



**MAR 03 2014**

Mr. Don Litchfield  
Browning Ferris Industries  
Chateau Fresno Landfill  
9999 South Austin Road  
Manteca, CA 95336

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)  
District Facility # C-150  
Project # C-1130280**

Dear Mr. Litchfield:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project is to add conditions for the California Air Resources Board (CARB) regulation for methane emissions from municipal solid waste landfills and to remove conditions for open flares since the facility does not have an open flare.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authority to Construct with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

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

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

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

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

MAR 03 2014

Mr. Don Litchfield  
Page 2

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

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

# San Joaquin Valley Air Pollution Control District

## Application Review for Methane Emissions from Municipal Solid Waste Landfills

Facility Name: Browning Ferris Industries  
Chateau Fresno Landfill  
Date: January 22, 2014

Mailing Address: 9999 S Austin Road  
Manteca, CA 95336  
Engineer: Dan Klevann  
Lead Engineer: Allan Phillips *ASUR ADE*

Contact Person: Erin Fanning  
Telephone: 209-982-4298  
JAN 22 2014  
Fax:

Application #(s): C-150-1-8  
Project #: C-1130280

Deemed Complete: February 28, 2013

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### I. PROPOSAL:

Browning Ferris Industries (BFI) is requesting that an Authority to Construct (ATC) be issued for their existing municipal solid waste (MSW) landfill. The California Air Resources Board (CARB) regulation (Methane Emissions from Municipal Solid Waste Landfills - California Code of Regulations Title 17, Subchapter 10, Article 4, Subarticle 6, sections 95460 through 95476) went into effect on June 17, 2010. The District entered into a Memorandum of Understanding (MOU) with CARB on October 20, 2011 to implement and enforce the methane emission regulation. This regulation is being enforced through the District's permitting program.

Based on the information provided by the applicant, the District has determined that the MSW facilities landfill gas collection and control system (GCCS) was installed prior to the date of the ARB regulation. BFI is not installing additional equipment or changing the method of operation. Therefore, an ATC will be issued which incorporates the CARB requirements for controlling methane emissions from the existing MSW landfill facility.

BFI has also requested some changes to the existing permit conditions. Those changes are to remove CFR conditions which reference open flare requirements. Since BFI does not have an open flare they are not subject to open flare requirements and they will be removed. Conditions referencing the applicable subpart WWW requirements will be added to the permit at this time as well.

BFI has received their Title V Permit on October 6, 2000. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. BFI must apply to administratively amend their Title V permit.

## **II. APPLICABLE RULES:**

Rule 2010: Permits Required (12/17/92)  
Rule 2201: New and Modified Stationary Source Review Rule (4/21/11)  
Rule 2520: Federally Mandated Operating Permits (6/21/01)  
Rule 4001: New Source Performance Standards (4/14/99)  
Rule 4101: Visible Emissions (2/17/05)  
Rule 4102: Nuisance (12/17/92)  
Rule 4642: Solid Waste Disposal Sites (4/16/98)  
California Health & Safety Code Section 41700 (Public Nuisance)  
California Health & Safety Code Section 42301.6 (School Notice)  
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)  
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines  
California Code of Regulations Title 17, Subchapter 10, Article 4, Subarticle 6, sections 95460 through 95476: Methane Emissions from Municipal Solid Waste Landfills

## **III. PROJECT LOCATION:**

The facility is located at 8622 W. Muscat Avenue in Fresno, California.

## **IV. PROCESS DESCRIPTION:**

The facility operates a MSW landfill. The facility has provided information to indicate that the quantity of waste in place is greater than 450,000 tons.

The landfill is equipped with a landfill gas collection and control system (C-150-1).

## **V. EQUIPMENT LISTING:**

Current PTO:

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

ATC:

C-150-1-8: MODIFICATION OF 54 MMBTU/HR LANDFILL GAS COLLECTION AND TREATMENT SYSTEM WITH MCGILL MODEL EGF-4 ENCLOSED FLARE WITH COMBUSTION AIR CONTROLS, PROPANE-FIRED PILOT FLAME, FLAME ARRESTOR, BLOWERS, CONCRETE CONDENSATE SUMPS, EXHAUST STACK AND 67 EXTRACTION WELLS: REMOVE REQUIREMENTS FOR OPEN FLARE AND ADD CONDITIONS TO COMPLY WITH CARB LANDFILL METHANE REGULATIONS

## **VI. EMISSION CONTROL TECHNOLOGY EVALUATION:**

The landfill is equipped with a landfill gas collection and control system.

VOCs are emitted at landfills when decomposing material that is collected by the landfill offgasses. This gas is mainly methane gas which is not considered an ozone precursor, but a significant portion of this gas is also non-methane organic hydrocarbon (NMOC) which does contribute to the formation of ozone. The gas is collected and incinerated in an enclosed flare, which results in the formation of combustion pollutants which includes NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and any remaining uncombusted VOCs. However, the flare is at least 98% efficient at destroying VOC emissions. Therefore the benefit of VOC reduction outweighs the resulting criteria pollutant formation. Further, the flare meets the latest BACT standards, as discussed in Section VIII below.

## **VII. CALCULATIONS:**

Since the project is not a modification per District Rule 2201, calculations needed to demonstrate compliance with various sections of the Rule (e.g. BACT, offset, and public notification) are not required. No calculations are required for daily and annual potential to emit (PE) along with the stationary source potential to emit (SSPE) calculations.

## **VIII. COMPLIANCE**

### **Rule 2010 – Permits Required**

The provisions of this rule apply to any person who plans to or does operate, construct, alter, or replace any source operation, which may emit air contaminants or may reduce the emission of air contaminants.

Pursuant to Section 4.0, a written permit shall be obtained from the APCO. No Permit to Operate shall be granted either by the APCO or the Hearing Board for any source operation described in Section 3.0 constructed or installed without authorization as required by Section 3.0 until the information required is presented to the APCO and such source operation is altered, if necessary, and made to conform to the standards

set forth in Rule 2070 (Standards for Granting Applications) and elsewhere in these rules and regulations.

Municipal Solid Waste landfills with more than 450,000 tons of waste in place are required to obtain a District permit to allow the District to implement and enforce the CARB landfill methane regulation.

### **Rule 2201 - New and Modified Stationary Source Review Rule**

An emissions unit that was installed at a time when permits were not required is exempt from District Rule 2201 for the initial permitting action, per District Rule 2020, Section 9.0. Therefore, as shown above, this facility is not subject to the requirements of this rule until they modify their operation.

### **Rule 2520 - Federally Mandated Operating Permits**

MSW landfills, other than those subject to NSPS Subpart WWW or Cc are not required to obtain a Title V permit. BFI has received their Title V Operating Permit. This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, 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.

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment application.

### **Rule 4001 – New Source Performance Standards**

40 CFR Part 60 – Subpart WWW- The requirements of this subpart apply to each existing municipal solid waste landfill for which construction, reconstruction, or modification was commenced on or after May 30 , 1991. This facility is subject to the subpart and is required to meet the requirements that are applicable. In this case, the facility has an enclosed flare. The permit currently has conditions referencing an open flare. The conditions referencing an open flare will be removed and conditions applicable to an enclosed flare will be added. Continued compliance is expected with this rule.

### **Rule 4101 - Visible Emissions**

District Rule 4101, Section 5.0, indicates that 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 dark or darker than Ringelmann 1 or equivalent to 20% opacity. Opacity is expected to be less than 20% provided that these operations are properly performed. The following conditions will be listed on each permit:

- {15} 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]

Compliance is expected with this Rule.

### **Rule 4102 - Nuisance**

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected provided that these operations are properly performed. The following condition will be placed on each permit:

- {98} No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]

Compliance is expected with this Rule.

## **California Health & Safety Code 41700 (Health Risk Assessment)**

The District's Risk Management Policy for Permitting New and Modified Sources requires that a risk management review be performed for all projects that result in any increases in emissions of hazardous air pollutants. This project is to issue permits for existing organic waste processing operations with no increase in hazardous air pollutants. Therefore, a risk management review is not required.

## **Rule 4642 – Solid Waste Disposal Sites**

The purpose of this rule is to limit the emissions volatile organic compounds (VOC) from solid waste disposal sites. Per Section 2.0, this rule applies to any facility which has a gas collection system and/or control device in operation, or undergoing maintenance or repair.

The facility is currently in compliance with this rule, continued compliance is expected.

## **California Code of Regulations Title 17, Subchapter 10, Article 4, Subarticle 6, sections 95460 through 95476: Methane Emissions from Municipal Solid Waste Landfills**

The purpose of this CARB regulation is to reduce methane emissions from municipal solid waste landfills pursuant to the California Global Warming Solutions Act of 2006. Facilities that have MSW landfills with greater than 450,000 tons waste-in-place are required to calculate the landfill gas heat input capacity per section 95471(b) of the regulation. The facility has submitted documentation of the waste-in-place as well as the landfill gas heat input capacity see appendix I. The current average heat input rate for landfill gas collected from this site is 14.6 MMBTU/hour.

### **Gas Collection and Control System:**

The facility currently has a collection and control system permitted with the District (C-150-1). The system controls the methane emissions from the surface of the landfill. The landfill is required to operate the gas collection system continuously pursuant to Section 95464(b)(1)(A), except during maintenance, repairs, and temporary shutdowns as allowed pursuant to Section 95454(e).

Landfill gas collection system components upstream of the blower must be operated under vacuum (Section 95464(c)). Monthly wellhead monitoring is required (Section 95469(c)) to demonstrate compliance with this requirement.

Any landfill gas collection system components downstream of the blower that are intended to be operated under positive pressure have a component leak limit of 500

ppmv, measured as methane (Section 95464(b)(1)(B)). Section 95469(b)(3) requires quarterly leak checks to demonstrate compliance with this limit.

The gas must be sent to a control device or devices that meet the requirements of section 95464. BFI has installed an enclosed ground flare. The enclosed flare must meet the requirements in Section 95464(b)(2), including compliance with a methane destruction efficiency of at least 99% by weight. Compliance with this limit is demonstrated by annual source testing. The flare must also be operated within the temperature range established during the initial source test and this temperature and landfill gas flow rate must be monitored continuously per Section 95469(b)(1).

#### Surface methane emissions:

Section 95465 contains the two landfill surface emission standards: the instantaneous surface emission limit is 500 ppmv as methane; the integrated surface emission limit is 25 ppmv as methane for each grid. Section 95469(a) requires quarterly surface monitoring to demonstrate compliance with these standards.

#### Records:

According to Section 95470 the landfill is required to keep records of the following:

(A) All gas collection system downtime exceeding five calendar days, including individual well shutdown and disconnection times, and the reason for the downtime.

(B) All gas control system downtime in excess of one hour, the reason for the downtime, and the length of time the gas control system was shutdown.

(C) Expected gas generation flow rate calculated pursuant to section 95471(e).

(D) Records of all instantaneous surface readings of 200 ppmv or greater; all exceedances of the limits in sections 95464(b)(1)(B) or 95465, including the location of the leak (or affected grid), leak concentration in ppmv, date and time of measurement, the action taken to repair the leak, date of repair, any required re-monitoring and the re-monitored concentration in ppmv, and wind speed during surface sampling; and the installation date and location of each well installed as part of a gas collection system expansion.

(E) Records of any positive wellhead gauge pressure measurements, the date of the measurements, the well identification number, and the corrective action taken.

(F) Annual solid waste acceptance rate and the current amount of waste-in-place.

(G) Records of the nature, location, amount, and date of deposition of non-degradable waste for any landfill areas excluded from the collection system.

(H) Results of any source tests conducted pursuant to section 95464(b)(4).

(I) Records describing the mitigation measures taken to prevent the release of methane or other emissions into the atmosphere:

1. When solid waste was brought to the surface during the installation or preparation of wells, piping, or other equipment;
2. During repairs or the temporary shutdown of gas collection system components; or,
3. When solid waste was excavated and moved.

(J) Records of any construction activities pursuant to section 95466.

The records must contain the following information:

1. A description of the actions being taken, the areas of the MSW landfill that will be affected by these actions, the reason the actions are required, and any landfill gas collection system components that will be affected by these actions.
2. Construction start and finish dates, projected equipment installation dates, and projected shut down times for individual gas collection system components.
3. A description of the mitigation measures taken to minimize methane emissions and other potential air quality impacts.

(K) Records of the equipment operating parameters specified to be monitored under sections 95469(b)(1) and 95469(b)(2) as well as records for periods of operation during which the parameter boundaries established during the most recent source test are exceeded. The records must include the following information:

1. For enclosed flares, all 3-hour periods of operation during which the average temperature difference was more than 28 degrees Celsius (or 50 degrees Fahrenheit) below the average combustion temperature during the most recent source test at which compliance with sections 95464(b)(2) and 95464(b)(3)(A) was determined.

Reporting:

According to Section 95470(b) the landfill must submit the following reports as required. Closure notification, Equipment removal report, Annual report, Waste-in-place report, and Landfill gas heat input capacity report. Any reports must be

accompanied by a certification of truth, accuracy, and completeness signed by a responsible official.

### California Environmental Quality Act (CEQA)

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the project qualifies for ministerial approval for an existing operation, which did not require District permits at the time of installation. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

### IX. RECOMMENDATION

Issue permit C-150-1-8 subject to the permit conditions on the attached draft ATC. (Appendix III)

### X. BILLING INFORMATION

Permit Number	Fee Schedule	Fee Description	Fee
C-150-1-8	3020-02-H	54 MMBtu/hr	\$1,030

### XI. APPENDICES

- Appendix I: Facility Waste-in-place report/ Landfill gas heat input
- Appendix II: Current PTO
- Appendix III: Draft Authority to Construct
- Appendix IV: Title V compliance certification form

**APPENDIX I**  
**Facility Waste-in-place report/  
Landfill gas heat input report**



7600 Dublin Blvd • Suite 200, Dublin, CA 94568 • (630) 410-7208 Fax: (925) 560-9879

September 15, 2010

Mr. Renaldo Crooks  
California Air Resources Board  
P.O. Box 2815  
Sacramento, California 95812

Re: Landfill Gas Heat Input Capacity Report for Chateau Fresno Landfill  
CalRecycle Solid Waste Information System Number: 10-AA-0002  
Facility Address: 8662 West Muscat  
Fresno, CA 93706  
Facility Located within San Joaquin Air Pollution Control District

*Handwritten:* ✓ 2c, STU, closed

Dear Mr. Crooks,

Cornerstone Environmental Group, LLC (Cornerstone) is submitting this letter to report the landfill gas (LFG) heat input capacity (HIC) of the Chateau Fresno Landfill (Chateau Fresno) to the California Air Resources Board (CARB) Executive Officer (EO) in accordance with Regulation Order §95463(b) of the CARB's "Methane Emissions from Municipal Solid Waste Landfills" Subchapter 10, Article 4, Subarticle 6 (Landfill Methane Control Measures [LF MCM]) adopted on June 17, 2010. Chateau Fresno, owned and operated by Republic Services Inc., is a closed municipal solid waste (MSW) landfill located in Fresno, California with more than 450,000 tons of waste in place and an active gas collection and control system (GCCS).

As of September 13, 2010, Cornerstone's verbal communications with the CARB, as well as the draft LF MCM guidance document indicate that landfills with an existing GCCS are not required to prepare and submit a LFG HIC report. However, in lieu of an official policy statement or regulatory ruling, Cornerstone has prepared the following LFG HIC Report to satisfy Regulation Order §95463(b) for Chateau Fresno, even though the site already has an active GCCS.

**Landfill Gas Heat Input Capacity Report for Chateau Fresno Landfill**

The LFG HIC has been calculated pursuant to Regulation Order §94571(b)(1) using actual site-specific LFG collection rate and average methane content. If desired, this detailed information can be made available at CARB's request. The LFG HIC for Chateau Fresno was calculated as follows:

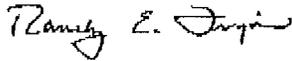
$$\begin{aligned} &\text{Heat Input Capacity (MMBtu/hr)} \\ &= \text{LFG Collection Rate (scfm)} \times \frac{\text{LFG Methane Content (\%)}}{100} \times \frac{60 \text{ minutes}}{1 \text{ hr}} \times \text{GHV} \times \frac{1 \text{ MMBtu}}{1,000,000 \text{ Btu}} \end{aligned}$$

The gross heating value (GHV) of methane, which, pursuant to Appendix 1, Part 1 of the LF MCM, is assumed to be 1,012 British Thermal Units per standard cubic foot (Btu/scf). Based on the average LFG collection rate of 600 standard cubic feet per minute (scfm) and the average LFG methane content of 40 percent, the LFG HIC for Chateau Fresno is 14.6 million BTU per hour (MMBtu/hr).

September 15, 2010  
Page 2 of 2

This letter satisfies the LFG HIC Report requirements of Regulation Order 95463(b). If you have any questions, please contact me at (630) 410-7208.

Sincerely,



Randy Frazier, P.E.  
Senior Client Manager  
Cornerstone Environmental Group, LLC

**Responsible Official Certification:**

Based on the information and belief formed after reasonable inquiry, I certify that the statements included in this report are true, accurate, and complete.



Don Litchfield, R.E.A.  
Responsible Official  
Environmental Manager  
Chateau Fresno Landfill  
Republic Services, Inc.

**APPENDIX II**  
**Current PTO**

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-150-1-7

EXPIRATION DATE: 04/30/2014

## EQUIPMENT DESCRIPTION:

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

## PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

**APPENDIX III**  
**Draft Authority to Construct**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE:** DRAFT  
**DRAFT**

**PERMIT NO:** C-150-1-8

**LEGAL OWNER OR OPERATOR:** BROWNING FERRIS INDUSTRIES  
**MAILING ADDRESS:** ATTN: DON LITCHFIELD, ENVIRONMENTAL MANAGER  
9999 S AUSTIN ROAD  
MANTECA, CA 95336

**LOCATION:** 8662 W MUSCAT AVE  
FRESNO, CA 93710

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 54 MMBTU/HR LANDFILL GAS COLLECTION AND TREATMENT SYSTEM WITH MCGILL MODEL EGF-4 ENCLOSED FLARE WITH COMBUSTION AIR CONTROLS, PROPANE-FIRED PILOT FLAME, FLAME ARRESTOR, BLOWERS, CONCRETE CONDENSATE SUMPS, EXHAUST STACK AND 67 EXTRACTION WELLS: REMOVE REQUIREMENTS FOR OPEN FLARE AND ADD CONDITIONS TO COMPLY WITH CARB LANDFILL METHANE REGULATIONS

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Landfill gas shall be tested for sulfur content quarterly using Draeger tubes. If source specific historical data (for a period of at least one year) shows seasonal variation of less than 20%, then landfill gas shall be tested annually using Draeger tubes. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
5. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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-150-1-8 : Jan 22 2014 1:18PM - KLEVANNID : Joint Inspection NOT Required

6. Actual flare emissions shall not exceed 20 tons VOC/year. Process information, including fuel usage data for the flare and process rates for operations controlled by the flare, shall be submitted to the District annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Flare shall be equipped with a failure alarm to automatically shut off the blower and landfill gas supply. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Landfill gas flowrate shall be monitored by flow indicator and recorders. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Gas collection system shall be sealed at all times during operation. [District NSR Rule] Federally Enforceable Through Title V Permit
10. All condensate traps shall remain covered unless treatment of condensate is taking place. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Flame temperature indicator and recorder shall be operated whenever gas is flared. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Flare temperature shall be maintained to at least 1400 degree F. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Total volume of landfill gas flared shall not exceed 2600 scf/min (3,744,000 scf/day) and shall be recorded daily. [District Rules 2520, 9.4.2 and NSR] Federally Enforceable Through Title V Permit
14. Emissions shall not exceed any of the following: NO<sub>x</sub> - 0.0616 lb/MMbtu, PM<sub>10</sub> - 2.92 lb/hr, CO - 7.75 lb/hr, SO<sub>x</sub> - 1.1 lb/hr, nor VOC(NMHC) - 1.92 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Daily emissions shall not exceed any of the following: NO<sub>x</sub> - 63.4 lb/day, PM<sub>10</sub> - 70.0 lb/day, CO - 186.0 lb/day, SO<sub>x</sub> - 27.1 lb/day, nor VOC(NMHC) - 47.0 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Methane destruction efficiency shall be at least 99% by weight. [17 CCR 95464]
17. Interior wells: DEW-04, DEW-06, and DEW-07 may be operated with 15% oxygen concentration or less, provided that the temperature of these wells stays below the 130 °F which would indicate that aerobic decomposition is not occurring. [40 CFR 60.753(c)] Federally Enforceable Through Title V Permit
18. Perimeter wells: EW-01, EW-02, EW-04, EW-05, EW-07, EW-09, EW-10, EW-12, EW-16, EW-17, EW-18, EW-20, EW-22, EW-23, EW-24, EW-25, EW-28, EW-29, EW-31, EW-32, EW-33, EW-35, EW-36, EW-38, EW-40, EW-43, EW-46, EW-47, EW-49, EW-50, EW-53, EW-55, and EW-56 may be operated with 15% oxygen concentration or less, provided that the temperature of these wells stays below the 130 °F which would indicate that aerobic decomposition is not occurring. [40 CFR 60.753(c)] Federally Enforceable Through Title V Permit
19. The enclosed flares shall either reduce VOC by 98 weight percent or reduce the outlet VOC concentration to less than 20 parts per million by volume, dry basis as methane at 3 percent oxygen. [District Rules 2201 and 4102, and 40 CFR 60.752(b)(2)(iii)(B)] Federally Enforceable Through Title V Permit
20. The enclosed flares shall be equipped with a temperature indicator and recorder which measures and records the operating temperature. The temperature indicator and recorder must operate continuously. [40 CFR 60.756(b)(1)] Federally Enforceable Through Title V Permit
21. The enclosed flare control devices shall be operated within the parameter ranges established during the initial or most recent performance test. [40 CFR 60.752(b)(2)(iii)(B)(2) and 17 CCR 95464] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Except during periods of startup, shutdown, and malfunction, the permittee shall continuously monitor and record combustion chamber temperature. The enclosed flare average combustion temperature, for all 3-hour periods of operation, shall not drop more than 28 degrees C below the average combustion temperature, during the most recent performance test at which compliance with 60.752(b)(2)(iii)(B)(2) was determined. Upon detecting any temperature excursion lower than 28 degree C (50 degree F) below the source test average combustion temperature, averaged over a 3-hour period, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. Duration of startup, shutdown, or malfunction shall not exceed 5 days for collection systems and shall not exceed 1 hour for control devices where free venting of landfill gas occurs. [40 CFR 60.758(c)(1)(i), 60.755(e)] Federally Enforceable Through Title V Permit
23. The owner or operator shall measure the gauge pressure in the gas collection header at each individual interior well on a monthly basis as provided in 60.755(a)(3). If a positive pressure exists, action shall be initiated to correct the exceedance within 5 calendar days. If negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial measurement of positive pressure. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval. [40 CFR 60.755(a)(3), 60.756(a)(1)] Federally Enforceable Through Title V Permit
24. The owner or operator shall monitor each interior well monthly for temperature and oxygen as provided in 60.753(c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval. [40 CFR 60.753(c), 60.755(a)(3) and (a)(5), 60.756(a)(2) and (a)(3)] Federally Enforceable Through Title V Permit
25. The operator shall record quarterly the surface emission tests including test time, weather conditions, precipitation records, areas sampled, calibration records, and test results. Corrective action shall be taken if required in accordance to 40 CFR 60.755(c). [District Rule 2201, 40 CFR 60.755(c), 60.756(f)] Federally Enforceable Through Title V Permit
26. Permittee shall maintain continuous records of flare combustion temperature and volumetric gas flow rate. Permittee shall record and test the net heating value of landfill gas being combusted at least annually using ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201 and 40 CFR 60.756(b), 60.758(b)(2)(i), (c)(2) and (b)(2)(i)] Federally Enforceable Through Title V Permit
27. Permittee shall keep, for the life of the collection system, an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label for each collector. [40 CFR 60.758(d)] Federally Enforceable Through Title V Permit
28. Permittee shall operate the landfill gas collection system with negative pressure at each wellhead except under the following conditions: (1) A fire or increased well temperature. The owner or operator shall record instances when positive pressure occurs in efforts to avoid a fire. These records shall be submitted with the annual reports as provided in 60.757(f)(1); (2) At a wellhead within the immediate vicinity of filling; (3) Use of a geomembrane or synthetic cover. The owner or operator shall develop acceptable pressure limits in the design plan; (4) A decommissioned well. A well may experience a static positive pressure after shut down to accommodate for declining flows. All design changes shall be approved by the APCO. [40 CFR 60.753(b), 17 CCR 95464 and 17 CCR 95468] Federally Enforceable Through Title V Permit
29. Permittee shall operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the owner or operator shall conduct surface testing around the perimeter of the collection area and along a pattern that traverses the landfill at 30 meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover. The owner or operator may establish an alternative traversing pattern that ensures equivalent coverage. A surface monitoring design plan shall be developed that includes a topographical map with the monitoring route and the rationale for any site-specific deviations from the 30 meter intervals. Areas with steep slopes or other dangerous areas may be excluded from the surface testing. [40 CFR 60.753(d), 60.755(c)(1)] Federally Enforceable Through Title V Permit

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30. Compliance with the surface methane operational standard shall be demonstrated using the procedures outlined in 40 CFR 60.755(c) within 180 days of installation and startup of the collection and control system and quarterly thereafter. [40 CFR 60.753(d), 60.755(c)] Federally Enforceable Through Title V Permit
31. Permittee shall operate the enclosed flares at all times when the collected gas is routed to it. [40 CFR 60.753(f)] Federally Enforceable Through Title V Permit
32. Permittee shall operate the landfill gas collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill in which solid waste has been in place for: (1) five years or more if active; or (2) two years or more if closed or at final grade. [40 CFR 60.753(a)] Federally Enforceable Through Title V Permit
33. Permittee shall operate each interior wellhead in the collection system with a landfill gas temperature less than 55 C and with oxygen level less than 5 percent except under the following conditions: (1) A fire or increased well temperature; or (2) at a wellhead within the immediate vicinity of filling. The owner or operator may establish a higher operating temperature or oxygen value at a particular well. A higher operating value demonstration shall show supporting data that the elevated parameter does not cause fires or significantly inhibit anaerobic decompositions by killing methanogens. [40 CFR 60.753(c)] Federally Enforceable Through Title V Permit
34. The collection system shall be operated so that the methane concentration is less than 500 parts per million above background at the surface of the landfill, and such that all collected gases are sent to a control system designed and operated in compliance with 60.752(b)(2)(iii). In the event the collection or control system is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within 1 hour. [40 CFR 60.753(d), (e), 60.755(c)] Federally Enforceable Through Title V Permit
35. If monitoring demonstrates that the operational requirements are not met, corrective action shall be taken as specified in 40 CFR 60.755(a)(3 - 5) or (c). [40 CFR 60.753(g)] Federally Enforceable Through Title V Permit
36. For each interior wellhead, unless an alternative test method is established as allowed by 60.752(b)(2)(i) of this subpart, the oxygen shall be determined by a Landtec GEM gas meter or equal, in accordance with the equipment requirements set forth in 40 CFR 60.753 for field measurement of temperature and oxygen or an oxygen meter using Method 3A or 3C except that: (i) The span shall be set so that the regulatory limit is between 20 and 50 percent of the span; (ii) A data recorder is not required; (iii) Only two calibration gases are required, a zero and span, and ambient air may be used as the span; (iv) A calibration error check is not required; (v) The allowable sample bias, zero drift, and calibration drift are +/-10 percent. [40 CFR 60.753(c)(2)] Federally Enforceable Through Title V Permit
37. Surface emission monitoring shall be performed in accordance with section 4.3.1 of Method 21 of appendix A, except that the probe inlet shall be placed within 5 to 10 centimeters of the ground. Monitoring shall be performed during typical meteorological conditions. Any reading of 500 parts per million or more above background at any location shall be recorded as a monitored exceedance and the actions specified in 40 CFR 60.755(c)(4)(i-v) shall be taken. As long as the specified actions are taken, the exceedance is not a violation of the operational requirements of 60.753(d). [40 CFR 60.755(c)(3), (4)] Federally Enforceable Through Title V Permit
38. Permittee shall calculate the NMOC emission rate for purposes of determining when the collection and control system can be removed as provided in 40 CFR 60.752(b)(2)(v) by using the equation found in 40 CFR 60.754(b). [40 CFR 60.754(b)] Federally Enforceable Through Title V Permit
39. For the performance test required in 60.752(b)(2)(iii)(B), Method 25, 25C, or Method 18 of Appendix A must be used to determine compliance with the 98 weight percent efficiency or the 20 ppmv outlet concentration level, unless another method to demonstrate compliance has been approved by the APCO as provided by 60.752(b)(2)(i)(B). Method 3 or 3A shall be used to determine oxygen for correcting the NMOC concentration as hexane to 3 percent. In cases where the outlet concentration is less than 50 ppm NMOC as carbon (8 ppm NMOC as hexane), Method 25A should be used in place of Method 25. If using Method 18 of appendix A, the minimum list of compounds to be tested shall be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42). The following equation shall be used to calculate efficiency:  $(\text{NMOC}_{\text{in}} - \text{NMOC}_{\text{out}}) / \text{NMOC}_{\text{in}}$ . The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081 and 40 CFR 60.754(d)] Federally Enforceable Through Title V Permit

40. Each owner or operator shall place each well or design component as specified in the approved design plan as provided in 40 CFR 60.752(b)(2)(i). Each well shall be installed no later than 60 days after the date on which the initial solid waste has been in place for a period of: 1) 5 years or more if active or 2) 2 years or more if closed or at final grade. [40 CFR 60.755(b)] Federally Enforceable Through Title V Permit
41. Surface monitoring shall be performed on a quarterly basis using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in 40 CFR 60.755(d). [40 CFR 60.755(c)(1)] Federally Enforceable Through Title V Permit
42. Permittee shall implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis. [40 CFR 60.755(c)(5)] Federally Enforceable Through Title V Permit
43. The portable analyzer shall meet the instrument specifications of Method 21, section 3 (except that "methane" shall replace all references to VOC). The calibration gas shall be methane, diluted to a nominal concentration of 500 parts per million in air. To meet the performance evaluation requirements of Method 21, section 3.1.3, the instrument evaluation procedures of Method 21, section 4.4 shall be used. The calibration procedures provided in Method 21, section 4.2 shall be followed immediately before commencing a surface monitoring survey. The provisions of this condition apply at all times, except during periods of start-up, shutdown, or malfunction which shall not exceed 5 days for collections systems and shall not exceed 1 hour for treatment or control devices. [40 CFR 60.755(d), (e)] Federally Enforceable Through Title V Permit
44. Each wellhead shall have a sampling port and a thermometer, other temperature-measuring device, or an access port for temperature measurements. [40 CFR 60.756(a)] Federally Enforceable Through Title V Permit
45. The enclosed flares shall be equipped with a temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of  $\pm 1$  percent of the temperature being measured expressed in degrees Celsius or  $\pm 0.5$  degrees Celsius, whichever is greater. The temperature indicator and recorder must operate continuously. [District Rule 2201 and 40 CFR 60.756(b)(1)] Federally Enforceable Through Title V Permit
46. The owner/operator shall install, calibrate, maintain, and operate a meter with a continuous recording device that measures and records the landfill gas flow rate into the flare at least once every 15 minutes. This meter shall also be capable of measuring the landfill gas flow rate that might bypass the flare in the event of equipment malfunction or maintenance. [40 CFR 60.754(b)(1), 60.756(b)(2)] Federally Enforceable Through Title V Permit
47. When performing surface monitoring, any closed landfill that has no monitored exceedances of the operational standard in three consecutive quarterly monitoring periods may skip to annual monitoring. Any methane reading of 500 ppm or more above background detected during the annual monitoring returns the frequency for that landfill to quarterly monitoring. [40 CFR 60.756(f)] Federally Enforceable Through Title V Permit
48. The operator shall monitor and record maintenance-related and other control system downtimes and individual well shutdowns. Exceedances defined under 60.758(c) shall be reported once every 180 days. [District Rule 4102 and 40 CFR 60.757(f), (g)(4) and 60.758(c) and (e)] Federally Enforceable Through Title V Permit
49. Except as provided in 60.752(b)(2)(i)(B), each owner or operator of a controlled landfill shall keep up-to-date, readily accessible records for the life of the control equipment of the data listed in paragraphs 60.758(b)(1) through (b)(4) as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring shall be maintained for a minimum of 5 years. Records of the control device vendor specifications shall be maintained until removal. [40 CFR 60.758(b)] Federally Enforceable Through Title V Permit
50. Permittee shall keep the following records: (1)(i) the maximum expected gas generation flow rate as calculated in 60.755(a)(1). The owner or operator may use another method to determine the maximum gas generation flow rate, if the method has been approved by the APCO; (ii) the density of wells, horizontal collectors, surface collectors, or other gas extraction devices determined using the procedures specified in 60.759(a)(1); (2)(i) the average combustion temperature measured at least every 15 minutes and averaged over the same time period of the performance test; (ii) the percent reduction of NMOC determined as specified in 60.752(b)(2)(iii)(B) achieved by the control device. [40 CFR 60.758(b)(1) and (2)] Federally Enforceable Through Title V Permit

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51. Except as provided in 60.752(b)(2)(i)(B), permittee shall keep, for the life of the collection system, an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label for each collector. If applicable, permittee shall keep readily accessible documentation of the nature, date of deposition, amount, and location of asbestos-containing or nondegradable waste excluded from collection as well as any nonproductive areas excluded from collection. [40 CFR 60.758(d)] Federally Enforceable Through Title V Permit
52. Except as provided in 60.752(b)(2)(i)(B), permittee shall keep for at least 5 years up-to-date, readily accessible records of all collection and control system exceedances of the operational standards in 60.753, the reading in the subsequent month whether or not the second reading is an exceedance, and the location of each exceedance. [40 CFR 60.758(e)] Federally Enforceable Through Title V Permit
53. Landfill gas collection system wellheads must be operated under vacuum. Monthly monitoring of wellheads is required. Landfill gas collection system wellheads may be operated under neutral or positive pressure when there is a fire or during other times as allowed in sections 95464(c), 95464(d), and 95464(e). [17 CCR 95464]
54. Landfill gas collection system components downstream of blower have a leak limit of 500 ppmv as methane. Components must be checked quarterly. If compliance with the methane limit has been demonstrated for 4 consecutive quarters, then the component checking frequency shall be annually. If an annual test fails to show compliance, quarterly testing shall resume. [17 CCR 95464]
55. The flare must operate within the parameter ranges established during the initial or most recent source test. [17 CCR 95464]
56. The flare must be source tested annually. If the flare is in compliance after three consecutive source tests, the facility may move to source testing the flare every three years. If subsequent tests show the flare out of compliance, the test frequency shall revert to annual testing. [17 CCR 95464]
57. The flare must have automatic dampers, an automatic shutdown device, a flame arrester, and continuous recording temperature sensors. [17 CCR 95464]
58. Landfill collection and control system must be operated such that landfill surface methane emissions shall not exceed instantaneous surface emission limit of 500 ppmv as methane or integrated surface emission limit of 25 ppmv as methane. [17 CCR 95464, 17 CCR 95465]
59. Instantaneous and integrated landfill surface emissions measurements shall be done quarterly. If there are no exceedances after 4 consecutive quarterly measurements, the facility may measure annually. Any exceedances that can not be remediated within 10 days or any exceedances during compliance inspection will result in a return to quarterly monitoring. [17 CCR 95469]
60. Permittee shall keep records of all gas collection system downtime exceeding five days, including individual well shutdown and disconnection times and the reason for downtime. [17 CCR 95470]
61. Permittee shall keep records of all gas control system downtime in excess of one hour, the reason for the downtime and the length of time the gas control system was shutdown. [17 CCR 95470]
62. Permittee shall keep records of the expected gas generation flow rate calculated pursuant to section 95471(e). [17 CCR 95470]
63. Permittee shall keep records of all instantaneous surface readings of 200 ppmv or greater; all exceedances of the limits in sections 95464(b)(1)(B) or 95465, including the location of the leak (or affected grid), leak concentration in ppmv, date and time of measurement, the action taken to repair the leak, date of repair, any required re-monitoring and the re-monitored concentration in ppmv, and wind speed during surface sampling; and the installation date and location of each well installed as part of a gas collection system expansion. [17 CCR 95470]
64. Permittee shall keep records of any positive wellhead gauge pressure measurements, the date of the measurements, the well identification number, and the corrective action taken. [17 CCR 95470]
65. Permittee shall terminate surface emission testing when the measured average wind speed is over 10 mph or the instantaneous wind speed is over 20 mph. [17 CCR 95468, 17 CCR 95471]
66. Permittee shall keep records of the annual solid waste acceptance rate and the current amount of waste-in-place. [17 CCR 95470]

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67. Permittee shall keep records of the nature, location, amount, and date of deposition of non-degradable waste for any landfill areas excluded from the collection system. [17 CCR 95470]
68. Permittee shall keep records of any source tests conducted pursuant to section 95464(b)(4). [17 CCR 95470]
69. Permittee shall keep records describing the mitigation measures taken to prevent the release of methane or other emissions into the atmosphere during the following activities: 1. When solid waste was brought to the surface during the installation or preparation of wells, piping, or other equipment; 2. During repairs or the temporary shutdown of gas collection system components; or, 3. When solid waste was excavated and moved. [17 CCR 95470]
70. Permittee shall keep records of any construction activities pursuant to section 95466. The records must contain the following information: 1. A description of the actions being taken, the areas of the MSW landfill that will be affected by these actions, the reason the actions are required, and any landfill gas collection system components that will be affected by these actions. 2. Construction start and finish dates, projected equipment installation dates, and projected shut down times for individual gas collection system components. 3. A description of the mitigation measures taken to minimize methane emissions and other potential air quality impacts. [17 CCR 95470]
71. Permittee shall keep records of the equipment operating parameters specified to be monitored under section 95469(b)(1) as well as records for periods of operation during which the parameter boundaries established during the most recent source test are exceeded. The records must include the following information: 1. For enclosed flares, all 3-hour periods of operation during which the average temperature difference was more than 28 degrees Celsius (or 50 degrees Fahrenheit) below the average combustion temperature during the most recent source test at which compliance with sections 95464(b)(2) was determined and a gas flow rate device which must record the flow to the control device at least every 15 minutes. [17 CCR 95470]
72. Permittee shall submit the following reports as required in section 95470(b): Closure notification, Equipment removal report and Annual report. All reports must be accompanied by a certification of truth, accuracy, and completeness signed by a responsible official. [17 CCR 95470]
73. Permittee may comply with the CARB regulation for landfill methane control measures by using approved alternative compliance options. The permittee shall obtain written District approval for the use of any alternative compliance options not specifically approved by this permit. Changes to the approved alternate compliance options must be made and approved in writing. Documentation of approved alternative compliance options shall be available for inspection upon request. [17 CCR 95468]

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**APPENDIX IV**  
**Title V compliance certification form**

San Joaquin Valley  
Unified Air Pollution Control District

RECEIVED  
NOV 19 2013  
SJVAPCD  
Southern Region

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

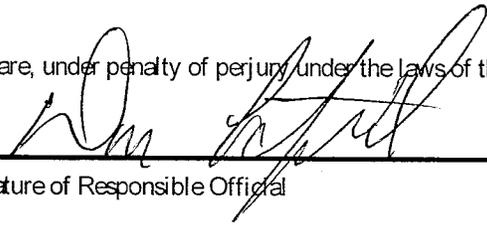
- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: Browning-Ferris Industries of California, Inc.	FACILITY ID: <input checked="" type="checkbox"/> 150
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Republic Services, Inc.	
3. Agent to the Owner:	

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

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

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

  
\_\_\_\_\_  
Signature of Responsible Official

11/12/13  
\_\_\_\_\_  
Date

Don Litchfield  
\_\_\_\_\_  
Name of Responsible Official (please print)  
Area Environmental Manager  
\_\_\_\_\_  
Title of Responsible Official (please print)