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PERMIT TO CONSTRUCT/OPERATE
 (Modifications to LFG Collection System, G35513)

APPLICANT'S NAME: ORANGE CO., WASTE & RECYCLING, PRIMA

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 SANTA ANA, CA 92703-5000

EQUIPMENT ADDRESS: 32250 LA PATA AVENUE
 (Prima Deshecha Landfill)
 SAN JUAN CAPISTRANO, CA 92675

FACILITY ID.: 052753

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EQUIPMENT DESCRIPTION:

LANDFILL GAS COLLECTION SYSTEM (MODIFICATIONS TO PERMIT TO OPERATE G35513),
 CONSISTING OF:

I. WASTE MANAGEMENT UNIT NO. 1 (WMU1):

1. PHASE I AND IA:

TEN (10) HORIZONTAL COLLECTORS, WITH ALTERNATING 10'-0" LENGTHS OF 12" DIAMETER AND 15" DIAMETER POLYETHYLENE COATED CORRUGATED STEEL PIPE.

2. PHASE 2:

A. ONE HORIZONTAL COLLECTOR, WITH ALTERNATING 10'-0" LENGTHS OF 12" DIAMETER AND 15" DIAMETER POLYETHYLENE COATED CORRUGATED STEEL PIPE.

B. SIXTEEN (16) VERTICAL GAS COLLECTION WELLS, 24" DIA., RANGING FROM 40' TO 100' DEPTH. EACH WITH 4" DIA. CASING CONNECTED TO A 4" TO 6" DIA. SLOTTED CASING.

3. PHASE 3:

TWENTY (20) VERTICAL GAS COLLECTION WELLS, 24" DIA., RANGING FROM 40' TO 100' DEPTH. EACH WITH 4" TO 6" DIA. CASING CONNECTED TO A 4" TO 6" DIA. SLOTTED CASING.

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4. FORTY SEVEN (47) VERTICAL GAS COLLECTION WELLS, 24" DIA., RANGING FROM 40' TO 100' DEPTH, EACH WITH 4" TO 6" DIA. CASING CONNECTED TO A 4" TO 6" DIA. SLOTTED CASING, TO BE ADDED AS NEEDED.

II. ZONE-1

1. PHASE 1:

FOURTEEN (14) HORIZONTAL COLLECTORS, 0'-8" DIA. HDPE PIPING, PERFORATED WITH FOUR ROWS OF 3/4 INCH DIA. HOLES, THREE INCH ON CENTER.

2. PHASE 2:

A. TWENTY THREE (23) HORIZONTAL COLLECTORS, 0'-8" DIA. HDPE PIPING, PERFORATED WITH FOUR ROWS OF 3/4 INCH DIA. HOLES, THREE INCH ON CENTER.

B. TWENTY (20) VERTICAL GAS COLLECTION WELLS, 4" TO 6" DIA., HDPE.

3. PHASE 3:

FIFTEEN (15) HORIZONTAL COLLECTORS, 0'-8" DIA. HDPE PIPING, PERFORATED WITH FOUR ROWS OF 3/4 INCH DIA. HOLES, THREE INCH ON CENTER

BY THE ADDITION OF:

4. TWENTY FIVE (25) HORIZONTAL COLLECTORS, 0'-8" DIA. HDPE PIPING, PERFORATED WITH FOUR ROWS OF 3/4 INCH DIA. HOLES, THREE INCH ON CENTER

5. FIFTY (50) VERTICAL GAS COLLECTION WELLS, 24" DIA., RANGING FROM 30' TO 200' DEPTH. EACH WITH 4" TO 6" DIA. CASING CONNECTED TO A 4" TO 6" DIA. SLOTTED CASING.

III. WASTE MANAGEMENT UNIT NO. 2 (WMU2):

PHASE 1:

TWENTY SIX (26) VERTICAL GAS COLLECTION WELLS, 4' TO 6' DIA., HDPE.

IV. LATERAL AND HEADERS CONNECTING THE HORIZONTAL AND VERTICAL GAS COLLECTION WELLS AND DIRECTING THE COLLECTED GAS TO A GAS TREATMENT/PROCESSING FACILITY.

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BY THE ADDITION OF:

1. TEN (10) VERTICAL GAS COLLECTION WELLS, 4' TO 6' DIA., HDPE.

Conditions:

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
3. THIS EQUIPMENT SHALL BE OPERATED AND MAINTAINED BY PERSONNEL PROPERLY TRAINED IN ITS OPERATION.
[RULE 204]
4. ALL GASES COLLECTED BY THIS SYSTEM SHALL BE VENTED TO COMBUSTION OR PROCESSING FACILITY WHICH IS IN FULL USE, CAN ADEQUATELY PROCESS THE VOLUME OF GAS COLLECTED, AND HAS BEEN ISSUED A VALID PERMIT TO CONSTRUCT OR OPERATE BY THE SCAQMD.
[RULE 1150.1, 1303(a) (1)-BACT]
5. DURING VERTICAL WELL DRILLING, AN APPROVED EMISSION CONTROL BOX SHALL BE PLACED OVER THE WELL HOLE TO COLLECT LANDFILL GAS. THE COLLECTED GAS SHALL EITHER BE VENTED TO THE LANDFILL GAS COLLECTION SYSTEM OR AN AIR POLLUTION CONTROL SYSTEM, WHICH IS IN GOOD OPERATING CONDITION, IN FULL OPERATION, AND CAN ADEQUATELY PROCESS THE VOLUME OF GAS COLLECTED AND HAS BEEN ISSUED A VALID PERMIT TO CONSTRUCT/OPERATE ISSUED BY THE SCAQMD.
[RULE 402, 1150.1]
6. EACH HORIZONTAL GAS COLLECTOR SHALL BE CONNECTED TO AN OPERATING LANDFILL GAS HEADER OR THE ENDS OF THE COLLECTOR SHALL BE SEALED WITH BLIND FLANGES OR OTHER TYPES OF SEALS APPROVED BY THE SCAQMD AS SOON AS THE GAS COLLECTOR IS INSTALLED TO PREVENT GAS FROM ESCAPING FROM THE LINE TO THE ATMOSPHERE.
[RULE 1150, 1150.1]
7. EACH VERTICAL WELL HEAD AND HORIZONTAL COLLECTOR SHALL BE EQUIPPED WITH A SHUT-OFF VALVE AND A SAMPLING PORT.
[RULE 1150.1]
8. UNTIL CONNECTED TO AN OPERATING LANDFILL GAS COLLECTION SYSTEM, EACH COMPLETED WELL SHALL BE CAPPED AND ITS GAS CONTROL VALVE CLOSED TO AVOID VENTING LANDFILL GAS TO THE ATMOSPHERE.
[RULE 1150, 1150.1]

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9. EACH WELL SHALL BE SECURELY SEALED TO PREVENT ANY EMISSIONS OF LANDFILL GAS FROM AROUND THE WELL CASING.
[RULE 402, 1150, 1150.1]
10. CONSTRUCTION SHALL NOT BE CONDUCTED BETWEEN THE HOURS OF 6 P.M. AND 7 A.M. OR ON SATURDAYS, SUNDAYS OR LEGAL HOLIDAYS, UNLESS OTHERWISE APPROVED BY THE SCAQMD.
[RULE 402, 1150]
11. CONSTRUCTION SHALL NOT BE CONDUCTED ON DAYS WHEN THE SCAQMD FORECASTS FIRST, SECOND OR THIRD STAGE EPISODES FOR AREA NO. 21, OR WHEN THE SCAQMD REQUIRES COMPANIES IN AREA NO. 21 TO IMPLEMENT THEIR FIRST SECOND OR THIRD STAGE EPISODE PLANS. EPISODE FORECASTS FOR THE FOLLOWING DAY CAN BE OBTAINED BY CALLING (800) CUT-SMOG.
[RULE 402, 1150]
12. CONSTRUCTION SHALL NOT BE CONDUCTED WHEN THE WIND SPEED IS GREATER THAN 15 M.P.H. AVERAGE (OVER 15 MINUTES) OR THE WIND SPEED INSTANTANEOUSLY EXCEEDS 25 M.P.H.
[RULE 402, 403, 1150]
13. CONSTRUCTION SPOILS AND ALL WORKING AREAS BEING ACTIVELY USED FOR TRUCK AND CONSTRUCTION EQUIPMENT TRAFFICKING SHALL BE MAINTAINED IN A MOIST CONDITION TO MINIMIZE DUST AND EMISSIONS.
[RULE 402, 403, 1150]
14. IF A DISTINCT ODOR LEVEL (LEVEL III OR GREATER) RESULTING FROM THE CONSTRUCTION IS DETECTED AT OR BEYOND THE PROPERTY LINE, ALL WORK SHALL CEASE UNTIL THE ODOR SOURCES ARE DETERMINED AND ELIMINATED. ODOR LEVELS SHALL BE DETERMINED BY SCAQMD PERSONNEL OR ON-SITE SAFETY COORDINATOR IN THE ABSENCE OF SCAQMD PERSONNEL.
[RULE 402, 1150]
15. WELL HOLES, TRENCHES, AND EXPOSED LANDFILL TRASH SHALL BE COMPLETELY COVERED TO PREVENT ANY EMISSIONS OF LANDFILL GAS TO THE ATMOSPHERE WHENEVER WORK IS NOT ACTIVELY IN PROGRESS. THE COVER SHALL INCLUDE, BUT MAY NOT BE LIMITED TO A MINIMUM OF 6 INCHES OF CLEAN DIRT, APPROVED FOAM, OR HEAVY-DUTY PLASTIC SHEETING. FOAM BY ITSELF SHALL NOT BE USED AS A NIGHT COVER IF IT IS RAINING OR RAIN IS PREDICTED BY THE NATIONAL WEATHER SERVICE PRIOR TO THE NEXT SCHEDULED WORKING DAY.
[RULE 402, 1150]
16. THE CONSTRUCTION OF ANY PIPING OR WELL TRENCH WHICH EXPOSES LANDFILL TRASH TO THE ATMOSPHERE SHALL BE STAGED SO THAT NO MORE THAN ONE HUNDRED (100) LINEAR FEET OF TRENCH SHALL BE EXPOSED AT ANY TIME PRIOR TO BACKFILLING.
[RULE 402, 1150]

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17. EXCAVATED REFUSE MAY BE PLACED ALONG THE TRENCH EDGE UPON REMOVAL FROM THE TRENCH. ALL EXCAVATED REFUSE SHALL BE TRANSFERRED TO THE WORKING FACE WITHIN ONE HOUR OF REMOVAL FROM THE TRENCH, UNLESS OTHERWISE NOTED BELOW.
[RULE 402, 1150]
18. DURING CONSTRUCTION, IF A CONSIDERABLE NUMBER OF COMPLAINTS ARE RECEIVED, ALL WORK SHALL CEASE AND APPROVED MITIGATION MEASURES SHALL BE IMPLEMENTED IMMEDIATELY. WORK SHALL NOT RESUME UNTIL THE EMISSIONS CAUSING THE COMPLAINTS ARE MITIGATED AND THE APPROVAL TO RESUME WORK IS RECEIVED FROM THE SCAQMD.
[RULE 402, 1150]
19. THE EXTERIOR OF THE VEHICLE (INCLUDING THE TIRES) HAULING EXCAVATED MATERIAL SHALL BE CLEANED OFF PRIOR TO LEAVING THE WORKING SITE.
[RULE 1150]
20. ALL CONSTRUCTION SPOILS SHALL BE BURIED AT THE WORKING FACE OF THE LANDFILL BY THE END OF EACH DAY.
[RULE 402, 1150]
21. THE SCAQMD SHALL BE NOTIFIED IN WRITING AT LEAST ONE WEEK IN ADVANCE WHEN AN ADDITIONAL WELL OR SET OF WELLS AND THEIR ASSOCIATED PIPING WILL BE INSTALLED. THE PROPOSED WELL LOCATIONS AND CONNECTING PIPING SHALL BE IDENTIFIED ON A DRAWING WHICH DESCRIBES AND SHOWS THE ENTIRE GAS COLLECTION SYSTEM. ESTIMATED GAS COLLECTION VOLUME, WELL DEPTHS, PIPE LENGTHS, DIAMETERS, AND LAYOUTS SHALL BE SUPPLIED TO THE SCAQMD IN THIS ADVANCE NOTIFICATION.
[RULE 1150.1]
22. WITHIN 90 DAYS AFTER CONSTRUCTION OF A GROUP OF WELLS AND THEIR ASSOCIATED PIPING IS COMPLETE, THE PERMITEE SHALL SUBMIT AS-BUILT DRAWINGS SHOWING THE TRENCH LOCATIONS, VERTICAL WELL LOCATIONS, AND LINE SIZES TO THE SCAQMD.
[RULE 1150.1]
23. THE OPERATION OF THIS EQUIPMENT SHALL NOT RESULT IN THE RELEASE OF ANY RAW LANDFILL GAS OR CONDENSATE INTO THE ATMOSPHERE.
[RULE 402, 1150.1]
24. MITIGATION MEASURES, OTHER THAN THOSE INDICATED IN THESE CONDITIONS, WHICH ARE DEEMED APPROPRIATE BY SCAQMD PERSONNEL AS NECESSARY TO PROTECT THE COMFORT, REPOSE, HEALTH OR SAFETY OF THE PUBLIC SHALL BE IMPLEMENTED UPON REQUEST.
[RULE 402, 1150]
25. A COPY OF THIS PERMIT SHALL BE KEPT AT THE SITE OFFICE AT ALL TIMES.
[RULE 206]

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26. ORANGE COUNTY WASTE & RECYCLING (OCWR) SHALL, ON AN ANNUAL BASIS, MAKE A WRITTEN REQUEST FOR AND OBTAIN AN EXTENSION OF TIME TO CONSTRUCT THE LANDFILL GAS COLLECTION SYSTEM UNDER WHICH THIS PERMIT TO CONSTRUCT IS GRANTED. AT LEAST 30 DAYS PRIOR TO THE EXPIRATION DATE OF THE PERMIT TO CONSTRUCT, OCWR SHALL PROVIDE IN THE WRITTEN REQUEST A DESCRIPTION OF CONSTRUCTION COMPLETION PROGRESS TO SCAQMD. THE ANNUAL REQUESTS FOR EXTENSION SHALL CONTINUE UNTIL SUCH TIME THAT THE, LANDFILL GAS COLLECTION SYSTEM IS COMPLETE, OR, THIS PERMIT TO CONSTRUCT HAS BEEN REPLACED BY A SUBSEQUENT PERMIT TO CONSTRUCT OR OPERATE.
[RULE 205]

EMISSIONS AND REQUIREMENTS:

27. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:
- GASEOUS EMISSIONS: RULE 1150.1
GASEOUS EMISSIONS: 40 CFR 60 SUBPART WWW
GASEOUS EMISSIONS: 40 CFR 63 SUBPART AAAA

BACKGROUND:

On June 16, 2015, OC Waste & Recycling –Prima Deshecha landfill facility submitted this application for modifications to recently issued landfill gas collection system PO G35513; A/N 492235 (PC was granted 4/15/10 and PC was converted to final PO on 4/30/2015).

This is a Title V (TV) facility. Most recent TV revision was issued on 7/29/2015.

District inspector conducted a Title V inspection on 6/12/2015 and indicated that the facility was operating in compliance at the time of inspection.

Note: OCWR was aware and had confirmed that any future modifications to install new wells and/or collectors will be covered under a new permit application (e-mail, 3-27-15); as a result this new application was submitted.

PROCESS DESCRIPTION:

Prima Deshecha landfill is an active landfill site. The facility was recently issued PO G35513 (A/N 492235), as a PC to PO conversion, for the LFG collection system modifications made over the past several years.

The facility has planned further landfill expansion over the next five years and proposes to install additional horizontal gas collectors and LFG wells, which are prefaced in the Equipment Description with "By the Addition of". Collected LFG is directed to the combustion or processing facility/equipment, which is in full use and can adequately process the volume of LFG, and has been issued a valid permit from the SCAQMD.

The proposed permit includes conditions (No. 21 & 22) which require the operator to notify the SCAQMD prior to installing well(s) and associated piping and to submit updated as built drawings and equipment information.

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Note: As per E-mail from OCWR (9/29/15), equipment description under item IV, Waste Management Unit No. 2 (WMU2), addition for number of vertical gas collection wells has been revised from five (5) to ten (10) wells to perform final closure on the west slope for the La Pata Extension project as directed by the LEA and Regional Water Board.

VOC Emissions:

No emissions are expected from the LFG collection system. LFG emissions will be controlled by air pollution equipment per current operating practice.

For this application, R1 = R2 = 0 lbs/hr.

RULES EVALUATION

Landfill gas collected by the system is required to be vented to the air pollution control system or LFG processing facility to control VOCs/TACs emissions into the atmosphere. Conditions are imposed for mitigation and monitoring of potential fugitive emissions while gas collection wells/trenches are installed.

Rule 401: No visible or smoke emission is expected from the LFG collection system with good housekeeping practices when horizontal trenches or vertical gas collection wells are installed. Compliance is expected

Rule 402: With proper operation of the equipment and good housekeeping practice compliance can be expected.

Rule 1150, 1150.1, 40 CFR Part 60 subpart WWW and 40 CFR Part 63 subpart AAAA:

Compliance with these rules is expected and appropriate conditions are tagged.

Compliance with all applicable rules and regulations is expected.

RECOMMENDATIONS:

Issue a Permit to construct/operate with conditions listed above. A revised Title V permit is recommended after EPA review.

Note: Upon PC-PO approval, include this permit under Title V Facility Permit, Section D, Rev 06.