

**MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT
PROPOSED TITLE V OPERATING PERMIT**

24580 Silver Cloud Court
Monterey, CA 93940
Telephone: (831) 647-9411

ISSUED TO:

Pacific Recovery Corporation
4040 Fink Road
Crows Landing, CA 95313

PLANT SITE LOCATION:

350 Crazy Horse Canyon Road
Salinas, CA 93907

ISSUED BY:

Douglas Quetin, Air Pollution Control Officer

Effective Date

Nature of Business: Landfill gas to energy facility

SIC Code: 4911 - Electric Power Generation

RESPONSIBLE OFFICIAL:

Name: Steve Swanson
Title: Vice President, Western Region
Phone: (209) 837-4423

ALTERNATIVE RESPONSIBLE OFFICIAL:

Name: Paul Scott
Title: Northern Regional Manager
Phone: (831) 663-6145

FACILITY CONTACT PERSON:

Name: Ken Landsverk
Title: Operator
Phone: (831) 663-6145

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FACILITY DESCRIPTION

The Pacific Recovery Corporation - Salinas facility is an alternative energy facility. This facility recovers and combusts landfill gas from the Crazy Horse Landfill in an internal combustion engine which drives a generator to create electricity. The electricity generated is then sold to the local utility company.

EQUIPMENT DESCRIPTION

INTERNAL COMBUSTION ENGINE GENERATOR SET UTILIZING LANDFILL GAS CONSISTING OF:

1. "Clean Burn" Engine, M.E.P. Industries Model MEP-8T, Opposed Piston, Turbocharged-Intercooled, Eight Cylinders, Rated 2,200 Horsepower-Hour At 900 RPM.
2. Generator, Rated At 1,500 Kw.
3. Landfill Condensate Evaporation System.

FEDERALLY ENFORCEABLE EMISSION LIMITS AND STANDARDS

1. The mass emission rates from the facility shall be less than the following limits [District Rule 207, District Rule 404 NOx limit of 140 lbs/hr]:

<u>Pollutant</u>	<u>Lbs/Hour</u>	<u>Lbs/Day</u>
Oxides of Nitrogen	6.25	150.0
Carbon Monoxide	22.90	550.0
Non-methane Hydrocarbons	6.25	150.0

2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark or darker than Ringelmann 1, or equivalent 20% opacity. [District Rule 400]
3. Sulfur compounds calculated as sulfur dioxide (SO₂) shall not exceed 0.2 percent by volume in the exhaust stream. [District Rule 404]
4. The landfill gas combusted shall contain no more than 50 grains of sulfur compounds (calculated as hydrogen sulfide) per 100 cubic feet of gas. [District Rule 412]
5. Pacific Recovery Corporation - Salinas shall either reduce non-methane organic compounds (NMOC) by 98 weight-percent or reduce the NMOC outlet concentration to less than 20 ppmv, dry basis as hexane at 3% oxygen. [40 CFR Part 60, Subpart WWW]

6. Pacific Recovery Corporation - Salinas shall operate the Landfill Gas Engine at all times that the collected landfill gas is routed to the system. [40 CFR Part 60, Subpart WWW]
7. Conditions 5 and 6 do not apply to Pacific Recovery Corporation - Salinas' Landfill Gas Engine during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction shall not exceed 1 hour. [40 CFR Part 60, Subpart WWW]
8. For the Landfill Gas Engine, Pacific Recovery Corporation - Salinas shall calibrate, maintain, and operate according to the manufacturer's specifications an exhaust gas temperature monitoring device equipped with continuous recorders having an accuracy of ± 1 percent of the temperature being measured expressed in degrees Celsius or ± 0.5 °C, whichever is greater. [40 CFR Part 60, Subpart WWW]
9. Pacific Recovery Corporation - Salinas shall limit emissions of volatile organic compounds from the use of architectural coatings pursuant to the requirements of District Rule 426. [District Rule 426]
10. Should the facility, as defined in 40 CFR §68.3 become subject to Part 68, then Pacific Recovery Corporation - Salinas shall submit a risk management plan (RMP) by the date specified in 40 CFR §68.10. Once subject to Part 68, Pacific Recovery Corporation - Salinas shall certify compliance with these requirements as part of the annual compliance certification required by 40 CFR Part 70 and this permit. [40 CFR Part 68]
11. Pacific Recovery Corporation - Salinas shall comply with the requirements of 40 CFR Part 82 - Protection of Stratospheric Ozone. [40 CFR Part 82]

TESTING REQUIREMENTS AND PROCEDURES

12. Semiannual performance testing of the Landfill Gas Engine shall be conducted in June and December of each year. Pacific Recovery Corporation - Salinas shall conduct performance tests in accordance with CARB Method 100 to verify compliance with condition numbers 1 and 3. Pacific Recovery Corporation - Salinas shall furnish the District written results of such performance tests within thirty (30) days of the test completion. Written notice of the performance test shall be provided to the District a minimum of ten (10) days prior to the test so that a District observer may be present. [District Rules 207 and 218]
13. No testing is specified for the generic (Rule 400) opacity requirement from condition number 2. The Landfill Gas Engine is assumed to be in compliance with the opacity requirement due to its being fired on gaseous fuel. If testing is conducted for condition number 2, Pacific Recovery Corporation - Salinas should conduct testing in accordance with the methodology contained in EPA Method 9 and the data reduction procedures contained in District Rule 400. [District Rule 218]
14. Semiannual testing of the landfill gas to determine the sulfur content shall be completed during the months

of June and December. Pacific Recovery Corporation - Salinas shall conduct testing in accordance with ASTM D 1072-80, ASTM D 3031-81, ASTM D 3246-81 or SCAQMD Method 307-91 to verify compliance with condition number 4. Pacific Recovery Corporation - Salinas shall furnish the District written results of the test within thirty (30) days of completion. [District Rule 218]

15. On an annual basis, Pacific Recovery Corporation - Salinas shall cause testing to be conducted to verify compliance with Condition 5. This testing shall be conducted in accordance with EPA test method 18 or 25. [40 CFR Part 60, Subpart WWW and District Rule 218]

RECORD KEEPING REQUIREMENTS

16. As required in Section 60.757(f) of the NSPS for MSW Landfills, Pacific Recovery Corporation - Salinas shall maintain the following specific monitoring records: [40 CFR Part 60, Subpart WWW]
 - A) the value and length of time for exceedances of applicable parameters monitored under Section 60.756(d) and specified in the design plan submittal; and
 - B) a description and the duration of all times when the control device was not operating for any period exceeding 1 hour and the length of time the control device was not operating.
17. As applicable Pacific Recovery Corporation - Salinas shall maintain the following general records of required monitoring information: [District Rule 218]
 - A) the date and time of sampling or measurements;
 - B) the date(s) analyses were performed;
 - C) the company or entity that performed the analyses;
 - D) the analytical techniques or methods used;
 - E) the results of such analyses;
 - F) the operating conditions existing at the time of sampling or measurement; and
 - G) the records of quality assurance for continuous monitoring systems (including, but not limited to quality control activities, audits, and calibration drift checks) and source testing methods.
18. Pacific Recovery Corporation - Salinas shall maintain records on the occurrence and duration of any start-up, shutdown, or malfunction in the operation of the equipment under this permit. [District Rule 218]
19. Pacific Recovery Corporation - Salinas shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring, sample collection, measurement, report, and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [District Rule 218]

REPORTING REQUIREMENTS

20. Pacific Recovery Corporation - Salinas shall report all breakdowns to the Air Pollution Control Officer (APCO) within 1 hour of the occurrence. This one hour period may be extended up to six hours for good cause by the APCO.

The estimated time for repair of the breakdown shall be supplied to the APCO within 24 hours of the occurrence and a written report shall be supplied to the APCO within 5 days after the occurrence has been corrected. This report shall include at a minimum [District Rule 214]:

- A) a statement that the condition or failure has been corrected and the date of the correction; and
- B) a description of the reasons for the occurrence; and
- C) a description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future; and
- D) an estimate of the emissions caused by the condition or failure.

21. Pacific Recovery Corporation - Salinas shall submit semiannual monitoring reports to the District, in a District approved format, no later than August 15 for the period of January 1 through June 30 and no later than February 15 for the period of July 1 through December 31.

These monitoring reports shall include at a minimum:

- A) the time intervals, date and magnitude of excess emissions, nature and cause of the excess (if known), corrective actions and preventative measures adopted; and
- B) the averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard for the pollutant in question; and
- C) all information pertaining to any monitoring as required by the permit; and
- D) a negative declaration specifying when no excess emissions occurred.

22. Pacific Recovery Corporation - Salinas shall submit an annual compliance certification report to the District and U.S. EPA, in a District approved format, no later than February 15 for the period of January 1 through December 31 of the preceding year.

This report shall include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report and shall include at a minimum:

- A) identification of each term or condition of the permit that is the basis of the certification; and
- B) the compliance status; and
- C) whether compliance was continuous or intermittent; and
- D) the method(s) used for determining the compliance status of the source, currently and over the reporting period.

GENERAL CONDITIONS

23. Pacific Recovery Corporation - Salinas shall comply with all conditions of this federal operating permit. Any noncompliance with a permit condition constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [District Rule 218]
24. In an enforcement action, the fact that Pacific Recovery Corporation - Salinas would have to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit is not a defense. [District Rule 218]
25. This permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by the District. The filing of a request by Pacific Recovery Corporation - Salinas for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 218]
26. This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. [District Rule 218]
27. Pacific Recovery Corporation - Salinas shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Salinas Valley Solid Waste Authority shall also furnish to the District copies of records required to be retained by this permit. [District Rule 218]
28. For applicable requirements that will become effective during the permit term, Pacific Recovery Corporation - Salinas shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement. [District Rule 218]
29. Any document submitted to the District pursuant to this permit shall contain certification by the responsible official of truth, accuracy and completeness. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Pacific Recovery Corporation - Salinas shall promptly, upon discovery, report to the District a material error or omission in these records, reports, plans, or other documents. [District Rule 218]
30. Pacific Recovery Corporation - Salinas shall report any violation of any requirement contained in this permit to the District within 96 hours after such occurrence. The violation report shall include the time intervals, date and magnitude of excess emissions; nature and cause of the excess (if known), corrective actions and preventive measures adopted. [District Rule 218]

31. Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, record keeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with. [District Rule 218]

32. For this federal operating permit to remain valid through the permit term of five years from the date of issuance, Pacific Recovery Corporation - Salinas shall pay an annual emission fee based upon the requirements of District Rule 308. [District Rule 218]

33. Pacific Recovery Corporation - Salinas shall have available at the facility at all times a copy of this federal operating permit [District Rule 218]

34. For protection from enforcement action based upon an emergency, as defined in District Rule 218, the responsible official for Pacific Recovery Corporation - Salinas shall submit to the District relevant evidence which demonstrates: [District Rule 218]
 - A) an emergency occurred; and
 - B) that Pacific Recovery Corporation - Salinas can identify the cause(s) of the emergency; and
 - C) that the facility was being properly operated at the time of the emergency; and
 - D) that all steps were taken to minimize the emissions resulting from the emergency; and
 - E) within two working days of the emergency event, Pacific Recovery Corporation provided the District with a description of the emergency and any mitigating or corrective actions taken.

35. Upon presentation of credentials, Pacific Recovery Corporation - Salinas shall allow the District, the ARB, the EPA, or an authorized representative, to perform the following [District Rule 218]:
 - A) enter upon the premises where the federal operating permit source is located or in which any records are required to be kept under the terms and conditions of this federal operating permit;
 - B) to have access to and copy any records required to be kept under the terms and conditions of this federal operating permit;
 - C) to inspect any equipment, operation, or process described or required in this federal operating permit; and,
 - D) to sample emissions from the source.
