



MAR 05 2015

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-1141517**

Dear Mr. Gray:

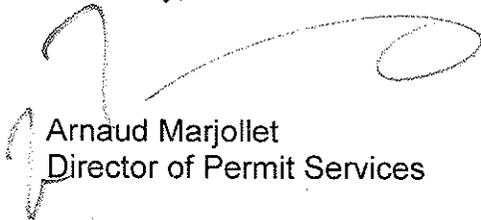
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate the recently issued ATC #C-3839-3-0 into the Title V operating permit. This ATC authorized the installation of a vadose zone landfill gas collection system served by carbon adsorption canisters.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC #C-3839-3-0, 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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1141517

Engineer: Jonah Aiyabei
Date: March 2, 2015

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

I. PROPOSAL

Avenal Regional Landfill is proposing a Title V minor permit modification to incorporate the recently issued ATC #C-3839-3-0 into the Title V operating permit. This ATC is for a vadose zone landfill gas collection system served by carbon adsorption canisters.

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-3839-3-1: VADOSE ZONE GAS COLLECTION SYSTEM SERVED BY TWO 1,000 LB ENVIROSUPPLY, MODEL V-1,000 HP, CARBON CANISTERS CONNECTED IN SERIES

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 subsurface landfill gas (LFG) vadose zone migration control system is designed to remove LFG from the vadose zone. The system consists of five vadose zone LFG extraction wells, two 200-pound carbon canisters connected in series, and an electric blower that conveys the collected gas from the vadose zone wells to the carbon canisters.

In 2011, the District deemed this system to be exempt from permitting requirements as a low emitting source per Rule 2020 Section 6.19. Emissions from the vadose zone migration control system were exempt from permitting as long as the facility monitored the collected gas and documented that the uncontrolled emissions did not exceed 2 lb/day or 75 lb/year. Since the amount of uncontrolled VOC emissions has been increasing and is expected to continue to increase over time, the facility requested that a permit for the operation be issued.

The permit conditions will be modified as follows:

C-3839-3-1:

Permit condition 1 on the Authority to Construct was omitted from the proposed Permit to Operate since full compliance with the requirement is achieved through this application.

Permit condition 2 on the Authority to Construct was included as permit condition 1 on the proposed Permit to Operate. This condition requires the equipment to be maintained in proper operating condition.

Permit condition 3 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 visible emissions opacity limit.

Permit condition 4 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 5 on the Authority to Construct was included as permit condition 2 on the proposed Permit to Operate. This condition, which specifies the exhaust stack design, is based on District Rule 4102 and is therefore not federally enforceable through Title V.

Permit condition 6 on the Authority to Construct was included as permit condition 3 on the proposed Permit to Operate. This condition specifies control efficiency of the emissions control system.

Permit condition 7 on the Authority to Construct was included as permit condition 4 on the proposed Permit to Operate. This condition specifies the daily emissions limit.

Permit condition 8 on the Authority to Construct was included as permit condition 5 on the proposed Permit to Operate. This condition specifies the gas flow rate.

Permit condition 9 on the Authority to Construct was included as permit condition 6 on the proposed Permit to Operate. This condition specifies the VOC concentration of the exhaust gas.

Permit condition 10 on the Authority to Construct was included as permit condition 7 on the proposed Permit to Operate. This condition specifies the minimum number of carbon canisters required.

Permit condition 11 on the Authority to Construct was included as permit condition 8 on the proposed Permit to Operate. This condition requires that emissions sampling ports shall be provided.

Permit conditions 12 through 14 on the Authority to Construct were omitted from the proposed Permit to Operate. These conditions all specify one-time initial compliance requirements and full compliance must be demonstrated before the Permit to Operate is issued.

Permit condition 15 on the Authority to Construct was included as permit condition 9 on the proposed Permit to Operate. This condition specifies the sampling requirements for demonstration of ongoing compliance.

Permit condition 16 on the Authority to Construct was included as permit condition 10 on the proposed Permit to Operate. This condition requires that spent carbon canisters shall be sealed vapor-tight.

Permit condition 17 on the Authority to Construct was included as permit condition 11 on the proposed Permit to Operate. This condition requires that records of cumulative running time and measured VOC concentrations shall be maintained.

Permit condition 18 on the Authority to Construct was included as permit condition 12 on the proposed Permit to Operate. This condition requires that records shall be retained for at least five years and shall be made available for District inspection upon request.

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;

Avenal Regional Landfill
Facility # C-3839
Project # C-1141517

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-3839-3-1
- B. Authority to Construct No. C-3839-3-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
C-3839-3-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-3839-3-1

EXPIRATION DATE: 06/30/2015

EQUIPMENT DESCRIPTION:

VADOSE ZONE GAS COLLECTION SYSTEM SERVED BY TWO 1,000 LB ENVIROSUPPLY, MODEL V-1,000 HP, CARBON CANISTERS CONNECTED IN SERIES

PERMIT UNIT REQUIREMENTS

1. The soil remediation system shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. The VOC control device shall be at least 60% efficient in controlling the VOC from the vadose zone. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The total VOC emissions from the vadose zone shall not exceed 1.4 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The carbon adsorption unit effluent gas flow rate shall exceed 220 scfm. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The VOC concentration of the exhaust gas from the vadose zone served by the carbon adsorption unit shall not exceed 107 ppmv, as methane. [District Rule 2201] Federally Enforceable Through Title V Permit
7. A minimum of two carbon canisters which are connected in series shall be utilized. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Sampling ports adequate for extraction of grab samples, measurement of gas flow rate, and use of an FID, PID, or other District-approved VOC detection device shall be provided for both the influent and the effluent gas streams. [District Rule 1081] Federally Enforceable Through Title V Permit
9. Sampling to demonstrate ongoing compliance with the VOC emission rate and control efficiency requirements shall be performed at least once per week by sampling both the influent and the effluent gas streams with an FID, PID, or other District-approved VOC detection device. [District Rule 1081] Federally Enforceable Through Title V Permit
10. The carbon canisters removed from the system shall be sealed vapor tight. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Records of the cumulative running time and the measured influent and effluent VOC concentrations shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
12. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Authority to Construct No. C-3839-3-0



AUTHORITY TO CONSTRUCT

PERMIT NO: C-3839-3-0

ISSUANCE DATE: 05/29/2014

LEGAL OWNER OR OPERATOR: AVENAL REGIONAL LANDFILL

MAILING ADDRESS: PO BOX 189
AVENAL, CA 93204

LOCATION: 201 HYDRIL RD
AVENAL, CA 93204

EQUIPMENT DESCRIPTION:

VADOSE ZONE GAS COLLECTION SYSTEM SERVED BY TWO 1,000 LB ENVIROSUPPLY, MODEL V-1,000 HP, CARBON CANISTERS CONNECTED IN SERIES

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. The soil remediation system shall be maintained in proper operating condition at all times. [District Rule 2201]
3. 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]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
6. The VOC control device shall be at least 60% efficient in controlling the VOC from the vadose zone. [District Rule 2201]
7. The total VOC emissions from the vadose zone shall not exceed 1.4 pounds in any one day. [District Rule 2201]
8. The carbon adsorption unit effluent gas flow rate shall exceed 220 scfm. [District Rule 2201]
9. The VOC concentration of the exhaust gas from the vadose zone served by the carbon adsorption unit shall not exceed 107 ppmv, as methane. [District Rule 2201]
10. A minimum of two carbon canisters which are connected in series shall be utilized. [District Rule 2201]

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


Arnaud Margollet, Director of Permit Services
C-3839-3-0; May 29 2014 10:45AM - YOUNG : Joint Inspection NOT Required

11. Sampling ports adequate for extraction of grab samples, measurement of gas flow rate, and use of an FID, PID, or other District-approved VOC detection device shall be provided for both the influent and the effluent gas streams. [District Rule 1081]
12. Laboratory samples shall be taken at the initial inspection, under the supervision of the APCD Inspector. Samples shall be taken from both the influent and the effluent gas stream sampling ports. [District Rule 1081]
13. Measurements to determine the influent and the effluent gas flow rates shall be taken at the initial inspection. Flow rate calculations shall be submitted to the District along with the laboratory sample analysis results. [District Rule 1081]
14. Initial compliance with VOC emission rate and control efficiency requirements shall be demonstrated by the results of the laboratory sample analysis. The results shall be submitted to the District within 60 days of the test. [District Rule 1081]
15. Sampling to demonstrate ongoing compliance with the VOC emission rate and control efficiency requirements shall be performed at least once per week by sampling both the influent and the effluent gas streams with an FID, PID, or other District-approved VOC detection device. [District Rule 1081]
16. The carbon canisters removed from the system shall be sealed vapor tight. [District Rule 2201]
17. Records of the cumulative running time and the measured influent and effluent VOC concentrations shall be maintained. [District Rule 2201]
18. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 2201]

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-3839-3-0	0	511	0	0	0
TOTAL	0	511	0	0	0

ATTACHMENT D

Application



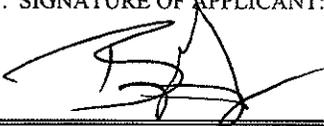
San Joaquin Valley Air Pollution Control District

www.valleyair.org



Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: AVENAL REGIONAL LANDFILL	
2. MAILING ADDRESS: STREET/P.O. BOX: P. O. Box 189 CITY: AVENAL STATE: CA 9-DIGIT ZIP CODE: 93204	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 201 HYDRIL RD CITY: AVENAL SE 15 TOWNSHIP 22 S RANGE 17 E	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: MUNICIPAL SOLID WASTE LANDFILL	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Carbon Abatement System to control volatile organic compounds from vadose zone vapor collection wells	
6. TYPE OR PRINT NAME OF APPLICANT: Benjamin Gray	TITLE OF APPLICANT: District Manager
7. SIGNATURE OF APPLICANT: 	DATE: 5/6/14 PHONE: () FAX: (559) 386-5844 EMAIL: BenjaminG@WasteConnections.com

For APCD Use Only:

DATE STAMP Received MAY 12 2014 SJVUAPCD	FILING FEE RECEIVED: \$ 19.00 CHECK#: 1315 DATE PAID: 5/12/14 PROJECT NO: C-1141517 FACILITY ID: C-3839
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Central Regional Office • 1990 E. Gettysburg Avenue • Fresno, CA 93726-0244 • (559) 230-5900 • FAX (559) 230-6061



**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):

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