



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



NOV 25 2014

Mr. Scott Redelfs
City of Clovis - Landfill
1033 Fifth Street
Clovis, CA 93612

**Re: Notice of Significant Title V Permit Modification
District Facility # C-3074
Project # C-1141564**

Dear Mr. Redelfs:

Enclosed for your review is the District's analysis of an application for significant Title V permit modification for the facility identified above. City of Clovis - Landfill is proposing a Title V significant permit modification to incorporate the recently issued C-3074-8-4 into the Title V operating permit (see enclosures). The modification is to expand the existing municipal solid waste landfill disposal area from 2.7 million cubic yards (57 acres) to 10.45 million cubic yards (76.3 acres).

Enclosed are the current Title V permit, recently issued C-3074-8-4, proposed modified Title V permit, engineering evaluation, and application. The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the modified Title V operating permit. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

Arnaud Marjollet
Director of Permit Services

Enclosures

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

Sayed Sadredin
Executive Director/Air Pollution Control Officer

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TITLE V APPLICATION REVIEW

Significant Modification

Project #: C-1141564

Engineer: John Yoshimura

Date: 7/1/14

Facility Number: C-3074
Facility Name: City of Clovis – Landfill
Mailing Address: 1033 Fifth Street
Clovis, CA 93612

Contact Name: Scott Redelfs
Phone: (559) 324-2648

Responsible Official: Scott Redelfs
Title: Assistant Public Utilities Director

I. PROPOSAL

City of Clovis – Landfill is proposing a Title V significant permit modification to incorporate the recently issued C-3074-8-4 into the Title V operating permit. The modification was to expand the existing municipal solid waste landfill disposal area from 2.7 million cubic yards (57 acres) to 10.45 million cubic yards (76.3 acres).

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

City of Clovis - Landfill is located at 15679 Auberry Road in Clovis, CA.

III. EQUIPMENT DESCRIPTION

Current PTO:

C-3074-8-2: 57 ACRE MUNICIPAL SOLID WASTE LANDFILL (2.7 MILLION CUBIC YARD) WITH A LANDFILL GAS COLLECTION AND CONTROL SYSTEM, INCLUDING UP TO 18 COLLECTION WELLS, PIPING, VACUUM PUMP/BLOWER, CONDENSATE TRAPS AND A 5,000 GALLON CONDENSATE STORAGE

TANK, CONTROLLED BY AN ENCLOSED GROUND FLARE (30 MMBTU/HR MAXIMUM)

ATC Description:

C-3074-8-4: MODIFICATION OF 57 ACRE MUNICIPAL SOLID WASTE LANDFILL (2.7 MILLION CUBIC YARD) WITH A LANDFILL GAS COLLECTION AND CONTROL SYSTEM, INCLUDING UP TO 18 COLLECTION WELLS, PIPING, VACUUM PUMP/BLOWER, CONDENSATE TRAPS AND A 5,000 GALLON CONDENSATE STORAGE TANK, CONTROLLED BY AN ENCLOSED GROUND FLARE (30 MMBTU/HR MAXIMUM): INCREASE LANDFILL DESIGN CAPACITY FROM 2.7 MILLION CUBIC YARDS (57 ACRES) TO 10.45 MILLION CUBIC YARDS (76.3 ACRES)

Proposed PTO:

C-3074-8-5: 76.3 ACRE MUNICIPAL SOLID WASTE LANDFILL (10.45 MILLION CUBIC YARD) WITH A LANDFILL GAS COLLECTION AND CONTROL SYSTEM, INCLUDING UP TO 18 COLLECTION WELLS, PIPING, VACUUM PUMP/BLOWER, CONDENSATE TRAPS AND A 5,000 GALLON CONDENSATE STORAGE TANK, CONTROLLED BY AN ENCLOSED GROUND FLARE (30 MMBTU/HR MAXIMUM)

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a significant modification because the applicant did not originally apply for a Certificate of Conformity (COC) with the original New Source Review (NSR) Authorities to Construct (ATCs). As such, this project requires public review.

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

City of Clovis - Landfill is proposing to modify permit unit C-3074-8 to expand the solid waste landfill disposal area from 2.7 million cubic yards (57 acres) to 10.45 million cubic yards (76.3).

C-3074-8-5:

Permit condition 1 of the current PTO '-8-2 is represented by condition 2 of the proposed PTO '-8-5.

Permit condition 2 on the current PTO '-8-2 was replaced by conditions 2 and 3 of the proposed PTO '-8-5. The facility proposed to limit landfill gas as an auxiliary fuel and LPG/propane as a pilot fuel to start the flare.

Permit conditions 3 through 5 of the current PTO '-8-2 is represented by conditions 4 through 6 of the proposed PTO '-8-5.

Permit conditions 6 and 7 of the current PTO '-8-2 have been replaced by condition 7 of the proposed PTO '-8-5. The requirements of conditions 6 and 7 have been combined into one condition in the proposed PTO.

Permit conditions 8 through 15 of the current PTO '-8-2 is represented by conditions 8 through 15 of the proposed PTO '-8-5.

Permit conditions 16 of the current PTO '-8-2 has been replaced by condition 16 of the proposed PTO '-8-5. The total VOC emissions limit from the flare has been reduced from 71.3 lbs-VOC/day to 4.32 lbs-VOC/day.

Permit condition 17 of the current PTO '-8-2 is represented by condition 20 of the proposed PTO '-8-5.

Permit condition 18 of the current PTO '-8-2 has been replaced by condition 22 of the proposed PTO '-8-5. The requirement has been modified to include source testing for VOC and CO emissions.

Permit condition 19 of the current PTO '-8-2 is represented by condition 23 of the proposed PTO '-8-5.

Permit condition 20 of the current PTO '-8-2 has been replaced by condition 24 of the proposed PTO '-8-5. The reference for EPA Test Method 25 has been removed as the standard testing protocol for concentrations has been moved to condition 28 of the proposed PTO '-8-5.

Permit condition 21 of the current PTO '-8-2 is represented by condition 25 of the proposed PTO '-8-5.

Permit conditions 22 through 39 of the current PTO '-8-2 are represented by conditions 31 through 33, 52, and 54 through 67 of the proposed PTO '-8-5.

Permit conditions 40, 41, 42, 43, and 44 of the current PTO '-8-2 were inadvertently left off of the proposed PTO '-8-5. These conditions allow for alternative compliance options to reduce methane emissions from municipal solid waste landfills and were added as conditions 38 through 42 of the proposed PTO '-8-5.

Permit conditions 45 through 48 of the current PTO '-8-2 are represented by conditions 68 through 71 of the proposed PTO '-8-5.

Permit conditions 49 through 53 of the current PTO '-8-2 are represented by conditions 72 through 76 of the proposed PTO '-8-5.

Permit condition 54 of the current PTO '-8-2 is represented by condition 84 of the proposed PTO '-8-5.

Permit conditions 17, 18, and 19 of the proposed PTO '-8-5 were added to limit the daily and annual PM10 emissions from the landfill.

Permit condition 21 of the proposed PTO '-8-5 was added to ensure the flare demonstrates compliance with the VOC emissions limits annually.

Permit conditions 26 through 29 of the proposed PTO '-8-5 were added to ensure the facility uses the correct test methods for VOC, NMOC, sulfur content, NOx, and CO emissions.

Permit condition 30 of the proposed PTO '-8-5 was added to ensure the facility uses the correct test method to determine the landfill gas fuel heating value.

Permit conditions 34 through 37, 43 through 51, and 53 of the proposed PTO '-8-5 were added to address the Rule 2201 monitoring requirements for a gas collection and control system used in the landfill expansion area.

Permit conditions 77 through 83 of the proposed PTO '-8-5 were added to address the Rule 2201 recordkeeping requirements for a gas collection and control system used in the landfill expansion area.

Permit conditions 85 through 93 of the proposed PTO '-8-5 were added to address Regulation VIII (Fugitive PM10 Prohibitions) dust control measures.

Permit conditions 94 through 114 of the proposed PTO '-8-5 were added to address the 40 CFR Part 60 Subpart WWW requirements for municipal waste landfills that commenced construction, reconstruction, or modification after May 30, 1991.

Permit condition 112 of the ATC '8-4 was removed. The inclusion of this condition was in error since the ATC project was not processed with a Certificate of Conformity (COC).

VII. COMPLIANCE

District Rule 2520, Section 6.0 describes the source's ability to make changes including significant permit modification. This modification does not meet the minor permit modification criteria pursuant to Section 3.20 described as follows.

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 11.3 by including;

1. The identification of the source, the name and address of the permit holder, the activities and emissions change involved in the permit action;
2. The name and address of the District, the name and telephone number of District staff to contact for additional information;
3. The availability, upon request, of a statement that sets forth the legal and factual basis for the proposed permit conditions;

4. The location where the public may inspect the complete application, the District analysis, the proposed permit, and all relevant supporting materials;
5. A statement that the public may submit written comments regarding the proposed decision within at least 30 days from the date of publication and a brief description of commenting procedures, and
6. A statement that members of the public may request the APCO or his designee to preside over a public hearing for the purpose of receiving oral public comment, if a hearing has not already been scheduled. The APCO shall provide notice of any public hearing scheduled to address the proposed decision at least 30 days prior to such hearing;

ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. C-3074-8-5
- B. Authority to Construct No. C-3074-8-4
- C. Previous Title V Operating Permit No. C-3074-8-2
- D. Emissions Increases
- E. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
C-3074-8-5

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-3074-8-5

EXPIRATION DATE: 10/31/2018

EQUIPMENT DESCRIPTION:

76.3 ACRE MUNICIPAL SOLID WASTE LANDFILL (10.45 MILLION CUBIC YARD) WITH A LANDFILL GAS COLLECTION AND CONTROL SYSTEM, INCLUDING UP TO 18 COLLECTION WELLS, PIPING, VACUUM PUMP/BLOWER, CONDENSATE TRAPS AND A 5,000 GALLON CONDENSATE STORAGE TANK, CONTROLLED BY AN ENCLOSED GROUND FLARE (30 MMBTU/HR MAXIMUM)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Only landfill gas shall be used as auxiliary fuels for the combustion of VOC. [District Rule 2201] Federally Enforceable Through Title V Permit
3. LPG/propane shall be used as a pilot fuel to start the flare. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Sampling ports shall be installed on each well head. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Gas collection system shall be operated in a manner which maximizes the amount of landfill gas extracted while preventing overdraw that can cause fires or damage the gas collection system. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Landfill gas line from collection header shall be equipped with a gas flow rate measurement device. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Landfill gas collection system shall be equipped with an enclosed flare having a methane destruction efficiency of at least 99% by weight and a VOC destruction efficiency of at least 98% by weight, or reduce the VOC concentration (measured as methane) to 20 ppmv @ 3% O₂. [District Rule 2201 and 17 CCR 95464] Federally Enforceable Through Title V Permit
8. The minimum operating temperature for the combustion chamber of the flare shall be maintained at or above 1,400 degrees F. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The flare shall be equipped with an operational temperature gauge to indicate the temperature of the combustion chamber. A continuously recording device shall be utilized to indicate the combustion chamber temperature during operation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The landfill gas vapor collection system shall not be operated unless the combustion chamber is at or above minimum operating temperature. The system shall automatically terminate operation if the temperature drops below the minimum operating temperature. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Excavated solid waste shall be covered using fresh soil, plastic sheeting, or vapor retarding foam as necessary to prevent odorous emissions and to minimize the release of landfill gas. [District Rule 2201] 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.

12. Maintenance is defined as any work performed on the gas collection system and/or control device in order to ensure continued compliance with District rules, regulations, and/or Permits to Operate, and to prevent its failure or malfunction. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The permittee shall notify the APCO by telephone at least 24 hours before performing any maintenance work that requires the system to be shutdown. The notification shall include a description of work, the date work will be performed and the amount of time needed to complete the maintenance work. [District Rule 2201] Federally Enforceable Through Title V Permit
14. During maintenance of the landfill gas collection system or incineration device, emissions of landfill gas shall be minimized during shutdown. [District Rules 2020 and 2201] Federally Enforceable Through Title V Permit
15. Emission rates from the flare shall not exceed any of the following limits: 0.05 lb-NOx/MMBtu; 0.006 lb-VOC/MMBtu; 0.2 lb-CO/MMBtu; 0.05 lb-PM10/MMBtu; or 0.033 lb-SOx/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The total VOC emissions from the landfill gas vapor collection system served by the flare shall not exceed 4.32 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The permittee shall water the unpaved truck unloading and maneuvering area. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Total PM10 emissions from the handling of soil cover shall not exceed 0.0023 lb-PM10/ton of material handled. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Total soil cover usage rate shall not exceed 1,997 tons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The influent gas flowrate into the control device shall not exceed 1,667 scfm. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The flare shall be tested for compliance with the VOC emissions limit at least once every 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Source testing on the flare shall be performed to demonstrate compliance with the flare NOx and CO limits, and the NMOC/VOC destruction efficiency of 98%, or 20 ppmvd @ 3% O2 as hexane, as required by this permit; and shall be conducted annually. [District Rules 2201, 1081 and 17 CCR 95464] Federally Enforceable Through Title V Permit
23. The operator shall measure daily, in actual cubic feet, the volumetric flow rate of the collected landfill gas entering the flare. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Simultaneous grab samples shall be taken at the inlet to the flare and in the exhaust of the control device. The VOC concentrations shall be referenced as methane. [District Rule 2201] Federally Enforceable Through Title V Permit
25. The destruction efficiency of the flare shall be calculated using the following equation: $\text{Destruction Efficiency} = [1 - ((a \times b) / (c \times d))] \times 100\%$, where a = measured concentration of VOC in the flare exhaust, b = exhaust flow of flare, c = measured concentration of VOC in the landfill gas entering the flare, and d = inlet flow of flare. [District Rule 2201] Federally Enforceable Through Title V Permit
26. The following test methods shall be used for VOC (ppmv) and NMOC (ppmv) - EPA Method 18, EPA Method 25A, 25B, 25C, or ARB Method 100. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Sulfur content of the landfill gas being combusted in the flare shall be determined using ATSM D1072, D3031, D4084, D3246 or double GC for H2S and mercaptans, or draeger tubes for H2S, or an equivalent method approved by the District. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Source testing for flare NOx emissions shall be conducted using EPA Method 7E or ARB Method 100. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Source testing for flare CO emissions shall be conducted using EPA Method 10 or ARB Method 100. [District Rule 2201] 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.

30. Operator shall determine landfill gas fuel higher heating value annually by ASTM D1826 or D1945 in conjunction with ASTM D3588 for gaseous fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
31. During annual source testing, the volumetric flow rate of the flare effluent gases shall be measured using CARB Method 2 or EPA Method 19. [District Rule 2201] Federally Enforceable Through Title V Permit
32. The heating value of the process gas shall be determined by using the latest revision of test method ASTM D1826 or ASTM D3588. [District Rule 2201] Federally Enforceable Through Title V Permit
33. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days after testing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
34. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
35. Permittee shall operate the flare at all times when the collected gas is routed to it. [District Rule 2201] Federally Enforceable Through Title V Permit
36. During maintenance of the gas collection system or incineration device, emissions of landfill gas shall be minimized during shutdown. [District Rule 2201] Federally Enforceable Through Title V Permit
37. A non-resettable, totalizing mass or volumetric landfill gas fuel flow meter, or other APCO approved alternative, to measure the amount of gas combusted in the enclosed flare shall be installed, utilized and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
38. Permittee shall keep records of delays encountered during repair of leaks or repair of positive wellhead readings. Documentation of delays shall be submitted with the annual report. [17 CCR 95468] Federally Enforceable Through Title V Permit
39. Permittee shall identify areas which are dangerous and unable to be inspected. Areas shall be clearly identified on a map of the facility. A copy of the map shall be kept onsite as well as submitted with the annual report. [17 CCR 95468] Federally Enforceable Through Title V Permit
40. Permittee shall conduct monitoring of the landfill surface within 3 inches of the surface. The facility may monitor surface emissions with the probe tip at the height of the vegetation if there is vegetation and it is impractical to monitor at 3 inches from the landfill surface. [17 CCR 95468] Federally Enforceable Through Title V Permit
41. 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] Federally Enforceable Through Title V Permit
42. Permittee shall only conduct surface emission testing when precipitation has met the following requirements. It has been 24 hours since measured precipitation of 0.01 to 0.15 inches. It has been 48 hours since measured precipitation of 0.16 to 0.24 inches. It has been 72 hours since measured precipitation of 0.25 or more inches. [17 CCR 95468] Federally Enforceable Through Title V Permit
43. Sampling ports adequate for sulfur testing shall be provided in the landfill gas manifold line to the flare. [District Rule 1081] Federally Enforceable Through Title V Permit
44. For initial monitoring of collection devices in the expansion area, prior to initial operation, the permittee shall monitor the collectors at least once per quarter for static pressure, percent methane, percent oxygen, and temperature utilizing a District-approved portable landfill gas analyzer. [District Rule 2201] Federally Enforceable Through Title V Permit
45. For commissioning of collection devices in the expansion area, collectors shall be commissioned and continually operated if all of the following parameters are met: (1) methane percent 45% or greater; (2) oxygen percent 5% or less; (3) temperature 131 degrees F; and (4) static pressure 5.0 in H₂O or greater. [District Rule 2201] Federally Enforceable Through Title V Permit
46. For operation of collection devices in the expansion area, once the collectors are commissioned, the permittee shall monitor the collectors weekly for the first six months of operation and may switch to monthly monitoring thereafter. [District Rule 2201] 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.

47. For surface emissions monitoring, once an area has reached final grade or within 90 days when the LFG system in the area is commissioned, whichever comes first, surface emissions shall not exceed a methane concentration of 500 parts per million above background at the surface of the landfill. [District Rule 2201] Federally Enforceable Through Title V Permit
48. For surface emissions monitoring, surface monitoring for the landfill area shall be performed quarterly. If there are any exceedances during a quarterly event, monitoring will be required monthly until three consecutive months without exceedances, which would allow a return to quarterly monitoring. [District Rule 2201] Federally Enforceable Through Title V Permit
49. For surface emissions monitoring, after an exceedance, the permittee shall initiate correction action within five days and conduct remonitoring within ten days from the initial exceedance. If compliance is shown, an additional remonitoring event is required within one month of the initial exceedance. If the ten day event shows an exceedance, the permittee shall initiate correction action within five days and conduct remonitoring within ten days from the second exceedance. If compliance is shown, an additional remonitoring is required within one month of the initial exceedance. If the second ten day event shows an exceedance, the permittee shall permit and install additional landfill gas wells to correct the problem within 120 days of the initial exceedance. The permittee may utilize an alternative corrective action with prior approval from the APCO. [District Rule 2201] Federally Enforceable Through Title V Permit
50. For surface emissions monitoring, permittee shall conduct surface testing around the perimeter of the collection area and along a pattern that traverses the landfill at 30-meter intervals (or a site-specific established spacing) 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. [District Rule 2201] Federally Enforceable Through Title V Permit
51. For surface emissions monitoring, surface testing shall be performed using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in 40 CFR 60.755(d). [District Rule 2201] Federally Enforceable Through Title V Permit
52. An amended landfill design capacity report shall be submitted to the District and to US EPA providing notification of an increase in the design capacity of the landfill, within 90 days of an increase in the maximum design capacity of the landfill to or above 2.5 million megagrams and 2.5 million cubic meters. This increase in design capacity may result from an increase in the permitted volume of the landfill or an increase in the density as documented in the annual recalculation required in Section 60.758(f) of 40 CFR 60 Subpart WWW. [District Rule 2201 and 40 CFR 60.757(a)(3)] Federally Enforceable Through Title V Permit
53. Maintenance is defined as work performed on a gas collection system and/or control device in order to ensure continued compliance with District rules, regulations, and/or Permits to Operate, and to prevent its failure or malfunction. [District Rule 2201] Federally Enforceable Through Title V Permit
54. Landfill owners or operators who convert design capacity from volume to mass or mass to volume to demonstrate that landfill design capacity is less than 2.5 million megagrams or 2.5 million cubic meters, as provided in the definition of "design capacity", shall keep readily accessible, on-site records of the annual recalculation of site-specific density, design capacity, and the supporting documentation. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable. [40 CFR 60.758(f)] Federally Enforceable Through Title V Permit
55. Permittee shall record emission control device source test reports showing VOC destruction/treatment efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
56. Permittee shall maintain average monthly records of landfill gas flow rate to any control device(s) as well as the hours of operation of the control device(s) to show compliance with the daily influent flowrate limit. [District Rule 2201] Federally Enforceable Through Title V Permit
57. Landfill collection and control system may be operated intermittently provided the methane emission from the landfill do not exceed instantaneous or integrated limit requirements. [17 CCR 95464] 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.

58. 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, while GCCS is offline during intermittent operation as allowed in this permit, or during other times as allowed in sections 95464 (c), 95464(d), and 95464(e). [17 CCR 95464, 17 CCR 95468] Federally Enforceable Through Title V Permit
59. Landfill gas collection system components downstream of blower have a leak limit of 500 ppmv as methane. Components must be checked quarterly. [17 CCR 95464] Federally Enforceable Through Title V Permit
60. The flare must have automatic dampers, an automatic shutdown device, a flame arrester, and continuous recording temperature sensors. [17 CCR 95464] Federally Enforceable Through Title V Permit
61. The flare must operate within the parameter ranges established during most recent source test. [17 CCR 95464] Federally Enforceable Through Title V Permit
62. 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] Federally Enforceable Through Title V Permit
63. Instantaneous and integrated landfill surface emissions measurements shall be done quarterly. The landfill may monitor annually provided they comply with requirements of 17 CCR 95469 (a)(1). [17 CCR 95469] Federally Enforceable Through Title V Permit
64. 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] Federally Enforceable Through Title V Permit
65. 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] Federally Enforceable Through Title V Permit
66. Permittee shall keep records of the expected gas generation flow rate calculated pursuant to section 95471(e). [17 CCR 95470] Federally Enforceable Through Title V Permit
67. 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] Federally Enforceable Through Title V Permit
68. 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] Federally Enforceable Through Title V Permit
69. Permittee shall keep records of the annual solid waste acceptance rate and the current amount of waste-in-place. [17 CCR 95470] Federally Enforceable Through Title V Permit
70. 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] Federally Enforceable Through Title V Permit
71. Permittee shall keep records of any source tests conducted pursuant to section 95464(b)(4). [17 CCR 95470] Federally Enforceable Through Title V Permit
72. 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] 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.

73. 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] Federally Enforceable Through Title V Permit
74. 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] Federally Enforceable Through Title V Permit
75. 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] Federally Enforceable Through Title V Permit
76. Permittee may comply with the CARB regulation for landfill methane control measures by using approved alternative compliance options. Documentation of approved alternative compliance options shall be available for inspection upon request. [17 CCR 95468] Federally Enforceable Through Title V Permit
77. Permittee shall maintain records of system inspections including: date, time and inspection results. [District Rule 2201] Federally Enforceable Through Title V Permit
78. Permittee shall maintain records of maintenance related or other collection system and control device downtime, including individual well shutdown. [District Rule 2201] Federally Enforceable Through Title V Permit
79. Permittee shall maintain records of the amount of soil cover in tons/day. [District Rule 2201] Federally Enforceable Through Title V Permit
80. The operator shall record emission control device source tests (emissions of CO, NOx, and VOC) in pounds per MMBtu heat input. Operator shall also record VOC destruction/treatment efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
81. Daily records of the weight of materials received (tons) - including Class II/III waste material, Class II soil cover, and clean soil cover shall be maintained, kept on site for a period of five years, and made available to District staff upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
82. A record of continuous flare combustion temperature, continuous volumetric gas flow rate, net heating value of landfill gas being combusted, daily landfill gas fuel consumption, and hourly heat input shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
83. Records of calculated landfill and flare VOC emissions shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
84. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
85. Except for the spreading of landfill cover, when handling bulk materials outside an enclosed structure or building, water or chemical/organic stabilizers/suppressants shall be applied as required to limit Visible Dust Emissions to a maximum of 20% opacity. When necessary to achieve this opacity limitation, wind barriers with less than 50% opacity shall also be used. [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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86. When storing bulk materials outside an enclosed structure or building, water or chemical/organic stabilizers/suppressants shall be applied as required to limit Visible Dust Emissions to a maximum of 20% opacity. When necessary to achieve this opacity limitation, all bulk material piles shall also be either maintained with a stabilized surface as defined in Section 3.58 of District Rule 8011, or shall be protected with suitable covers or barriers as prescribed in Table 8031-1, Section B, of District Rule 8031. [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
87. When transporting bulk materials outside an enclosed structure or building, all bulk material transport vehicles shall limit Visible Dust Emissions to 20% opacity by either limiting vehicular speed, maintaining sufficient freeboard on the load, applying water to the top of the load, or covering the load with a tarp or other suitable cover. [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
88. All outdoor chutes and conveyors shall be controlled by any of the following options: 1) full enclosure, 2) operation with material sufficiently wetted such that VDE is limited to 20% opacity, or 3) the concentration of particles having an aerodynamic diameter of 10 microns or less in the conveyed material shall be sufficiently small to limit VDE to 20% opacity. [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
89. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Rule 8041 or Rule 8011. [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
90. One or more of the following control measures shall be implemented on each day that 50 or more VDT (Vehicle Daily Trips), or 25 or more VDT with 3 or more axles, originates from within and remains exclusively within an unpaved vehicle/equipment traffic area: water, gravel, roadmix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure shall be applied to unpaved vehicle travel areas as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit
91. On each day that 50 or more VDT (Vehicle Daily Trips), or 25 or more VDT with 3 or more axles, originates from within and remains exclusively within an unpaved vehicle/equipment traffic area, dusting materials accumulated on paved surfaces shall be removed daily or water and/or chemical/organic dust stabilizers/suppressants shall be applied to the paved surface as required to maintain continuous compliance with the requirements for a stabilized unpaved road as defined in District Rule 8011 and limit Visible Dust Emissions (VDE) to 20% opacity. [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
92. Whenever any portion of the site becomes inactive, Permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in Section 3.58 of District Rule 8011. [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit
93. Records and other supporting documentation shall be maintained as required to demonstrate compliance with the requirements of the rules under Regulation VIII only for those days that a control measure was implemented. Such records shall include the type of control measure(s) used, the location and extent of coverage, and the date, amount, and frequency of application of dust suppressant, manufacturer's dust suppressant product information sheet that identifies the name of the dust suppressant and application instructions. Records shall be kept for one year following project completion that results in the termination of all dust generating activities. [District Rules 8031, 8071, and 8011] Federally Enforceable Through Title V Permit
94. The NMOC emission rate shall be calculated using the equation in 40CFR60.754(a)(1)(i), if the actual year-to-year solid waste acceptance rate is known or the equation in 40CFR60.754(a)(1)(ii), if the actual year-to-year solid waste acceptance rate is unknown. The values for k, Lo, and CNMOC for both equations shall be taken from 40CFR60.754(a)(1), as appropriate. Both equations may be used if the actual year-to-year acceptance rate is known for a part of the landfill life, but unknown for another part of the landfill life. The mass of nondegradable solid waste may be subtracted from the average annual acceptance rate when calculating R, if documentation of the nature and amount of such wastes is maintained. (Tier 1 specifications) [60.754(a)(1) and 60.34c] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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95. If the calculated NMOC emission rate is equal to or greater than 50 megagrams/year, then the landfill owner or operator shall either comply with the requirements of this permit to submit a collection and control design plan and install the system, or determine a site-specific NMOC concentration and recalculate the NMOC emission rate using Tier 2 specifications. [60.754(a)(2)(ii) and 60.34c] Federally Enforceable Through Title V Permit
96. Tier 2 specifications to determine the site-specific NMOC concentration shall include the following: 1) For sampling, at least 2 sample probes shall be installed per hectare of landfill surface that has retained waste for at least 2 years, up to a maximum of 50 required probes. One sample of landfill gas shall be collected from each probe to determine the NMOC concentration, using EPA Method 25C or 18. If EPA Method 18 is used, the minimum list of compounds to be tested shall be those published in the most recent Compilation of AP-42. If composite sampling is used, equal sample volumes are required. All samples taken shall be used in the analysis. The NMOC concentration from Method 25C shall be divided by 6 to convert from C-NMOC, as carbon to as hexane. [60.754(a)(3) and 60.34c] Federally Enforceable Through Title V Permit
97. Tier 2 specifications to determine the site-specific NMOC concentration shall include the following: 1) The NMOC mass emission rate shall be recalculated using the average site-specific concentration, instead of the default value, 2) If the resulting calculated mass emission rate is equal to or greater than 50 megagrams/year, the landfill owner or operator shall either comply with 60.752(b)(2), or determine a site-specific methane generation rate constant and recalculate the NMOC emission rate using Tier 3 specifications. [60.754(a)(3)(i)&(ii) and 60.34c] Federally Enforceable Through Title V Permit
98. If the calculated NMOC mass emission rate, using the site-specific NMOC concentration, is less than 50 megagrams/year, then a periodic estimate of the emission rate report, pursuant to 60.757(b)(1) shall be submitted to the Administrator. The site-specific NMOC concentration shall be retested every 5 years, using Tier 2 specifications. [60.754(a)(3)(iii) and 60.34c] Federally Enforceable Through Title V Permit
99. Tier 3 specifications to determine the site-specific methane generation rate constant shall include the following: 1) EPA Method 2E shall be used, 2) The NMOC mass emission rate shall be recalculated using the average site-specific NMOC concentration and the site-specific methane generation rate constant k , instead of the default values in 40 CFR 60(a)(1), and 3) If the resulting calculated NMOC mass emission rate is equal to or greater than 50 megagrams/year, the landfill owner or operator shall comply with 60.752(b)(2). [60.754(a)(4) and (i) and 60.34c] Federally Enforceable Through Title V Permit
100. If Tier 3 specifications are used to determine the site-specific methane generation rate and the calculated NMOC mass emission rate is less than 50 megagrams/year, then a periodic emission rate report shall be submitted to the Administrator, pursuant to 60.757(b)(1) and the NMOC concentration shall be recalculated annually, pursuant to 60.757(b)(1), using the site-specific methane generation rate constant and the NMOC concentration obtained using Tier 2 specifications. Determination of the site-specific methane generation rate constant is performed once and used in all subsequent annual NMOC emission rate calculations. [60.754(a)(4)(ii) and 60.34c] Federally Enforceable Through Title V Permit
101. For PSD purposes, the NMOC emission rate shall be estimated and compared to the PSD major source and significance levels in 40 CFR 51.166 or 52.21, using AP-42 or EPA-approved procedures. [60.754(c) and 60.34c] Federally Enforceable Through Title V Permit
102. The NMOC emission rate shall be recalculated and reported to the APCO annually, except as otherwise provided in this permit, until such time as the calculated NMOC emission rate is equal to or greater than 50 megagrams/year and a collection and control system is installed or until the landfill is closed. [40 CFR 60.752(b)(1), 60.754(a), 60.757(b), 60.34c and 60.35c] Federally Enforceable Through Title V Permit
103. If the NMOC emission rate, as reported in the annual report is less than 50 megagrams/year in each of the next 5 consecutive years, the owner or operator may elect to submit an estimate of the NMOC emission rate for the next 5-year period in lieu of the annual reports for those 5 years. This estimate shall include the current amount of solid waste-in-place and the estimated waste acceptance rate for each year of the 5 years. All data and calculations upon which this estimate is based shall be provided to the APCO. This estimate shall be revised at least once every 5 years. [60.757(b)(1)(ii) and 60.35c] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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104. If the actual waste acceptance rate exceeds the estimated rate used in any year reported in a 5-year estimate of the NMOC emission rate, then a revised 5-year estimate shall be submitted to the APCO. The revised estimate shall cover the 5-year period beginning with the year in which the actual waste acceptance rate exceeded the estimated acceptance rate. [40 CFR 60.757(b)(1)(ii) and 60.35c] Federally Enforceable Through Title V Permit
105. The NMOC emission rate report shall include all the data, calculations, sample reports and measurements used to estimate the annual or 5-year emissions. [40 CFR 60.757(b)(2) and 60.35c] Federally Enforceable Through Title V Permit
106. If the owner or operator elects to recalculate the NMOC emission rate using Tier 2 specifications and the resulting NMOC emission rate is less than 50 megagrams/year, annual periodic reporting shall resume. The revised NMOC emission rate report, with the recalculated NMOC emission rate using Tier 2 specifications, shall be submitted within 180 days of the first Tier 1 calculated exceedance of 50 megagrams/year. [40 CFR 60.757(c)(1) and 60.35c] Federally Enforceable Through Title V Permit
107. If the owner or operator elects to recalculate the NMOC emission rate using Tier 3 specifications and the resulting NMOC emission rate is less than 50 megagrams/year, annual periodic reporting shall resume. The revised NMOC emission rate report, with the recalculated NMOC emission rate using Tier 3 specifications, shall be submitted within 1 year of the first Tier 1 calculated exceedance of 50 megagrams/year. [40 CFR 60.757(c)(2) and 60.35c] Federally Enforceable Through Title V Permit
108. Each owner or operator shall keep for at least 5 years up-to-date, readily accessible, on-site records of the maximum design capacity, the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. [60.758(a), 60.35c and District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
109. This operating permit may be cancelled with APCO approval when the landfill 1) is closed, pursuant to the requirements of this permit, 2) never needed control, and 3) is not otherwise subject to the requirements of part 40 CFR 70. [40 CFR 60.32c(d) and 60.752(b)] Federally Enforceable Through Title V Permit
110. If the landfill is permanently closed, a closure notification shall be submitted to the APCO within 30 days of waste disposal cessation. A permanent closure must take place in accordance with 40 CFR 258.60. If a closure report has been submitted, no additional waste may be placed in the landfill without filing a notification of modification to the APCO, pursuant to 40 CFR 60.7(a)(4). [40 CFR 60.752(b)(1)(ii)(B), 60.757(d) and 60.35c] Federally Enforceable Through Title V Permit
111. If the calculated NMOC is equal to or greater than 50 megagrams/year, the owner or operator shall submit a collection and control system design plan, pursuant to 40 CFR 60.752(b)(2)(i) and prepared by a professional engineer, to the APCO within 1 year of that determination. [40 CFR 60.752(b)(2)(i) and 60.36c(b)] Federally Enforceable Through Title V Permit
112. If the calculated NMOC is equal to or greater than 50 megagrams/year, the owner or operator shall install a collection and control system, that effectively captures the gas generated within the landfill, within 30 months of that determination. This operating permit must be modified accordingly to show compliance with 40 CFR 60, Subpart Cc requirements applicable to a MSWL with a collection and control system. [40 CFR 60.752(b)(2)(ii), 60.753, 60.755, 60.756, 60.34c and 60.36c(b)] Federally Enforceable Through Title V Permit
113. If a gas collection and control system is installed, it shall comply with the operational standards of 40 CFR 60.753, the compliance provisions of 40 CFR 60.755, the monitoring provisions of 40 CFR 60.756, the reporting and recordkeeping requirements of 40 CFR 60.757 and 60.758, and the requirements of 40 CFR 60.759 (for active collection systems). [40 CFR 60.34c; 40 CFR 60.752(b)(2)(ii), 60.753, 60.755, 60.756, 60.757, 60.758, and 60.759] Federally Enforceable Through Title V Permit
114. Compliance with permit conditions in the Title V permit shall be deemed compliance with EPA-approved State Plan for implementing 40 CFR 60, Subpart Cc. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

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ATTACHMENT B

Authority to Construct No.
C-3074-8-4



AUTHORITY TO CONSTRUCT

PERMIT NO: C-3074-8-4

ISSUANCE DATE: 03/11/2014

LEGAL OWNER OR OPERATOR: CITY OF CLOVIS - LANDFILL

MAILING ADDRESS: 155 N SUNNYSIDE
CLOVIS, CA 93611

LOCATION: 15679 AUBERRY RD
CLOVIS, CA 93612

EQUIPMENT DESCRIPTION:

MODIFICATION OF 57 ACRE MUNICIPAL SOLID WASTE LANDFILL (2.7 MILLION CUBIC YARD) WITH A LANDFILL GAS COLLECTION AND CONTROL SYSTEM, INCLUDING UP TO 18 COLLECTION WELLS, PIPING, VACUUM PUMP/BLOWER, CONDENSATE TRAPS AND A 5,000 GALLON CONDENSATE STORAGE TANK, CONTROLLED BY AN ENCLOSED GROUND FLARE (30 MMBTU/HR MAXIMUM): INCREASE LANDFILL DESIGN CAPACITY FROM 2.7 MILLION CUBIC YARDS (57 ACRES) TO 10.45 MILLION CUBIC YARDS (76.3 ACRES)

CONDITIONS

1. 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]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Only landfill gas shall be used as auxiliary fuels for the combustion of VOC. [District Rule 2201]
5. LPG/propane shall be used as a pilot fuel to start the flare. [District Rule 2201]
6. Sampling ports shall be installed on each well head. [District Rule 2201]
7. Gas collection system shall be operated in a manner which maximizes the amount of landfill gas extracted while preventing overdraw that can cause fires or damage the gas collection system. [District Rule 2201]
8. Landfill gas line from collection header shall be equipped with a gas flow rate measurement device. [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


DAVID WARNER, Director of Permit Services

C-3074-8-4 : 03/11/2014 1:41PM - YOSHIMUJ : Jam Inspection NOT Required

9. Landfill gas collection system shall be equipped with an enclosed flare having a methane destruction efficiency of at least 99% by weight and a VOC destruction efficiency of at least 98% by weight, or reduce the VOC concentration (measured as methane) to 20 ppmv @ 3% O₂. [District Rule 2201 and 17 CCR 95464]
10. The minimum operating temperature for the combustion chamber of the flare shall be maintained at or above 1,400 degrees F. [District Rule 2201]
11. The flare shall be equipped with an operational temperature gauge to indicate the temperature of the combustion chamber. A continuously recording device shall be utilized to indicate the combustion chamber temperature during operation. [District Rule 2201]
12. The landfill gas vapor collection system shall not be operated unless the combustion chamber is at or above minimum operating temperature. The system shall automatically terminate operation if the temperature drops below the minimum operating temperature. [District Rule 2201]
13. Excavated solid waste shall be covered using fresh soil, plastic sheeting, or vapor retarding foam as necessary to prevent odorous emissions and to minimize the release of landfill gas. [District Rule 2201]
14. Maintenance is defined as any work performed on the gas collection system and/or control device in order to ensure continued compliance with District rules, regulations, and/or Permits to Operate, and to prevent its failure or malfunction. [District Rule 2201]
15. The permittee shall notify the APCO by telephone at least 24 hours before performing any maintenance work that requires the system to be shutdown. The notification shall include a description of work, the date work will be performed and the amount of time needed to complete the maintenance work. [District Rule 2201]
16. During maintenance of the landfill gas collection system or incineration device, emissions of landfill gas shall be minimized during shutdown. [District Rules 2020 and 2201]
17. Emission rates from the flare shall not exceed any of the following limits: 0.05 lb-NO_x/MMBtu; 0.006 lb-VOC/MMBtu; 0.2 lb-CO/MMBtu; 0.05 lb-PM₁₀/MMBtu; or 0.033 lb-SO_x/MMBtu. [District Rule 2201]
18. The total VOC emissions from the landfill gas vapor collection system served by the flare shall not exceed 4.32 pounds in any one day. [District Rule 2201]
19. The permittee shall water the unpaved truck unloading and maneuvering area. [District Rule 2201]
20. Total PM₁₀ emissions from the handling of soil cover shall not exceed 0.0023 lb-PM₁₀/ton of material handled. [District Rule 2201]
21. Total soil cover usage rate shall not exceed 1,997 tons per day. [District Rule 2201]
22. The influent gas flowrate into the control device shall not exceed 1,667 scfm. [District Rule 2201]
23. The flare shall be tested for compliance with the VOC emissions limit at least once every 12 months. [District Rule 2201]
24. Source testing on the flare shall be performed to demonstrate compliance with the flare NO_x and CO limits, and the NMOC/VOC destruction efficiency of 98%, or 20 ppmvd @ 3% O₂ as hexane, as required by this permit; and shall be conducted annually. [District Rules 2201, 1081 and 17 CCR 95464]
25. The operator shall measure daily, in actual cubic feet, the volumetric flow rate of the collected landfill gas entering the flare. [District Rule 2201]
26. Simultaneous grab samples shall be taken at the inlet to the flare and in the exhaust of the control device. The VOC concentrations shall be referenced as methane. [District Rule 2201]
27. The destruction efficiency of the flare shall be calculated using the following equation: $\text{Destruction Efficiency} = [1 - ((a \times b) / (c \times d))] \times 100\%$, where a = measured concentration of VOC in the flare exhaust, b = exhaust flow of flare, c = measured concentration of VOC in the landfill gas entering the flare, and d = inlet flow of flare. [District Rule 2201]
28. The following test methods shall be used for VOC (ppmv) and NMOC (ppmv) - EPA Method 18, EPA Method 25A, 25B, 25C, or ARB Method 100. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

29. Sulfur content of the landfill gas being combusted in the flare shall be determined using ATSM D1072, D3031, D4084, D3246 or double GC for H₂S and mercaptans, or draeger tubes for H₂S, or an equivalent method approved by the District. [District Rule 2201]
30. Source testing for flare NO_x emissions shall be conducted using EPA Method 7E or ARB Method 100. [District Rule 2201]
31. Source testing for flare CO emissions shall be conducted using EPA Method 10 or ARB Method 100. [District Rule 2201]
32. Operator shall determine landfill gas fuel higher heating value annually by ASTM D1826 or D1945 in conjunction with ASTM D3588 for gaseous fuels. [District Rule 2201]
33. During annual source testing, the volumetric flow rate of the flare effluent gases shall be measured using CARB Method 2 or EPA Method 19. [District Rule 2201]
34. The heating value of the process gas shall be determined by using the latest revision of test method ASTM D1826 or ASTM D3588. [District Rule 2201]
35. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days after testing. [District Rules 1081 and 2201]
36. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
37. Permittee shall operate the flare at all times when the collected gas is routed to it. [District Rule 2201]
38. During maintenance of the gas collection system or incineration device, emissions of landfill gas shall be minimized during shutdown. [District Rule 2201]
39. A non-resettable, totalizing mass or volumetric landfill gas fuel flow meter, or other APCO approved alternative, to measure the amount of gas combusted in the enclosed flare shall be installed, utilized and maintained. [District Rule 2201]
40. Sampling ports adequate for sulfur testing shall be provided in the landfill gas manifold line to the flare. [District Rule 1081]
41. For initial monitoring of collection devices in the expansion area, prior to initial operation, the permittee shall monitor the collectors at least once per quarter for static pressure, percent methane, percent oxygen, and temperature utilizing a District-approved portable landfill gas analyzer. [District Rule 2201]
42. For commissioning of collection devices in the expansion area, collectors shall be commissioned and continually operated if all of the following parameters are met: (1) methane percent 45% or greater; (2) oxygen percent 5% or less; (3) temperature 131 degrees F; and (4) static pressure 5.0 in H₂O or greater. [District Rule 2201]
43. For operation of collection devices in the expansion area, once the collectors are commissioned, the permittee shall monitor the collectors weekly for the first six months of operation and may switch to monthly monitoring thereafter. [District Rule 2201]
44. For surface emissions monitoring, once an area has reached final grade or within 90 days when the LFG system in the area is commissioned, whichever comes first, surface emissions shall not exceed a methane concentration of 500 parts per million above background at the surface of the landfill. [District Rule 2201]
45. For surface emissions monitoring, surface monitoring for the landfill area shall be performed quarterly. If there are any exceedances during a quarterly event, monitoring will be required monthly until three consecutive months without exceedances, which would allow a return to quarterly monitoring. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

46. For surface emissions monitoring, after an exceedance, the permittee shall initiate correction action within five days and conduct remonitoring within ten days from the initial exceedance. If compliance is shown, an additional remonitoring event is required within one month of the initial exceedance. If the ten day event shows an exceedance, the permittee shall initiate correction action within five days and conduct remonitoring within ten days from the second exceedance. If compliance is shown, an additional remonitoring is required within one month of the initial exceedance. If the second ten day event shows an exceedance, the permittee shall permit and install additional landfill gas wells to correct the problem within 120 days of the initial exceedance. The permittee may utilize an alternative corrective action with prior approval from the APCO. [District Rule 2201]
47. For surface emissions monitoring, permittee shall conduct surface testing around the perimeter of the collection area and along a pattern that traverses the landfill at 30-meter intervals (or a site-specific established spacing) 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. [District Rule 2201]
48. For surface emissions monitoring, surface testing shall be performed using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in 40 CFR 60.755(d). [District Rule 2201]
49. An amended landfill design capacity report shall be submitted to the District and to US EPA providing notification of an increase in the design capacity of the landfill, within 90 days of an increase in the maximum design capacity of the landfill to or above 2.5 million megagrams and 2.5 million cubic meters. This increase in design capacity may result from an increase in the permitted volume of the landfill or an increase in the density as documented in the annual recalculation required in Section 60.758(f) of 40 CFR 60 Subpart WWW [District Rule 2201 and 40 CFR 60.757(a)(3)]
50. Maintenance is defined as work performed on a gas collection system and/or control device in order to ensure continued compliance with District rules, regulations, and/or Permits to Operate, and to prevent its failure or malfunction. [District Rule 2201]
51. Landfill owners or operators who convert design capacity from volume to mass or mass to volume to demonstrate that landfill design capacity is less than 2.5 million megagrams or 2.5 million cubic meters, as provided in the definition of "design capacity", shall keep readily accessible, on-site records of the annual recalculation of site-specific density, design capacity, and the supporting documentation. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable. [40 CFR 60.758(f)]
52. Permittee shall record emission control device source test reports showing VOC destruction/treatment efficiency. [District Rule 2201]
53. Permittee shall maintain average monthly records of landfill gas flow rate to any control device(s) as well as the hours of operation of the control device(s) to show compliance with the daily influent flowrate limit. [District Rule 2201]
54. Landfill collection and control system may be operated intermittently provided the methane emission from the landfill do not exceed instantaneous or integrated limit requirements. [17 CCR 95464]
55. Landfill gas collection system wellheads must be operated under vacuum. Monthly monitoring of wellheads is required. [17 CCR 95464]
56. Landfill gas collection system components downstream of blower have a leak limit of 500 ppmv as methane. Components must be checked quarterly. [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. The flare must operate within the parameter ranges established during the initial or most recent source test. [17 CCR 95464]
59. 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]
60. Instantaneous and integrated landfill surface emissions measurements shall be done quarterly. The landfill may monitor annually provided they comply with requirements of 17 CCR 95469 (a)(1). [17 CCR 95469]

CONDITIONS CONTINUE ON NEXT PAGE

61. 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]
62. 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]
63. Permittee shall keep records of the expected gas generation flow rate calculated pursuant to section 95471(e). [17 CCR 95470]
64. 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]
65. 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]
66. Permittee shall keep records of the annual solid waste acceptance rate and the current amount of waste-in-place. [17 CCR 95470]
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. Documentation of approved alternative compliance options shall be available for inspection upon request. [17 CCR 95468]
74. Permittee shall maintain records of system inspections including: date, time and inspection results. [District Rule 2201]
75. Permittee shall maintain records of maintenance related or other collection system and control device downtime, including individual well shutdown. [District Rule 2201]
76. Permittee shall maintain records of the amount of soil cover in tons/day. [District Rule 2201]
77. The operator shall record emission control device source tests (emissions of CO, NO_x, and VOC) in pounds per MMBtu heat input. Operator shall also record VOC destruction/treatment efficiency. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

78. Daily records of the weight of materials received (tons) - including Class II/III waste material, Class II soil cover, and clean soil cover shall be maintained, kept on site for a period of five years, and made available to District staff upon request. [District Rule 2201]
79. A record of continuous flare combustion temperature, continuous volumetric gas flow rate, net heating value of landfill gas being combusted, daily landfill gas fuel consumption, and hourly heat input shall be maintained. [District Rule 2201]
80. Records of calculated landfill and flare VOC emissions shall be maintained. [District Rule 2201]
81. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
82. Except for the spreading of landfill cover, when handling bulk materials outside an enclosed structure or building, water or chemical/organic stabilizers/suppressants shall be applied as required to limit Visible Dust Emissions to a maximum of 20% opacity. When necessary to achieve this opacity limitation, wind barriers with less than 50% opacity shall also be used. [District Rules 8011 and 8031]
83. When storing bulk materials outside an enclosed structure or building, water or chemical/organic stabilizers/suppressants shall be applied as required to limit Visible Dust Emissions to a maximum of 20% opacity. When necessary to achieve this opacity limitation, all bulk material piles shall also be either maintained with a stabilized surface as defined in Section 3.58 of District Rule 8011, or shall be protected with suitable covers or barriers as prescribed in Table 8031-1, Section B, of District Rule 8031. [District Rules 8011 and 8031]
84. When transporting bulk materials outside an enclosed structure or building, all bulk material transport vehicles shall limit Visible Dust Emissions to 20% opacity by either limiting vehicular speed, maintaining sufficient freeboard on the load, applying water to the top of the load, or covering the load with a tarp or other suitable cover. [District Rules 8011 and 8031]
85. All outdoor chutes and conveyors shall be controlled by any of the following options: 1) full enclosure, 2) operation with material sufficiently wetted such that VDE is limited to 20% opacity, or 3) the concentration of particles having an aerodynamic diameter of 10 microns or less in the conveyed material shall be sufficiently small to limit VDE to 20% opacity. [District Rules 8011 and 8031]
86. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Rule 8041 or Rule 8011. [District Rules 8041 and 8011]
87. One or more of the following control measures shall be implemented on each day that 50 or more VDT (Vehicle Daily Trips), or 25 or more VDT with 3 or more axles, originates from within and remains exclusively within an unpaved vehicle/equipment traffic area: water, gravel, roadmix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure shall be applied to unpaved vehicle travel areas as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011]
88. On each day that 50 or more VDT (Vehicle Daily Trips), or 25 or more VDT with 3 or more axles, originates from within and remains exclusively within an unpaved vehicle/equipment traffic area, dusting materials accumulated on paved surfaces shall be removed daily or water and/or chemical/organic dust stabilizers/suppressants shall be applied to the paved surface as required to maintain continuous compliance with the requirements for a stabilized unpaved road as defined in District Rule 8011 and limit Visible Dust Emissions (VDE) to 20% opacity. [District Rules 8011 and 8071]
89. Whenever any portion of the site becomes inactive, Permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in Section 3.58 of District Rule 8011. [District Rules 8071 and 8011]
90. Records and other supporting documentation shall be maintained as required to demonstrate compliance with the requirements of the rules under Regulation VIII only for those days that a control measure was implemented. Such records shall include the type of control measure(s) used, the location and extent of coverage, and the date, amount, and frequency of application of dust suppressant, manufacturer's dust suppressant product information sheet that identifies the name of the dust suppressant and application instructions. Records shall be kept for one year following project completion that results in the termination of all dust generating activities. [District Rules 8031, 8071, and 8011]

CONDITIONS CONTINUE ON NEXT PAGE

91. The NMOC emission rate shall be calculated using the equation in 40CFR60.754(a)(1)(i), if the actual year-to-year solid waste acceptance rate is known or the equation in 40CFR60.754(a)(1)(ii), if the actual year-to-year solid waste acceptance rate is unknown. The values for k, Lo, and CNMOC for both equations shall be taken from 40CFR60.754(a)(1), as appropriate. Both equations may be used if the actual year-to-year acceptance rate is known for a part of the landfill life, but unknown for another part of the landfill life. The mass of nondegradable solid waste may be subtracted from the average annual acceptance rate when calculating R, if documentation of the nature and amount of such wastes is maintained. (Tier 1 specifications) [60.754(a)(1) and 60.34c] Federally Enforceable Through Title V Permit
92. If the calculated NMOC emission rate is equal to or greater than 50 megagrams/year, then the landfill owner or operator shall either comply with the requirements of this permit to submit a collection and control design plan and install the system, or determine a site-specific NMOC concentration and recalculate the NMOC emission rate using Tier 2 specifications. [60.754(a)(2)(ii) and 60.34c] Federally Enforceable Through Title V Permit
93. Tier 2 specifications to determine the site-specific NMOC concentration shall include the following: 1) For sampling, at least 2 sample probes shall be installed per hectare of landfill surface that has retained waste for at least 2 years, up to a maximum of 50 required probes. One sample of landfill gas shall be collected from each probe to determine the NMOC concentration, using EPA Method 25C or 18. If EPA Method 18 is used, the minimum list of compounds to be tested shall be those published in the most recent Compilation of AP-42. If composite sampling is used, equal sample volumes are required. All samples taken shall be used in the analysis. The NMOC concentration from Method 25C shall be divided by 6 to convert from C-NMOC, as carbon to as hexane. [60.754(a)(3) and 60.34c] Federally Enforceable Through Title V Permit
94. Tier 2 specifications to determine the site-specific NMOC concentration shall include the following: 1) The NMOC mass emission rate shall be recalculated using the average site-specific concentration, instead of the default value, 2) If the resulting calculated mass emission rate is equal to or greater than 50 megagrams/year, the landfill owner or operator shall either comply with 60.752(b)(2), or determine a site-specific methane generation rate constant and recalculate the NMOC emission rate using Tier 3 specifications. [60.754(a)(3)(i)&(ii) and 60.34c] Federally Enforceable Through Title V Permit
95. If the calculated NMOC mass emission rate, using the site-specific NMOC concentration, is less than 50 megagrams/year, then a periodic estimate of the emission rate report, pursuant to 60.757(b)(1) shall be submitted to the Administrator. The site-specific NMOC concentration shall be retested every 5 years, using Tier 2 specifications. [60.754(a)(3)(iii) and 60.34c] Federally Enforceable Through Title V Permit
96. Tier 3 specifications to determine the site-specific methane generation rate constant shall include the following: 1) EPA Method 2E shall be used, 2) The NMOC mass emission rate shall be recalculated using the average site-specific NMOC concentration and the site-specific methane generation rate constant k, instead of the default values in 40 CFR 60(a)(1), and 3) If the resulting calculated NMOC mass emission rate is equal to or greater than 50 megagrams/year, the landfill owner or operator shall comply with 60.752(b)(2). [60.754(a)(4) and (i) and 60.34c] Federally Enforceable Through Title V Permit
97. If Tier 3 specifications are used to determine the site-specific methane generation rate and the calculated NMOC mass emission rate is less than 50 megagrams/year, then a periodic emission rate report shall be submitted to the Administrator, pursuant to 60.757(b)(1) and the NMOC concentration shall be recalculated annually, pursuant to 60.757(b)(1), using the site-specific methane generation rate constant and the NMOC concentration obtained using Tier 2 specifications. Determination of the site-specific methane generation rate constant is performed once and used in all subsequent annual NMOC emission rate calculations. [60.754(a)(4)(ii) and 60.34c] Federally Enforceable Through Title V Permit
98. For PSD purposes, the NMOC emission rate shall be estimated and compared to the PSD major source and significance levels in 40 CFR 51.166 or 52.21, using AP-42 or EPA-approved procedures. [60.754(c) and 60.34c] Federally Enforceable Through Title V Permit
99. The NMOC emission rate shall be recalculated and reported to the APCO annually, except as otherwise provided in this permit, until such time as the calculated NMOC emission rate is equal to or greater than 50 megagrams/year and a collection and control system is installed or until the landfill is closed. [40 CFR 60.752(b)(1), 60.754(a), 60.757(b), 60.34c and 60.35c] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

100. If the NMOC emission rate, as reported in the annual report is less than 50 megagrams/year in each of the next 5 consecutive years, the owner or operator may elect to submit an estimate of the NMOC emission rate for the next 5-year period in lieu of the annual reports for those 5 years. This estimate shall include the current amount of solid waste-in-place and the estimated waste acceptance rate for each year of the 5 years. All data and calculations upon which this estimate is based shall be provided to the APCO. This estimate shall be revised at least once every 5 years. [60.757(b)(1)(ii) and 60.35c] Federally Enforceable Through Title V Permit
101. If the actual waste acceptance rate exceeds the estimated rate used in any year reported in a 5-year estimate of the NMOC emission rate, then a revised 5-year estimate shall be submitted to the APCO. The revised estimate shall cover the 5-year period beginning with the year in which the actual waste acceptance rate exceeded the estimated acceptance rate. [40 CFR 60.757(b)(1)(ii) and 60.35c] Federally Enforceable Through Title V Permit
102. The NMOC emission rate report shall include all the data, calculations, sample reports and measurements used to estimate the annual or 5-year emissions. [40 CFR 60.757(b)(2) and 60.35c] Federally Enforceable Through Title V Permit
103. If the owner or operator elects to recalculate the NMOC emission rate using Tier 2 specifications and the resulting NMOC emission rate is less than 50 megagrams/year, annual periodic reporting shall resume. The revised NMOC emission rate report, with the recalculated NMOC emission rate using Tier 2 specifications, shall be submitted within 180 days of the first Tier 1 calculated exceedance of 50 megagrams/year. [40 CFR 60.757(c)(1) and 60.35c] Federally Enforceable Through Title V Permit
104. If the owner or operator elects to recalculate the NMOC emission rate using Tier 3 specifications and the resulting NMOC emission rate is less than 50 megagrams/year, annual periodic reporting shall resume. The revised NMOC emission rate report, with the recalculated NMOC emission rate using Tier 3 specifications, shall be submitted within 1 year of the first Tier 1 calculated exceedance of 50 megagrams/year. [40 CFR 60.757(c)(2) and 60.35c] Federally Enforceable Through Title V Permit
105. Each owner or operator shall keep for at least 5 years up-to-date, readily accessible, on-site records of the maximum design capacity, the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. [60.758(a), 60.35c and District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
106. This operating permit may be cancelled with APCO approval when the landfill 1) is closed, pursuant to the requirements of this permit, 2) never needed control, and 3) is not otherwise subject to the requirements of part 40 CFR 70. [40 CFR 60.32c(d) and 60.752(b)] Federally Enforceable Through Title V Permit
107. If the landfill is permanently closed, a closure notification shall be submitted to the APCO within 30 days of waste disposal cessation. A permanent closure must take place in accordance with 40 CFR 258.60. If a closure report has been submitted, no additional waste may be placed in the landfill without filing a notification of modification to the APCO, pursuant to 40 CFR 60.7(a)(4). [40 CFR 60.752(b)(1)(ii)(B), 60.757(d) and 60.35c] Federally Enforceable Through Title V Permit
108. If the calculated NMOC is equal to or greater than 50 megagrams/year, the owner or operator shall submit a collection and control system design plan, pursuant to 40 CFR 60.752(b)(2)(i) and prepared by a professional engineer, to the APCO within 1 year of that determination. [40 CFR 60.752(b)(2)(i) and 60.36c(b)] Federally Enforceable Through Title V Permit
109. If the calculated NMOC is equal to or greater than 50 megagrams/year, the owner or operator shall install a collection and control system, that effectively captures the gas generated within the landfill, within 30 months of that determination. This operating permit must be modified accordingly to show compliance with 40 CFR 60, Subpart Cc requirements applicable to a MSWL with a collection and control system. [40 CFR 60.752(b)(2)(ii), 60.753, 60.755, 60.756, 60.34c and 60.36c(b)] Federally Enforceable Through Title V Permit
110. If a gas collection and control system is installed, it shall comply with the operational standards of 40 CFR 60.753, the compliance provisions of 40 CFR 60.755, the monitoring provisions of 40 CFR 60.756, the reporting and recordkeeping requirements of 40 CFR 60.757 and 60.758, and the requirements of 40 CFR 60.759 (for active collection systems). [40 CFR 60.34c; 40 CFR 60.752(b)(2)(ii), 60.753, 60.755, 60.756, 60.757, 60.758, and 60.759] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

111. Compliance with permit conditions in the Title V permit shall be deemed compliance with EPA-approved State Plan for implementing 40 CFR 60, Subpart Cc. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
112. The issuance of this permit has met the procedural requirements of 40 CFR part 70. This permit shall be converted to a Title V operating permit and these conditions shall become federally enforceable through administrative amendment, upon approval of the State plan to implement the Emission Guidelines. [District Rule 2520, 3.2; 40 CFR 60.32c(c) and 60.33c(a)] Federally Enforceable Through Title V Permit

ATTACHMENT C

Previous Title V Operating Permit No
C-3074-8-2

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-3074-8-2

EXPIRATION DATE: 10/31/2018

EQUIPMENT DESCRIPTION:

57 ACRE MUNICIPAL SOLID WASTE LANDFILL (2.7 MILLION CUBIC YARD) WITH A LANDFILL GAS COLLECTION AND CONTROL SYSTEM, INCLUDING UP TO 18 COLLECTION WELLS, PIPING, VACUUM PUMP/BLOWER, CONDENSATE TRAPS AND A 5,000 GALLON CONDENSATE STORAGE TANK, CONTROLLED BY AN ENCLOSED GROUND FLARE (30 MMBTU/HR MAXIMUM)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Only landfill gas or LPG/propane shall be used as auxiliary fuels for the combustion of VOC. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Sampling ports shall be installed on each well head. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Gas collection system shall be operated in a manner which maximizes the amount of landfill gas extracted while preventing overdraw that can cause fires or damage the gas collection system. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Landfill gas line from collection header shall be equipped with a gas flow rate measurement device. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Landfill gas collection system shall be equipped with an enclosed flare having VOC destruction efficiency of at least 98% by weight, or reduce the VOC concentration (measured as methane) to 20 ppmv @ 3% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Methane destruction efficiency shall be at least 99% by weight. [17 CCR 95464]
8. The minimum operating temperature for the combustion chamber of the flare shall be maintained at or above 1,400 degrees F. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The flare shall be equipped with an operational temperature gauge to indicate the temperature of the combustion chamber. A continuously recording device shall be utilized to indicate the combustion chamber temperature during operation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The landfill gas vapor collection system shall not be operated unless the combustion chamber is at or above minimum operating temperature. The system shall automatically terminate operation if the temperature drops below the minimum operating temperature. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Excavated solid waste shall be covered using fresh soil, plastic sheeting, or vapor retarding foam as necessary to prevent odorous emissions and to minimize the release of landfill gas. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Maintenance is defined as any work performed on the gas collection system and/or control device in order to ensure continued compliance with District rules, regulations, and/or Permits to Operate, and to prevent its failure or malfunction. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The permittee shall notify the APCO by telephone at least 24 hours before performing any maintenance work that requires the system to be shutdown. The notification shall include a description of work, the date work will be performed and the amount of time needed to complete the maintenance work. [District Rule 2201] Federally Enforceable Through Title V Permit
14. During maintenance of the landfill gas collection system or incineration device, emissions of landfill gas shall be minimized during shutdown. [District Rule 2201]
15. Emission rates from the flare shall not exceed any of the following limits: 0.05 lb-NO_x/MMBtu; 0.006 lb-VOC/MMBtu; 0.2 lb-CO/MMBtu; 0.05 lb-PM₁₀/MMBtu; or 0.033 lb-SO_x/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The total VOC emissions from the landfill gas vapor collection system served by the flare shall not exceed 71.3 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The influent gas flowrate into the control device shall not exceed 1,667 scfm. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Source testing to demonstrate VOC destruction efficiency or VOC emission concentration limits shall be conducted annually. [District Rules 2201, 1081 and 17 CCR 95464] Federally Enforceable Through Title V Permit
19. The operator shall measure daily, in actual cubic feet, the volumetric flow rate of the collected landfill gas entering the flare. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Simultaneous grab samples shall be taken at the inlet to the flare and in the exhaust of the control device. The VOC concentrations of the samples shall be determined by using EPA Test Method 25 referenced as methane. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The destruction efficiency of the flare shall be calculated using the following equation: $\text{Destruction Efficiency} = [1 - ((a \times b) / (c \times d))] \times 100\%$, where a = measured concentration of VOC in the flare exhaust, b = exhaust flow of flare, c = measured concentration of VOC in the landfill gas entering the flare, and d = inlet flow of flare. [District Rule 2201] Federally Enforceable Through Title V Permit
22. During annual source testing, the volumetric flow rate of the flare effluent gases shall be measured using CARB Method 2 or EPA Method 19. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The heating value of the process gas shall be determined by using the latest revision of test method ASTM D1826 or ASTM D3588. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days after testing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
25. An amended landfill design capacity report shall be submitted to the District and to US EPA providing notification of an increase in the design capacity of the landfill, within 90 days of an increase in the maximum design capacity of the landfill to or above 2.5 million megagrams and 2.5 million cubic meters. This increase in design capacity may result from an increase in the permitted volume of the landfill or an increase in the density as documented in the annual recalculation required in 60.758(f) of 40 CFR 60 Subpart WWW [District Rule 2201 and 40 CFR 60.757(a)(3)] Federally Enforceable Through Title V Permit
26. Landfill owners or operators who convert design capacity from volume to mass or mass to volume to demonstrate that landfill design capacity is less than 2.5 million megagrams or 2.5 million cubic meters, as provided in the definition of "design capacity", shall keep readily accessible, on-site records of the annual recalculation of site-specific density, design capacity, and the supporting documentation. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable. [40 CFR 60.758(f)] Federally Enforceable Through Title V Permit
27. Permittee shall record emission control device source test reports showing VOC destruction/treatment efficiency. [District Rule 2201] 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.

28. Permittee shall maintain average monthly records of landfill gas flow rate to any control device(s) as well as the hours of operation of the control device(s) to show compliance with the daily influent flowrate limit. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Landfill collection and control system may be operated intermittently provided the methane emission from the landfill do not exceed instantaneous or integrated limit requirements. [17 CCR 95464]
30. 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, while GCCS is offline during intermittent operation as allowed in this permit, or during other times as allowed in sections 95464 (c), 95464(d), and 95464(e) [17 CCR 95464, 17 CCR 95468]
31. Landfill gas collection system components downstream of blower have a leak limit of 500 ppmv as methane. Components must be checked quarterly. [17 CCR 95464]
32. The flare must have automatic dampers, an automatic shutdown device, a flame arrester, and continuous recording temperature sensors. [17 CCR 95464]
33. The flare must operate within the parameter ranges established during the initial or most recent source test. [17 CCR 95464]
34. 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]
35. Instantaneous and integrated landfill surface emissions measurements shall be done quarterly. The landfill may monitor annually provided they comply with requirements of 17 CCR 95469 (a)(1). [17 CCR 95469]
36. 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]
37. 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]
38. Permittee shall keep records of the expected gas generation flow rate calculated pursuant to section 95471(e). [17 CCR 95470]
39. 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]
40. Permittee shall keep records of delays encountered during repair of leaks or repair of positive wellhead readings. Documentation of delays shall be submitted with the annual report. [17 CCR 95468]
41. Permittee shall identify areas which are dangerous and unable to be inspected. Areas shall be clearly identified on a map of the facility. A copy of the map shall be kept onsite as well as submitted with the annual report. [17 CCR 95468]
42. Permittee shall conduct monitoring of the landfill surface within 3 inches of the surface. The facility may monitor surface emissions with the probe tip at the height of the vegetation if there is vegetation and it is impractical to monitor at 3 inches from the landfill surface. [17 CCR 95468]
43. 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]
44. Permittee shall only conduct surface emission testing when precipitation has met the following requirements. It has been 24 hours since measured precipitation of 0.01 to 0.15 inches. It has been 48 hours since measured precipitation of 0.16 to 0.24 inches. It has been 72 hours since measured precipitation of 0.25 or more inches. [17 CCR 95468]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

45. 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]
46. Permittee shall keep records of the annual solid waste acceptance rate and the current amount of waste-in-place. [17 CCR 95470]
47. 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]
48. Permittee shall keep records of any source tests conducted pursuant to section 95464(b)(4). [17 CCR 95470]
49. 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]
50. 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]
51. 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]
52. 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]
53. 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 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]
54. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and Fresno County Rule 107] Federally Enforceable Through Title V Permit

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

ATTACHMENT D

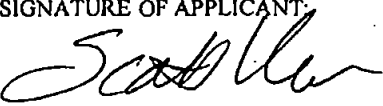
Emission Increases

Stationary Source Emission Increases			
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	Emission Increase (lb/year)
NO _x	13,140	13,140	0
SO _x	8,760	8,760	0
PM ₁₀	24,206	24,206	0
CO	52,560	52,560	0
VOC	17,227	11,327	5,900

ATTACHMENT E

Application

RECEIVED**San Joaquin Valley Air Pollution Control District** MAY 16 2014www.valleyair.org**Permits Services**
SJVAPCD**Permit Application For:**☐ ADMINISTRATIVE AMENDMENT ☐ MINOR MODIFICATION ☒ SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>City of Clovis</u>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>1033 Fifth Street</u> CITY: <u>Clovis</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93612</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>15679 Auberry Road</u> CITY: <u>Clovis</u> ____ 1/4 SECTION ____ TOWNSHIP ____ RANGE ____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <u>Municipal Solid Waste Landfill</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>Increase in permitted waste capacity of landfill from 2.7 million cubic yards to 10.45 million cubic yards, per ATC C-3074-8-4.</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>Scott Redelfs</u>	TITLE OF APPLICANT: <u>Assistant Public Utilities Director</u>
7. SIGNATURE OF APPLICANT:  DATE: <u>5/16/14</u>	PHONE: <u>(559) 324-2648</u> FAX: <u>(559) 324-2862</u> EMAIL: <u>scottr@ci.clovis.ca.us</u>

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ <u>0</u>	CHECK#: <u>—</u>
	DATE PAID: <u>—</u>	
	PROJECT NO: <u>C-1141560</u>	FACILITY ID: <u>C-3074</u>

San Joaquin Valley Air Pollution Control District

www.valleyair.org

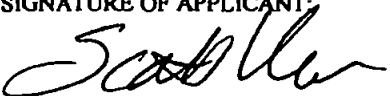
RECEIVED

MAY 19 2014

Permits Services
SJVAPCD

Permit Application For:

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

1. PERMIT TO BE ISSUED TO: City of Clovis	
2. MAILING ADDRESS: STREET/P.O. BOX: 1033 Fifth Street CITY: Clovis STATE: CA 9-DIGIT ZIP CODE: 93612	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 15679 Amberry Road CITY: Clovis 1/4 SECTION TOWNSHIP RANGE	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) Increase in permitted waste capacity of landfill from 2.7 million cubic yards to 10.45 million cubic yards, per ATC C-3074-8-4.	
6. TYPE OR PRINT NAME OF APPLICANT: Scott Redelfs	TITLE OF APPLICANT: Assistant Public Utilities Director
7. SIGNATURE OF APPLICANT: 	DATE: 5/16/14 PHONE: (559) 324-2648 FAX: (559) 324-2862 EMAIL: scottr@ci.clovis.ca.us

For APCD Use Only:

DATE STAMP RECIEVED MAY 20 2014 FINANCE SJVUAPCD	FILING FEE RECEIVED: \$ 19.00 CHECK#: 1317 DATE PAID: 5/16/14 PROJECT NO: C-1141504 FACILITY ID: C-3074
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**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
☐ MINOR PERMIT MODIFICATION

☐ ADMINISTRATIVE
AMENDMENT

COMPANY NAME:	FACILITY ID: C - 3074
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input checked="" type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: City of Clovis	
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

5/12/14

Date

Scott Redelfs

Name of Responsible Official (please print)

Assistant Public Utilities Director

Title of Responsible Official (please print)