



**NOV 18 2014**

Mr. Benjamin Gray  
Avenal Regional Landfill  
P O Box 189  
Avenal, CA 93204

**Re: Notice of Minor Title V Permit Modification  
District Facility # C-3839  
Project # C-1141615**

Dear Mr. Gray:

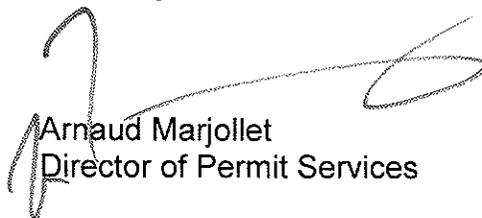
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued C-3839-2-0 into the Title V operating permit. This ATC authorized the installation of a transportable 197 horsepower John Deere Model 6068HF285 Tier 3 certified diesel-fired engine powering an electrical generator.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-3839-2-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

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

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

# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: C-1141615

Engineer: Jonah Aiyabei  
Date: November 17, 2014

Facility Number: C-3839  
Facility Name: Avenal Regional Landfill  
Mailing Address: P O Box 189  
Avenal, CA 93204

Contact Name: Benjamin Gray  
Phone: (559) 386-5844

Responsible Official: Benjamin Gray  
Title: District Manager

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## I. PROPOSAL

Avenal Regional Landfill is proposing a Title V minor permit modification to incorporate the recently issued ATC C-3839-2-0 into the Title V operating permit. This ATC authorized the installation of a transportable 197 horsepower John Deere Model 6068HF285 Tier 3 certified diesel-fired engine powering an electrical generator.

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

The facility is located at 201 Hydril Road in Avenal.

## III. EQUIPMENT DESCRIPTION

**C-3839-2-1:** TRANSPORTABLE 197 BHP JOHN DEERE MODEL 6068HF285 S/N PE6068L130485 TIER 3 DIESEL-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR FOR A VADOSE ZONE GAS COLLECTION SYSTEM

#### **IV. SCOPE OF EPA AND PUBLIC REVIEW**

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

#### **V. APPLICABLE REQUIREMENTS**

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

#### **VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

The proposed modification consists of the installation of a transportable 197 horsepower John Deere Model 6068HF285 Tier 3 certified diesel-fired engine powering an electrical generator. The electrical generator provides power to a vadose zone gas collection system.

The permit conditions will be modified as follows:

C-3839-2-1:

Permit condition 2 on the Authority to Construct was omitted from the proposed Permit to Operate as it is subsumed by condition 42 of the facility-wide requirements. This condition prohibits nuisance conditions.

Permit condition 3 on the Authority to Construct was replaced by permit condition 1 on the proposed Permit to Operate. This condition specifies the concentration limit for particulate matter.

Permit condition 4 on the Authority to Construct was omitted from the proposed Permit to Operate as it is subsumed by condition 22 of the facility-wide requirements. This condition specifies the opacity limit.

Permit condition 5 on the Authority to Construct was replaced by permit condition 2 on the proposed Permit to Operate. This condition specifies that the engine shall not be operated at one location or site at the facility for more than 12 consecutive months.

Permit condition 6 on the Authority to Construct was replaced by permit condition 3 on the proposed Permit to Operate. This condition specifies the receptor distance. This condition is based on District Rule 4102 and is therefore not federally enforceable through Title V.

Permit condition 7 on the Authority to Construct was replaced by permit condition 4 on the proposed Permit to Operate. This condition specifies design

requirements for the exhaust stack. This condition is based on District Rule 4102 and is therefore not federally enforceable through Title V.

Permit condition 8 on the Authority to Construct was replaced by permit condition 5 on the proposed Permit to Operate. This condition requires that the engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier.

Permit condition 9 on the Authority to Construct was replaced by permit condition 6 on the proposed Permit to Operate. This condition requires the permittee to monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier.

Permit condition 10 on the Authority to Construct was replaced by permit condition 7 on the proposed Permit to Operate. This condition specifies the fuel that may be used.

Permit condition 11 on the Authority to Construct was replaced by permit condition 8 on the proposed Permit to Operate. This condition requires that the engine shall be equipped with an operational non-resettable elapsed time meter.

Permit condition 12 on the Authority to Construct was replaced by permit condition 9 on the proposed Permit to Operate. This condition specifies the operation time limits.

Permit conditions 13 and 14 on the Authority to Construct were replaced by permit conditions 10 and 11 on the proposed Permit to Operate. These conditions specify the emission rates.

Permit conditions 15 through 19 on the Authority to Construct were replaced by permit conditions 12 through 16 on the proposed Permit to Operate. These conditions specify record keeping requirements.

## **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, these modifications:

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 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit No. C-3839-2-1
- B. Authority to Construct No. C-3839-2-0
- C. Emissions Increases
- D. Application

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
C-3839-2-1

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-3839-2-1

EXPIRATION DATE: 06/30/2015

## EQUIPMENT DESCRIPTION:

TRANSPORTABLE 197 BHP JOHN DEERE MODEL 6068HF285 S/N PE6068L130485 TIER 3 DIESEL-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR FOR A VADOSE ZONE GAS COLLECTION SYSTEM

## PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. This engine shall not be operated at one location or site at the facility for more than 12 consecutive months. [District Rules 2201 and 17 CCR 93116] Federally Enforceable Through Title V Permit
3. This on-site transportable unit shall not operate within 560 feet of an offsite receptor. [District Rule 4102]
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (a flapper type rain cap is acceptable), roof overhang, or any other obstruction. [District Rule 4102]
5. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
6. During periods of operation, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables, and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
7. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201, 4102, 4702, 4801 and 17 CCR 93116] Federally Enforceable Through Title V Permit
8. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 4701 and 4702 and 17 CCR 93116] Federally Enforceable Through Title V Permit
9. The engine shall not operate more than 2,191 hours during any rolling 12-consecutive month period (this limit is for HRA purposes and to enforce the zero equivalency threshold for greenhouse gas emissions), as determined by an operational nonresettable elapsed operating time meter or other APCO approved alternative. These records shall be updated at least monthly. [District Rules 2201, 4102, 4702 and Public Resources Code 21000-21177: California Environmental Quality Act] Federally Enforceable Through Title V Permit
10. Emissions from this IC engine shall not exceed any of the following limits: 2.51 g-NOx/bhp-hr, 0.97 g-CO/bhp-hr, or 0.18 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93116] Federally Enforceable Through Title V Permit
11. Emissions from this IC engine shall not exceed 0.13 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93116] Federally Enforceable Through Title V Permit
12. Permittee shall keep records or documentation that demonstrates only CARB certified diesel fuel is combusted in the engine. [District Rule 4702] 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.

13. The permittee shall maintain daily records of the following: (a). The total quantity of hours the engine was operated (in hours/day); (b). The type of fuel used in the engine; (c). Engine maintenance or modifications performed; (d). Engine operational characteristics monitoring; (e). Any other information necessary to demonstrate compliance with Rule 4702. [District Rules 1070 and 4702] Federally Enforceable Through Title V Permit
14. The permittee shall maintain records of each location where the engine is operated, including dates and duration of residency at each location, and shall update those records each time the engine is moved. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The permittee shall maintain a rolling 12-consecutive month total of the hours the engine is operated and shall update the rolling total at least once each month. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4701, and 4702] Federally Enforceable Through Title V Permit

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

DRAFT

# ATTACHMENT B

Authority to Construct No. C-3839-2-0



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT

## AUTHORITY TO CONSTRUCT

PERMIT NO: C-3839-2-0

ISSUANCE DATE: 12/04/2012

LEGAL OWNER OR OPERATOR: AVENAL REGIONAL LANDFILL  
MAILING ADDRESS: PO BOX 189  
AVENAL, CA 93204

LOCATION: 201 HYDRIL RD  
AVENAL, CA 93204

**EQUIPMENT DESCRIPTION:**

TRANSPORTABLE 197 BHP JOHN DEERE MODEL 6068HF285 S/N PE6068L130485 TIER 3 DIESEL-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR FOR A VADOSE ZONE GAS COLLECTION SYSTEM

### CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. This engine shall not be operated at one location or site at the facility for more than 12 consecutive months. [District Rules 2201 and 17 CCR 93116]
6. This on-site transportable unit shall not operate within 560 feet of an offsite receptor. [District Rule 4102]
7. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (a flapper type rain cap is acceptable), roof overhang, or any other obstruction. [District Rule 4102]
8. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

C-3839-2-0: Dec 4 2012 4:00PM - TOMS : Joint Inspection NOT Required

9. During periods of operation, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables, and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
10. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201, 4102, 4702, 4801 and 17 CCR 93116]
11. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 4701 and 4702 and 17 CCR 93116]
12. The engine shall not operate more than 2,191 hours during any rolling 12-consecutive month period (this limit is for HRA purposes and to enforce the zero equivalency threshold for greenhouse gas emissions), as determined by an operational nonresettable elapsed operating time meter or other APCO approved alternative. These records shall be updated at least monthly. [District Rules 2201, 4102, 4702 and Public Resources Code 21000-21177: California Environmental Quality Act]
13. Emissions from this IC engine shall not exceed any of the following limits: 2.51 g-NOx/bhp-hr, 0.97 g-CO/bhp-hr, or 0.18 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93116]
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15. Permittee shall keep records or documentation that demonstrates only CARB certified diesel fuel is combusted in the engine. [District Rule 4702]
16. The permittee shall maintain daily records of the following: (a). The total quantity of hours the engine was operated (in hours/day); (b). The type of fuel used in the engine; (c). Engine maintenance or modifications performed; (d). Engine operational characteristics monitoring; (e). Any other information necessary to demonstrate compliance with Rule 4702. [District Rules 1070 and 4702]
17. The permittee shall maintain records of each location where the engine is operated, including dates and duration of residency at each location, and shall update those records each time the engine is moved. [District Rules 1070 and 2201]
18. The permittee shall maintain a rolling 12-consecutive month total of the hours the engine is operated and shall update the rolling total at least once each month. [District Rules 1070 and 2201]
19. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4701, and 4702]

# ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-3839-2-0	2,388	171	923	5	124
<b>TOTAL</b>	<b>2,388</b>	<b>171</b>	<b>923</b>	<b>5</b>	<b>124</b>

# ATTACHMENT D

Application

RECEIVED



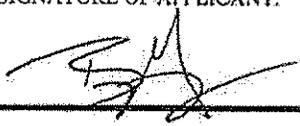
San Joaquin Valley Air Pollution Control District

www.valleyair.org

MAY 22 2015  
HEALTHY AIR  
Permits Services  
SJVAPCD

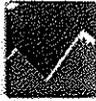
Permit Application For:

[ X ] ADMINISTRATIVE AMENDMENT [ ] MINOR MODIFICATION [ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <b>AVENAL REGIONAL LANDFILL</b>	
2. MAILING ADDRESS: STREET/P.O. BOX: <b>P. O. Box 189</b> CITY: <b>AVENAL</b> STATE: <b>CA</b> 9-DIGIT ZIP CODE: <b>93204</b>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <b>201 HYDRIL RD</b> CITY: <b>AVENAL</b> SECTION <b>SE15</b> TOWNSHIP <b>22S</b> RANGE <b>17E</b>	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <b>MUNICIPAL SOLID WASTE LANDFILL</b>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  <b>Portable diesel engine powering portable generator.</b>	
6. TYPE OR PRINT NAME OF APPLICANT: <b>Benjamin Gray</b>	TITLE OF APPLICANT: <b>District Manager</b>
7. SIGNATURE OF APPLICANT: 	DATE: <b>5/14/15</b> PHONE: (559) 386-5844 FAX: ( ) EMAIL: BenjaminG@WasteConnections.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <b>C-1141015</b> FACILITY ID: <b>C-3839</b>



**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: AVENAL REGIONAL LANDFILL	FACILITY ID: C - 3839
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: AVENAL REGIONAL LANDFILL	
3. Agent to the Owner:	

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

- BRL*  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).
- BRL*  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.
- BRL*  Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- BRL*  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:

*[Signature]*  
Signature of Responsible Official

5/6/14  
Date

BENJAMIN D GRAY  
Name of Responsible Official (please print)

DISTRICT MANAGER  
Title of Responsible Official (please print)