	2,028	2,050	2,073	2,073	4.11
	CO	110.7	9,959	10,070	10,180	10,180	20.19
	NO <sub>x</sub>	45.3	4,075	4,120	4,165	4,165	8.26
	SO <sub>x</sub>	21.3	1,915	1,936	1,958	1,958	3.88
	PM <sub>10</sub>	20.0	1,800	1,820	1,840	1,840	3.65
P-80-98 (C-98-122) Engine 3	VOC	23.4	2,108	2,132	2,155	2,155	4.28
	CO	110.7	9,967	10,077	10,188	10,188	20.21
	NO <sub>x</sub>	51.1	4,600	4,651	4,702	4,702	9.33
	SO <sub>x</sub>	8.5	767	775	784	784	1.55
	PM <sub>10</sub>	2.6	230	233	235	235	0.47
P-81-98(a1) (C-07-38) Engine 4A	VOC	23.1	2,081	2,104	2,127	2,127	4.22
	CO	207.6	18,687	18,895	19,103	19,103	37.89
	NO <sub>x</sub>	50.8	4,574	4,625	4,676	4,676	9.28
	SO <sub>x</sub>	27.8	2,505	2,533	2,561	2,561	5.08
	PM <sub>10</sub>	20.0	1,804	1,824	1,844	1,844	3.66
P-87-98(a1) (C-07-39) Engine 5A	VOC	23.1	2,081	2,104	2,127	2,127	4.22
	CO	207.6	18,687	18,895	19,103	19,103	37.89
	NO <sub>x</sub>	42.0	3,783	3,825	3,867	3,867	7.67
	SO <sub>x</sub>	27.8	2,505	2,533	2,561	2,561	5.08
	PM <sub>10</sub>	20.0	1,804	1,824	1,844	1,844	3.66

[District Rules 2.11, 2.12, 2.16, and 3.4/C-07-35, C-07-36, C-98-122, C-07-38, and C-07-39] (*Title V Condition II.A.1 / Permitted Emission Limit Tables of P-78-98(a2), P-79-98(a1), P-80-98, P-81-98(a1), and P-87-98(a1)*)

**Rule Requirement #3 (Permit Condition)** - Hydrogen sulfur limit for P-78-98(a2), P-79-98(a1), P-81-98(a1), and P-87-98(a1)

The hydrogen sulfide (H<sub>2</sub>S) content of the landfill gas shall not exceed 250.0 ppmv. [District Rule 3.4/C-07-35, C-07-36, C-07-38, and C-07-39] (*Title V Condition II.A.6 / P-78-98(a2) Condition 11, P-79-98(a1) Condition 11, P-81-98(a1) Condition 11, P-87-98(a1) Condition 11*)

**Rule Requirement #4 (Permit Condition)** - Process limits for P-78-98(a2) and P-79-98(a1)

The maximum landfill gas consumption rate for any single engine shall not exceed 512,000 standard cubic feet/day, 46.080 million standard cubic feet/1<sup>st</sup> calendar quarter, 46.592 million standard cubic feet/2<sup>nd</sup> calendar quarter, 47.104 million standard cubic feet/3<sup>rd</sup> calendar quarter, 47.104 million standard cubic feet/4<sup>th</sup> calendar quarter, and 186.880 million standard cubic feet/year. [District Rule 3.4/C-07-35 and C-07-36] (*Title V Condition II.B.1 / Permitted Process Limit Tables of P-78-98(a2) and P-79-98(a1)*)

**Rule Requirements #5 and #6 (Permit Conditions)** - Process limits for P-80-98

The maximum landfill gas consumption rate for the engine shall not exceed 230 million BTU/day, 20,736 million BTU/1<sup>st</sup> calendar quarter, 20,966 million BTU feet/2<sup>nd</sup> calendar quarter, 21,197 million BTU/3<sup>rd</sup> calendar quarter, 21,197 million BTU/4<sup>th</sup> calendar quarter, and 84,096 million BTU/year. [District Rule 3.4/C-98-122] (*Title V Condition II.B.2 / Permitted Process Limit Table of P-80-98*)

Landfill gas usage for all five engines shall be limited to the following:

- a. 1,094 million BTU/day;
- b. 98,496 million BTU/1<sup>st</sup> calendar quarter;
- c. 99,590 million BTU/2<sup>nd</sup> calendar quarter;
- d. 100,684 million BTU/3<sup>rd</sup> calendar quarter;
- e. 100,684 million BTU/4<sup>th</sup> calendar quarter; and
- f. 399,456 million BTU/year. [District Rule 3.4/C-98-122] (*Title V Condition II.B.3 / P-80-98 Condition 13*)

**Rule Requirement #7 (Permit Condition)** - Process limits for P-81-98(a1), and P-87-98(a1)

The maximum landfill gas consumption rate for any single engine shall not exceed 669,856 standard cubic feet/day, 60.287 million standard cubic feet/1<sup>st</sup> calendar quarter, 60.957 million standard cubic feet/2<sup>nd</sup> calendar quarter, 61.627 million standard cubic feet/3<sup>rd</sup> calendar quarter, 61.627 million standard cubic feet/4<sup>th</sup> calendar quarter, and 244.497 million standard cubic feet/year. [District Rule 3.4/C-07-38, and C-07-39] (*Title V Condition II.B.4 / Permitted Process Limit Tables of P-81-98(a1) and P-87-98(a1)*)

**Rule Requirement #8 (Permit Condition)** - Sampling and Testing Locations

The Permit Holder shall install and maintain such facilities as are necessary for sampling and testing purposes. The number, size, and location of sampling ports shall be in accordance with Air Resources Board Test Method 1. The location and access to the sampling platform shall be in accordance with the General Industry Safety Orders of the State of California. [District Rule 3.4/C-07-35, C-07-36, C-07-38, and C-07-39] (*Title V Condition II.B.6 / P-78-98(a2) Condition 14, P-79-98(a1) Condition 14, P-81-98(a1) Condition 14, and P-87-98(a1) Condition 14*)

**Rule Requirement #9 (Permit Condition)** - Fuel Specification of P-80-98

Only landfill gas shall be burned in the engine(s). [District Rule 3.4/C-98-122] (*Title V Condition II.B.8 / P-80-98 Condition 15*)

**Rule Requirement #10 (Permit Condition)** - Parametric Emission Monitoring Plan for P-81-98(a1) and P-87-98(a1)

The Permit Holder shall operate the IC engines in accordance with the approved Parametric Emission Monitoring Plan. [District Rule 3.4/C-07-38, and C-07-39] (*Title V Condition II.B.9 / P-81-98(a1) Condition 18, P-87-98(a1) Condition 18*)

**Rule Requirement #11 (Permit Condition)** - Fuel Analysis for P-78-98(a2), P-79-98(a1), P-81-98(a1), and P-87-98(a1)

The Permit Holder shall on a yearly basis analyze the fuel's higher heating value (wet basis) and sulfur content (as H<sub>2</sub>S) at least once every 12 consecutive month period. [District Rule 3.4/C-07-35, C-07-36, C-07-38, and C-07-39] (*Title V Condition II.C.1 / P-78-98(a2) Condition 12, P-79-98(a1) Condition 12, P-81-98(a1) Condition 12, P-87-98(a1) Condition 12*)

**K. RULE 3.8 - Federal Operating Permits**

**Rule Description**

This rule implements the requirements of Title V of the Federal Clean Air Act (CAA) as amended in 1990 for permits to operate. Title V provides for the establishment of operating permit programs for sources which emit regulated air pollutants, including attainment and non-attainment pollutants at or above the major source levels.

**Compliance Status**

The source has submitted a timely and complete Title V renewal application. As explained in the discussion for District Rule 3.4, this renewal will only reflect the operating requirements contained in the most recent ATCs that have been implemented into PTOs.

**Rule Requirement #1 (Facility Wide Permit Condition)** - Right of Entry

The permit shall require that the source allow the entry of the District, ARB, or U.S. EPA officials for the purpose of inspection and sampling, including:

- a. Inspection of the stationary source, including equipment, work practices, operations, and emissions-related activity;
- b. Inspection and duplication of records required by the permit to operate; and
- c. Source sampling or other monitoring activities. [District Rule 3.8, §302.10] *(Title V Condition IV.A.1)*

**Rule Requirements #2 through #7 (Facility Wide Permit Conditions) -**

**Compliance with Permit Conditions**

The Permit Holder shall comply with all Title V permit conditions. [District Rule 3.8, §302.11(a)] *(Title V Condition IV.B.1)*

The permit does not convey property rights or exclusive privilege of any sort. [District Rule 3.8, §302.11(b)] *(Title V Condition IV.B.2)*

Non-compliance with any permit condition is grounds for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal. [District Rule 3.8, §302.11(c)] *(Title V Condition IV.B.3)*

The Permit Holder shall not use the “need to halt or reduce a permitted activity in order to maintain compliance” as a defense for non-compliance with any permit condition. [District Rule 3.8, §302.11(d)] *(Title V Condition IV.B.4)*

A pending permit action or notification of anticipated non-compliance does not stay any permit condition. [District Rule 3.8, §302.11(e)] *(Title V Condition IV.B.5)*

Within a reasonable time period, the Permit Holder shall furnish any information requested by the APCO, in writing, for the purpose of determining:

- a. Compliance with the permit; or
- b. Whether or not cause exists for a permit or enforcement action. [District Rule 3.8, §302.11(f)] *(Title V Condition IV.B.6)*

**Rule Requirements #8 (Facility Wide Permit Conditions) - Emergency Provisions**

Within two (2) weeks of an emergency event, the owner or operator shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:

- a. An emergency occurred;
- b. The Permit Holder can identify the cause(s) of the emergency;
- c. The facility was being properly operated at the time of the emergency;
- d. All steps were taken to minimize the emissions resulting from the emergency;
- e. Within two (2) working days of the emergency event, the Permit Holder provided the District with a description of the emergency and any mitigating or corrective actions taken; and

In any enforcement proceeding, the Permit Holder has the burden of proof for establishing that an emergency occurred. [District Rule 3.8, §302.12(b)] *(Title V Condition IV.C.1)*

**Rule Requirement #9 (Facility Wide Permit Condition) - Severability**

If any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgement shall not affect or invalidate the remainder of these conditions. [District Rule 3.8, §302.13] *(Title V Condition IV.D.1)*

**Rule Requirements #10 through #12 (Facility Wide Permit Conditions) - Compliance Certification**

The compliance certification shall identify the basis for each permit term or condition (e.g., specify the emissions limitation, standard, or work practice) and a means of monitoring compliance with the term or condition consistent with Sections 302.5, 302.6, and 302.7 of Rule 3.8. [District Rule 3.8, §302.14(b)] *(Title V Condition IV.E.2)*

The compliance certification shall include a statement of the compliance status, whether compliance was continuous or intermittent, and method(s) used to determine compliance for the current time period and over the entire reporting period. [District Rule 3.8, §302.14(c)] *(Title V Condition IV.E.3)*

The compliance certification shall include any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to Sections 114(a) and 504(b) of the Federal CAA. [District Rule 3.8, §302.14(d)] *(Title V Condition IV.E.4)*

**Rule Requirement #13 (Facility Wide Permit Condition) - Permit Life**

The Title V permit shall expire five (5) years from the date of issuance. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted. [District Rule 3.8, §302.15] *(Title V Condition IV.F.1)*

**Rule Requirement #14 (Facility Wide Permit Condition) - Payment of Fees**

An owner or operator shall pay the appropriate Title V permit fees on schedule. If fees are not paid on schedule, the permit is forfeited. Operation without a permit subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to Section 502(a) of the CAA. [District Rule 3.8, §302.16] *(Title V Condition IV.G.1)*

**Rule Requirement #15 (Facility Wide Permit Condition)** - Permit Revision Exemption

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit. [District Rule 3.8, §302.22] (*Title V Condition IV.H.1*)

**Rule Requirements #16 through #18 (Facility Wide Permit Conditions)** - Application Requirements

An owner or operator shall submit a standard District application for renewal of the Title V permit, no earlier than 18 months and no later than six months before the expiration date of the current permit to operate. [District Rule 3.8, §402.2] (*Title V Condition IV.I.1*)

An owner or operator shall submit a standard District application for each emissions unit affected by a proposed permit revision that qualifies as a significant Title V permit modification. The application shall be submitted after obtaining any required preconstruction permits. Upon request by the APCO, the owner or operator shall submit copies of the latest preconstruction permit for each affected emissions unit. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. [District Rule 3.8, §402.3] (*Title V Condition IV.I.2*)

An owner or operator shall submit a standard District application for each emissions unit affected by the proposed permit revision that qualifies as a minor permit modification. The application shall be submitted after obtaining any required preconstruction permits. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. In the application, the owner or operator shall include the following:

- a. A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply;
- b. Proposed permit terms and conditions; and
- c. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. [District Rule 3.8, §402.4] (*Title V Condition IV.I.3*)

**Rule Requirement #19 (Facility Wide Permit Condition)** - Permit Reopening for Cause

Circumstances that are cause for reopening and revision of a permit include, but are not limited to, the following:

- a. The need to correct a material mistake or inaccurate statement;
- b. The need to revise or revoke a permit to operate to assure compliance with applicable federal requirements;
- c. The need to incorporate any new, revised, or additional applicable federal requirements, if the remaining authorized life of the permit is three (3) years or greater, no later than 18 months after the

- promulgation of such requirement (where less than three (3) years remain in the authorized life of the permit, the APCO shall incorporate the requirements into the permit to operate upon renewal); or
- d. Additional requirements promulgated pursuant to Title IV as they become applicable to any acid rain unit governed by the permit. [District Rule 3.8, §413.1] (*Title V Condition IV.J.1*)

**Rule Requirement #20 (Facility Wide Permit Condition)** - Monitoring, Testing and Analysis

As previously discussed for District Rule 2.32, the affected engines are subject to the periodic monitoring and testing requirements. Therefore, no additional monitoring, testing, and analysis conditions are required.

**Permit Condition**

No permit condition is required.

**Rule Requirements #21 and #22 (Facility Wide Permit Condition)** - Recordkeeping

The Permit Holder shall record maintenance of all monitoring and support information required by any applicable federal requirement, including:

- a. Date, place, and time of sampling;
- b. Operating conditions at the time of sampling;
- c. Date, place, and method of analysis; and
- d. Results of the analysis. [District Rule 3.8, §302.6(a)] (*Title V Condition IV.K.1*)

The Permit Holder shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of sample collection, measurement, report, or application. [District Rule 3.8, §302.6(b)] (*Title V Condition IV.K.2*)

**Rule Requirements #23 through #25 (Facility Wide Permit Condition)** - Reporting Requirements

Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be promptly reported to the APCO. For the purpose of this condition prompt means as soon as reasonably possible, but no later than 10 days after detection. [District Rule 3.8, §302.7(a)] (*Title V Condition IV.L.1*)

All reports of deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. [District Rule 3.8, §302.7(c)] (*Title V Condition IV.L.3*)

Each monitoring report shall be accompanied by a written statement from the responsible official that certifies the truth, accuracy, and completeness of the report. [District Rule 3.8, §302.7(e)] (*Title V Condition IV.L.4*)

**Streamlining Demonstrations:** Table 9 (below) summarizes the streamlining of District Rule 3.8 reporting requirements with Rule 3.4 requirements. The table also lists the applicable permit condition numbers.

**Table 9:** Streamlining of District Rule 3.8 Reporting Requirements

Rule Citation	Description	Comment & Permit Condition	PTO Cond.	Title V Cond.
Rule 3.8, §302.14(a)	The SIP approved rule requires that every twelve (12) months the Responsible Official submit an accurate and complete compliance certification to the U.S. EPA and the District.	The responsible official shall submit a compliance certification to the U.S. EPA and the APCO every twelve (12) months unless required more frequently by an applicable requirement. The twelve (12) month period shall be January 1 through December 31, and shall be submitted by January 30 following the reporting period, unless otherwise approved in writing by the District. All compliance reports and other documents required to be submitted to the District by the responsible official shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [District Rule 3.4, §409 and District Rule 3.8, §302.14(a)]	-	IV.E.1
Rule 3.4, §409.2	The rule establishes explicit certification periods and submittal deadlines.			
Rule 3.8, §302.7(b)	The SIP approved rule requires that every six (6) months the Responsible Official submit an accurate and complete a semi-annual monitoring report to the U.S. EPA and the District.	A semi-annual monitoring report shall be submitted at least every six (6) consecutive months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7(a) of District Rule 3.8. The six (6) month periods shall be January 1 through June 30 and July 1 through December 31. The reports shall be submitted by July 30 and January 30 following each reporting period, respectfully, unless otherwise approved in writing by the District. [District Rule 3.4, §409 and District Rule 3.8, §302.7(b)]	-	IV.L.2
Rule 3.4, §409.2	The rule establishes explicit monitoring periods and submittal deadlines.			

**L. 40 CFR Part 60, Subpart C - Emission Guidelines and Compliance Times**

**Rule Description**

This subpart applies to existing municipal solid waste (MSW) landfills and contains emission guidelines and compliance times for the control of NMOCs at these area source categories.

**Compliance Status**

The requirements of the subpart do not apply to any of the stationary IC engines since they are not owned or operated by the Yolo County Central Landfill.

**Permit Condition**

No permit conditions are required.

**M. 40 CFR Part 60, Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills**

**Rule Description**

This subpart applies to new MSW landfills and includes standards of performance for the control of NMOCs at these area source categories that commenced construction, reconstruction or modification or began accepting waste on or after May 30, 1991, and having a design capacity of equal to or greater than 2.5 million megagrams.

**Compliance Status**

The engines are not subject to the control requirements of this regulation, since YCCL is not yet subject to the landfill gas collection and control system of the subpart (i.e., not emitting above 50 Mg per year of non-methane organic compounds). The permit will require that upon determining that the landfill's uncontrolled NMOC emission rate is equal or greater than 50 Mg per year, that MM Yolo verify that the existing collection and control system is compliant with the provisions of this regulation.

**Rule Requirement #1 (Permit Condition) - Landfill Gas Collection and Control**

The Permit Holder shall comply with all applicable standards, criteria and requirements of Section 60.752(b) of 40 CFR Part 60, Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills, upon determination by the District that the Yolo County Central Landfill's uncontrolled non-methane organic compounds (NMOC) emission rate exceeds 50 megagrams per year. [40 CFR Part 60.752(b)(2)] *(Title V Condition II.B.10)*

**N. 40 CFR 63, Subpart ZZZZ - Reciprocating IC Engines Maximum Achievable Control Technology**

**Rule Description**

This subpart applies to various types of reciprocating internal combustion engines (RICE) that operate at major or area sources of hazardous air pollutants (HAPs). The version of the rule used in this evaluation is the rule last amended on March 9, 2011.

**Compliance Status**

Each stationary IC engine is subject to the provisions of the rule and the facility is currently considered an area source of HAPs (see YCCL MSW Landfill Emission Evaluation ATC C-07-164, issued August 21, 2009). For the purposes of this rule, each engine is considered to be an existing (installed prior to June 12, 2006) non-emergency MSW landfill gas fired stationary RICE operating at an area source of HAPs. As discussed below, the source is currently exempt from the requirements of the subpart and is required to demonstrate compliance by October 19, 2013.

**Rule Requirement #1 (Permit Condition) - Compliance Deadline**

Part 63.6595(a)(1) requires that a source operating an existing stationary SI RICE located at an area source of HAP emissions comply with all applicable emission and operating limitations of the subpart no later than October 19, 2013.

Since the source has not yet become subject to the requirements of the Subpart, the District will not at this time incorporate the future effective requirements into the renewed Title V Permit. Instead, the District will amend the local Air District permits at the time of renewal to include a permit condition requiring that the source comply with the subpart no later than October 19, 2013. It is expected that the Title V Permit will be amended to reflect the applicable requirements of the subpart upon the next significant modification or renewal of the federal permit, whichever is first.

**Permit Condition**

No permit conditions are required.

**O. 40 CFR Part 64 - Compliance Assurance Monitoring**

**Rule Description**

This subpart provides guidelines for developing a compliance assurance monitoring (CAM) plan. The CAM plan requires that a facility monitor the appropriate parameters of a process or its control equipment, and/or measure the process' actual emissions, so as to ensure emission compliance on an ongoing basis.

The CAM requirements apply to any pollutant specific emissions unit at a major source that is required to obtain a Part 70 permit and which satisfies all the following:

- a. The unit is subject to an emission limit or standard for an applicable regulated air pollutant;
- b. The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- c. The unit's pre-control device potential to emit of an applicable regulated pollutant is greater than or equal to that pollutant's major source threshold.

**Compliance Status**

The source is exempt from the requirements of this federal subpart, since the source does not operate any control device (e.g. selective catalytic reduction (SCR), oxidation catalysts, etc.) to achieve compliance with any emission limit or standard.

**Permit Condition**

The permit does not require a CAM specific condition.