### VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

4567 Telephone Road Ventura, CA 93003 805/303-4005

### **PART 70 PERMIT**

Number 07340

Permit Term: February 11, 2019 to December 31, 2023

Company Name / Address:Facility Name / Address:Ventura Regional Sanitation DistrictToland Road Landfill4105 W. Gonzales Road3500 Toland RoadOxnard, CA 93036Santa Paula, CA 93060

Responsible Official:Title V Contact:Richard JonesEdward PettitDirector of OperationsRegulatory Compliance Officer805/658-4679805/658-4678

The Part 70 permit consists of this page and the tables, attachments and conditions listed in the attached table of contents. The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

Pursuant to Rule 33.1, the Part 70 permit shall also serve as a permit to operate issued to fulfill the requirements of Rule 10.B.

Ali R. Ghasemi

Air Pollution Control Officer

Alip De

March 20, 2023

### VENTURA REGIONAL SANITATION DISTRICT TOLAND ROAD LANDFILL PART 70 PERMIT NO. 07340 TABLE OF CONTENTS

- 1. Permit Cover Sheet
  - a. Permit Revisions Table
  - b. Permit Summary and Statement of Basis
  - c. Periodic Monitoring Summary
- 2. Permitted Equipment and Applicable Requirements Table
  - a. Equipment List Description Key
  - b. Applicable Requirement Code Key
- 3. Permitted Throughput and Consumption Limit Table
- 4. Permitted Emissions Table
- 5. Exempt Equipment List
- 6. Specific Applicable Requirements (Attachments)
  - a. Rule 70, Storage and Transfer of Gasoline (70N3-07340)
  - b. Rule 74.17.1, Municipal Solid Waste Landfills (74.17.1N5-07340)
    Implements 40 CFR Part 60, Subpart Cc, Emission Guidelines and Compliance
    Times for Municipal Solid Waste Landfills and requires compliance with specific
    sections of 40 CFR Part 60, Subpart WWW, Standards of Performance for Municipal
    Solid Waste Landfills
  - c. 40 CFR Part 63, Subpart AAAA, NESHAPS for Municipal Solid Waste Landfills (40CFR63AAAA)
  - d. Title 17, California Code of Regulations, Sections 95460 to 95476, Methane Emissions From Municipal Solid Waste Landfills (CARB CH4fromMSW)
- 7. Permit Specific Conditions (Attachments)
  - a. General Recordkeeping Requirements (PO07340PC1)
    - Rule 26, New Source Review
    - Rule 29, Conditions on Permits
  - b. Landfill Gas Collection and Control System Flare (PO07340PC2)
    - Rule 26, New Source Review
    - Rule 51, Nuisance
    - Rule 54, Sulfur Compounds
    - Rule 57.1, Particulate Matter Emissions From Fuel Burning Equipment
    - Rule 74.17.1, Municipal Solid Waste Landfills

Section No. 1 Table of Contents (07340-171,191)

- c. 250 KW Micro-Turbines (PO07340PC3)
  - Rule 51, Nuisance
  - Rule 54, Sulfur Compounds
  - Rule 64, Sulfur Content of Fuels
  - Rule 74.17.1, Municipal Solid Waste Landfills
  - 40 CFR Part 60, Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills
- d. Biosolids Drying System Out of Service (PO07340PC4) Rule 26, New Source Review
- 8. General Applicable Requirements (Attachments)
  - a. Rule 50, Opacity (50)
  - b. Rule 54.B.1, Sulfur Compounds SOx at Point of Discharge (54.B.1)
  - c. Rule 54.B.2, Sulfur Compounds SOx at or Beyond Property Line (54.B.2)
  - d. Rule 55, "Fugitive Dust" (55)
  - e. Rule 57.1, Particulate Matter Emissions From Fuel Burning Equipment (57.1)
  - f. Rule 64.B.1, Sulfur Content of Fuels Gaseous Fuels (64.B.1)
  - g. Rule 64.B.2, Sulfur Content of Fuels Liquid Fuels (64.B.2)
  - h. Rule 74.6, Surface Cleaning and Degreasing (74.6)
  - i. Rule 74.11.1, Large Water Heaters and Small Boilers (74.11.1)
  - j. Rule 74.22, Natural Gas-Fired Central Furnaces (74.22)
- 9. General Requirements for Short-Term Activities (Attachments)
  - a. Rule 74.1, Abrasive Blasting (74.1)
  - b. Rule 74.2, Architectural Coatings (74.2)
  - c. Rule 74.4.D, Cutback Asphalt (74.4.D)
  - d. Rule 74.28, Asphalt Roofing Operations (74.28)
  - e. Rule 74.29, Soil Decontamination Operations (74.29N3)
  - f. 40 CFR Part 61 Subpart M Asbestos NESHAPS (40CFR61.M)
- 10. General Permit Conditions
  - a. General Part 70 Permit Conditions (Part 70 General)
  - b. General Permit to Operate Conditions (PO General)
- 11. Miscellaneous Federal Program Conditions
  - a. Part 70 Permit Shield 40 CFR, Part 64, Compliance Assurance Monitoring (Shield-40 CFR64)
  - b. 40 CFR, Part 68 Accidental Release Prevention and Risk Management Plans (40CFR68)
  - c. 40 CFR, Part 82 Protection of Stratospheric Ozone (40CFR82)
- 12. Part 70 Permit Application Package The application is included for reference only and is not part of the Part 70 Permit

Section No. 1 Table of Contents (07340-171,191)

### PART 70 PERMIT NO. 07340 PERMIT REVISIONS

Application No.	Issue Date	Description	Revised Permit Sections
07340-ADM1	02/20/03	Administrative Amendment	Signature Cover Page
	02/20/03	to revise permitted emissions	<ul> <li>Table of Contents</li> </ul>
		of gasoline storage tank due	<ul> <li>Permit Revisions Table</li> </ul>
		to round-off of combined	
		permits	• Table No. 4 (Permitted Emissions)
07340-121	04/12/05	1	/
0/340-121	04/12/03	Add 70 kW Ingersoll-Rand PowerWorks Micro-Turbine	Signature Cover Page  Table of Contents
		/ Minor Part 70 Permit	Table of Contents
		Modification	Permit Revisions Table
		Wiodification	Stationary Source
			Description
			Periodic Monitoring
			Summary
			• Table No. 2
			Applicable Requirements
			Code Key
			• Table No. 3
			• Table No. 4
			• Remove Attachment
			74.17.1N2
			• Attachment 74.17.1N5-
			07340
			• Attachment PO07340PC2
			• Attachment PO07340PC3
			• Remove Attachment 52
			• Attachment 57.1
			• Remove Attachment 57.B
			• Remove Attachment 68
			• Attachment 74.6 (2003)
			• Remove Attachment 74.6
07340-141	07/01/07	Administrative Amendment	Signature Cover Page
		to change the Responsible	Permit Revisions Table
		Official and Title V Contact	Totalic Ito (Island I wale
07340-151	08/04/08	Permit Reissuance for Term	See "Permit Summary and
		Ending December 31, 2012	Statement of Basis"
07340-ADM	09/03/09	Administrative Amendment	Signature Cover Page
			Permit Revisions Table
		Correct name of Title V	1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
		Contact	

Application No.	Issue Date	Description	Revised Permit Sections
07340-132	01/05/12	Permitted Nine (9) Micro-	Signature Cover Page
		Turbines per AC No. 07340-	Table of Contents
		130	Permit Revisions Table
			Permit Summary and
			Statement of Basis
			Periodic Monitoring
			Summary
			• Table No. 2
			Equipment List
			Description Key
			(glossary)
			• Table No. 3
			• Table No. 4
			• Attachment 74.17.1N5-
			07340
			• Remove Attachment
			PO07340PC3
			• Attachment PO07340PC4
07340-171	02/11/2019	App 07340-171: Permit	See "Permit Summary and
07340-191		Reissuance for Five Year	Statement of Basis"
		Term Ending 12/31/23	
		App 07340-191: Increase	
		LFG Consumption at Flare;	
		Withdraw Applications	
		07340-131, 07340-161, and	
		07340-181 (Biosolids	
		Drying System – Non-	
0.70.40.65	0.0 / 0.0 / 0.0	Operational)	
07340-201	09/23/20	Administrative Amendment	Signature Cover Page
		to change the Responsible	Permit Revisions Table
0.70.40.004	00/00/00	Official	
07340-221	03/20/23	Administrative Amendment	Signature Cover Page
		to change the Responsible Official	Permit Revisions Table

 $M:\ \ TITLEV\ \ Permits\ \ \ Po7340\ \ Permit\ III\ \ \ \ 07340\ \ -\ 221\ \ Revisions\ \ Table-221.docx$ 

### 1.b. PERMIT SUMMARY AND STATEMENT OF BASIS

### Stationary Source Description

The Ventura Regional Sanitation District's (VRSD) Toland Road Landfill is located in eastern Ventura County between the cities of Santa Paula and Fillmore, north of Highway 126. This municipal solid waste landfill began accepting waste in 1962 and was expanded in 1996. The landfill has a Standard Industrial Classification (SIC) Code of 4953, Sanitary Services-Refuse Systems. The source operates a landfill gas collection system that routes the gas to a collection header for combustion in a flare and micro-turbines. The micro-turbines generate electricity for the facility and for off-site export. The source also includes a 2,000 gallon aboveground gasoline tank.

The Toland Road Landfill is subject to Title V permitting as the facility is subject to Ventura County APCD Rule 74.17.1, "Municipal Solid Waste Landfills". Rule 74.17.1 was submitted to EPA as part of the California State Plan to control emissions from existing municipal solid waste landfills as required by 40 CFR Part 60, Subpart Cc, "Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills". EPA approved the California State Plan on November 22, 1999, which required the submittal of a Title V application by February 20, 2001.

As discussed in more detail throughout this Permit Summary and Statement of Basis, this permit applies to emissions units that are required to have a permit to operate pursuant to District Rule 10, "Permits Required", and District Rule 23, "Exemptions from Permit". These emissions units are listed in Table No. 2 in Section No. 2 of this permit. However, as discussed below, some equipment that is exempt from permit pursuant to District Rule 23, "Exemptions from Permit", may be subject to District rules such as District Rule 50, "Opacity", and Rule 55, "Fugitive Dust". This includes "Insignificant Activities" as listed in Section No. 5 of the permit. In addition, "Short Term Activities" as listed in Section No. 9 of the permit are subject to certain rules and regulations. This permit does not regulate or restrict the use of motor vehicles and mobile equipment such as cars, trucks, bulldozers, and forklifts, however, any smoke or dust emissions generated from the use of such equipment is subject to District Rule 50, "Opacity". This permit does not shield the permittee from complying with any Federal, State, or District rule or regulation that is not specifically addressed in the permit or any rule or regulation that may come into effect during the term of the permit.

### Stationary Source Emissions

In Ventura County, the Part 70 permit thresholds are 50 tons per year for ROC and NOx and 100 tons per year for PM, SOx, and CO, pursuant to Rule 33.B.2 and Ventura County's "Serious" nonattainment classification with the federal ozone standard. Ventura County's nonattainment classification with the federal ozone standard has been in transition and is currently set at "Serious". As stated above, this stationary source is subject to the Part 70 Permit program because it is subject to District Rule 74.17.1. The potential to emit of the criteria pollutants do not exceed any of the Part 70 Permit program thresholds. The purpose of Table No. 4 is to document the permitted emissions of the criteria pollutants ROC, NOx, PM, SOx, and CO for this stationary source. District Rule 29, "Conditions on Permits", requires permitted emissions to

be included on each Permit to Operate. District Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

Criteria pollutant emissions (ROC, NOx, PM, SOx, and CO) result from the combustion of landfill gas in the flare and micro-turbines. Reactive Organic Compound (ROC) emissions result from the aboveground gasoline storage tank and the landfill gas and condensate collection and storage equipment.

This stationary source is not a major source of federal Hazardous Air Pollutants (HAPs). The source is well below the HAP major source levels of 10 tons per year of a single HAP or 25 tons per year of combined HAPs. Attachment PO07340PC2 requires that the landfill gas and the landfill gas flare be subject to toxics source testing every four years. The most recent toxics source testing at the flare was conducted October 26, 2017.

The goal of the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (California Health and Safety Code Section 44300) is to collect air toxics emission data, to identify facilities having localized adverse health impacts, to ascertain health risks, to notify nearby workers and residents of significant risks, and to reduce significant risks if they exist. Under state law, motor vehicles (on-road and off-road) are not subject to the "Hot Spots" program. This facility has been subject to the "Hot Spots" program since initial Authority to Construct for the landfill gas collection system and flare (Authority to Construct No. 07340-100, issued December 7, 2000). Based on the quantity of toxic air contaminants released from the facility as determined by source testing, material balance calculations, and other engineering estimates, the potency and toxicity of materials released, and the proximity to sensitive receptors, this facility has been classified as "low level". As a low level facility, the stationary source is exempt from toxics reporting requirements unless any changes are made; such as facility changes, receptor changes, or toxicity calculation changes, which would put the facility in the "intermediate" category.

The United States EPA has added greenhouse gases (GHGs) to the list of regulated air pollutants. As of January 2, 2011, EPA has required that GHGs be calculated for each Title V stationary source and included in the Part 70 Permit. EPA has "tailored" the regulations to include GHGs, such that the Title V applicability for the stationary source based on GHGs alone is emissions of 100,000 tons per year of CO<sub>2</sub> equivalent emissions (CO<sub>2e</sub>). Greenhouse gases are defined as the aggregate group of six greenhouse gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons (by category), perfluorocarbons (by category), and sulfur hexafluoride. CO<sub>2e</sub> is the amount of greenhouse gases emitted relative to the global warming potential of each pollutant. The CO<sub>2e</sub> potential to emit for this stationary source has been calculated to be 120,977.8 metric tons per year, as stated in the Title V Reissuance application. This greenhouse gas emissions report includes both fugitive emissions from the landfill surface and landfill gas combustion emissions. This CO<sub>2e</sub> potential to emit does not include insignificant activities or equipment exempt from permit pursuant to Rule 23, "Exemptions From Permit". It is important to note however, that on June 23, 2014 the Supreme Court of the United States ruled that the

Tailoring Rule could not be used to require that GHGs be used for the determination of Title V permitting applicability.

### Compliance History

Upon reissuance of this Part 70 permit, the facility was determined to be in compliance with all applicable requirements. For the January 1, 1996 to February 7, 2019 time period, the facility received twenty (20) Notice of Violations (NOVs) as detailed in the "NOV by Facility" history for Facility No. 07340 located at the end of this section of the Part 70 Permit. The District has received approximately 100 complaints since 2010 for odors and/or dust for this stationary source. There has been some reduction in the number of complaints since 2015 when the Ventura County APCD began enforcing the California ARB Landfill Greenhouse Gas Regulation based on a 2015 MOU agreement with CARB (additional details below). Also the Biosolids Drying System has not operated since April 2015 (see additional details below).

### Equipment Description and Applicable Requirements - General

Applicable requirements for this stationary source are listed throughout the permit. The Table of Contents in the front of the permit summarizes the applicable requirements including the equipment specific requirements, the general applicable requirements, and the applicable requirements for short-term activities. Table No. 2 in Section No. 2 of this Permit to Operate details the applicable requirements for specific emissions units at the facility. Permit conditions that enforce these requirements are listed in Section No. 6, "Specific Applicable Requirements" and Section No. 7, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 6 and Section No. 7, there are additional general requirements that may apply to the emissions units listed in Table No. 2, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 8, "General Applicable Requirements"; Section No. 9, "General Requirements for Short-Term Activities"; Section No. 10, "General Permit Conditions"; and Section No. 11, "Miscellaneous Federal Program Conditions". A detailed applicability discussion and additional legal basis for the permit condition(s) is included with each attachment or set of permit conditions.

### Equipment Description and Applicable Requirements - Specific

As required by Rule 74.17.1, VRSD submitted a Gas Collection and Control System Design Plan on June 9, 1999. On December 7, 2000, the District issued VRSD Authority to Construct No. 07340-100 for a new landfill gas flare. The landfill gas collection system uses a combination of vertical and horizontal gas collection wells that are routed to a common collection header. The collected landfill gas is combusted in nine (9) 250 kilowatt Flex Energy (formerly Ingersoll-Rand) micro-turbines. Remaining landfill gas is directed to an 85.8 MMBTU/Hr LFG Specialties Inc. enclosed landfill gas flare. The micro-turbines are used to provide on-site electrical power, including power to charge on-site electric vehicles; and any additional power is delivered to the electrical grid.

The landfill gas flare is required to meet the NMOC (non-methane organic compounds) destruction efficiency requirements of Rule 74.17.1. The rule also limits the emissions of NOx (nitrogen oxides), and CO (carbon monoxide) from the flare. Rule 74.17.1 contains operational standards and monitoring, reporting, and recordkeeping requirements to make sure that adequate landfill gas is collected such that methane gas does not leak from the surface of the landfill. Landfill condensate and leachate is collected and stored in collection vessels. The collected condensate and leachate is either injected into the landfill gas flare, re-injected into the landfill waste mass, or transferred off-site for disposal. In addition to Rule 74.17.1, the collection vessels and the landfill gas flare have federally enforceable requirements and permit conditions that are based on Rule 26, "New Source Review".

The District adopted Rule 74.17.1, "Municipal Solid Waste Landfills", to implement the requirements of 40 CFR Part 60, Subpart Cc, "Emissions Guidelines and Compliance Times for Municipal Solid Waste Landfills". The EPA published the original proposal for the Emission Guidelines in the Federal Register on May 30, 1991 (56 FR 33790). The Emission Guidelines implement Section 111 of the Clean Air Act. Rule 74.17.1 requires compliance with specific sections of 40 CFR Part 60, Subpart WWW, "Standards of Performance for Municipal Solid Waste Landfills". The stationary source is also required to demonstrate compliance with the applicable sections of 40 CFR Part 63, Subpart AAAA, "National Emission Standards for Hazardous Air Pollutants (NESHAPS) for Municipal Solid Waste Landfills".

A new NSPS for MSW Landfills (40 CFR Part 60, Subpart XXX) was finalized on August 29, 2016 (81 FR 59332) and became effective on October 28, 2016. This NSPS is not applicable because the facility was not constructed, reconstructed, or modified after July 17, 2014.

The "Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills" (Emission Guidelines) have also been updated. 40 CFR Part 60, Subpart Cf became effective October 28, 2016 (81 FR 59275). The Emission Guidelines require the California ARB to submit a revised compliance plan to the U.S. EPA. On May 25, 2017 the ARB adopted California's State Plan to comply with the Emission Guidelines and the plan was submitted to U.S. EPA on May 30, 2017. Note that the California plan to comply with the new Emission Guidelines is essentially compliance with the "Landfill Methane Regulation" discussed below.

Title 17, California Code of Regulations, Sections 95460 to 95476, "Methane Emissions From Municipal Solid Waste Landfills", applies to this landfill. The purpose of the regulation is to reduce methane emissions from municipal solid waste landfills. The regulation is a greenhouse gas reduction measure, as described in the California Global Warming Act of 2006 (Assembly Bill 32). The regulation requires a landfill gas methane destruction efficiency of 99 percent by weight. The District signed a Memorandum of Understanding (MOU) with the California ARB on May 18, 2015 to implement and enforce this regulation. Prior to May 18, 2015, this regulation was implemented and enforced only by CARB. This regulation is not federally-enforceable.

The nine (9) microturbines are subject to 40 CFR Part 60, Subpart WWW, "Standards of Performance for Municipal Solid Waste Landfills". The LFG combustion is subject to 40 CFR

Section 60.752(b)(2)(iii)(C) because the LFG is routed through a treatment system that processes the gas for subsequent sale or use. Therefore, the microturbines are not subject to the control device requirements of a 98% NMOC reduction efficiency or a 20 ppmvd NMOC outlet limitation. The permittee is required to maintain documentation of a compliance determination from EPA stating that the LFG meets the "treated" requirements and is subject to Section 60.752(b)(2)(iii)(C) and not subject to the control requirements of 40 CFR Section 60.752(b)(2)(iii)(B) and the associated monitoring, recordkeeping, and reporting for such control devices.

There is a Biosolids Drying System at the landfill that has been placed on Permanent Non-Operational Status. The system was installed pursuant to Authority to Construct Nos. 07340-130 (issued March 9, 2009) and 07340-160 (issued June 27, 2012). The system operated under temporary Permit to Operate Nos. 07340-131, 07340-161, and 07340-181. Pursuant to Authority to Construct No. 07340-190 (issued February 2, 2016) the Biosolids Drying System was placed on Permanent Non-Operational Status with the submittal of Permit to Operate Application No. 07340-191 on February 3, 2016. VRSD has stated that the Biosolids Drying System has not operated since April 2015. Permit Specific Condition Attachment PO07340PC4 applies to the non-operational Biosolids Drying System and requires a new permit application for any future operation.

The landfill also has a 2,000-gallon aboveground gasoline storage tank that is equipped with Phase I and Phase II vapor recovery systems to comply with the best available control technology (BACT) requirements of Rule 26, "New Source Review", and Rule 70, "Storage and Transfer of Gasoline". The Rule 70 Phase II vapor recovery system re-verification testing conditions have been applied pursuant to the periodic monitoring requirements of 40 CFR Part 70.6(a)(3)(i)(B). The tank also meets the California mandated standing loss control requirements for aboveground gasoline tanks. The tank is a "split" tank that has other compartments for diesel fuel storage. Diesel fuel storage and transfer is exempt from APCD permit requirements and exempt from APCD Rule 70.

The facility has other equipment and activities necessary to support and maintain the refuse and disposal operations. These "insignificant activities" are listed in Section No. 5 of the permit. These activities are exempt from permit pursuant to Rule 23, "Exemptions From Permit", and include storage tanks for diesel fuel; and small engines for air compressors, welders, pressure washers, electricity generators, and landscaping.

This stationary source has stated that 40 CFR Part 68, "List of Regulated Substances and Thresholds for Accidental Release Prevention", is not an applicable requirement. Therefore, a risk management plan (RMP), pursuant to section 112(r) of the federal Clean Air Act as amended, is not required.

This permit also shields the source from the requirements of 40 CFR Part 64, "Compliance Assurance Monitoring". The landfill gas collection and control equipment is exempt from compliance assurance monitoring because these emission units and activities are subject to emission limitations and standards proposed by EPA after November 15, 1990 pursuant to Section 111 or 112 of the Clean Air Act.

### Permit Revisions Summary

The Permit Revisions Table (located in Section No. 1 of the permit) is a list of all permit revisions since Part 70 Permit No. 07340 was initially issued on January 1, 2003. A detailed list of a portion of the permit revisions is described below. The District's Engineering Analysis for each application can also be consulted for further details.

Application No. 07340-151: Application No. 07340-151 is for the reissuance of Part 70 Permit No. 07340 for the period terminating December 31, 2012. The following items summarize the changes from the initial Part 70 Permit No. 07340 (January 1, 2003 to December 31, 2007):

- Added a permit attachment for 40 CFR Part 63, Subpart AAAA, "National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills"
- Revised the solvent recordkeeping permit condition in Attachment PO07340PC1 to reflect the exempt status of the wipe cleaning operation.
- Added Attachment PO07340PC4 that applies to the non-operational Biosolids Drying System and requires a new permit application for any future operation.
- An annual gasoline throughput limit of 12,000 gallon per year has been imposed on the 2,000 gallon aboveground gasoline tank. This is based on the March 14, 2006 revisions to Rule 26.3, "New Source Review Exemptions", that removed the offset exemption for gasoline dispensing.
- The following rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the last permit revision of Part 70 Permit No. 07340:
  - a) Rule 50, "Opacity"
  - b) Rule 51, "Nuisance"
  - c) Rule 57.1, "Particulate Matter Emissions From Fuel Burning Equipment"
  - d) Rule 70, "Storage and Transfer of Gasoline"
  - e) Rule 74.2, "Architectural Coatings"
  - f) Rule 74.6, "Surface Cleaning and Degreasing"
  - g) Rule 74.29, "Soil Decontamination Operations"

Application No. 07340-132: Application No. 07340-132 is for the permitting of the nine (9) 250 KW Micro-Turbines pursuant to Authority to Construct No. 07430-130.

Application Nos. 07340-171 and 191: Application No. 07340-191 is for the permitting of the increase in the LFG consumption at the 85.8 MMBTU/hr Landfill Gas Flare and to place the Biosolids Drying System in a "Permanent Non-Operational Status" pursuant to Authority to Construct No. 07340-190 (issued February 2, 2016). The Biosolids Drying System was installed pursuant to Authority to Construct Nos. 07340-130 (issued March 9, 2009) and 07340-160 (issued June 27, 2012). The Biosolids Drying System operated under a temporary Permit to Operate pursuant to Application Nos. 07340-131, 07340-161, and 07340-181. These applications for the Biosolids Drying System have been withdrawn.

Application No. 07340-171 is for the reissuance of Part 70 Permit No. 07340 for the period ending December 31, 2023. Pursuant to Rule 33.9.A.1, a permit reissuance application shield

was granted to this stationary source on August 22, 2012. The following items summarize the significant changes from the previous Part 70 Permit No. 07340 reissuance:

- A discussion of Greenhouse Gases has been added to the Permit Summary and Statement of Basis.
- An attachment for the California ARB Methane Emissions From Municipal Solid Waste Landfills regulation has been added to the permit.
- A general attachment for Rule 55, "Fugitive Dust", has been added to the General Applicable Requirements Section.
- The California ARB requirements for Standing Loss Control for aboveground gasoline tanks have been added to Attachment 70N3.
- The following rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the last permit revision of Part 70 Permit No. 07340:
  - a) Rule 54, "Sulfur Compounds"
  - b) Rule 70, "Storage and Transfer of Gasoline"
  - c) Rule 74.2, "Architectural Coatings"
  - d) Rule 74.11.1, "Large Water Heaters and Small Boilers"
  - e) Rule 74.29, "Soil Decontamination Operations"

Note that the draft reissuance permit was first proposed to the EPA and the public on December 11, 2014 with the Biosolids Drying System in operation. A public hearing was conducted on May 14, 2015 to discuss this initial proposed permit. The Biosolids Drying System has since been placed in a "Permanent Non-Operational Status" as noted above.

This revised version of the proposed reissuance permit includes significant revisions as compared to the permit proposed to EPA on December 11, 2014. The following list details the significant revisions to the first proposed permit:

Biosolids Drying System (PO07340PC4) The Biosolids Drying System, and its associated air pollution control system, have been shut down and are no longer in operation. A single set of permit conditions for the Biosolids Drying System contained in PO07340PC4 has replaced a number of permit conditions in former PO07340PC4 through PO07340PC9. As detailed in PO07340PC4, the Biosolids Drying System has been placed on "Permanent Non-Operational Status" and any future operation of the Biosolids Drying System shall require a new Authority to Construct application that demonstrates compliance with all applicable rules and regulations including, but not limited to, the Best Available Control Technology (BACT) and emission offset requirements of Rule 26, "New Source Review," and Rule 51, "Nuisance." The shutdown of the Biosolids Drying System was formalized in Authority to Construct Application No. 07340-190 and its associated Permit to Operate Application No. 07340-191. These actions required the shutdown of the Biosolids Drying System and authorized an increase in the landfill gas consumption limit at the Landfill Gas Flare. Landfill gas that used to be combusted in the dryers and thermal oxidizer associated with the Biosolids Drying System will now be combusted in the Landfill Gas Flare. The Toland

Section No. 1 Page: 7

Road Landfill accepts primary and secondary sewage sludge for disposal in accordance with its solid waste permit and waste discharge requirements.

- California Air Resources Board Regulation "Methane Emissions From Municipal Solid Waste Landfills" (Attachment CARB CH4 from MSW) When this reissuance permit was first proposed to EPA on December 11, 2014, only the California Air Resources Board had the authority to implement and enforce this state regulation. The VCAPCD signed a Memorandum of Understanding (MOU) with the ARB on May 18, 2015 to implement and enforce this regulation.
- Updates to Attachment 74.17.1N5-07340 that highlight revisions to the New Source Performance Standards for municipal solid waste landfills.

Because of the above revisions, other sections of the permit have been revised to accommodate these changes. These other revisions include the Table of Contents, Periodic Monitoring Summary, and Table Nos. 2, 3, and 4. In addition, the Responsible Official listed on the permit has been changed from Frank Kiesler to Matt Baumgardner in response to a request from Ventura Regional Sanitation District.

M:\TITLEV\TV Permits\Po7340\Permit III\Statement of Basis-171.191.docx

NOV by Facility
Since January 1, 1996

Facility selected

07340

Facility No 07340 Toland Road Landfill

NOV D	NOW A	DI. M.			
NOV Date INC	ate NOV No	V No Kule Number Comment	Comment	Settlement	Date Closed
08/20/20	08/20/2007 021590	29.C	Permit Condition Not Met - Permit Renewal	\$2,500.00	10/19/2007
10/19/20	10/19/2010 022609	29.C	Permit Condition Not Met - Dehydration Chambers	\$5,000.00	01/17/2012
07/26/20	07/26/2011 022578	29.C.1	Permit Condition Not Met - Biosolids Hopper	\$3,500.00	02/02/2012
09/13/20	09/13/2011 022633	29.C	Permit Condition Not Met - Dehydration Chamber	\$44,500.00	11/29/2012
10/27/20	10/27/2011 022634	29.C	Permit Condition Not Met - Failed NOx Concentration	\$7,500.00	02/24/2012
04/05/20	04/05/2012 022729	29.C	Permit Condition Not Met - Leaking Leachate	\$10,000.00	06/25/2012
09/14/20	09/14/2015 022985	17CCR95465.(a)	Failure To Meet Landfill Surface Leak Threshold - Landfill 17 CCR 95465(a)(1)	\$2,465.00	12/27/2016
09/14/20	09/14/2015 022989	17CCR95464.(b)	Failure To Meet Landfill Component Leak Threshold - Landfill 17 CCR 95464(b)(1)	\$145.00	12/27/2016
09/14/20	09/14/2015 022990	17CCR95464.(b)	Failure To Route Landfill Gas To Collection System - Landfill 17 CCR 95464(b)(1)	\$145.00	12/27/2016
09/24/20	09/24/2015 023501	17CCR95465.(a)	Failure To Meet Landfill Surface Leak Threshold - Landfill 17 CCR 95465(a)(1)	\$580.00	12/27/2016
02/03/2016 02:	~~	492 17CCR95464.(b)	Failure To Meet Landfill Component Leak Threshold - Landfill 17 CCR 95464(b)(1)	\$435.00	12/27/2016

Thursday, February 7, 2019

\$435.00 12/27/2016	- \$870.00 12/27/2016	\$145.00 12/27/2016	\$500.00 05/03/2017	\$1,000.00 05/03/2017	\$500.00 05/03/2017	\$500.00 04/19/2018	\$1,500.00 04/19/2018	\$1,500.00 12/19/2018	\$83,720.00
Failure To Meet Landfill Surface Leak Threshold - Landfill 17 CCR 95465(a)(1)	Failure To Meet Landfill Component Leak - Threshold- Landfill 17 CCR 95464(b)(1)	Failure To Meet Landfill Surface Leak - Landfill 17 CCR 95465(a)(1)	ICIS AIR #CAVCAA66746 17CCR95464(b)(1)(A) Failure To Route Landfill Gas To Collection System - Landfill	ICIS AIR #CAVCAA66746 17CCR95464(b)(1)(B)Failure To Meet Landfill Component Leak Threshold - Landfill	ICIS AIR #CAVCAA66746 17CCR95465(a)(1) Failure To Meet Landfill Surface Leak Threshold - Landfill	ICIS AIR #CAVCAA71341 Failure To Meet Landfill Component Leak - Landfill	ICIS AIR #CAVCAA71341 Failure To Meet Landfill Surface Leak Threshold • Landfill	ICIS AIR #CAVCAA1455862 Failure To Meet Landfill Surface Leak - Landfill	
17CCR95465.(a)	17CCR95464.(b)	17CCR95465.(a)	17CCR95464.(b)	17CCR95464.(b)	17CCR95465.(a)	17CCR95464.(b)	17CCR95465.(a)	17CCR95465.(a)	
02/03/2016 023493	03/29/2016 023480	03/29/2016 023481	04/04/2017 023681	04/04/2017 023682	04/04/2017 023683	03/21/2018 023697	03/21/2018 023698	11/29/2018 023915	Total for 20 NOVs

## PERIODIC MONITORING SUMMARY

This periodic monitoring summary is intended to aid the permittee in quickly identifying key monitoring, recordkeeping, and reporting requirements. It is not intended to be used as a "stand alone" monitoring guidance document that completely satisfies the requirements specifically applicable to this facility. The following tables are included in the periodic monitoring summary:

- Table 1.a Specific Applicable Requirements
  - Table 1.b Permit-Specific Conditions
- Table 1.c General Applicable Requirements
- Table 1.d General Requirements for Short-Term Activities

### 1a. Specific Applicable Requirements

The Specific Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 6 of this permit.

Comments				
Test Methods	•Static Test (ARB TP- 201.3b) •Dynamic Test (ARB TP- 201.4)	•NMOC-EPA Test Method 25, 25C or 18 •NOx – EPA Method 7 (flare) •CO – EPA Method 10 (flare) •Calorific value –ASTM Method D1826-77 •O2 – EPA Method 3A •Exhaust Flow – F Factor EPA Method 19 •Surface Methane – EPA Method 21		•See Section 95471(f)
Semi-annual Reports	None	Reports of exceedances Reports of new wells	•SSM plan reports	None
Recordkeeping	Records of tests conducted     Log of maintenance conducted     Records of daily inspections	Records of waste in place and annual waste acceptance rate     Records of flare testing     Records of flare temperature and landfill gas flow to the flare     Records of existing wells, newly installed wells, and planned wells     Records of methane concentration at the landfill surface     Records of asbestos-containing or nondegradable waste     Records of exceedances	Records of SSM plan	•As required by Section 95470
Monitoring	Annual compliance certification     Static pressure test every two years     Dynamic pressure test every four years     Daily inspections of Phase II vapor recovery system	Annual compliance certification     Monitor flare and turbine gas flow rate and flare temperature     Monitor wells and collection header (temperature, pressure, nitrogen, oxygen)     Monitor methane concentration at the surface of the landfill     Source test flare every 24 months     (NMOC, NOx, and CO)	<ul> <li>Annual compliance certification</li> <li>Comply with 40 CFR Part 60, Subpart Cc</li> <li>Develop a startup, shutdown, malfunction (SSM) plan</li> </ul>	Annual compliance certification     Annual source test for CH4 destruction     Quarterly surface monitoring
Applicable Rule or Requirement	Rule 70	Rule 74.17.1	40 CFR Part 63, Subpart AAAA	Methane Emissions from Municipal Solid Waste Landfills
Attachment No./ Condition No.	70N3	74.17.1N5-07340	40CFR63AAAA	CARB CH4fromMSW

### 1b. Permit-Specific Conditions

The Permit-Specific Conditions Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 7 of this permit.

					-						
Comments		District	enforceable only					Not required based on District EPA emission factor	वावाप्रधार	District enforceable only	District enforceable only
Test Methods	None	None	None	ROC-EPA Test Method     S or 18     NOx FPA Method 7	• H2S – colorimetric	<ul> <li>Sulfur Compounds - EPA Test Method 6. 6A. 6C.</li> </ul>	8, 15, 16A, 16B, or SCAQMD Method 307-	None	None	APCD approved test protocol	APCD approved test protocol
Semi-annual Reports	None	None	None	None	None			None	None	None	None
Recordkeeping	Monthly records of throughput and consumption	Solvent use exemption records	•Landfill gas flow rate and heating value	Records of flare temperature     Records of source tests	Records of daily H2S LFG content monitoring	Records of monthly total sulfur LFG content measurement	<ul> <li>Records of source tests, if requested</li> </ul>	•None	•None	•Records of source tests	Records of source tests
Monitoring	<ul> <li>Annual compliance certification</li> <li>Monthly records of throughput and consumption</li> </ul>	Annual compliance certification	Annual compliance certification     Landfill gas flow rate and heating value	•Annual compliance certification •Flare temperature •Testing every 2 years (ROC,NOx)	Annual compliance certification     Daily H2S LFG content monitoring	Monthly total sulfur LFG content     SOx source test upon request	•Modeling upon request	<ul> <li>Annual compliance certification</li> </ul>	Annual compliance certification	Source testing	Source testing
Applicable Rule or Requirement	Kule 26 General Recordkeeping	Rule 29 Solvent Use	Rule 26 Annual Flare Combustion Limit	Rule 26 Flare BACT Limits	Rules 26 and 54 LFG Sulfur content 60	ppmv limit as H2S		Rule 57.1	Rule 26 Flare Equipment and Operation Requirements	Rule 51 Flare Dimensions and Exhaust Velocity	Rule 51 Toxics Testing and HRA Requirements
Condition No.	Condition No. 1	PO7340PC1 - Condition No. 2	PO7340PC2 - Condition No. 1	PO7340PC2 - Condition Nos. 2 and 12	PO7340PC2 - Condition Nos. 3, 4,	and 12		PO7340PC2 - Condition No. 5	PO7340PC2 - Condition Nos. 6, 7, and 8	PO7340PC2 - Condition No. 9	PO7340PC2 - Condition Nos. 10, 11, and 12

1b. Permit-Specific Conditions (Continued)

Comments						
Test Methods	None	H2S Daily – colorimetric method     Sulfur Compounds     Monthly - SCAQMD     Method 207. 01	None	None	None	None
Semi-annual Reports	None	None	None	None	None	None
Recordkeeping	•Records of CARB certification	Records of daily H2S LFG content monitoring     Records of monthly LFG total sulfur content measurement	•Maintain records of EPA determination	None	Electrical power generated, landfill gas flow rate, and heating value	None
Monitoring	Annual compliance certification     Maintain documentation of CARB certification	•Annual compliance certification •Daily LFG H2S content monitoring •Monthly LFG total sulfur content	<ul> <li>Annual compliance certification</li> </ul>	Annual compliance certification	Annual compliance certification     Electrical power generated, landfill gas     flow rate, and heating value	<ul> <li>Annual compliance certification</li> </ul>
Applicable Rule or Requirement	CARB Distributed Generation Certification	Rules 54 and 64 LFG 60 ppmv Sulfur Content limit	40 CFR, Part 60, Subpart WWW & LFG Treatment	Rules 51 and 54 Exhaust requirements	Rule 74.17.1 Micro- Turbine Metering Requirement	Rule 26 Biosolids Drying System – Out of Service
Attachment No./ Condition No.	PO7340PC3 - Condition No. 1	PO7340PC3 – Condition Nos. 2 and 7	PO7340PC3 – Condition Nos. 3 and 4	PO7340PC3 Condition No. 5	PO7340PC3 – Condition Nos. 6 and	PO7340PC4 Condition Nos. 1 – 5

## 1c. General Applicable Requirements

The General Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 8 of this permit.

		-T		T	_		T
Comments		Compliance with Rule 64     ensures compliance with this rule based on District analysis			•Compliance based on District EPA emission factor analysis		
Test Methods	•Opacity - EPA Method 9	•Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-91, as appropriate	•SO <sub>2</sub> - BAAQMD Manual of Procedures, Vol.VI, Section 1, Ground Level Monitoring for H <sub>2</sub> S and SO <sub>2</sub> with amendments	•EPA Method 9	•PM - CARB Method 5	•SCAQMD Method 307-94 or ASTM D1072-90 or other alternatives per Rule 64 E 1	•ASTM Method D4294-83 or D2622-87
Semi-annual Reports	None	None	None	None	None	None	None
Recordkeeping	•All occurrences of visible emissions for periods>3min in any one hour •Annual formal survey of all emissions units	None	Representative fuel analysis or exhaust analysis and compliance demonstration	Specific activity records as applicable	None	•Annual fuel (LFG) sulfur analysis	•Fuel supplier's certification, or fuel test per each delivery
Monitoring	Visual inspections     Annual compliance     certification, including a formal     survey     Opacity readings upon request     Notification required for uncorrectable visible emissions	Annual compliance certification     Follow monitoring requirements     under Rule 64     Upon request, source test for     sulfur compounds at point of     discharge	•Annual compliance certification •Determine ground or sea level concentrations of SO <sub>2</sub> , upon request	•Annual compliance certification	•Annual compliance certification	<ul> <li>◆Annual compliance certification</li> <li>◆Annual fuel (LFG) sulfur analysis</li> </ul>	Annual compliance certification     Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)
Applicable Rule or Requirement	Rule 50	Rule 54.B.1	Rule 54.B.2	Rule 55	Rule 57.1	Kule 64.B.1	Rule 64.B.2
Attachment No./ Condition No.	50	54.B.1	54.B.2	55	57.1	04.5.1	64.B.2

## General Applicable Requirements (continued)

16.

			1
Comments		•Rule only applies to future installation of large water heaters and small boilers	Rule only applies to future installation of natural gas-
Test Methods	*ROC content-EPA Test Method 24     *Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85     *True vapor pressure or composite partial pressure -ASTM D2879-86     *Initial boiling point-ASTM 1078-78 or published source     *Spray gun active/passive solvent losses-SCAOMD Method (10.3.80)	None	None
Semi-annual Reports	None	None	None
Recordkeeping	•Records of current solvent information	Records of current information of large water heaters and small boilers	•Records of current furnace information
Monitoring	Annual compliance certification  Maintain current solvent information  Upon request, solvent testing  Measurement of freeboard height and drain hole area for cold cleaners (as applicable)	Annual compliance certification     Maintain identification records     of large water heaters and small     boilers	<ul> <li>Annual compliance certification</li> <li>Maintain furnace identification records</li> </ul>
Applicable Rule or Requirement	Rule 74.6	Rule 74.11.1	Rule 74.22
Attachment No./ Condition No.	74.6	74.11.1	74.22

# 1d. General Requirements for Short-Term Activities

The General Requirements for Short-term Activities Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 9 of this permit.

	1	_	_			
Comments						
Test Methods	Visible emission evaluation-Section 92400 of CCR	•Rule 74.2.G	•ASTM D402	None	•Vapor concentration- EPA Method 21 •Wt. % of contaminant in soil-EPA Method 8015B	•See 40 CFR Part 61.145 for test methods
Semi-annual Reports	None	None	None	None	None	•See 40 CFR Part 61.145 for notification procedures
Recordkeeping	<ul> <li>Abrasive blasting records</li> </ul>	Maintain VOC     records of coatings     used	Records of oil     analyses	None	Weekly measurements of soil decontamination operation vapor concentration     Date and quantity of soil aerated	•See 40 CFR Part 61.145 for recordkeeping procedures
Monitoring	Annual compliance certification     Visual inspections of abrasive blasting operation     Abrasive blasting records	Annual compliance certification     Maintain VOC records of     coatings used	Annual compliance certification     Test report of ROC content of oil     sample being proposed for usage	Annual compliance certification     Visual inspection to ensure proper vapor control during roofing kettle operation	Annual compliance certification     Weekly measurements of in-situ soil bioventing or bioremediation     Weekly measurements of soil aeration     Date and quantity of soil aerated     Notification required for excavation	Annual compliance certification     See 40 CFR Part 61.145 for inspection procedures
Applicable Rule or Requirement	Rule 74.1	Rule 74.2	Rule 74.4.D	Rule 74.28	Rule 74.29	40 CFR Part 61, Subpart M
Attachment No./ Condition No.	74.1	74.2	74.4.D	74.28	74.29	40CFR.61.M

M:\TTLEV\TV Permits\Po7340\Permit II\")perdcTbl-171,191.docx

### 2. PERMITTED EQUIPMENT AND APPLICABLE REQUIREMENTS TABLE

### Purpose

The purpose of this table is to list the emissions units at this stationary source that are permitted to operate pursuant to Rule 10, "Permits Required" and Rule 23, "Exemptions From Permit". The table also provides a list of requirements that are specifically applicable to these emissions units. Permit conditions that enforce these requirements are listed in Section No. 6, "Specific Applicable Requirements" and Section No. 7, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 6 and Section No. 7, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 8, "General Applicable Requirements"; Section No. 9, "General Requirements for Short-Term Activities"; Section No. 10, "General Permit Conditions"; and Section No. 11, "Miscellaneous Federal Program Conditions".

### Equipment Description

This portion of the table provides a brief description of the permitted equipment at this stationary source. Attached to the table is a "Title V Equipment List Description Key" that contains definitions and explanations for some of the standard terminology used in the equipment description.

### Applicable Requirements

The applicable requirements portion of the table is a matrix of applicability for the specific requirements that apply to the listed emissions units. The columns are labeled with APCD rule numbers or references to federal requirements. An "X" in the row corresponding to the emissions unit indicates the requirement is specifically applicable to that unit. For cases where a rule has multiple compliance options, a number appears instead of an "X". The number is a code key that corresponds to the "Title V Applicable Requirement Code Key" attached to the table. The code key table contains specific citations for the portions of the rule that are applicable. The code key is also used to identify the permit attachment in Section No. 6, "Specific Applicable Requirements", that contains the associated permit conditions. For example, code key "3" under Rule 70 is associated with Attachment 70N3 in Section No. 6.

Permit specific conditions are identified with a "PC" followed by a number in the column labeled "ADD REQ" (additional requirements). A "PC#" in the row corresponding to the emissions unit indicates that the permit specific condition is specifically applicable to that unit. The "PC#" also corresponds to the permit attachment in Section No. 7, "Permit Specific Conditions", that contains the permit specific requirements.

### TABLE NO. 2

### VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

### Part 70 Permit No. 7340

### Permitted Equipment and Applicable Requirements

Permitted Equipment and Applicable Requirements			
M:\TITLEV\TV Permits\PO7340\PERMITIII\Tables7340-171,191	Permit		
Equipment	Specific Conditions	Rule 70	Rule 74.17.1
Landfill Gas (LFG) Collection and Control System with Enclosed Combustors, consisting of:			5
1 - 85.8 MMBTU/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare equipped with:	PC1, PC2		5
<ul> <li>Condensate Knock-Out / Filter Vessel</li> <li>Condensate and leachate storage and injection system</li> <li>Electric powered gas blower(s)</li> <li>Sulfur removal system<sup>1</sup></li> </ul>			
Electrical Power Microturbines  9 - 3.2 MMBTU/hr Flex Energy (formerly Ingersoll Rand) MT250 Microturbines, 250 KW, fire on treated LFG. As landfill gas control devices the microturbines are subject to permit to enforce compliance with applicable rules. The combustion emissions are exempt from permit pursuant to Rule 23.D.6.	PC3		5 <sup>2</sup>
LFG Treatment System <sup>1</sup> consists of: - Sulfur removal system - Knockouts/mesh pads for moisture and particulate removal; gas compressor; heat exchangers for dew point suppression; and vessel(s) containing siloxane removal media			
Biosolids Drying System - "Permanent Non-Operational Status"	PC4		
Gasoline Dispensing Facility  1 - 2,000 Gallon Aboveground AGT Gasoline Tank, equipped with:  - Standing Loss Control VR System Requirements  - Two Point Phase I Vapor Recovery System  - AGT Balance Phase II Vapor Recovery System	PC1	3	
Notes:  1 - There is a single sulfur removal system that treats all gas to be combusted at the flare or microturbines; there is an additional LFG treatment system for the microturbines.  2 - The microturbines are fired on treated LFG and are not subject to the reduction efficiency, emissions limits, monitoring, recordkeeping, and reporting requirements of 40 CFR Part 60, Subpart WWW (implemented by Rule 74.17.1). The Flare is subject to these requirements.			

### TITLE V EQUIPMENT LIST DESCRIPTION KEY

The Permitted Equipment and Applicable Requirements Table and this Title V permit contain a number of terms, abbreviations, and acronyms that have been standardized. The following list describes and defines many of the terms in this permit:

**APCD** 

Air Pollution Control District

**APCO** 

Air Pollution Control Officer of the Ventura County APCD

**ARB** 

The California Air Resources Board

**ASTM** 

American Standards for Testing Materials

**BACT** 

Best Available Control Technology

**BHP** 

The rating of an internal combustion engine as measured in brake horsepower

**CARB** 

California Air Resources Board

CFH

Cubic feet per hour

**CIWMB** 

California Integrated Waste Management Board

**CFM** 

Cubic feet per minute

CFR

Code of Federal Regulations

CO

Carbon Monoxide

**EPA** 

**Environmental Protection Agency** 

FO

Fuel oil or diesel fuel

Gal

Gallon

HAP

Hazardous Air Pollutant

Lb ROC/Gal

Pound(s) of ROC per gallon

**LFG** 

Landfill Gas

LPG

Liquid petroleum gas

MMBTU/Hr

The heat input of an external combustion device as measured in millions of

British Thermal Units per hour

**NESHAPS** 

National Emission Standards for Hazardous Air Pollutants

NG

Natural gas

NMOC

Non-Methane Organic Compounds

NOx

Oxides of Nitrogen

**NSPS** 

New Source Performance Standards

PM

Particulate Matter

ROC

Reactive Organic Compound

SCAQMD

South Coast Air Quality Management District

SCFM

Standard cubic feet per minute

SIP

State Implementation Plan

SOx

Sulfur Oxides

TV AF

Title V application form

VOC

Volatile Organic Compound

VR

Vapor recovery

M:\TITLEV\TV Permits\Po7340\Permit III\Glossary.doc

### PART 70 PERMIT NO. 7340 TITLE V APPLICABLE REQUIREMENT CODE KEY

### Rule 70, "Storage and Transfer of Gasoline"

- 1. Storage tank shall be equipped with a submerged fill pipe only, tank is exempt from Phase I and Phase II vapor recovery since gasoline throughput has not exceeded 6,000 gallons per year. (70.B.1 and 70.F.3) Tank vent shall be equipped with a pressure vacuum relief valve. (70.B.6) Requirement for signage in dispensing area. (70.B.15)
- 2. Storage tank shall be equipped with a submerged fill pipe and Phase I vapor recovery, tank is exempt from Phase II vapor recovery since gasoline throughput has not exceeded 24,000 gallons per year (70.B.1, 70.B.2, and 70.F.4) Tank vent shall be equipped with a pressure vacuum relief valve. (70.B.6) Requirement for signage in dispensing area. (70.B.15)
- 3. Storage tank shall be equipped with a submerged fill pipe, Phase I vapor recovery, and Phase II vapor recovery. (70.B.1, 70.B.2, and 70.B.9) Tank vent shall be equipped with a pressure vacuum relief valve. (70.B.6) Requirement for signage in dispensing area. (70.B.15) Operation and maintenance requirements for Phase II vapor recovery components. (70.E)

### Rule 74.17.1, "Municipal Solid Waste Landfills"

- 1. Requirements and emission limits specifically for internal combustion engines used as a landfill gas control device where the engine operator does not operate the landfill. (74.17.1.B.3 and 74.17.1.B.4)
- 2. Requirements to install and operate a landfill gas collection system, using a flare as a landfill gas control device. Requirements and emission limits for flares used as a control device. (74.17.1.B.2, 74.17.1.B.3, and 74.17.1.B.4)
- 3. Requirements to install and operate a landfill gas collection system, using either a flare as a landfill gas control device or an option to sell or transfer the landfill gas to an off-site facility for use as fuel in internal combustion engines. Requirements and emission limits for flares used as a control device. (74.17.1.B.2, 74.17.1.B.3, and 74.17.1.B.4)
- 4. Requirements to install and operate a landfill gas collection system, using both an internal combustion engine and a flare as a landfill gas control device. Requirements and emission limits for engines and flares used as a control device. (74.17.1.B.2, 74.17.1.B.3, and 74.17.1.B.4)
- 5. Requirements to install and operate a landfill gas collection system, using a flare as a landfill gas control device. Requirements and emission limits for a flare used as a control device. Microturbines, biosolids oil heaters, and biosolids thermal oxidizer burn treated landfill gas and do not need to comply with emission limits. (74.17.1.B.2, 74.17.1.B.3, and 74.17.1.B.4)

### 3. PERMITTED THROUGHPUT AND CONSUMPTION LIMIT TABLE

### Purpose

The purpose of this table is to list the emissions units at this stationary source that have limitations on throughput, fuel consumption, raw material usage, hours of operation, or other parameters that limit the potential to emit of the emissions unit. In some cases, the limit on the potential to emit is expressed directly as a set of pollutants and emission limits in tons per year.

These limitations are applied pursuant to Rule 26, "New Source Review" or Rule 29, "Conditions on Permits". Two sets of limits are listed in this table. The "Throughput Permit Limit" is the enforceable limit pursuant to this permit. Permit conditions that enforce these limits are listed in Section No. 7, "Permit Specific Conditions" of this permit.

The "Calculation Throughput" is used only to calculate permitted emissions pursuant to Rule 29, "Conditions on Permits".

### Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

### Throughput Permit Limit

The throughput or consumption limit listed in this column of the table is an enforceable limit on the emissions unit's potential to emit. In the column labeled "District (D)/ Federal (F) Enforceable", a "D" or an "F" denotes whether the limit is only enforceable by the District or whether the limit is a federally-enforceable limit. District-enforceable limits are limits applied solely pursuant to Rule 29, "Conditions on Permits". Limits that have been applied pursuant to Rule 26, "New Source Review" are federally enforceable.

The throughput permit limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the throughput permit limit column.

Pursuant to Rule 26 and Rule 29, the throughput permit limit is an annual limit which is enforceable based on a period of any twelve (12) consecutive calendar months.

Note that when the calculation throughput (discussed below) corresponds to using the emissions unit full time (8760 hours per year) at maximum rated capacity, the throughput permit limit column contains the notation "No Limit". When District emission calculation procedures do not involve throughput or consumption data, both the throughput permit limit and the calculation throughput

column are left blank.

### Calculation Throughput

The throughput or consumption limit listed in this column of the table is the throughput used in the District calculation procedures to calculate permitted emissions for the emissions unit. The calculation throughput may apply to a single emissions unit or to a set of emissions units denoted as discussed above. The calculation throughput is not an enforceable permit limit.

### **Abbreviations**

The following abbreviations have been used in the "Permitted Throughput and Consumption Limit Table" for the "Throughput Permit Limit" column and for the "Calculation Throughput Limit" column:

BBL/Yr: barrels per year Days/Yr: days per year FO: fuel oil or diesel fuel Gal/Yr: gallons per year Hrs/Day: hours per day Hrs/Yr: hours per year Lbs/day: pounds per day

Lbs ROC/Yr: pounds of reactive organic compounds per year

MBBL/Yr: thousands of barrels per year MGal/Yr: thousands of gallons per year

MMBTU/Yr: million British Thermal Units of heat input per year MMCF/Yr: million standard cubic feet of natural gas per year

MMGal/Yr: million gallons per year

NG: natural gas TPY: tons per year

M:\TITLEV\Attachments updated\PERMIT3std.docx

### TABLE NO. 3

### VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Part 70 Permit No. 7340 Permitted Throughput/Consumption Limits M:\TITLEV\TV Permits\PO7340\PERMITIII\Tables7340-171\_191 Throughput District (D) Federal(F) Calculation Permit Enforceable Equipment Limit Throughput 1 - Landfill Gas (LFG) Collection and Control System consisting of: 1 - 85.8 MMBTU/Hr LFG Specialties, Inc. Model EF945112 Landfill 751,608 MMBTU/Yr F 751,608 MMBTU/Yr Gas Flare equipped with: - Condensate Knock-Out / Filter Vessel - Condensate and leachate storage and injection system - Electric powered gas blower(s) - Sulfur removal system<sup>1</sup> **Electrical Power Microturbines** No Limit None 9 - 3.2 MMBTU/hr Flex Energy (formerly Ingersoll Rand) MT250 Microturbines, 250 KW, fired on treated LFG. As landfill gas control devices the microturbines are subject to permit to enforce compliance with applicable rules. The combustion emissions are exempt from permit pursuant to Rule 23.D.6 LFG Treatment System consists of: - Sulfur removal system - Knockouts/mesh pads for moisture and particulate removal; gas compressor; heat exchangers for dew point suppression; and vessel(s) containing siloxane removal media Biosolids Drying System - "Permanent Non-Operational Status" Gasoline Dispensing Facility 1 - 2,000 Gallon Aboveground AGT Gasoline Tank, equipped with: 12,000 Gal/Yr 12,000 Gal/Yr - Standing Loss Control VR System Requrirements - Two Point Phase I Vapor Recovery System - AGT Balance Phase II Vapor Recovery System Notes: 1 - There is a single sulfur removal system that treats all gas to be combusted at the flare or microturbines; there is an additional LFG treatment system for the microturbines.

### 4. PERMITTED EMISSIONS TABLE

### **Purpose**

The purpose of this table is to document the permitted emissions for this stationary source. Rule 29, "Conditions on Permits", requires permitted emissions to be included on each Permit to Operate. Rule 29 is not federally enforceable.

The permitted emissions table also characterizes the amount and type of criteria air pollutants emitted by this stationary source.

Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

In general, permitted emissions are calculated based on throughput or consumption data for an emission unit, specific physical characteristics of the emission unit, and emission factors. The emission factors may be standard published emission factors or they may be derived from source test data or specific emission limits that apply to the emissions unit. In some cases, permitted emissions are expressed directly as a set of pollutants and emission limits in tons per year without reference to any calculation method.

Section No. 3, "Permitted Throughput and Consumption Limit Table", contains information on the throughput and consumption limits that are enforceable at this stationary source. In addition, other sections of this permit contain conditions that act to enforce specific portions of the permitted emissions table.

### **Equipment Description**

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

### Tons Per Year

This column of the table represents the permitted emissions in units of tons per year for ROC (reactive organic compounds), NOx (nitrogen oxides), PM (particulate matter), SOx (sulfur oxides), and CO (carbon monoxide). In some cases, emissions of non-criteria pollutants of interest may also be listed. Pursuant to Rule 29, annual permitted emissions shall be the annual emissions used to determine compliance for issuance of any new or revised permit issued after October 22, 1991. For emissions units for which no new or revised permit has been issued since

October 22, 1991, annual permitted emissions generally reflect actual historical emissions from the emissions unit.

The permitted emissions limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the pollutant columns.

### Pounds Per Hour

This column of the table represents the permitted emissions in units of pounds per hour for ROC (reactive organic compounds), NOx (nitrogen oxides), PM (particulate matter), SOx (sulfur oxides), and CO (carbon monoxide). Pursuant to Rule 29, hourly permitted emissions shall be calculated based on the maximum quantity of each air pollutant which may be emitted from the emissions unit during a one hour period, as limited by any applicable rules or permit conditions.

### **Hazardous Air Pollutants**

This permit does not provide information that characterizes the emissions of hazardous air pollutants (HAPS) from this facility. This information can be obtained from the reissuance application. The hazardous air pollutant emissions from the source are discussed in the Permit Summary and Statement of Basis section of the permit.

M:\TITLEV\TV Permits\Po7340\Permit III\PERMIT4-7340.doc

### TABLE NO. 4

VENTURA COUNTY AIR PO				OL DIS	TRIC	Γ				
Part 70 P Permitt			)							
M:\TITLEV\TV Permits\PO7340\PERMITIII\Tables7340-171.[9]		TON	IS PER	YEAR			POUN	DS PEI	R HOU	R
Equipment	ROC	NOx	PM	SOx	СО	ROC	NOx	PM	SOx	со
Landfill Gas (LFG) Collection and Control System consisting of:  1 - 85.8 MMBTU/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare equipped with:  - Condensate Knock-Out / Filter Vessel  - Condensate and leachate storage and injection system  - Electric powered gas blower(s)  - Sulfur removal system <sup>1</sup>	4.36	22.55	6.01	7.52	75.16	1.00	5.15	1.37	1.72	17.16
Electrical Power Microturbines  9 - 3.2 MMBTU/hr Flex Energy (formerly Ingersoll Rand) MT250 Microturbines, 250 KW, fired on treated LFG As landfill gas control devices the microturbines are subject to permit to enforce compliance with applicable rules. The combustion emissions are exempt from permit pursuant to Rule 23.D.6.  LFG Treatment System consists of: Sulfur removal system Knockouts/mesh pads for moisture and particulate removal; gas compressor; heat exchangers for dew point suppression; and vessel(s) containing siloxane removal media			v							
Biosolids Drying System - "Permanent Non-Operational Status"  Gasoline Dispensing Facility  1 - 2,000 Gallon Aboveground AGT Gasoline Tank, equipped with: - Standing Loss Control VR System Requirements - Two Point Phase I Vapor Recovery System - AGT Balance Phase II Vapor Recovery System	0.27					0.89				
	-									
9										
Notes:  I - There is a single sulfur removal system that treats all gas to be combusted at the flare or microturbines; there is an additional LFG treatment system for the microturbines.										
Total Permitted Emissions	4.63	22.55	6.01	7.52	75.16	1.89	5.15	1.37	1.72	17.16

### 5. EXEMPT EQUIPMENT LIST

Rule 33.2.A.3 (Part 70 Permits - Application Contents) requires the applicant to provide a list of all emissions units located at the stationary source that are exempt pursuant to Rule 23 based on size or production rate. Pursuant to Rule 33.2.A.3, emissions from insignificant activities do not need to be included in the permit application.

This section of the permit contains a table entitled "Insignificant Activities (Exempt Equipment)". This table is a list of insignificant activities (exempt equipment) at the facility that are exempt from permit based on a size or production rate exemption in Rule 23, "Exemptions From Permit". Insignificant Activity is defined in Rule 33.1 (Part 70 Permits – Definitions). The permittee shall provide calculations, usage records, emission records, and/or operational data as necessary to substantiate an activity as insignificant.

This table is presented for informational purposes only. Any changes to this list are not considered to be permit modifications, nor is the list considered to be enforceable. As detailed in Rule 33.2.A.3, this list is required to be submitted with an application for permit reissuance. The general requirements listed in Section No. 8 of this permit may apply to these insignificant activities.

M:\TITLEV\Attachments updated\PERMIT5 std.docx

### Ventura County Air Pollution Control District INSIGNIFICANT ACTIVITIES (EXEMPT EQUIPMENT) Part 70 Permit No. 07340

INSIGNIFICANT	BASIS FOR EXEMPTION	RULE 23 CITATION
ACTIVITIES (EXEMPT	(Size/Production Rate)	
EMISSION UNITS)		
Small Generator (6.5 BHP)	Maximum design rating < 50 BHP	23.D.6
Pressure Washer	Maximum design rating < 50 BHP	23.D.6
6 - Portable Water Pumps	Maximum design rating < 50 BHP	23.D.6
2 - Gasoline Powered Pole Saws	Maximum design rating < 50 BHP	23.D.6
3 – Chain Saws	Maximum design rating < 50 BHP	23.D.6
Gas Powered Circular Saw	Maximum design rating < 50 BHP	23.D.6
Spray Rigs with gas pumps	Maximum design rating < 50 BHP	23.D.6
Air Compressor – Diesel (48 BHP)	Maximum design rating < 50 BHP	23.D.6
Small Generator (11 BHP)	Maximum design rating < 50 BHP	23.D.6
Lincoln Arc Welder – Diesel (42 BHP)	Maximum design rating < 50 BHP	23.D.6
Fork Lift - Propane	Maximum design rating < 50 BHP	23.D.6
Pipe Welding Machine – Gas	Maximum design rating < 50 BHP	23.D.6
6 – Weed Eaters	Maximum design rating < 50 BHP	23.D.6
Diesel Fuel Storage Tanks	Low vapor pressure < 0.5 psia	23.F.21
Drums of lubricating and hydraulic oils	Storage capacity < 250 gallons	23.F.2
8" Portable Diesel Water Pump (99 BHP)	Portable Emergency water pump	23,D.7.c

M:\TITLEV\TV Permits\Po7340\Permit III\EXEMPT-171.docx

### 6. SPECIFIC APPLICABLE REQUIREMENTS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table", the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are based on the District's prohibitory rules, State of California ATCM's, federal NSPS (40 CFR Part 60), federal NESHAPS (40 CFR Part 61), and federal NESHAPS/MACT (40 CFR Part 63).

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No. or CFR No.) #" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

M:\TITLEV\Attachments updated\PERMIT6 std.docx

### Ventura County Air Pollution Control District Rule 70 Applicable Requirements Storage and Transfer of Gasoline AGT Vault Aboveground Gasoline Storage Tank Standing Loss Control, Phase I and Phase II Vapor Recovery

Rule 70, "Storage and Transfer of Gasoline" Adopted 03/10/09, Federally-Enforceable

Rule 26, "New Source Review
Conditions applied pursuant to Rule 26 are federally enforceable

### Applicability:

This attachment applies to the storage of gasoline in an AGT Vault aboveground gasoline storage tank, and to the transfer of gasoline from delivery vessels to aboveground storage tanks, and from aboveground tanks to motor vehicles. Gasoline is defined as any petroleum distillate having a Reid vapor pressure of 4.0 pounds per square inch or greater that is sold or intended for sale for use in motor vehicles or engines and is commonly or commercially known or sold as gasoline.

This attachment describes the requirements of APCD Rule 70, "Storage and Transfer of Gasoline"; the California Air Resources Board (CARB) Executive Order G-70-160, "Above Ground Tank Vault Aboveground Tank Filling / Dispensing Vapor Recovery System"; and other applicable CARB Executive Orders which grant certification to gasoline vapor recovery systems pursuant to Section 41954 of the California Health and Safety Code. The aboveground gasoline storage tank is also required to comply with CARB Executive Order VR-301, "Standing Loss Control Vapor Recovery System for Existing Installations of Aboveground Storage Tanks".

This attachment also describes the best available control technology (BACT) requirements of Rule 26, "New Source Review'. The requirement for the gasoline tank to be equipped and operated with a Phase II vapor recovery system is more stringent than Rule 70 and was required as BACT when the gasoline tank was originally permitted in November 1998 under APCD Permit to Operate No. 06410. The Rule 70 Phase II vapor recovery system reverification testing conditions have been applied pursuant to the periodic monitoring requirements of 40 CFR Part 70.6(a)(3)(i)(B).

### **Conditions:**

### 1.0 Standing Loss Control

The aboveground gasoline storage tank shall comply with the most recent version of California ARB Executive Order VR-301, "Standing Loss Control Vapor Recovery

Section No. 6 Attachment 70N3-7340-rev171 System for Existing Installations of Aboveground Storage Tanks". This includes requirements for high reflectivity paint and a certified pressure-vacuum relief valve on the tank vent pipe.

### 2.0 General requirements of Rule 70, "Storage and Transfer of Gasoline", as applied to gasoline dispensing facilities.

- All open vent pipes shall be equipped with a pressure-vacuum relief valve.

  Pressure relief shall be set at no less than 2.5 inches water column gauge.

  Pressure-vacuum relief valve(s) shall be properly installed at a minimum height of 12 feet above grade and shall be maintained in good operating order. (Rule 70.B.6 and CARB Executive Order G-70-160)
- All "pump-outs", or bulk transfers, of gasoline from a storage container shall be performed using a vapor recovery system that returns displaced vapors to the stationary storage container unless the purpose of the bulk transfer is to prepare the tank for removal or to fill it with water for testing. (Rule 70.B.8)
- 2.3 The permittee shall follow good operating practices including but not limited to: preventing gasoline spills and leaks, storing gasoline in closed containers, and disposing of gasoline in compliance with all state and local regulations. (Rule 70.E.5)

#### 3.0 Phase I Vapor Recovery

The Phase I vapor recovery system is the set of equipment that recovers the vapors displaced during the transfer of gasoline from the delivery vessels into stationary gasoline storage tanks. The Phase I vapor recovery system is usually either a Two Point or a Coaxial System and includes a submerged fill pipe. A two point system is one in which the product and vapor recovery lines are connected to the storage tank at separate points. In a coaxial system the product and vapor recovery lines are connected to the tank together with a coaxial fitting in which the product line is inside the vapor return line.

- 3.1 All tanks shall be equipped with a permanently installed submerged fill pipe which extends to within six inches of the tank bottom. The connection shall be free of leaks. (Rule 70.B.1 and CA Health and Safety Code Section 41950)
- 3.2 The permittee shall use a permanently installed Two Point Phase I vapor recovery system which has been certified by California Air Resources Board (CARB) to prevent 95 percent of the displaced vapors from being released into the atmosphere. The Phase I vapor recovery system shall be installed as specified in the latest version of CARB Executive Order G-70-160, Above Ground Tank Vault Aboveground Tank Filling/Dispensing Vapor Recovery System. The Phase

I vapor recovery system shall be equipped with CARB certified components as listed in the latest versions of CARB Executive Orders G-70-97, G-70-102, and/or G-70-142. (Rule 70.B.2 and CARB Executive Order G-70-160)

- 3.3 The Phase I vapor recovery system shall be maintained and operated in the same manner as when certified by CARB. All vapor recovery equipment shall be maintained in good working order and shall not leak. (Rule 70.E.1)
- 3.4 The permittee shall not install a Phase I vapor recovery system unless the system is equipped with CARB-certified poppetted drybreaks or spring-loaded vapor check valves on the vapor return coupler of the system. (Rule 70.B.5)
- 3.5 The storage tank shall contain a minimum of 4 inches of proprietary insulating material between the inner holding tank and exterior containment tank. The general exterior of the tank shall be painted white. (CARB Executive Order G-70-160)
- 3.6 Standing gasoline in Phase I spill containment devices is prohibited. (Rule 70.B.17)
- 3.7 Because the aboveground gasoline tank has a permitted throughput limit of less than or equal to 18,000 gallons per year, this facility is exempt from the requirement to be equipped and operated with a CARB-Certified Phase I EVR Two Point Vapor Recovery System. If the throughput ever exceeds 18,000 gallons per year, the permittee will be required to comply with the EVR requirements.

#### 4.0 Phase II Vapor Recovery

The Phase II vapor recovery system is the set of equipment which recovers the vapors generated during the fueling of motor vehicles from stationary gasoline storage tanks. The Phase II vapor recovery system is either a balance system or a vacuum assist system. The balance system operates solely on the principle of vapor displacement by liquids; and the vacuum assist system utilizes a pump, blower, or other vacuum producing device to recover the vapors.

4.1 The permittee shall use a permanently installed Phase II vapor recovery system which has been certified by California Air Resources Board (CARB) to prevent 95 percent of the displaced vapors from being released into the atmosphere. The Phase II vapor recovery system shall be installed as specified in the latest version of CARB Executive Order G-70-160, Above Ground Tank Vault Aboveground Tank Filling/Dispensing Vapor Recovery System. The Phase II vapor recovery system shall be equipped with CARB-certified components as listed in the latest

- version of CARB Executive Order G-70-52. (Rule 26, Rule 70.B.9 and CARB Executive Order G-70-160)
- 4.2 The permittee shall not install any new or rebuilt vapor recovery equipment unless the equipment is clearly identified or marked by the certified manufacturing company and/or the certified rebuilding company as per CARB specifications. (Rule 70.B.16)
- 4.3 The Phase II vapor recovery system shall be maintained and operated in the same manner as when certified by CARB. All vapor recovery equipment shall be maintained in good working order and shall not leak. "Leak" is defined in Rule 70.J.15. (Rule 70.E.1)
- 4.4 The permittee shall not install any balance system vapor recovery nozzle unless a vapor check valve is located in the nozzle. A balance vapor recovery system shall not be operated with more than one check valve per nozzle and hose assembly. The vapor check valve is a valve which closes the vapor recovery line when the nozzle is not in use to prevent vapors from escaping. (Rule 70.B.10)
- 4.5 Any flexible tubing connecting the vapor recovery riser and the gasoline dispenser shall be listed by the Underwriters' Laboratory for use with gasoline and shall be capable of maintaining electrical continuity between the riser and dispenser. (Rule 70.B.11)
- 4.6 The permittee shall not allow the operation, or install, a bellows-equipped vapor recovery nozzle unless it is equipped with a certified insertion interlock mechanism. An insertion interlock mechanism is a device which prohibits the dispensing of fuel unless the bellows is compressed. (Rule 70.B.12)
- 4.7 The permittee shall not operate a vapor recovery nozzle unless it is equipped with a coaxial hose. (Rule 70.B.13)
- 4.8 In order to prevent spitback or condensate from blocking the vapor path between the vehicle fill pipe and the storage tank headspace, the routing of the coaxial hose shall be consistent with the configurations shown on exhibits 4 through 11a in CARB Executive Order No. G-70-52, with the exception that the highest point in the vapor return path must be above the top of the storage tank and there shall be no liquid trap in the vapor path and the storage tank vapor headspace during fuel dispensing. Furthermore, there shall be no liquid trap in the vapor path between the vehicle fill pipe and the highest point in the vapor return path during fuel dispensing unless the coaxial hose is equipped with a liquid removal system with the liquid pickup located at the liquid trap. The liquid removal devices shall

- be maintained to achieve a minimum liquid removal rate of five milliliters per gallon transferred. (Rule 70.B.14 and CARB Executive Order G-70-160)
- 4.9 The permittee shall daily inspect the hanging hardware on Phase II vapor recovery systems, which includes, but is not limited to, coaxial hose, nozzles, retractors, and hose casings. (Rule 70.B.18)

#### 5.0 Phase II Vapor Recovery Defects

- Phase II vapor recovery systems shall be maintained and operated with none of the defects listed in California Code of Regulations Section 94006, Subchapter 8, Chapter 1, Part III, of Title 17, adopted 9/15/08. (Rule 70.E.2)
- Any equipment that is not operating in compliance with Rule 70 shall be tagged "Out of Order." Except during repair activity, that tag shall not be removed and the tagged equipment shall not be used, or provided for use, unless the tagged equipment has been fixed or replaced. (Rule 70.E.4)

#### 6.0 Required Signs Posted

The owner/operator of the gasoline dispensing facility shall conspicuously post the following signs in the immediate gasoline dispensing area:

- 6.1 "NOZZLE" operating instructions.
- 6.2 "VCAPCD" toll-free telephone number.
- 6.3 A warning sign stating "DO NOT TOP OFF TANKS".
- 6.4 Required signs shall comply with one of the following:
  - 6.4.1 Decal signs shall be readable from a distance of 3 feet or more and shall be located adjacent to the dispenser price indicator (per gallon) on each side next to the driveway it serves.
  - 6.4.2 Pump toppers shall be double-back with one sign per island and shall be readable from a distance of 6 feet or more.
  - 6.4.3 Permanent (non-decal) signs shall be two single-sided or one double-sided sign(s) per two (2) dispensers and shall be readable from a distance of 6 feet or more.

A dispenser that is not permitted to fuel motor vehicles shall have a sign posted on it restricting its use from motor vehicles.

(Rule 70.B.15)

#### 7.0 Verification Testing

The following reverification tests shall be conducted on the balance Phase II vapor recovery system at the time intervals specified below:

- 7.1 At least every two years, CARB Test Procedure TP-201.3b shall be conducted to quantify the **static pressure performance** of the vapor recovery system. (Rule 26, Rule 70.H.1.c and CARB Executive Order G-70-160)
- 7.2 At least once every four years, CARB Test Procedure TP-201.4 shall be conducted to quantify the **dynamic pressure performance** in the vapor path leading from the dispensing nozzles to the tank. Dynamic pressure testing shall not be required for any aboveground gasoline storage container that (1) has a dispenser mounted directly to the container and (2) is equipped with a Phase II vapor recovery system that does not have a liquid trap at any location in the vapor path between the gasoline nozzle and the storage container vapor head space during gasoline dispensing. The District may require documents or engineering drawings verifying exemption from this testing requirement. (Rule 26 and Rule 70.H.2.c)

If the vapor recovery system does not meet the requirements of one or more of the required tests, corrective repairs shall be made and the test(s) shall be repeated.

The permittee shall notify the District Compliance Division least five working days prior to the test(s) and shall submit the results to the Compliance Division within 15 days after the test(s) are conducted. District personnel shall be allowed to witness the test(s).

#### 8.0 Recordkeeping Requirements

- Records of all tests conducted on the vapor recovery systems shall be maintained. These reports shall be dated and shall contain names, addresses, and telephone numbers of the parties responsible for the system installation and/or testing. (Rule 70.G.4)
- 8.2 A log of all maintenance conducted on any part of the vapor recovery system shall be maintained in chronological order. The log shall include the date, a description and location of any equipment replaced, and a description of the system problem

- which required repair. The log shall also indicate the time period and duration of each malfunction of the system. (Rule 70.G.5)
- Records of daily inspections of the Phase II vapor recovery shall be maintained. Records shall include the date and time of the inspection, the equipment inspected, and the signature of the person conducting the inspection. (Rule 70.G.6)

These records shall be maintained for a period of five years and be made available to District personnel upon request. (Rule 70.G.7)

#### 9.0 Authority to Construct Application Required for Modifications

A major modification at a gasoline dispensing facility is defined as a replacement or addition of tank(s) or vapor recovery piping or a change in the type of Phase I or Phase II vapor recovery system.

- 9.1 Prior to performing any major modification to a gasoline dispensing facility the permittee shall submit an application to modify the facility and receive an Authority to Construct. (Rule 70.B.7)
- 9.2 Within 45 days after modifying a facility, the permittee shall conduct and pass all tests on the vapor recovery system as specified by the Authority to Construct. The test results shall be submitted to the District within 15 days after the tests are conducted. (Rule 70.H.1.a and 70.H.2.a)

M:\TITLEV\TV Permits\Po7340\Permit III\70N3-7340-rev171.docx

# Rule 74.17.1 Applicable Requirements Landfill Gas Collection and Control System Approved Design Plan - Rule 74.17.1.G.3 Control System includes Enclosed Combustors

### Rule 74.17.1, "Municipal Solid Waste Landfills" Adopted 02/09/99, Federally-Enforceable

Rule 74.17.1 is federally enforceable as it was included with the EPA approval of the California State Plan for implementing the emissions guidelines (EG) applicable to existing municipal solid waste landfills. This approval was published in the Federal Register (Volume 64, No. 184 Thursday September 23, 1999) as a direct final rule with an effective date of November 22, 1999.

Rule 74.17.1 implements the requirements of 40 CFR, Part 60, Subpart Cc, "Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills", which requires compliance with specific sections of 40 CFR, Part 60, Subpart WWW, "Standards of Performance for Municipal Solid Waste Landfills". Subpart WWW is a NSPS for MSW Landfills that is not applicable as a whole because the facility was an existing source at the time of Subpart WWW promulgation (03/12/1996).

A new NSPS for MSW Landfills (40 CFR Part 60, Subpart XXX) was finalized on August 29, 2016 and became effective on October 28, 2016. This NSPS is not applicable because the facility was not constructed, reconstructed, or modified after July 17, 2014.

The "Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills" (Emission Guidelines) have also been updated. 40 CFR Part 60, Subpart Cf became effective October 28, 2016. The Emission Guidelines require California ARB to submit a revised compliance plan to the U.S. EPA. On May 25, 2017 the ARB adopted California's State Plan to comply with the Emission Guidelines and the plan was submitted to U.S. EPA on May 30, 2017. Note that the California plan to comply with the new Emission Guidelines is essentially compliance with the "Landfill Methane Regulation" - Title 17, California Code of Regulations, Sections 95460 to 95476, "Methane Emissions From Municipal Solid Waste Landfills".

#### Applicability:

This attachment applies to any municipal solid waste (MSW) landfill that has a District-approved site-specific design plan as required by Rule 74.17.1.G, has installed a gas collection and control system as required by Rule 74.17.1.B.1, and uses enclosed combustors (enclosed landfill gas flare and microturbines) as required by Rule 74.17.1.B.3. Note that as stated in Condition No. 2, the flare is subject to the control requirements and associated monitoring, recordkeeping, and reporting requirements; the micro-turbines are not subject to these requirements.

The terms "Administrator" and "design plan" are defined in Rule 74.17.1. Other specific terms used in this attachment are defined in 40 CFR 60.751. Rule 74.17.1.I.1 defines "Administrator" as the Air Pollution Control Officer (APCO) of the Ventura County Air Pollution Control

Page: 1

Section No. 6 Attachment 74.17.1N5-07340-rev171 District, except that the APCO shall not be empowered to approve (a) alternative or equivalent test methods, alternative standards; or (b) work practices unless included in the site-specific design plan as specified in 40 CFR 60.752(b)(2)(i)(B). Rule 74.17.1.I.2 defines "Design plan or plan" as the site-specific design plan for the gas collection and control system submitted under Rule 74.17.1.G.

#### **Conditions:**

- 1. Pursuant to Rule 74.17.1.B.2, the permittee shall:
  - a. Operate the landfill gas collection system such that gas is collected from each area, cell, or group of cells in the Municipal Solid Waste (MSW) landfill in which the initial solid waste has been in place for a period of two years or more. The requirements of 40 CFR 60.752(b)(2)(ii)(A)(2)(i), 40 CFR 60.753(a)(1), and 40 CFR 60.755(b)(1) concerning the timing of operation of the gas collection system shall not apply to MSW landfills subject to Rule 74.17.1.
  - b. As required by 40 CFR 60.752(b)(2)(ii)(A), route all collected gas to an active collection system that:
    - (1) Is designed to handle the maximum expected gas flow rate from the entire area of the landfill that warrants control over the intended use period of the gas control or treatment system equipment.
    - (2) Collects gas from each area, cell, or group of cells in the landfill in which the initial solid waste has been placed for a period of 2 years or more.
    - (3) Collects gas at a sufficient extraction rate.
    - (4) Is designed to minimize off-site migration of subsurface gas.

Pursuant to Rule 74.17.1.B.2 (b), the requirements of 40 CFR 60.752(b)(2)(ii)(B) concerning passive collection systems shall not apply to MSW landfills subject to Rule 74.17.1.

2. Pursuant to Rule 74.17.1.B.3.a, the permittee shall meet the requirements of 40 CFR 60.752(b)(2)(iii)(B) and shall route all the collected gas to a landfill gas-fired flare that reduces NMOC (non-methane organic compounds) by 98 weight-percent or reduces the outlet NMOC concentration to less than 20 parts per million by volume, dry basis as hexane at 3 percent oxygen. The flare shall be operated within the parameter ranges established during the initial or most recent performance test. The operating parameters to be monitored are specified in 40 CFR 60.756 and Condition No. 7 below. The permittee shall demonstrate that the flare meets the NMOC requirements of Rule 74.17.1.B.3.a using the source testing procedures described below. The flare shall be source tested to demonstrate continuing compliance every 24 months.

The collected landfill gas may also be routed to the nine (9) 250 KW micro-turbines. It has been determined that the LFG combustion at the micro-turbines is subject to 40 CFR Section 60.752(b)(2)(iii)(C) because the LFG is routed through a treatment system that processes the gas for subsequent sale or use. Therefore, the micro-turbines are not subject to the control device requirements of a 98% NMOC reduction efficiency or a 20 ppmvd NMOC outlet limitation. The micro-turbines are also not subject to the associated monitoring, recordkeeping, and reporting requirements of this attachment.

- Pursuant to Rule 74.17.1.B.3.b, flares shall meet all of the following additional requirements:
  - a. The landfill gas flares shall be of the enclosed ground type with automatic dampers, an automatic shutdown device, a flame arrester and continuous recording temperature sensors. During restart or startup there shall be a sufficient flow of propane or commercial natural gas to the pilot flame to ensure immediate ignition when in contact with landfill gasses.
  - b.  $NO_X$  emissions from flares shall not exceed 0.06 pounds per million BTUs of heat input.
  - c. CO emissions from flares shall not exceed 0.20 pounds per million BTUs of heat input.

The permittee shall demonstrate that each flare meets the  $NO_X$  and CO requirements of Rule 74.17.1.B.3.b using the source testing procedures described below. The flare shall be source tested to demonstrate continuing compliance every 24 months.

#### OPERATIONAL STANDARDS FOR COLLECTION AND CONTROL SYSTEMS

- 4. Pursuant to Rule 74.17.1.B.4, the permittee shall meet the operational requirements of 40 CFR 60.753, except as provided in Rule 74.17.1.G.3. Pursuant to 40 CFR 60.753 the permittee shall:
  - a. Operate the collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill in which solid waste has been in place for two years or more.
  - b. Operate the collection system with negative pressure at each wellhead except under the following conditions:
    - (1) A fire or increased well temperature. The permittee shall record instances when positive pressure occurs in efforts to avoid a fire. These records shall be submitted with the annual reports as provided in 40 CFR 60.757(f)(1) as shown in Condition No. 8 below.

- Use of a geomembrane or synthetic cover. The permittee shall develop acceptable pressure limits in the design plan.
- (3) A decommissioned well. A well may experience a static positive pressure after shut down to accommodate for declining flows. All design changes shall be approved by the Administrator.
- c. Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Centigrade (131 degrees Fahrenheit) and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The permittee may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. A higher operating value demonstration shall show supporting data that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methanogens.
  - (1) The nitrogen level shall be determined using EPA Method 3C, unless an alternative test method is established as allowed by 40 CFR 60.752(b)(2)(i).
  - (2) Unless an alternative test method is established as allowed by 40 CFR 60.752(b)(2)(i), the oxygen shall be determined by an oxygen meter using EPA Method 3A except that:
    - (i) The span shall be set so that the regulatory limit is between 20 and 50 percent of the span.
    - (ii) A data recorder is not required.
    - (iii) Only two calibration gases are required, a zero and span, and ambient air may be used as the span.
    - (iv) A calibration error check is not required.
    - (v) The allowable sample bias, zero drift, and calibration drift are plus or minus 10 percent.
- d. Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the permittee shall conduct surface testing around the perimeter of the collection area and along a pattern that traverses the landfill at 30 meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover. The permittee may establish an alternative traversing pattern that ensures equivalent coverage. A surface monitoring design plan shall be developed that includes a topographical map with the monitoring route and the rationale for any site-specific deviations from the 30-meter intervals. Areas with steep slopes or other dangerous areas may be excluded from the surface testing.

- e. Operate the system such that all collected gases are vented to the landfill gas-fired flare or landfill gas fired micro-turbines designed and operated in compliance with 40 CFR 60.752(b)(2)(iii) as shown in Condition No. 2 above. In the event the collection or control system is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within 1 hour.
- Operate the landfill gas-fired flare at all times when the collected gas is routed to the flare.
- g. Operate the landfill gas micro-turbines at all times when the collected gas is routed to the units.
- h. If monitoring demonstrates that the operational requirements in Condition Nos. 4.b, 4.c, and 4.d above (paragraphs (b), (c), or (d) of 40 CFR 60.753) are not met, corrective action shall be taken as specified in Condition Nos. 6.a and 6.b below (40 CFR 60.755(a)(3) through (5)) or Condition No. 6.d below (40 CFR 60.755(c)). If corrective actions are taken as specified in Condition No. 6 (40 CFR 60.755), the monitored exceedance is not a violation of the operational requirements of this Condition (40 CFR 60.753).

#### TEST METHODS AND PROCEDURES

5. In order to demonstrate compliance with the NMOC, NOx, and CO limits of Condition Nos. 2 and 3 above, the permittee shall meet the test methods and procedures of Rule 74.17.1.B.4 (40 CFR 60.754) and Rule 74.17.1.F as follows:

For the NMOC performance testing required in Condition No. 2, EPA Method 25, EPA Method 25C, or EPA Method 18 shall be used, unless another method to demonstrate compliance has been approved by the Administrator as provided by the Design Plan. EPA Method 3 or 3A shall be used for determining oxygen for correcting the NMOC concentration as hexane to 3 percent. In cases where the outlet concentration is less than 50 ppm NMOC as carbon (8 ppm NMOC as hexane), EPA Method 25A should be used in place of EPA Method 25. If using EPA Method 18, the minimum list of compounds to be tested shall be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42).

For the NO<sub>X</sub> and CO performance testing required by Condition No. 3, the following methods shall be used:

- a. EPA Method 7E for  $NO_X$ .
- b. EPA Method 10 for CO.
- c. ASTM D1826-77 for the gross (higher) calorific value (GCV) of landfill gas.

- d. EPA Method 3A for oxygen concentration.
- e. The F Factor method contained in 40 CFR 60, Appendix A, Method 19.

A source test plan for complying with the testing outlined above shall be submitted to the District Compliance Division at least 30 days prior to the test for approval. The test plan shall include, but not be limited to, a discussion of the sampling methods, test date, analytical methods, test equipment inventory, and calibration procedures. The District shall be given the opportunity, with sufficient notice of a minimum of 5 working days, to observe the emissions testing.

#### **COMPLIANCE PROVISIONS**

- 6. Pursuant to Rule 74.17.1.B.4, the permittee shall meet the compliance provisions in 40 CFR 60.755. Applicable requirements in 40 CFR 60.755 include the following:
  - a. For the purpose of demonstrating whether the gas collection system flow rate is sufficient to determine compliance with Condition No. 1.b (3) above (40 CFR 60.752(b)(2)(ii)(A)(3)), the permittee shall measure gauge pressure in the gas collection header at each individual well on a monthly basis. If a positive pressure exists, action shall be initiated to correct the exceedance within 5 calendar days, except for the three conditions allowed under Condition No. 4.b above (40 CFR 60.753(b)). If negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial measurement of positive pressure. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval. Owners and operators are not required to expand the system during the first 180 days after gas collection system start-up.
  - b. For the purpose of identifying whether excess air infiltration into the landfill is occurring, the permittee shall monitor each well monthly for temperature and nitrogen or oxygen as required in Condition No. 4.c above (40 CFR 60.753(c)). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within five calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.

- For purposes of demonstrating compliance with the gas collection requirements of Condition No. 1.a above (40 CFR 60.753(a)), the permittee shall place each well or design component as specified in the approved design plan as provided in Rule 74.17.1.G and 40 CFR 60.752(b)(2)(i). Each well shall be installed no later than 60 days after the date on which the initial solid waste has been in place for a period of two years or more.
- d. The following procedures shall be used for compliance with the surface methane operational standard as provided in Condition No. 4.d, above (40 CFR 60.753(d)).
  - (1) After installation of the collection system, the permittee shall monitor surface concentrations of methane along the entire perimeter of the collection area and along a pattern that traverses the landfill at 30 meter intervals (or a site-specific established spacing) for each collection area on a quarterly basis using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in Condition No. 6.e below (40 CFR 60.755 (d)).
  - (2) The background concentration shall be determined by moving the probe inlet upwind and downwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter wells.
  - (3) Surface emission monitoring shall be performed in accordance with Section 4.3.1 of Method 21 of Appendix A of 40 CFR, Part 60, except that the probe inlet shall be placed within 5 to 10 centimeters (2 to 3.9 inches) of the ground. Monitoring shall be performed during typical meteorological conditions.
  - (4) Any reading of 500 parts per million or more above background at any location shall be recorded as a monitored exceedance and the actions specified in (i) through (v) of this condition (below) shall be taken. As long as the specified actions are taken, the exceedance is not a violation of the operational requirements of Condition No. 4.d above (40 CFR 60.753(d)).
    - (i) The location of each monitored exceedance shall be marked and the location recorded.
    - (ii) Cover maintenance or adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance shall be made and the location shall be re-monitored within 10 calendar days of detecting the exceedance.
    - (iii) If the re-monitoring of the location shows a second exceedance, additional corrective action shall be taken and the location shall be

monitored again within 10 days of the second exceedance. If the re-monitoring shows a third exceedance for the same location, the action specified in Condition No. 6.d (4)(v) below (40 CFR 60.755(d)(4)(v)) shall be taken, and no further monitoring of that location is required until the action specified in Condition No. 6.d(4)(v) below has been taken.

- (iv) Any location that initially showed an exceedance but has a methane concentration less than 500 ppm methane above background at the 10-day re-monitoring specified in Condition Nos. 6.d (4)(ii) or (iii) above (40 CFR 60.755 (c)(4)(ii) or (iii)) shall be re-monitored 1 month from the initial exceedance. If the 1-month remonitoring shows a concentration less than 500 parts per million above background, no further monitoring of that location is required until the next quarterly monitoring period. If the 1-month remonitoring shows an exceedance, the actions specified in Condition Nos. 6.d (4)(iii) or (v) (40 CFR 60.755(c)(4)(iii) or (v)) shall be taken.
- (v) For any location where the monitored methane concentration equals or exceeds 500 parts per million above background three times within a quarterly period, a new well or other collection device shall be installed within 120 calendar days of the initial exceedance. An alternative remedy to the exceedance, such as upgrading the blower, header pipes or control device, and a corresponding timeline for installation may be submitted to the Administrator for approval.
- (5) The permittee shall implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis.
- e. When seeking to comply with the surface methane operational standards in Condition No. 6.d above (40 CFR 60.755(c)), the permittee shall comply with the following instrumentation specifications and procedures for surface emission monitoring devices:
  - (1) The portable analyzer shall meet the instrument specifications provided in Section 3 of Method 21 of Appendix A of 40 CFR, Part 60, except that "methane" shall replace all references to VOC.
  - (2) The calibration gas shall be methane, diluted to a nominal concentration of 500 parts per million in air.
  - (3) To meet the performance evaluation requirements in Section 3.1.3 of Method 21 of Appendix A of 40 CFR, Part 60, the instrument evaluation

- procedures of Section 4.4 of Method 21 of Appendix A of 40 CFR, Part 60 shall be used.
- (4) The calibration procedures provided in Section 4.2 of Method 21 of Appendix A of 40 CFR, Part 60 shall be followed immediately before commencing a surface monitoring survey.
- f. The provisions of 40 CFR, Part 60, Subpart WWW shall apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction shall not exceed 5 days for collection systems. (40 CFR Part 60.755(e))

#### MONITORING REQUIREMENTS

- 7. Pursuant to Rule 74.17.1.B.4, the permittee shall meet the monitoring provisions in 40 CFR 60.756, except as provided in Rule 74.17.1.G.3. Pursuant to 40 CFR 60.756 the permittee shall:
  - a. Install a sampling port and a thermometer, other temperature measuring device, or an access port for temperature measurements at each wellhead and:
    - (1) Measure the gauge pressure in the gas collection header on a monthly basis as provided in Condition No. 6.a above (40 CFR 60.755(a)(3)).
    - (2) Monitor nitrogen or oxygen concentration in the landfill gas on a monthly basis as provided in Condition No. 6.b above (40 CFR 60.755(a)(5)).
    - (3) Monitor temperature of the landfill gas on a monthly basis as provided in 40 CFR 60.755(a)(5).
  - b. Calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment:
    - (1) A temperature monitoring device equipped with a continuous recording device that measures and records the temperature of the combustion zone of the enclosed landfill gas flare. The temperature monitoring device shall have a minimum accuracy of  $\pm$  1 percent of the temperature being measured expressed in degrees Celsius or  $\pm$  0.5 degrees Celsius, whichever is greater. (40 CFR 60.756(b)(1))
    - (2) Devices that record flow to or bypass of the landfill gas flare. The permittee shall either:
      - (i) Install, calibrate, and maintain a gas flow rate measuring devices that shall record the flow to the device least every 15 minutes; or

- (ii) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.
- c. When seeking to demonstrate compliance with the surface methane operational standards in Condition No. 6.d above (40 CFR 60.755(c)), the permittee shall monitor surface concentrations of methane according to the instrument specifications and procedures provided in Condition No. 6.e above (40 CFR 60.755(d)). Any closed landfill that has no monitored exceedances of the operational standard in three consecutive quarterly monitoring periods may skip to annual monitoring. Any methane reading of 500 ppm or more above background detected during the annual monitoring returns the frequency for that landfill to quarterly monitoring.

#### REPORTING REQUIREMENTS

- 8. Pursuant to Rule 74.17.1.E, the permittee shall meet the following reporting requirements of 40 CFR 60.757, except as provided in Rule 74.17.1.G.3. The permittee shall:
  - a. Submit a closure report to the Administrator within 30 days of waste acceptance cessation. The Administrator may request additional information as may be necessary to verify that permanent closure has taken place in accordance with the requirements of 40 CFR 258.60. If a closure report has been submitted to the Administrator, no additional wastes may be placed into the landfill without filing a notification of modification as described under 40 CFR 60.7(a)(4).
  - b. Submit an equipment removal report to the Administrator 30 days prior to removal or cessation of operation of the control equipment. The equipment removal report shall contain all of the following items:
    - 1) A copy of the closure report submitted in accordance with Condition No. 8.a above (paragraph (d) of 40 CFR 60.757).
    - 2) A copy of the initial performance test report demonstrating that the 15 year minimum control period has expired.
    - Dated copies of three successive nonmethane organic compound (NMOC) emission rate reports demonstrating that the landfill is no longer producing 50 megagrams or greater of NMOC per year.
  - c. Submit other information requested by the Administrator that may be necessary to verify that all of the conditions for removal in 40 CFR 60.752(b)(2)(v) have been met. These conditions are as follows:

- (1) The landfill shall be a closed landfill as defined in 40 CFR 60.751. A closure report shall be submitted to the Administrator as provided in 40 CFR 60.757(d);
- (2) The collection and control system shall have been in operation a minimum of 15 years; and
- (3) Following the procedures specified in 40 CFR 60.754(b), the calculated NMOC gas produced by the landfill shall be less than 50 megagrams per year on three successive test dates. The test dates shall be no less than 90 days apart, and no more than 180 days apart.
- d. Submit to the Administrator annual reports of the recorded information in (1) through (6) below. The initial annual report shall be submitted within 180 days of installation and start-up of the collection and control system, and shall include the initial performance test report required under 40 CFR 60.8. For enclosed flares, reportable exceedances are defined under 40 CFR 60.758(c) as "all 3-hour periods of operation during which the average combustion temperature was more than 28 °C below the average combustion temperature during the most recent performance test at which compliance with 40 CFR 60.752(b)(2)(iii) was determined."
  - 1) Value and length of time for exceedance of applicable parameters monitored under Condition Nos. 7.a, 7.b and 7.c above (40 CFR 60.756(a), (b), and (d)).
  - Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under 40 CFR 60.756. For the purpose of the condition, the "control device" is considered to be the combination of the enclosed landfill gas flare and microturbines. Note that, as stated elsewhere in this permit, the microturbines are not subject to the NMOC control device requirements of 60.752(b)(2)(iii)(B).
  - 3) Description and duration of all periods when the control device was not operating for a period exceeding 1 hour and length of time the control device was not operating. For the purpose of the condition, the "control device" is considered to be the combination of the enclosed landfill gas flare and microturbines.
  - 4) All periods when the collection system was not operating in excess of 5 days.
  - 5) The location of each exceedance of the 500 parts per million methane concentration as provided in 40 CFR 60.753(d) and the concentration

- recorded at each location for which an exceedance was recorded in the previous month.
- The date of installation and the location of each well or collection system expansion added pursuant to Condition Nos. 6.a, 6.c, and 6.d (4) above (Paragraphs (a)(3), (b), and (c)(4) of 40 CFR 60.755).

All reports required by 40 CFR 60.757 shall be submitted to the APCO.

#### RECORDKEEPING REQUIREMENTS

- Pursuant to Rule 74.17.1.D, the permittee shall satisfy the recordkeeping requirements of 40 CFR 60.758, as applicable, except that the APCO may approve alternative recordkeeping provisions as provided in Rule 74.17.1G.3. Pursuant to 40 CFR 60.758 the permittee shall:
  - a. Keep for at least 5 years up-to-date, readily accessible, on-site records of the design capacity report which triggered 40 CFR 60.752(b), 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. Either paper copy or electronic formats are acceptable.
  - b. Keep up-to-date, readily accessible records for the life of the control equipment of the data listed below as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring shall be maintained for a minimum of 5 years. Records of the landfill gas flare vendor specifications shall be maintained until removal.
    - (1) The maximum expected gas generation flow rate as calculated in 40 CFR 60.755(a)(1). The permittee may use another method to determine the maximum gas generation flow rate, if the method has been approved by the Administrator.
    - (2) The density of wells, horizontal collectors, surface collectors, or other gas extraction devices determined using the procedures specified in 40 CFR 60.759(a)(1).
    - (3) The average combustion temperature of each flare measured at least every 15 minutes and averaged over the same time period of the performance test.
    - (4) The percent reduction of NMOC determined as specified in 40 CFR 60.752(b)(2)(iii)(B) achieved by the landfill gas flare.

Section No. 6 Attachment 74.17.1N5-07340-rev171

- c. Keep for 5 years up-to-date, readily accessible continuous records of the equipment operating parameters specified to be monitored in Condition No.7 above (40 CFR 60.756) as well as up-to-date, readily accessible records for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded.
  - (1) An exceedance for an enclosed flare is any 3-hour period of operation during which the average combustion temperature was more than 28 °C (50.4 °F) below the average combustion temperature during the most recent performance test at which compliance with 40 CFR 60.752(b)(2)(iii) was determined. All exceedances shall be recorded and reported under Condition No. 8 above (40 CFR 60.757(f)).
  - (2) The permittee shall keep up-to-date, readily accessible continuous records of the indication of flow to the landfill gas flare or the indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines, specified under Condition No. 7.b.2 above (40 CFR 60.756).
- d. Keep for the life of the collection system an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label for each collector.
  - (1) Permittee shall keep up-to-date, readily accessible records of the installation date and location of all newly installed collectors as specified under 40 CFR 60.755(b)
  - (2) Permittee shall keep readily accessible documentation of the nature, date of deposition, amount, and location of asbestos-containing or nondegradable waste excluded from collection as provided in 40 CFR 60.759(a)(3)(i) as well as any nonproductive areas excluded from collection as provided in 40 CFR 60.759(a)(3)(ii).
- e. Keep for at least 5 years up-to-date, readily accessible records of all collection and control system exceedances of the operational standards in Condition No. 4 above (40 CFR 60.753), the reading in the subsequent month whether or not the second reading is an exceedance, and the location of each exceedance.

Any records required to be submitted pursuant to 40 CFR 60.758 shall be submitted to the APCO.

M:\TITLEV\TV Permits\Po7340\Permit III\74171N5-07340-rev171.doc

# Ventura County Air Pollution Control District 40 CFR Part 63 Subpart AAAA Applicable Requirements National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills

40 CFR Part 63, Subpart A, "General Provisions"
40 CFR Part 63, Subpart AAAA, "National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills"
Federally-Enforceable

#### Applicability:

This attachment describes the requirements of 40 CFR Part 63 Subpart AAAA, National Emission Standards for Hazardous Air Pollutants (NESHAPS): Municipal Solid Waste Landfills, and applies to all existing and new municipal solid waste (MSW) landfills. The subpart requires all applicable landfills to meet the requirements of 40 CFR Part 60, Subpart Cc or WWW and to meet the startup, shutdown, and malfunction (SSM) requirements of the general provisions of Part 63. The subpart also includes requirements for bioreactors; however, the MSW landfills in Ventura County do not include any bioreactors. The requirements identified below apply to all MSW landfills that are required to install and operate a collection and control system. The Ventura County APCD has been delegated authority for 40 CFR Part 63 Subpart AAAA and is considered to be the Administrator.

#### **Conditions:**

- 1. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart AAAA, which include, but are not limited to, the requirements listed below.
- 2. Pursuant to Section 63.1955(a), the permittee shall comply with all applicable requirements of either 40 CFR Part 60, Subpart WWW or 40 CFR Part 60, Subpart Cc, whichever is applicable. The applicable subpart is identified elsewhere in this Part 70 Permit.
- 3. Pursuant to Section 63.1960, the permittee shall develop a written Startup, Shutdown, and Malfunction (SSM) plan according to the provisions in 40 CFR 63.6(e)(3). A copy of the SSM plan must be maintained on site.

\\APCDBULLPEN\DivData\ENG\TITLEV\Attachments updated\CFR63AAAA(01-16-03).doc

## Ventura County Air Pollution Control District California Air Resources Board Methane Emissions From Municipal Solid Waste Landfills

Article 4, Subarticle 6, Sections 95460 to 95476, Title 17, California Code of Regulations, Methane Emissions from Municipal Solid Waste Landfills Effective 06/17/10

District enforceable. The Ventura County APCD signed a Memorandum of Understanding (MOU) with the California ARB on May 18, 2015 to implement and enforce this regulation. Prior to May 18, 2015, this regulation was implemented and enforced only by California Air Resources Board (CARB). The regulation is not federally-enforceable.

#### Applicability:

This attachment is applicable to all active, or closed, municipal solid waste landfills with greater than or equal to 450,000 tons of waste-in-place. The purpose of the regulation is to reduce methane emissions from municipal solid waste (MSW) landfills. The regulation is a greenhouse gas reduction measure, as described in the California Global Warming Solutions Act of 2006 (Assembly Bill 32).

#### **Conditions:**

- 1. The landfill shall be operated in compliance with all applicable requirements of sections 95460 to 95476, title 17, California Code of Regulations, "Methane Emissions from Municipal Solid Waste Landfills." This includes, but is not limited to, the following requirements.
- 2. The landfill gas collection and control system shall be designed and operated as specified in section 95464(b).
- 3. Any landfill gas flare shall be operated in compliance with the requirements of section 95464(b)(2). This includes achieving a methane destruction efficiency of at least 99 percent by weight.
  - As required by section 95464(b)(4), compliance with this emissions standard shall be demonstrated on an annual basis by source testing using the test methods identified in section 95471(f).
- 4. Any gas control devices other than flares shall be operated in compliance with the requirements of section 95464(b)(3). This includes achieving a methane destruction efficiency of at least 99 percent by weight. In addition, lean burn internal combustion

engines must reduce the outlet methane concentration to less than 3,000 ppmvd at 15 percent oxygen.

As required by section 95464(b)(4), compliance with these emissions standards shall be demonstrated on an annual basis by source testing using the test methods identified in section 95471(f).

- 5. Pursuant to section 95465, no location on the municipal solid waste landfill surface may exceed either of the following methane concentration limits:
  - a. 500 ppmv, other than non-repeatable, momentary readings, as determined by instantaneous surface emissions monitoring
  - b. An average methane concentration limit of 25 ppmv as determined by integrated surface emissions monitoring.
- 6. Pursuant to section 95469, the permittee shall conduct instantaneous and integrated surface monitoring of the landfill surface on a quarterly basis. The procedures specified in section 95471(c) shall be used.
- 7. The permittee shall comply with all applicable recordkeeping and reporting requirements as detailed in section 95470.

M:\TITLEV\Attachments updated\CARBCH4fromMSW(05-18-15).docx

#### 7. PERMIT SPECIFIC CONDITIONS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table", the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are primarily based on Rule 26, "New Source Review" requirements (e.g., BACT and offset requirements), or Rule 29, "Conditions on Permits" requirements (e.g., throughput recordkeeping requirements, specific requirements that limit emissions, etc.). These requirements are in addition to the specific applicable requirements listed in Section No. 6.

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment PO (Title V Permit No.) PC#" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

M:\TITLEV\Attachments updated\PERMIT7std.docx

## Ventura County Air Pollution Control District Additional Permit Requirements General Recordkeeping Requirements

#### Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable

#### Rule 29, "Conditions on Permits"

Conditions applied pursuant to Rule 29 are District enforceable only

#### Applicability:

This attachment applies to this stationary source in general. These requirements are in addition to any other specific or general requirements referenced in this permit.

#### **Conditions:**

- In order to comply with the throughput and consumption limits of this permit, the permittee shall maintain monthly records of throughput and consumption as detailed in Section No. 3, "Permitted Throughput and Consumption Limit Table", of this permit. The monthly records shall be summed for the previous 12 months. Throughput or consumption totals for any of these 12 calendar month rolling periods in excess of the specified limit in Table No. 3 shall be considered a violation of this permit. This is a general throughput and consumption record keeping condition and applies unless another throughput and consumption record keeping condition appears in this section of the permit. These records shall be maintained for a period of five years and shall be made available to District personnel upon request. (Rule 26)
- 2. Pursuant to Rule 23.F.7, the use of solvents, in addition to the use of coatings, adhesives, lubricants, and sealants, for facility and building maintenance and repair is exempt from permit. However, the use of such materials by contractors for the maintenance and repair of process and industrial equipment is not exempt from permit pursuant to Rule 23.F.7, unless the material is exempted under another specific section of Rule 23. Pursuant to Rule 23.F.6, the use of non-refillable aerosol cans is exempt from permit. Pursuant to Rule 23.F.10, the use of cleaning agents certified by the SCAQMD as Clean Air Solvents (Rule 23.F.10.a) and the use of cleaning agents that contain no more than 25 grams per liter of ROC as used or applied, and no more than 5 percent by weight combined of methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, and chloroform (Rule 23.F.10.b), is also exempt from permit. This permit does not limit the usage of acetone. Acetone is exempt from permit and record keeping requirements, as it is not defined as a reactive organic compound.

Section No. 7
Attachment PO07340PC1

In order to substantiate the solvent use exemptions listed above, the permittee shall maintain a list of all exempt solvents used at the stationary source and a reference to the specific permit exemption status. (Rule 29)

M:\TITLEV\TV Permits\Po7340\Permit III\PC1 Records.doc

## Ventura County Air Pollution Control District Additional Requirements Landfill Gas Collection and Control System - Flare

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable

Rule 51, "Nuisance"

Adopted 04/13/04

Conditions applied pursuant to Rule 51 are District enforceable only

Rule 54, "Sulfur Compounds" Adopted 01/14/14, Federally Enforceable

Rule 57.1, "Particulate Matter Emissions From Fuel Burning Equipment" Adopted 01/11/05, Federally Enforceable

Rule 74.17.1, "Municipal Solid Waste Landfills" Adopted 02/09/99, Federally Enforceable

#### Applicability:

This attachment applies to the landfill gas collection and control system and the associated flare. These requirements are in addition to any other specific or general requirements referenced in this permit.

#### **Conditions:**

1. The annual amount of landfill gas combusted in the flare shall not exceed 751,608 million BTU's (MMBTU) per year.

In order to comply with this condition, the permittee shall maintain records of the amount of landfill gas burned in the flare on a daily basis in units of MMBTU per day. At the end of each month, the daily records shall be compiled into a monthly summary. These records shall include the landfill gas flow rate and the landfill gas heating value. The monthly records shall be summed for the previous 12 calendar months. Landfill gas combustion totals for any of these 12 calendar month rolling periods in excess of the above specified limit shall be considered a violation of this condition. (Rule 26)

- 2. The following conditions apply to the 85.8 MMBTU/Hr LFG Specialties Inc. flare:
  - a. The landfill gas flare shall be maintained at a minimum temperature of 1500 degrees Fahrenheit (815 degrees Celsius) as indicated by the flare temperature recorder. This condition is applied as BACT for ROC.
  - b. Emissions of ROC, as defined in Rule 2, from the landfill gas flare shall not exceed 1.00 pounds per hour. This condition is applied as BACT for ROC.
  - c. Emissions of oxides of nitrogen (NOx measured as NO2) from the landfill gas flare shall not exceed 5.15 pounds per hour. This condition is applied as BACT for NOx.

In order to comply with this condition, the flare shall be equipped with a temperature monitoring device with a continuous recorder as required by Rule 74.17.1. In addition, the flare shall be source tested every two years (ROC, NOx) as required by Rule 74.17.1. For the purpose of demonstrating compliance with the ROC limit above, ROC may be assumed to be equal to NMOC. To facilitate source testing of the flare, an approved heat shield or sufficiently insulated shroud must be placed around the test ports to permit sampling. The outer skin temperature must be less than 250 degrees Fahrenheit to avoid heat stress on source test personnel. Prior to conducting the source test, the permittee shall notify the APCD Compliance Division. A source test plan for complying with the testing outlined above shall be submitted to the District Compliance Division at least 30 days prior to the test for approval. The test plan shall include, but not be limited to, a discussion of the sampling methods, test date, analytical methods, test equipment inventory, and calibration procedures. The District shall be given the opportunity, with sufficient notice of a minimum of 5 working days, to observe the emissions testing. Additional monitoring, recordkeeping, reporting, and test method requirements for this flare are included in Attachment 74.17.1 in Section No. 6 of this permit and in the following conditions. (Rule 26 and Rule 74.17.1)

The operation of the 85.8 MMBTU/hr LFG Specialties Inc. flare shall comply with Rule 54, "Sulfur Compounds". In order to comply with the emission limits of Rule 54.B, the flare shall be fired on treated landfill gas (LFG) with a sulfur concentration of no more than 60 ppmv, calculated as hydrogen sulfide (H<sub>2</sub>S), at standard conditions. This condition is also applied as BACT for SOx.

The LFG treatment system shall consist of one or more vessels containing amounts of sulfur removal media, operated in parallel, as needed, for the control of sulfur content in the combusted gas. The vessels comprise a single system which provides sulfur control for gas routed to all combustion devices. The sulfur control media shall be replaced as necessary to ensure compliance with the sulfur content limit.

In order to demonstrate compliance with the 60 ppmv LFG sulfur concentration limit, the permittee shall comply with the following monitoring requirements:

- a. Hydrogen sulfide levels (ppmv) in the treated LFG shall be monitored at the exhaust of the sulfur removal system, using colorimetric method, on a daily basis (Monday through Friday, excluding recognized holidays).
- b. Total sulfur concentration (ppmv) measurements at the exhaust of the sulfur removal system vessels using SCAQMD Method 307-91 shall be conducted on a monthly basis. The monthly measurement shall be used for compliance and to verify a reasonable correlation between total sulfur concentration and hydrogen sulfide concentration measured using the colorimetric method. (Rules 26 and 54)

(Note that there is a single LFG sulfur treatment system which provides sulfur control for gas routed to all combustion devices. Therefore, this identical sulfur limit and monitoring is applied as BACT, Rule 54, and/or Rule 64 compliance for the flare and microturbines.)

- 4. The flare shall comply with Rule 54, "Sulfur Compounds", as follows:
  - a. Pursuant to Rule 54.B.1.a, emissions of sulfur compounds, calculated as sulfur dioxide (SO<sub>2</sub>), shall not exceed 300 ppm by volume at 3% oxygen at the point of discharge. All sulfur present in gaseous molecular compounds containing oxygen shall be calculated as SO<sub>2</sub>.
  - b. Pursuant to Rule 54.B.2, emissions of sulfur compounds, calculated as sulfur dioxide (SO<sub>2</sub>), shall not result in average ground or sea level concentrations at any point at or beyond the property line in excess of 0.25 ppmv averaged over any one hour period, or 0.04 ppmv averaged over any 24 hour period. All sulfur present in gaseous molecular compounds containing oxygen shall be calculated as SO<sub>2</sub>.
  - c. Pursuant to Rule 54.B.2.a, emissions of sulfur compounds, calculated as sulfur dioxide (SO2) as a liquid or gas at standard conditions, shall not result in a ground or sea level concentration at any point at or beyond the property line such that the 1-hour average design value exceeds 0.075 ppmv. Compliance shall be determined as specified in Sections B.2.a.1 through B.2.a.4 of Rule 54.
  - d. Pursuant to Rule 54.B.3, emissions of hydrogen sulfide (H<sub>2</sub>S) shall not exceed 10 ppm, by volume, at the point of discharge. All reduced sulfur compounds present shall be calculated as H<sub>2</sub>S.
  - e. Pursuant to Rule 54.B.4, emissions of hydrogen sulfide (H<sub>2</sub>S) shall not result in average ground or sea level concentrations at any point at or beyond the property line in excess of 0.06 ppm averaged over any 3 minute period, or 0.03 ppm averaged over any one hour period. All reduced sulfur compounds present shall

#### be calculated as $H_2S$ .

In order to comply with this condition, the flare shall be fired on treated LFG and the sulfur content of the gas shall be monitored as required by Condition No. 3. The permittee shall conduct testing to determine the sulfur dioxide (SO<sub>2</sub>) and hydrogen sulfide (H<sub>2</sub>S) emissions from the flare, upon District request, to demonstrate compliance with Rule 54.B.1 and 54.B.3. In addition, permittee shall perform dispersion modeling, upon District request, based on the source test results to demonstrate compliance with Rule 54.B.2 and 54.B.4. Source testing shall be performed in accordance with Rule 54.D. SOx dispersion modeling has been conducted pursuant to Application No. 07340-181 and Application No. 07340-190 to demonstrate compliance with this condition. (Rule 54)

5. The flare shall comply with Rule 57.1, "Particulate Matter Emissions From Fuel Burning Equipment". Pursuant to Rule 57.1.B, the permittee shall not discharge into the atmosphere from any fuel burning equipment particulate matter exceeding a concentration of 0.12 pounds per million BTU of fuel input. Particulate matter is defined as any material, except uncombined water, that exists in a finely divided form as a liquid or solid at standard conditions. Standard conditions are defined as: a gas temperature of 68 degrees Fahrenheit (20 degrees Celsius) and a gas pressure of 14.7 pounds per square inch (760 mm. Hg) absolute.

Periodic monitoring is not necessary to certify compliance with Rule 57.1. EPA particulate matter emission factors for landfill gas flares indicate that this flare will comply with Rule 57.1. To certify compliance, a reference to EPA emission factors is sufficient. (Rule 57.1)

- 6. The flare shall be equipped with a UV flame scanner to ensure that the flare is operating. The flare shall be equipped with site ports, sampling ports, a safety system to shut off the burner (flame failure alarm, gas shut off valve), inlet flow recorders, a burner assembly and gas pilot or electronic ignitor. All devices shall be maintained, operated, and calibrated according to manufacturer's specifications. This condition is applied as BACT. (Rule 26)
- 7. The flare shall be operated with a condensate knockout/ filter vessel. This condition is applied as BACT. (Rule 26)
- 8. The emissions from the condensate and leachate collection vessels shall be routed to the flare for incineration. This condition is applied as BACT. (Rule 26)
- 9. The stack height of the flare shall be no less than 45 feet. The stack diameter of the flare shall not exceed 9 feet. The stack gas exit velocity from the flare shall be no less than 4.4 feet per second and no more than 38.0 feet per second. In order to comply with this

condition, the permittee shall conduct testing as required by this attachment to determine the flare stack exit velocity. (Rule 51)

Once every four years, the landfill gas and landfill gas flare exhaust shall be tested to determine the actual concentrations, by weight, of the toxic/hazardous substances for which carcinogenic unit risk factors have been developed by the Cal EPA Office of Environmental Health Hazard Assessment or the Environmental Protection Agency and substances listed by the California Air Resources Board pursuant to Section 44321 of the California Health and Safety Code (AB 2588 List of Substances). In addition, the analysis shall determine the reactive organic compound (ROC as defined in APCD Rule 2) content in percent by weight in the landfill gas and flare exhaust; and the higher heating value of the landfill gas in BTUs per cubic foot and BTUs per pound. Analysis for any compound listed or referenced above which can be demonstrated as not being contained in the landfill gas and/or flare exhaust gas may be requested for removal from the required list, subject to APCD approval. The APCD shall be given the opportunity, with sufficient notice, to observe the emissions testing.

A source test plan for complying with the above outlined testing shall be submitted 30 days prior to the test for APCD approval. The test plan shall include, but not be limited to, a discussion of sampling methods, test date, analytical methods, test equipment inventory, and calibration procedures.

Within 45 days after completion of an emissions test, a test report shall be submitted to the APCD detailing the test procedures, quality assurance procedures, and the results of the tests as described above. (Rule 51)

If an analysis of a source test indicates that the concentrations of the toxic contaminants are significantly higher than those toxic contaminants considered in the risk assessment prior to the installation of the gas collection and flare system, then a new screening health risk assessment shall be prepared and submitted within 60 days of the date the test results are available. If this second health risk assessment shows excess cancer risks greater than one in a million to the maximum exposed individual, then a more detailed risk analysis that shows acceptable risk levels based on new data will be prepared and submitted within 90 days of the date the test results are available.

If appropriate, an alternate mitigation measure may be to apply for an Authority to Construct, within 120 days of the date that the results of the second health risk analysis are available, for modifications to the system that adequately reduce the emission impact to acceptable levels. A new health risk assessment, which demonstrates the acceptable risk levels, shall accompany the Authority to Construct application. (Rule 51)

- 12. The permittee shall maintain the following records:
  - a. Daily (Monday through Friday, excluding recognized holidays) colorimetric hydrogen sulfide (H<sub>2</sub>S) content measurements of the LFG at the exhaust of the sulfur removal system vessels;
  - b. Monthly SCAQMD Method 307.91 total sulfur content measurements of the LFG at the exhaust of the sulfur removal system vessels;
  - c. Source test reports as required by Condition Nos. 2 and 10.

These records shall be maintained for five years and shall be made available to District personnel upon request.

M:\TITLEV\TV Permits\Po7340\Permit III\PC2LFGCS-171,191.docx

#### Ventura County Air Pollution Control District 250 KW Micro-Turbines

Rule 51, "Nuisance"
Adopted 04/13/04, District Enforceable Only

Rule 54, "Sulfur Compounds" Adopted 01/14/14, Federally Enforceable

Rule 64, "Sulfur Content of Fuels" Adopted 04/13/99, Federally-Enforceable

Rule 74.17.1, "Municipal Solid Waste Landfills" Adopted 02/09/99, Federally Enforceable

40 CFR Part 60, Subpart WWW, "Standards of Performance for Municipal Solid Waste Landfills"

#### Applicability:

This attachment applies to the landfill gas-fired 250 KW (3.2 MMBTU/hr) Flex Energy Micro-Turbines which are a part of the landfill gas collection and control system. Attachment 74.17.1N5 also contains information regarding the micro-turbines. As stated below, the micro-turbines are subject to 40 CFR Part 60, Subpart WWW; however, the units are not subject to the requirements of the subpart because the landfill gas has been treated prior to combustion in the microturbines.

#### **Conditions:**

- The nine (9) microturbines shall be certified to meet the applicable waste gas emission standards as required by the CARB (California Air Resources Board) Distributed Generation Certification Regulation. The nine (9) microturbines shall comply with all applicable requirements of ARB Executive Order DG-027, "Distributed Generation Certification of Ingersoll Rand Energy Systems 250SW Microturbine" or other applicable executive order. The permittee shall maintain documentation that the microturbines are CARB certified or meet the CARB performance and emission standards as detailed in Authority to Construct No. 07340-130.
- 2. The nine (9) microturbines shall comply with Rule 54, "Sulfur Compounds", and Rule 64, "Sulfur Content of Fuels". In order to comply with these rules, the nine (9) microturbines shall be fired on treated landfill gas (LFG) with a sulfur concentration of no more than 60 ppmv, calculated as hydrogen sulfide (H<sub>2</sub>S), at standard conditions.

The LFG treatment system shall include a sulfur removal system to remove sulfur compounds from the landfill gas prior to use in all combustion devices at the landfill. The system consists of vessels containing sulfur removal media. The sulfur control media shall be replaced as necessary to ensure compliance with the sulfur content limit.

In order to demonstrate compliance with the 60 ppmv LFG sulfur concentration limit, the permittee shall comply with the following monitoring requirements:

- a. Hydrogen sulfide levels (ppmv) in the treated LFG shall be monitored at the exhaust of the sulfur removal system, using colorimetric method, on a daily basis (Monday through Friday, excluding recognized holidays).
- b. Total sulfur concentration (ppmv) measurements at the exhaust of the sulfur removal system vessels using SCAQMD Method 307-91 shall be conducted on a monthly basis. The monthly measurement shall be used for compliance and to verify a reasonable correlation between total sulfur concentration and hydrogen sulfide concentration measured using the colorimetric method. (Rules 54 and 64)

(Note that there is a single LFG sulfur treatment system which provides sulfur control for gas routed to all combustion devices. Therefore, this identical limit and monitoring is applied as BACT, Rule 54, and/or Rule 64 compliance for the flare and microturbines.)

- 3. After the sulfur treatment system, the LFG shall be further processed prior to combustion in the microturbines. This LFG treatment system shall include, but not be limited to, a knockout/mesh pad for removal of water particles 5 micron and larger; gas compressor(s); heat exchanger(s); and two (2) 8' diameter x 11' tall vessels containing siloxane removal media. The two (2) vessels holding siloxane removal media are included in the gas treatment process but not required by permit or regulation.
- 4. The nine (9) microturbines are subject to 40 CFR Part 60, Subpart WWW, "Standards of Performance for Municipal Solid Waste Landfills". It has been determined that the LFG combustion is subject to 40 CFR Section 60.752(b)(2)(iii)(C) because the LFG is routed through a treatment system that processes the gas for subsequent sale or use. The treatment includes moisture knockout, cooling, compression, and filtering, as described above.

Therefore, the microturbines are not subject to the control device requirements of a 98% NMOC reduction efficiency or a 20 ppmvd NMOC outlet limitation. The permittee shall maintain documentation of a compliance determination from EPA stating that the LFG meets the "treated" requirements and is subject to Section 60.752(b)(2)(iii)(C) and are not subject to the control requirements of 40 CFR Section 60.752(b)(2)(iii)(B) and the associated monitoring, recordkeeping, and reporting for such control devices. Without the EPA determination, the microturbines will be subject to the Section 60.752(b)(2)(iii)(B) and initial and periodic source testing will be required.

- 5. The stack exhausts of the nine microturbines shall be of a vertical orientation and shall not be equipped with rain caps. Flapper-type rain caps are acceptable. This condition is based on health risk assessments and Rule 54 dispersion modeling that were conducted and is applied pursuant to Rule 51, "Nuisance", and Rule 54, "Sulfur Compounds".
- 6. The landfill gas flow rate to the micro-turbine shall be continuously recorded by continuously recording the micro-turbine power output and back calculating the gas flow rate based at a heat rate of 14,500 Btu (LHV)/KW-hr. The permittee shall maintain records of the amount of electrical power generated and landfill gas burned in the micro-turbine on a daily basis in units of KW-hr per day and MMBTU per day. At the end of each month, the daily records shall be compiled into a monthly summary. These records shall include the power generated, the landfill gas flow rate, and the landfill gas heating value. The monthly records shall be summed for the previous 12 calendar months. (Rule 74.17.1 and 40 CFR Part 60.756(b)(2))
- 7. The permittee shall maintain the following records:
  - a. Daily (Monday through Friday, excluding recognized holidays) colorimetric hydrogen sulfide (H<sub>2</sub>S) measurements at the exhaust of the sulfur removal system vessels;
  - b. Monthly SCAQMD Method 307-91 total sulfur content measurements at the exhaust of the sulfur removal system vessels;
  - c. Documentation of the LFG treatment system sulfur control removal media replacement (as deemed necessary through emissions monitoring data);
  - d. Microturbine power generated, landfill gas flowrate, and landfill gas heating value as required by Condition No. 6.

These records shall be maintained for five years and shall be made available to District personnel upon request.

M:\TITLEV\TV Permits\Po7340\Permit III\PC3 Microturbines-171.docx

#### Ventura County Air Pollution Control District Biosolids Drying System – Out of Service

#### Rule 29, "Conditions on Permits"

Conditions applied pursuant to Rule 29 are District enforceable only.

#### Applicability:

This attachment applies to the Biosolids Drying System which was installed pursuant to Authority to Construct Nos. 07340-131 (issued March 9, 2009) and 07340-161 (issued June 27, 2012). The Biosolids Drying System has been placed on "Permanent Non-Operational Status" pursuant to Application No. 07340-191. The system is prohibited from operation.

#### **Conditions:**

- 1. All landfill gas lines shall be disconnected from combustion emissions units associated with the Biosolids Drying System. This includes the two 16.8 MMBTU/hr Thermal Oil Heaters and the 4.0 MMBTU/hr Thermal Oxidizer.
- 2. The Wet Biosolids Receiving Hopper and the two Wet Biosolids Storage Hoppers shall not contain any material.
- 3. The Wet Biosolids Receiving Hopper shall remain closed. The opening shall be dismantled such that it cannot readily accept any material.
- 4. Any future operation of the Biosolids Drying System shall require a new Authority to Construct application that demonstrates compliance with all applicable rules and regulations including, but not limited to, the Best Available Control Technology (BACT) and emission offset requirements of Rule 26, "New Source Review."
- In order to ensure compliance with these conditions, the permittee shall annually certify that the Biosolids Drying System, which has been designated with "Permanent Non-Operational Status," is shut down and not being operated.

M:\TITLEV\TV Permits\Po7340\Permit III\PC4 Biosolids System - Out of Service - 191.docx

#### 8. GENERAL APPLICABLE REQUIREMENTS (ATTACHMENTS)

The general applicable requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or activities. These requirements can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit or activity, provided that the scope of the requirement and the manner of its enforcement are clear. Examples of such requirements include those that apply identically to all emissions units at a facility (e.g., source-wide opacity limits), general housekeeping requirements, and requirements that apply identical emissions limits to small units (e.g., process weight requirements).

As detailed in the Title V Permit Reissuance Application, general applicable requirements that apply to this facility were determined. The permit conditions associated with each generally applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) \_\_\_\_\_" in the lower left corner of each attachment. Each attachment has an applicability section that describes the emissions units to which the attachment applies. Each attachment may apply to one or more of the emissions units listed in the Applicable Requirements Table of Section No. 2. Note that these general applicable requirements may also apply to emissions units not required to be listed in the permit, such as those that are short-term.

M:\TITLEV\Attachments updated\PERMIT8reissuestd.docx

# Ventura County Air Pollution Control District Rule 50 Applicable Requirements Opacity

Rule 50, "Opacity" Adopted 04/13/04, Federally-Enforceable

#### Applicability:

This attachment applies to all emissions units at this stationary source.

#### Conditions:

- 1. Pursuant to Rule 50.A, permittee shall not discharge into the atmosphere from any single source whatsoever any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50.
- 2. Permittee shall perform daily visual inspections to ensure that compliance with Rule 50 is being maintained. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date, time, and identity of emissions unit. If the visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.
- 3. On an annual basis, permittee shall certify that all emissions units at the facility are complying with Rule 50. This annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. As an alternative, the annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9, or any other appropriate test method as approved in writing by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.
- 4. Upon District request, opacity shall be determined by a person certified in reading smoke using EPA Method 9 or a certified, calibrated monitoring system.

M:\TITLEV\Attachments updated\50 (12-07-2017).docx

# Ventura County Air Pollution Control District Rule 54 Applicable Requirements Sulfur Compounds - Sulfur Emissions from Combustion Operations at Point of Discharge

Rule 54, "Sulfur Compounds" Adopted 01/14/14, Federally Enforceable

Rule 64, "Sulfur Content of Fuels" Adopted 04/13/99, Federally-Enforceable

## Applicability:

This attachment applies to all combustion emissions units at this stationary source that combust gaseous or liquid fuels. This attachment addresses the requirements of Rule 54 for sulfur emissions at the point of discharge. It can be demonstrated that compliance with the fuel sulfur content limits of Rule 64 ensures compliance with the sulfur emission limits of Rule 54.

### **Conditions:**

1. Pursuant to Rule 54.B.1.a, no person shall discharge sulfur compounds from any combustion operation, which would exist as a liquid or gas at standard conditions, in excess of the following limit at the point of discharge:

200 ppp by vol	For course subject to
300 ppm by vol,	For sources subject to:
on a dry basis,	Rule 74.11, "Natural Gas-Fired Water Heaters"
as sulfur dioxide	Rule 74.11.1, "Large Water Heaters and Small Boilers"
$(SO_2)$ , at 3%	Rule 74.15, "Boilers, Steam Generators, and Process Heaters"
oxygen	Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters"
	(1 to 5 MMBTUs)
300 ppm by vol,	For sources subject to:
on a dry basis,	Rule 74.9, "Stationary Internal Combustion Engines"
as sulfur dioxide	Rule 74.23, "Stationary Gas Turbines"
(SO <sub>2</sub> ), at 15% O <sub>2</sub>	Flares and all other combustion operations

- 2. In order to comply with Rule 54, permittee shall comply with the fuel sulfur content limits of Rule 64. No additional periodic monitoring requirements for Rule 54 are required beyond the periodic monitoring requirements of Rule 64.
- 3. Upon District request, sulfur compounds at the point of discharge shall be determined by source testing using EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or South Coast AQMD Test Method 307-91 (Determination of Sulfur in a Gaseous Matrix), as appropriate.

M:\TITLEV\Attachments updated\54B1 (01-14-14).docx

# Ventura County Air Pollution Control District Rule 54 Applicable Requirements Sulfur Compounds - Sulfur Dioxide Concentration at Ground Level

Rule 54, "Sulfur Compounds" Adopted 01/14/14, Federally Enforceable

## Applicability:

This attachment applies to all emissions units at this stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54 for sulfur emissions at ground or sea level at or beyond the property line of the stationary source.

#### Conditions:

- 1. Pursuant to Rule 54, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in average ground or sea level concentrations at any point at or beyond the property line in excess of 0.25 ppmv averaged over any one hour period, or 0.04 ppmv averaged over any 24 hour period.
- Pursuant to Rule 54.B.2.a, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in ground or sea level concentrations at any point at or beyond the property line such that the 1-hour average design value exceeds 0.075 ppm (Vol).
  - a) For purposes of Subsection B.2.a, the design value is derived from the 3-year average of annual 99th percentile daily maximum 1-hour values. At the District's discretion, compliance with the ground or sea level concentration limit in Subsection B.2.a of this rule may be demonstrated using EPA-approved dispersion models or ambient air monitoring. If the District requires ambient air monitoring, the test method(s) listed in Subsection D.2 of this rule must be employed.
  - b) To demonstrate compliance using dispersion modeling, the annual 99<sup>th</sup> percentile daily maximum at each receptor is determined from model results as follows: for each year of meteorological data modeled, select from each day the maximum hourly modeled SO<sub>2</sub> concentration value and sort all these daily maximum hourly values by descending value. The 99<sup>th</sup> percentile is the 4<sup>th</sup> highest value for each modeled year. Calculate the average of the 99<sup>th</sup> percentile values for three consecutive years of modeling data for each receptor. Compliance is demonstrated if this average value is less than or equal to the design value concentration limit in Subsection B.2.a of this Rule at each receptor.
  - c) Compliance with the limit in subsection B.2.a may also be demonstrated using EPA-approved screen models. Compliance is demonstrated if the 1-hour SO<sub>2</sub>.

- ground or sea level concentration does not exceed 0.075 ppm (Vol) at or beyond the property line.
- d) If ambient air monitoring data is used to demonstrate compliance, the design value must be calculated in accordance with 40 CFR Part 50 Appendix T Interpretation of the Primary National Ambient Air Quality Standards for Oxides of Sulfur (Sulfur Dioxide).
- 3. Permittee shall maintain a representative fuel analysis or exhaust analysis, along with modeling data or other demonstration to ensure that compliance with Rule 54 is being maintained. This analysis and compliance demonstration shall be provided to the District upon request.
- 4. Upon District request, ground or sea level concentrations of SO<sub>2</sub> shall be determined by Bay Area Air Quality Management District Manual of Procedures, Volume VI, Section 1, Ground Level Monitoring for Hydrogen Sulfide and Sulfur Dioxide (July 20, 1994) with the following amendments:
  - a. The wind direction shall be continuously measured and recorded to within 5 degrees of arc, and wind speed shall be continuously measured and recorded to within 0.25 miles per hour (mph) at wind speeds less than 25 mph and with a threshold no greater than 0.2 mph.
  - b. The meteorological instruments and siting requirements shall comply with the guidelines in "Quality Assurance Handbook for Air Pollution Measurements Systems, Volume IV, Meteorological Measurements Version 2.0," EPA-454/B-08-002, March 2008.
  - c. The gas standards shall be restandardized against the reference wet chemical method at a minimum of once every 12 months, or be standardized using National Institute of Standards and Technology (NIST) standard gases.

M:\TITLEV\Attachments updated\54B2 (01-14-14).docx

# Ventura County Air Pollution Control District Rule 55 Applicable Requirements Fugitive Dust

Rule 55, "Fugitive Dust" Adopted 06/10/08, District-Enforceable

This permit attachment will become federally enforceable when Rule 55 is approved by EPA as part of the SIP.

## Applicability:

This attachment applies to any operation, disturbed surface area, or man-made condition at this stationary source that is capable of generating dust. These operations may include bulk material handling, earth-moving, construction, demolition, storage piles, unpaved roads, track-out, or off-field agricultural operations.

All definitions listed in Section H of Rule 55 are applicable to this attachment. The Rule 55 definition section includes the following definitions: "disturbed surface area", "bulk material", "earth moving activities", "construction/demolition activities", "storage piles", "paved road", "track-out", and "off-field agricultural operations". All exemptions listed in Section D of Rule 55 are applicable to this attachment.

### **Conditions:**

- 1. Pursuant to Rule 55.B.1, the permittee shall not cause or allow the emissions of fugitive dust from any applicable source such that the dust remains visible beyond the midpoint (width) of a public street or road adjacent to the property line of the emission source or beyond 50 feet from the property line if there is not an adjacent public street or road.
- 2. Pursuant to Rule 55.B.2, the Permittee shall not cause or allow the emissions of fugitive dust from any applicable source such that the dust causes 20 percent opacity or greater during each observation and the total duration of such observations (not necessarily consecutive) is a cumulative 3 minutes or more in any one (1) hour. Only opacity readings from a single source shall be included in the cumulative total used to determine compliance. Compliance with the opacity limit shall be determined by using EPA Method 9 with the modifications listed in Section F of Rule 55.
- 3. Pursuant to Rule 55.B.3, the permittee shall not allow track-out to extend 25 feet or more in length unless at least one of the following three control measures is utilized: track-out area improvement, track-out prevention, or track-out removal. These control measures are detailed in Rule 55.B.3.a.

- 4. Pursuant to Rule 55.B.3.b, notwithstanding other track-out requirements, all track-out shall be removed at the conclusion of each workday or evening shift subject to the conditions listed in Section 55.B.3.b.
- 5. Pursuant to Rule 55.C, the permittee shall comply with the specific activity requirements detailed in Section C of Rule 55, for earth-moving, bulk material handling, and truck hauling activities, as applicable.
- 6. The permittee shall comply with the specific recordkeeping requirements listed in Section E of Rule 55, as applicable.
- On an annual basis, the permittee shall certify that all applicable sources of dust at this stationary source are operating in compliance with Rule 55. The permittee may also certify annually that there are no operations, disturbed surface areas, or man-made conditions at this stationary source that are subject to Rule 55.

M:\TITLEV\Attachments updated\55.docx

# Ventura County Air Pollution Control District Rule 57.1 Applicable Requirements Particulate Matter Emissions From Fuel Burning Equipment

Rule 57.1, "Particulate Matter Emissions From Fuel Burning Equipment" Adopted 01/11/05, Federally-Enforceable

## Applicability:

This attachment applies to fuel burning equipment such as boilers, steam generators, process heaters, water heaters, space heaters, flares, and gas turbines. This attachment does not apply to internal combustion engines, jet engine test stands and rocket engine test stands, and rocket propellant testing devices and rocket fuel testing devices. This attachment also does not apply to exhaust gas streams containing particulate matter that was not generated by the combustion of fuel; such exhaust gas streams are subject to Rule 52 and Rule 53.

#### Conditions:

- 1. Pursuant to Section B of Rule 57.1, emissions of particulate matter shall not exceed 0.12 pounds per million BTU of fuel input.
  - Particulate matter is defined as any material, except uncombined water, that exists in a finely divided form as a liquid or solid at standard conditions. Standard conditions are: a gas temperature of 68 degrees Fahrenheit (20 degrees Celsius) and a gas pressure of 14.7 pounds per square inch (760 mm. Hg) absolute.
- 2. Upon request of the District Compliance Division, compliance shall be determined by independent source test using CARB Method 5. The total particulate catch shall include the filter catch, probe catch, impinger catch, and the solvent extract, as specified in CARB Method 5. Any other appropriate test method may be used with prior written approval by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.
- 3. Periodic monitoring is not necessary to certify compliance with Rule 57.1. To certify compliance, a reference to the Rule 57.B District analysis dated December 3, 1997 is sufficient.

M:\TITLEV\Attachments updated\57.1 (01-11-05).docx

# Ventura County Air Pollution Control District Rule 64 Applicable Requirements Sulfur Content of Fuels - Gaseous Fuel Requirements

Rule 64, "Sulfur Content of Fuels" Adopted 04/13/99, Federally-Enforceable

## Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting gaseous fuels. Rule 64 shall not apply to any flare gas combustion, where no useful energy is produced and which is subject to Rule 54, "Sulfur Compounds".

#### **Conditions:**

- 1. Pursuant to Rule 64, no person shall burn at any time gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel (788 ppmv), calculated as hydrogen sulfide at standard conditions, unless specifically exempted by Rule 64.
- 2. If only Public Utilities Commission-regulated natural gas, propane, or butane is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.
- 3. If other than Public Utilities Commission-regulated natural gas, propane, or butane is being combusted, the permittee shall analyze the sulfur content of the fuel on an annual basis using South Coast AQMD Method 307-94 Determination of Sulfur in a Gaseous Matrix or by ASTM D1072-90 (1994), Standard Test Method for Total Sulfur in Fuel Gases.

Alternatively, when measuring the sulfur content of landfill or oilfield gaseous fuel, permittee may use the colorimetric method ASTM D 4810-88 (Reapproved 1994) or the ASTM D4084-94 (Lead Acetate Reaction Rate Method) and may assume that the hydrogen sulfide content of the fuel gas adequately represents the total sulfur content. However, if the sulfur content as measured by ASTM D4810-88 or ASTM D4084-94 equals or exceeds 200 ppmv, then only South Coast AQMD Method 307-94 or ASTM D1072-90 (1994) shall be used to determine compliance.

The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis may be used subject to the verification of the dilution ratio.

Permittee may use the colormetric method ASTM D 4810-88 (Reapproved 1994) for the measurement of the sulfur content of gaseous fuels other than landfill or oilfield gas only if written approval has been granted by the District and by US EPA.

- 4. Monitoring of the sulfur content of landfill or oilfield gaseous fuel by the permittee shall be at least quarterly if any of the following conditions apply:
  - a. Any sulfur measurement exceeds 394 ppmv, calculated as hydrogen sulfide at standard conditions.
  - b. A stationary source is new.
  - c. The permittee has not reported historical measurements of hydrogen sulfide of the landfill or oilfield gaseous fuel performed within the previous three years in writing to the District for a stationary source.

An operator may have the sulfur content of landfill or oilfield gaseous fuel monitored annually only, instead of quarterly, by satisfying the following provisions:

- a. During four consecutive calendar quarters, each sulfur content measurement shall not exceed 394 ppmv, calculated as hydrogen sulfide at standard conditions, and
- b. Submit a written request to the District for a reduction in monitoring frequency. This request shall contain backup documentation including monitoring reports that document the above provision. Requests for a reduction in monitoring frequency are not effective until written approval by the District is received by the operator.

This annual fuel analysis, and the quarterly analyses if applicable, shall be maintained at the facility and a copy of the annual analysis shall be provided to the District with the annual compliance certification.

M:\TITLEV\Attachments updated\64B1(4-13-99).docx

# Ventura County Air Pollution Control District Rule 64 Applicable Requirements Sulfur Content of Fuels - Liquid Fuel Requirements

Rule 64, "Sulfur Content of Fuels" Adopted 04/13/99, Federally-Enforceable

#### Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting liquid fuels. This attachment does not apply to any combustion emission unit with sulfur emission controls.

#### **Conditions:**

- 1. Pursuant to Rule 64, no person shall burn any liquid fuels with a sulfur content in excess of 0.5 percent, by weight, unless specifically exempted by Rule 64.
- 2. If only ARB-quality reformulated gasoline or ARB-certified diesel fuel is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.
- 3. If other than ARB-quality reformulated gasoline or ARB-certified diesel fuel is being combusted, for each liquid fuel delivery permittee shall either obtain the fuel supplier's certification, or shall test the sulfur content of the fuel using ASTM Method D4294-98 or D2622-98, to ensure that compliance with Rule 64 is being maintained. For liquid fuels, operators of electric power generation units may use the sampling and analysis methods prescribed in Code of Federal Regulations 40CFR Part 75 Appendix D.2.2. The fuel supplier's certification may be provided once for each purchase lot, if records are kept of the purchase lot number of each delivery.

The fuel sulfur content by weight data shall be maintained at the facility and shall be provided with the annual compliance certification.

M:\TITLEV\Attachments updated\64B2(4-13-99).docx

# Ventura County Air Pollution Control District Rule 74.6 Applicable Requirements Surface Cleaning and Degreasing

Rule 74.6, "Surface Cleaning and Degreasing" Adopted 11/11/03, Federally Enforceable

## Applicability:

This attachment applies to all solvent cleaning activities at this stationary source, except those activities listed in Condition No. 11 that are exempt pursuant to Section E of Rule 74.6. This attachment does not apply to substrate surface preparation regulated by other APCD surface coating, adhesive, ink, resin, and solvent rules. "Solvent" is defined as any ROC-containing liquid used to perform solvent cleaning. "Solvent cleaning" is defined as the use of organic solvent to remove loosely held uncured adhesives, uncured inks, uncured coatings, uncured resins, and other contaminants which include, but are not limited to, dirt, soil, lubricants, coolant, moisture, grease, and fingerprints, from parts, tools, machinery, equipment, and general work areas.

This attachment also contains requirements, pursuant to Rule 74.6, for cold cleaners. A cold cleaner is defined in Rule 74.6 as any batch operated equipment designed to contain liquid solvent that is operated below the solvent's boiling point to carry out solvent cleaning operations. A specific type of cold cleaner is a "remote reservoir cold cleaner" which is a device in which solvent is moved through a sink-like work area for cleaning parts and drains immediately, without forming a pool, through a single drain hole less than 100 square centimeters (15.5 square inches) in area into an enclosed container that is not accessible for soaking parts. The freeboard height for remote reservoir cold cleaners is the distance from the top of the solvent drain to the top of the tank.

This attachment does not apply to solvent cleaning where an emission control system is used pursuant to Rule 74.6.B.5 or where an alternative cleaning system is used pursuant to Rule 74.6.B.6. Pursuant to APCD Rule 23.F.7, solvents used by the permittee for facility, ground, and building maintenance and repair are exempt from the requirement to have a permit. However, unless exempted by Rule 74.6.E, such solvents are required to comply with Rule 74.6.

#### **Conditions:**

- 1. Pursuant to Rule 74.6.B.1, no person shall perform solvent cleaning using solvent that exceeds the following limits:
  - a. Solvents used for application equipment cleanup, and all other cleanup of uncured coatings, adhesives, inks, or resins, shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20°C, as applied.

- Solvents used for cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20°C, as applied.
- c. Solvents used for cleaning for purposes other than those listed in (a) and (b) above shall not exceed an ROC content of 25 grams per liter, as applied.
- 2. Pursuant to Rule 74.6.B.2, no person shall perform solvent cleaning using a solvent with an ROC content greater than 25 grams per liter unless one of the following cleaning devices or methods is used:
  - a. Wipe cleaning where solvent is dispensed to wipe cleaning materials from containers that are kept closed to prevent evaporation, except while dispensing solvent or replenishing the solvent supply;
  - b. Non-atomized solvent flow, dip, or flush method where pooling on surfaces being cleaned is prevented or drained, and all solvent runoff is collected in a manner that enables solvent recovery or disposal. The collection system shall be kept closed to prevent evaporation except while collecting solvent runoff or emptying the collection system;
    - If the cleaning method has a solvent capacity more than one gallon, a cold cleaner or remote reservoir cold cleaner meeting the equipment and operating requirements of Condition Nos. 8, 9, and 10 of this attachment (Sections C and D of Rule 74.6) shall be used to comply with this requirement.
  - c. Application of solvent from a hand held spray bottle, squirt bottle or other closed container with a capacity of one liter or less;
  - d. A properly used enclosed gun washer or low emission spray gun cleaner.
- 3. Pursuant to Rule 74.6.B.3.a, no person shall allow liquid cleaning solvent to leak from any equipment or container.
- 4. Pursuant to Rule 74.6.B.3.b, no person shall specify, solicit, supply, or require any cleaning solvent or solvent cleaning equipment intended for uses governed by Rule 74.6 if such use would violate Rule 74.6. This prohibition applies to all written and oral contracts under which solvent cleaning operations subject to Rule 74.6 are to be conducted at any location in Ventura County.
- 5. Pursuant to Rule 74.6.B.3.c, no person shall use more than one gallon per week of

solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these solvents, in a total concentration greater than 5 percent by weight, for cold cleaning except in a cold cleaner operated in accordance with National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards). Any person that uses the above solvent in quantities less than one gallon per week shall maintain records of the volume and formulation of such solvent on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

- 6. Pursuant to Rule 74.6.B.4.a, all ROC-containing solvents shall be stored in non-absorbent, non-leaking containers that shall be kept closed at all times except when filling or emptying.
- 7. Pursuant to Rule 74.6.B.4.b, waste solvent and waste solvent residues shall be disposed of in a manner conforming with Division 20, Chapter 6.5 of the California Health and Safety Code.
- 8. Pursuant to Rule 74.6.C.1, all cold cleaners, except remote reservoir cold cleaners, shall be equipped with the following devices:
  - a. A drying rack suspended above the solvent, or other facility for draining cleaned parts such that the drained solvent is returned to the cleaner.
  - A cover that prevents the solvent from evaporating when not processing work in the cleaner. If high volatility solvent is used, the cover must be a sliding, rolling, or guillotine (bi-parting) type that is designed to easily open and close, or it must be designed to be easily operated with one hand. A high volatility solvent is an unheated solvent with an ROC composite partial pressure of greater than 2 mmHg @ 20°C.
  - c. A freeboard height of at least 6 inches (15.2 centimeters), if low volatility solvent is used. A low volatility solvent is an unheated solvent with an ROC composite partial pressure of 2 mmHg or less @ 20°C.
  - d. At least one of the following control devices, if high volatility solvent is used:
    - 1. A freeboard height such that the freeboard ratio is at least 0.75.
    - 2. A water cover if the solvent is insoluble in and heavier than water.
  - e. A permanent conspicuous mark locating the maximum allowable solvent level that conforms with the applicable freeboard height requirement in Condition No. 8.c or 8.d.1.

- f. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.
- 9. Pursuant to Rule 74.6.C.2, remote reservoir cold cleaners shall be equipped with the following devices:
  - a. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.
  - b. A sink-like work area that is sloped sufficiently towards the drain to preclude pooling of solvent.
  - c. A single drain hole, less than 100 square centimeters (15.5 square inches) in area, for the solvent to flow from the sink into the enclosed reservoir.
  - d. A freeboard height of at least 6 inches (15.2 centimeters).
  - e. A cover for the drain when no work is being processed in the cleaner and high volatility solvent is used. If low volatility solvent is used, a cover is not required.
- 10. Pursuant to Rule 74.6.D, any person who operates a cold cleaner shall conform to the following operating requirements:
  - a. The operator shall drain cleaned parts of all solvent until dripping ceases to ensure that the drained solvent is returned to the cleaner.
  - b. Solvent agitation, where necessary, shall be achieved using pump recirculation, a mixer, or ultrasonics. Air agitation shall not be used.
  - c. If a solvent flow is utilized, only a solid fluid stream (not a fine, atomized, or shower type spray) shall be used.
  - d. The pressure of the solvent flow system shall be such that liquid solvent does not splash outside the container.
  - e. No person shall remove or open any required device designed to cover the solvent unless work is being processed in the cleaner or maintenance is being performed on the cleaner.
  - f. The cleaning equipment and emission control equipment shall be operated and maintained in proper working order.
  - g. The cleaning of porous or absorbent materials such as cloth, leather, wood, or rope is prohibited. This provision shall not apply to paper gaskets or paper filters.
- 11. Pursuant to Rule 74.6.E.1, Rule 74.6 (all requirements of this permit attachment) shall not

## apply to:

- a. Cleaning activities using Clean Air Solvent, or a solvent with an ROC-content no more than 25 grams per liter as applied. A "Clean Air Solvent" is a solvent certified by the South Coast Air Quality Management District as a Clean Air Solvent.
- b. The use of up to 160 fluid ounces of non-refillable aerosol cleaning products per day, per facility.
- c. Janitorial cleaning including graffiti removal.
- d. Cleaning carried out in vapor degreasers or motion picture film cleaning equipment.
- e. Any cleaning device or mechanism regulated by National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards).
- f. Cleaning operations subject to any of the following rules:

Rule 74.3, Paper, Fabric and Film Coating Operations

Rule 74.5.1, Petroleum Solvent Dry Cleaning

Rule 74.5.2, Synthetic Solvent Dry Cleaning

Rule 74.19, Graphic Arts Operations

Rule 74.19.1, Screen Printing Operations

Rule 74.21, Semiconductor Manufacturing

- g. Stripping of cured coating (e.g.; stripping), cured adhesive (e.g.; debonding, ungluing), cured ink, or cured resin.
- h. The use of solvent for purposes other than solvent cleaning activities.
- Pursuant to Rule 74.6.E.2, Rule 74.6.B.1 (Condition No. 1 of this attachment) shall not apply to:
  - a. Cleaning operations required to comply with any ROC content and/or composite vapor pressure limit in any of the following rules:

Rule 74.12, Surface Coating of Metal Parts and Products

Rule 74.13, Aerospace Assembly and Component Manufacturing Operations

Rule 74.14, Polyester Resin Material Operations

Rule 74.18, Motor Vehicle and Mobile Equipment Coating Operations

Rule 74.20, Adhesives and Sealants

Rule 74.24, Marine Coating Operations

- Rule 74.24.1, Pleasure Craft Coating Operations Rule 74.30, Wood Products Coatings
- b. Cleaning of ultraviolet lamps used to cure ultraviolet inks coatings, adhesives or resins.
- c. Cleaning of solar cells, laser hardware, scientific instruments, or high-precision optics.
- d. Cleaning conducted in laboratory tests and analyses including quality assurance/quality control applications, or bench scale or short-term (less than 2 years) research and development programs.
- e. Removal of elemental sodium from the inside of pipes and lines.
- f. Cleaning of mold release compounds from molds.
- g. Cleaning of tools used to cut or abrade cured magnetic oxide coatings.
- h. Cleaning of aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen or hydrazine.
- i. Cleaning of paper gaskets.
- j. Cleaning of clutch assemblies where rubber is bonded to metal by means of an adhesive.
- k. Cleaning of hydraulic actuating fluid from filters and filter housings.
- I. Removal of explosive materials and constituents from equipment associated with manufacturing, testing or developing explosives.
- m. Manufacturing cleaning of nuts and bolts designed for automotive racing applications, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.
- n. Cleaning of precision—lapped mechanical seals in pumps that handle liquefied gasses, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.
- o. Facility wide use of less than 1 gallon per week of non-compliant solvent where compliant solvents are not available. Any person claiming this exemption shall

maintain records of the volume and formulation of non-compliant solvent used on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

- Pursuant to Rule 74.6.E.3, Rule 74.6 Sections B.1 and B.2 (Condition Nos. 1 and 2 of this attachment) shall not apply to aircraft engine gas path cleaning or stationary gas turbine gas path cleaning using solvent with an ROC content of 200 g/l or less, as applied.
- 14. Pursuant to Rule 74.6.F, the permittee shall maintain a current material list showing each ROC containing material used in solvent cleaning activities. The list shall summarize the following information:
  - a. Solvent name and manufacturer's description.
  - b. All intended uses of the solvent at the facility, classified as follows:
    - 1. Cleanup, including application equipment cleaning, or
    - 2. Cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components, or
    - 3. Solvent used pursuant to an exemption in Rule 74.6.E (specify the exemption claimed).
  - c. The ROC content in units of grams per liter of material (and ROC composite partial pressure in units of mm Hg @ 20C, if applicable) of the solvent.
  - d. If the solvent is a mix of materials blended by the operator, a record of the mix ratio.

This information shall be made available to District personnel upon request.

- 15. Permittee shall maintain the above records and shall monitor each applicable solvent cleaning activity to ensure that compliance with Rule 74.6 is being maintained. Upon request of the District, compliance with Rule 74.6 shall be determined using the following methods:
  - a. Pursuant to Rule 74.6.G.1, the ROC content of materials shall be determined by EPA Test Method 24 (40 CFR Part 60, Appendix A).
  - b. Pursuant to Rule 74.6.G.4, the identity of components in solvents shall be determined using manufacturer's formulation data or by using ASTM E168-67, ASTM E169-87, or ASTM E260-85.

- c. Pursuant to Rule 74.6.G.5, ROC composite partial pressure of a solvent shall be calculated using a widely accepted published source such as: Boublik, T., V. Fried and E. Hala, "The Vapor Pressure of Pure Substances," Elsevier Scientific Publishing Co., New York (1973), Perry's Chemical Engineers Handbook, McGraw-Hill Book Company, CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-1987), and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985). The true vapor pressure of a component in a solvent mix may be determined by ASTM Method D2879-86. The ROC composite partial pressure of a solvent mix consisting entirely of ROC may be determined by ASTM Method D2879-86.
- d. Pursuant to Rule 74.6.G.6, the active and passive solvent losses from spray gun cleaning systems shall be determined using South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" dated October 3, 1989. The test solvent for this determination shall be any lacquer thinner with a minimum vapor pressure of 105 mm Hg at 20°C. The minimum test temperature shall be 15°C.
- e. Pursuant to Rule 74.6.G.7, initial boiling point of solvent shall be determined by ASTM 1078-78 or by using a published source such as listed in Rule 74.6.G.5.

M:\TITLEV\Attachments updated\746 (12-07-17).docx

# Ventura County Air Pollution Control District Rule 74.11.1 Applicable Requirements Rule 74.11.1, Large Water Heaters and Small Boilers

Rule 74.11.1, "Large Water Heaters and Small Boilers" Adopted 09/11/12, Federally Enforceable

## Applicability:

This attachment applies to all natural gas-fired water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr at this stationary source installed after January 1, 2013 and to the future installation of any such unit at this stationary source. Note that units rated less than 1,000,000 BTU/hr are exempt from District permit requirements pursuant to Rule 23.C.1.

#### **Conditions:**

- Pursuant to Rule 74.11.1.B.2, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than or equal to 75,000 BTU/hr and less than or equal to 400,000 BTU/hr that does not meet the following criteria:
  - a. Oxides of nitrogen emissions shall not exceed 14 nanograms per joule of heat output (32.5 pounds per billion BTU), or 20 parts per million, and
  - b. The unit is certified in accordance with Rule 74.11.1.C.

The oxides of nitrogen emission standard required above (Condition No. 1.a) does not apply to units specifically designed to heat swimming pools, hot tubs, or spas. For such units, oxides of nitrogen emissions shall not exceed 40 nanograms per joule of heat output (93 pounds per billion BTU), or 55 parts per million.

- 2. Pursuant to Rule 74.11.1.B.4, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than 400,000 BTU/hr and less than or equal to 1,000,000 BTU/hr that does not meet the following criteria:
  - a. Oxides of nitrogen emissions shall not exceed 20 parts per million and carbon monoxide emissions shall not exceed 400 parts per million, and
  - b. The unit is certified in accordance with Rule 74.11.1.C.
- 3. The permittee shall maintain a listing of manufacturer, brand name, model number, heat input rating, and installation date for each water heater, boiler, steam generator and

- process heater, with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr, at this stationary source. Permittee shall submit these identification records for all of these units to the District upon request.
- 4. On an annual basis, the permittee shall certify that all water heaters, boilers, steam generators and process heaters, with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr, at this stationary source are complying with Rule 74.11.1. This annual certification shall include a formal survey identifying each unit and documentation of certification status (pursuant to Rule 74.11.1.C), as required.

M:\TITLEV\Attachments updated\7411.1 (9-11-12).docx

# Ventura County Air Pollution Control District Rule 74.22 Applicable Requirements Rule 74.22, Natural Gas-Fired Fan-Type Central Furnaces

Rule 74.22, "Natural Gas-Fired Fan-Type Central Furnaces" Adopted 11/09/93, Federally-Enforceable

## Applicability:

This attachment applies to all natural gas-fired, fan-type central furnaces at this stationary source installed after May 31, 1994 and to the future installation of any natural gas-fired, fan-type central furnaces at this stationary source. A fan-type central furnace is a self contained space heater providing for circulation of heated air at pressures other than atmospheric through ducts of more than 10 inches in length that has a rated heat input capacity of less than 175,000 BTU per hour and, for combination heating and cooling units, a rated cooling capacity of less than 65,000 BTU per hour. Natural gas-fired, fan-type central furnaces installed in manufactured housing (mobile homes) are exempt from Rule 74.22.

#### **Conditions:**

- Pursuant to Rule 74.22.B, no person shall install, after May 31, 1994, any natural gasfired fan-type central furnace:
  - a. with NOx (oxides of nitrogen) emissions in excess of 40 nanograms per joule of heat output. (74.22.B.1)
  - b. unless it is certified and identified in accordance with Section C of Rule 74.22. (74.22.B.2)
- 2. Permittee shall maintain a listing of manufacturer, brand name, model number, and heat input rating for each natural gas-fired fan-type central furnace at this stationary source. Permittee shall submit these identification records for all of these furnaces to the District upon request.
- 3. On an annual basis, permittee shall certify that all natural gas-fired fan-type central furnaces at this stationary source are complying with Rule 74.22. This annual certification shall include a formal survey identifying each natural gas-fired fan-type central furnace; whether it was installed before or after May 31, 1994; and for those furnaces installed after May 31, 1994, information indicating that the certification is contained on the furnace nameplate, or that the furnace is included on a District-provided list of certified furnaces.

M:\TITLEV\Attachments updated\7422.docx

Attachment 74.22 Page: 1

## 9. GENERAL REQUIREMENTS FOR SHORT-TERM ACTIVITIES (ATTACHMENTS)

The general requirements for short-term activities are broadly applicable requirements that apply to temporary activities at the facility (e.g., abrasive blasting, architectural coatings, degassing operations, etc.). These are activities occurring infrequently and for a short duration. Requirements for short-term activities can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit, provided that the scope of the requirement and the manner of its enforcement are clear.

As detailed in the Title V Permit Reissuance Application, general applicable requirements for short-term activities that apply to this facility were determined. The permit conditions associated with each requirement for a short-term activity are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) \_\_\_\_\_" or "Attachment 40CFR61.M" in the lower left corner of each attachment.

M:\TITLEV\Attachments updated\PERMIT9reissuestd.docx

# Ventura County Air Pollution Control District Rule 74.1 Applicable Requirements Abrasive Blasting

Rule 74.1, "Abrasive Blasting" Adopted 11/12/91, Federally Enforceable

## Applicability:

This attachment applies to short term activities involving any abrasive blasting operation conducted at this facility. Abrasive blasting is the operation of cleaning or preparing a surface by forcibly propelling a stream of abrasive material against that surface. Abrasive materials subject to Rule 74.1 include, but are not limited to, sand, slag, steel shot, garnet or walnut shells.

#### **Conditions:**

- 1. Pursuant to Rule 74.1.B.1.a, all abrasive blasting operations shall be conducted within a permanent building, except for abrasive blasting operations conducted under one or more of the following conditions as detailed in Rule 74.1.B.1.b:
  - a. Steel or iron shot/grit is used exclusively
  - b. The item to be blasted exceeds eight feet in any dimension
  - c. The surface being blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted
- 2. Pursuant to Rule 74.1.B.1.c, any abrasive blasting that is allowed to be conducted outside of a permanent building, and is not exclusively using steel or iron shot/grit, must use one of the following:
  - a. Wet abrasive blasting
  - b. Hydroblasting
  - c. Vacuum blasting
  - d. Dry blasting with California ARB certified abrasives
- 3. Abrasive blasting for pavement marking shall comply with the requirements of Rule 74.1.B.2.

- 4. Abrasive blasting of stucco and concrete shall comply with the requirements of Rule 74.1.B.3.
- 5. Packages or containers for abrasives certified in accordance with Section 92530 of the California Code of Regulations used for permissible outdoor blasting shall comply with the labeling requirements of Rule 74.1.B.4.
- 6. Abrasive blasting operations shall comply with the visible emission standards of Rule 74.1.C.1 and the nuisance prohibition of Rule 74.1.C.2. The visible emission evaluation of abrasive blasting operations shall be conducted in accordance with Section 92400 of the California Code of Regulations.
- 7. Permittee shall monitor each abrasive blasting operation to ensure that compliance with Rule 74.1 is being maintained. For each abrasive blasting operation conducted at the facility, permittee shall maintain records of the following information:
  - a. Date of operation
  - b. Type of abrasive blasting media used
  - c. Identity, size, and location of item blasted
  - d. Whether operation was conducted inside or outside a permanent building
  - e. California ARB certifications for abrasives used

These records shall be maintained at the facility and submitted to the District upon request.

M:\TITLEV\Attachments updated\741 (12-07-2017).docx

# Ventura County Air Pollution Control District Rule 74.2 Applicable Requirements Architectural Coatings

Rule 74.2, "Architectural Coatings"
Adopted 01/12/10, Federally Enforceable

#### Applicability:

This attachment applies to short term activities involving any person who supplies, sells, offers for sale, applies or solicits the application of any architectural coating at this stationary source. An architectural coating is a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Coatings applied in shop applications or to nonstationary structures, such as airplanes, ships, boats, railcars and automobiles, are not considered to be architectural coatings for the purposes of this rule, nor are adhesives.

This attachment and Rule 74.2 do not apply to architectural coatings that are sold in a container with a volume of one liter (1.057 quart) or less and do not apply to any aerosol coating product.

## **Conditions:**

- Pursuant to Rule 74.2.B.1, the volatile organic compound (VOC) content of architectural coatings shall not exceed the following standards, as found in Table 2 of Rule 74.2.B.1, unless specifically exempted by Rule 74.2:
  - a. The VOC content of flat coatings shall not exceed 50 grams per liter of coating.
  - b. The VOC content of nonflat coatings shall not exceed 100 grams per liter of coating.
  - c. The VOC content of nonflat-high gloss coatings shall not exceed 150 grams per liter of coating.

Limits are expressed as VOC Regulatory (unless otherwise specified in Rule 74.2) thinned to the manufacturer's maximum recommendation, excluding colorant added to the tint bases. VOC Regulatory is defined in Rule 74.2.

2. Pursuant to Rule 74.2.B.1, the VOC content of specialty architectural coatings shall not exceed the VOC limits in the Table of Standards in Rule 74.2, unless specifically exempted by Rule 74.2.

Specifically, the VOC content of industrial maintenance coatings shall not exceed 250 grams per liter of coating.

Limits are expressed as VOC Regulatory (unless otherwise specified in Rule 74.2) thinned to the manufacturer's maximum recommendation, excluding colorant added to the tint bases. VOC Regulatory is defined in Rule 74.2.

- 3. Pursuant to Rule 74.2.B.4, all architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.
- 4. Pursuant to Rule 74.2.B.5, no person who applies or solicits the application of any architectural coating shall apply or solicit the application of any coating that is thinned to exceed the applicable VOC limit specified in the Tables in Subsection B.1.
- 5. Permittee shall monitor each architectural coating operation to ensure that compliance with Rule 74.2 is being maintained. Permittee shall specify the usage of compliant coatings and shall maintain VOC records of coatings used at the stationary source. This information shall be submitted to the District upon request.
- 6. The VOC content of architectural coatings, along with other specified physical and chemical properties, shall be measured using the testing procedures in Rule 74.2.G.

M:\TITLEV\Attachments updated\742 (12-07-2017).docx

# Ventura County Air Pollution Control District Rule 74.4.D Applicable Requirements Cutback Asphalt - Road Oils

Rule 74.4, "Cutback Asphalt" Adopted 07/05/83, Federally-Enforceable

## Applicability:

This attachment applies to short term activities involving the application of road oils for road, highway or street paving and maintenance. For the purpose of Rule 74.4, road oil shall be synonymous with slow cure asphalt.

## **Conditions:**

- 1. Pursuant to Rule 74.4.D, road oils used for highway or street paving or maintenance applications shall contain no more than 0.5 percent of organic compounds which boil at less than 500°F as determined by ASTM D402.
- 2. Permittee shall maintain a test report of oil being proposed for usage in order to ensure that compliance with Rule 74.4.D is being maintained. Permittee shall maintain records of oil analyses at the facility and submit these records to the District upon request.

M:\TITLEV\Attachments updated\744D.doc

# Ventura County Air Pollution Control District Rule 74.28 Applicable Requirements Asphalt Roofing Operations

Rule 74.28, "Asphalt Roofing Operations" Adopted 05/10/94, Federally-Enforceable

#### Applicability:

This attachment applies to short term activities involving operation of equipment used for melting, heating, or holding asphalt or coal tar pitch. The permittee shall insure that all asphalt roofing operations comply with Rule 74.28.

The District does not require permits for asphalt roofing operations as they are exempt from permit pursuant to District Rule 23, "Exemptions From Permit", as detailed in Rule 23.F.16 as "equipment for melting and applying coatings of oils, waxes, greases, resins, and like substances where no reactive organic solvents, diluents or thinners are used.

#### **Conditions:**

- 1. Pursuant to Rule 74.28.B.1, no person shall operate or use equipment subject to this rule for the on-site construction, installation, or repair of roofs unless the vapors from such equipment are contained by one or more close fitting lids. The lid(s) shall not be opened except for loading the kettle with solid roofing material or unless the material in the roofing kettle is less than 150°F.
- 2. Pursuant to Rule 74.28.B.2, the maximum temperature of the material inside a roofing kettle shall be 500°F for asphalt and 400°F for coal tar pitch.
- 3. Pursuant to Rule 74.28.B.3, the ROC vapors from the kettle shall be contained by a close fitting lid during a roofing kettle draining operation. Within two minutes after the draining operation has been completed, the vessel that received the hot roofing material shall be covered with a close fitting lid or capped to prevent the release of visible smoke from the vessel.
- 4. Pursuant to Rule 74.28.B.4., any kettle vent shall remain closed except during a pressure release caused by flashing of the roofing material.
- 5. During times when asphalt roofing operations are underway at the facility, permittee shall ensure that all applicable requirements of Rule 74.28 are met.

M:\TITLEV\Attachments updated\7428.DOC

Attachment 74.28 Page: 1

# Ventura County Air Pollution Control District Applicable Requirements for Soil Aeration Operations Rule 74.29, Soil Decontamination Operations

Rule 74.29, "Soil Decontamination Operations" Adopted 04/08/08, Federally Enforceable

#### Applicability:

This attachment applies to short-term activities involving soils that contain gasoline, diesel fuel, or jet fuel. Rule 74.29 does not apply to soil that contains only crude oil or was contaminated by a leaking storage tank used in an agricultural operation engaged in the growing of crops or the raising of fowl or animals.

Specifically, this attachment applies to the aeration of soil that contains gasoline, diesel fuel, or jet fuel. Aeration is defined as the exposure of excavated soil, containing diesel fuel, gasoline, or jet fuel, to the atmosphere without the use of air pollution control equipment or vapor extraction, bioremediation, or bioventing system.

Remediation equipment, such as a vapor extraction system, bioremediation system, or bioventing system, for contaminated soil requires an APCD permit. Rule 74.29 requirements for such remediation equipment would be addressed in another permit attachment, if applicable. As detailed in APCD Rule 23.F.23, any soil aeration project exempt from the soil aeration limit in Rule 74.29 pursuant to Subsection C.1 or C.2 of Rule 74.29 is exempt from the requirement to obtain a permit for the soil aeration project. Also, pursuant to APCD Rule 23.F.24, any soil remediation project where collected vapors are not emitted to the atmosphere by any means is exempt from the requirement to obtain a permit.

#### Conditions:

Pursuant to Rule 74.29.B.1.a, no person shall cause or allow the aeration of soil that contains gasoline, diesel fuel, or jet fuel if such aeration emits reactive organic compounds (ROC) as measured by a certified vapor analyzer, in excess of 50 parts per million by volume (ppmv) above background, as hexane, except nonrepeatable momentary readings. In determining compliance, a portion of soil measuring three inches in depth and no less than six inches in diameter shall be removed from the soil surface and the probe inlet shall be placed near the center of the resulting hole, level with the soil surface surrounding the hole.

For each soil decontamination operation where soil aeration occurs, the permittee shall determine compliance with Rule 74.29.B.1.a on a weekly basis as detailed above. A dated record of these measurements shall be maintained at the facility and submitted to the District upon request.

Page: 1

- 2. Pursuant to Rule 74.29.B.1.b, no person shall cause or allow the aeration of soil that contains gasoline, diesel fuel, or jet fuel if such aeration causes a nuisance, as defined in the California Health and Safety Code Section 41700 and APCD Rule 51, "Nuisance." In addition, offsite aeration is prohibited.
- 3. Pursuant to Rule 74.29.B.2, no person shall excavate an underground storage tank and/or transfer piping currently or previously used to store an applicable compound, or excavate or grade soil containing an applicable compound, unless ROC emissions are monitored with a certified organic vapor analyzer at least once every 15 minutes during the excavation period commencing at the beginning of excavation or grading. Soil with emission measurements in excess of 50 parts per million by volume (ppmv), as hexane, a shall be considered contaminated.

During excavation, all inactive exposed contaminated soil surfaces shall be treated with a vapor suppressant or covered with continuous heavy duty plastic sheeting (4 mil or greater) or other covering to minimize emissions of ROC to the atmosphere. Covering shall be in good condition, overlapped at the seams, and securely anchored to minimize headspace where vapors may accumulate.

- 4. Pursuant to Rule 74.29.B.5, the owner or operator of any applicable underground storage tank shall notify the District Compliance Division at least 24 hours prior to the beginning the excavation of the said storage tank and/or transfer piping.
- 5. Pursuant to Rule 74.29.B.6, contaminated soil in active storage piles shall be kept visibly moist by water spray, treated with a vapor suppressant, or covered with continuous heavy duty plastic sheeting (4 mil or greater) or other covering to minimize emissions of ROC to the atmosphere. Covering shall be in good condition, overlapped at the seams, and securely anchored to minimize headspace where vapors may accumulate. For any active storage pile, the surface area not covered by plastic sheeting or other covering shall not exceed 6,000 square feet. An "active" storage pile is defined as a worksite to which soil is currently being added or from which soil is being currently being removed. Activity must occur within one hour to be current.
- 6. Pursuant to Rule 74.29.B.7, contaminated soil in inactive storage piles shall be with covered with continuous heavy duty plastic sheeting (4 mil or greater) or other covering to minimize emissions to the atmosphere. The covering shall be in good condition, overlapped at the seams, and securely anchored to minimize headspace where vapors may accumulate.
- 7. Pursuant to Rule 74.29.B.8, if not removed within 30 days of excavation, on-site treatment to remove contamination from contaminated soil at an excavation or grading site shall be initiated. The treatment of contaminated soil shall be subject to all applicable District Rules and Regulations. This includes, but is not limited to,

- compliance with Rule 10, "Permits Required," and Rule 51, "Nuisance."
- 8. Pursuant to Rule 74.29.B.9, trucks used to transport contaminated soil must meet the following requirements:
  - a. The truck and trailer shall be tarped prior to leaving the site. Contaminated material shall not be visible beyond the tarp and shall not extend above the sides or rear of the truck or trailer; and
  - b. The exterior of the truck, trailer and tires shall be cleaned prior to leaving the site.
- 9. Pursuant to Rule 74.29.C.2, the soil aeration requirements of Rule 74.29.B.1.a shall not apply to:
  - a. Soil excavation activities necessary for the removal of in-situ soil such as in the removal of an underground storage tank, pipe or piping system, provided the exposed soil is covered as specified in Condition No. 6 while inactive; or
  - b. Soil moving, loading, or transport activities performed for the sole purpose of complying with local, state, or federal laws, provided the soil is handled in accordance with such laws; or
  - c. Soil excavation or handling occurring as a result of an emergency as declared by an authorized health officer, agricultural commissioner, fire protection officer, or other authorized agency officer. Whenever possible, the District Compliance Division shall be notified prior to commencing such excavation; or
  - d. Any soil aeration project involving less than 1 cubic yard of contaminated soil; or
  - e. Situations where the soil contamination which resulted from a spill or release of less than five (5) gallons of diesel fuel, jet fuel, or gasoline; or
  - f. Contaminated soil used as daily cover at permitted Class III Solid Waste Disposal Sites if such soils do not have a gasoline concentration exceeding 100 parts per million by weight (ppmw) or a diesel fuel concentration exceeding 1,000 ppmw, as determined by the method specified in Rule 74.29.F.1. Daily cover is defined as soil that is applied on a daily basis or less frequently as a covering over landfill waste.

The permittee shall maintain records of the gasoline concentration and diesel fuel concentration of any contaminated soil used as daily cover that need to qualify for this exemption.

- 10. Pursuant to Rule 74.29.F.1, the percent by weight of contaminant in soil samples shall be determined by EPA Method 8015B. Samples shall be introduced using Method 5035 (Purge and Trap) and shall be taken in accordance with the Los Angeles Regional Water Quality Control Board's guidelines for contaminated soil sampling. Standards shall be the same as the contaminant believed to be in the soil. If the soil is contaminated with methanol 85 (M85) the standard used shall be M85.
- 11. Pursuant to Rule 74.29.F.3, the ROC concentration measurements required in Subsections B.1 and B.2 of the rule (Condition Nos. 1 3 above) shall be made using an organic vapor analyzer certified according to the requirements of EPA Method 21.
- 12. Pursuant to Rule 74.29.D, for any soil aeration project subject to Rule 74.29, the permittee shall record each date that the soil was disturbed and the quantity of soil disturbed on each date. These records shall be maintained at the facility and submitted to the District upon request.
- 13. For any soil decontamination project subject to Rule 74.29, other than a soil aeration project, the following information shall be made available to the District upon request:
  - a. All dates that soil was disturbed and the quantity of soil disturbed on each date.
  - b. Reasons for excavation or grading.
  - c. Cause of VOC soil contamination and history of the site.
  - d. Description of tanks or piping associated with the soil contamination.
  - e. Description of mitigation measures employed for dust, odors and ROC emissions.
  - f. Details of treatment and/or disposal of ROC contaminated soil, including the ultimate receptor.
  - g. Description of monitoring equipment and techniques.
  - h. All ROC emission measurements shall be recorded on a continuous permanent strip-chart or in a format approved by the Air Pollution Control Officer (APCO).
  - i. A map showing the facility layout, property line, and surrounding area up to 2500 feet away, and including any schools, residential areas or other sensitive receptors such as hospitals or locations where children or elderly people live or work.
- 14. The permittee shall monitor each soil aeration operation or underground gasoline storage tank excavation operation to ensure that compliance with Rule 74.29.B.1 and/or

74.29.B.2 is being maintained. This monitoring requirement shall include ensuring that proper operation requirements are being met and shall include the recordkeeping required above.

# Ventura County Air Pollution Control District 40 CFR Part 61, Subpart M Applicable Requirements National Emission Standard for Asbestos

40 CFR Part 61, Subpart M, "National Emission Standard for Asbestos" Federally-Enforceable

#### Applicability:

This attachment applies to short term activities conducted at this facility pertaining to procedures for asbestos demolition or renovation activities as detailed in 40 CFR Part 61.145.

As defined in 40 CFR Part 61.141, asbestos means the asbestiform varieties of serpentinite (chrysotile), riebeckite (crocidolite), cummingtonite-grunerite, anthophyllite, and actinolite-tremolite. Renovation means altering a facility or one or more facility components in any way, including the stripping or removal of regulated asbestos containing material (RACM) from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

#### Conditions:

- 1. Permittee shall insure compliance with 40 CFR Part 61 Subpart M, "National Emission Standard for Asbestos". The owner or operator of a demolition or renovation activity, as defined in 40 CFR Part 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR Part 61.145, "Standards for Demolition and Renovation".
- 2. During times when asbestos renovation or demolition are underway at the facility, permittee shall ensure that all applicable requirements of 40 CFR Part 61.145 are met.

M:\TITLEV\Attachments updated\CFR61M.docx

## 10. GENERAL PERMIT CONDITIONS

This section contains general Part 70 permit conditions and general APCD permit to operate conditions. The general Part 70 permit conditions are associated with general federal requirements that apply to all Title V facilities. These conditions are based on APCD Rules 8, 30, 32, and 33, and 40 CFR Part 70.

The general permit to operate conditions are associated with general District requirements that apply to all operating Title V facilities. These conditions are based on APCD Rules 19, 20, 22, and 27.

M:\TITLEV\Attachments updated\PERMIT10std.docx

## Ventura County Air Pollution Control District General Part 70 Permit Conditions

- 1. The permittee shall comply with all federally-enforceable conditions of the Part 70 permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of an application for reissuance of the permit. (40 CFR 70.6(a)(6)(i), APCD Rule 33.3.B.1)
- 2. The permittee shall continue to comply with all the applicable requirements with which the company has certified that it is already in compliance. The permittee shall comply in a timely manner with applicable requirements that become effective during the permit term of this permit.
- 3. The permittee shall promptly report deviations from Part 70 permit requirements, including those attributable to upset conditions as defined in the Part 70 permit, the probable cause of the deviations, and any corrective actions or preventive measures taken. Promptly is defined as no later than four (4) hours after its detection by such owner or operator, or his agents or employees. (40 CFR 70.6(a)(3)(iii)(B), APCD Rule 33.3.A.3, APCD Rule 32.B.1)
- The need to halt or reduce activity is not a defense. It shall not be a defense for a permittee in an enforcement action that it would be necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Part 70 permit. (40 CFR 70.6(a)(6)(ii), APCD Rule 33.3.B.2)
- 5. All required records, monitoring data, and support information shall be maintained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 permit. All applicable reports shall be submitted to the District every 6 months and shall be certified by a responsible official. Such reports shall identify any deviations from Part 70 permit conditions. (40 CFR 70.6(a)(3)(ii)(B), 40 CFR 70.6(a)(3)(iii)(A), APCD Rule 33.3.A.3)
- 6. The permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 permit or to determine compliance with the Part 70 permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the Part 70 permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of the EPA along with a claim of confidentiality. (40 CFR 70.6(a)(6)(v), APCD Rule 33.3.B.5)

- 7. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the District or an authorized representative to perform the following:
  - a. Enter upon the permittee's premises where a Part 70 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the Part 70 permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the Part 70 permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Part 70 permit; and
  - d. As authorized by the federal Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the Part 70 permit or applicable requirements.

(40 CFR 70.6(c)(2), APCD Rule 8, APCD Rule 33.3.B.7)

- The Part 70 permit may be modified, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (40 CFR 70.6(a)(6)(iii), APCD Rule 33.3.B.3)
- 9. A Part 70 permit shall be reopened under the following conditions:
  - a. Additional applicable requirements under the federal Clean Air Act become applicable to the facility with a remaining Part 70 permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the Part 70 permit is due to expire, unless the original Part 70 permit or any of its terms and conditions has been extended pursuant to APCD Rule 33.6.D;
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator of the EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 permit;

- c. The District or EPA determines that the Part 70 permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 permit; or
- d. The Administrator of the EPA or the District determines that the Part 70 permit must be revised or revoked to assure compliance with the applicable requirements.

(40 CFR 70.7(f), APCD Rule 33.8.A)

- 10. All fees required by District Regulation III, Fees, shall be paid on a timely basis as requested by the District. Notwithstanding the term of the Part 70 permit, if the permittee fails to pay the annual renewal fees required pursuant to APCD Rule 42.H within the time period specified in APCD Rule 30, the Part 70 permit will be void. (40 CFR 70.6(a)(7), APCD Rule 30, APCD Rule 33.3.B.6)
- 11. The Part 70 permit does not convey any property rights of any sort, or any exclusive privilege. (40 CFR 70.6(a)(6)(iv), APCD Rule 33.3.B.4)
- 12. The provisions of this Part 70 permit shall be severable, and in the event of any challenge to any portion of the permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force. (40 CFR 70.6(a)(5), APCD Rule 33.3.B.8)
- 13. An application for reissuance of this Part 70 Permit shall be submitted no more than 18 months prior to the expiration date and no less than 6 months prior to the expiration date as stated on this permit. The application shall be subject to the same procedural requirements, including those for public participation and EPA review, that apply to initial Part 70 permit issuance. (40 CFR 70.5(a)(1)(iii), 40 CFR 70.7(c)(1)(i), APCD Rule 33.6.B)
- Any Part 70 application and any document, including reports, schedule of compliance progress reports, and compliance certification, required by this Part 70 permit shall be certified by a responsible official. The certification shall state that, based on information and belief formed after a reasonable inquiry, the statements and information in the document are true, accurate, and complete (40 CFR 70.5(d), APCD Rule 33.9.C)
- 15. Permittee shall submit a certification of compliance with all applicable requirements and all Part 70 permit conditions. A compliance certification shall be submitted with any Part 70 permit application and annually, on the anniversary date of the Part 70 permit, or on a more frequent schedule if required by an applicable requirement or permit condition.
  - This compliance certification shall identify each applicable requirement or condition of the Part 70 permit, the compliance status of the stationary source, whether the compliance

was continuous or intermittent since the last certification, and the method(s) used to determine compliance. In addition, the certification shall indicate the stationary source's compliance status with any applicable enhanced monitoring and compliance certification requirement of the federal Clean Air Act. A copy of each compliance certification shall be submitted to EPA Region IX. (40 CFR 70.5(c)(9), 40 CFR 70.6(c)(5), APCD Rule 33.3.A.9, APCD Rule 33.9.B)

M:\TITLEV\Attachments updated\PART70GN (10-01-02).docx

# Ventura County Air Pollution Control District General Permit to Operate Conditions

- 1. Within 30 days after receipt of a permit to operate, the permittee may petition the Hearing Board, in writing, to review any new or modified condition on the permit. (APCD Rule 22)
- 2. This permit to operate, or a copy, shall be posted reasonably close to the subject equipment and shall be readily accessible to inspection personnel from the District. Posting a copy of the "Permitted Equipment and Applicable Requirements Table" contained in Section No. 2 will fulfill this requirement if the entire permit to operate is readily available at another location at the stationary source. (APCD Rule 19)
- 3. This permit to operate is not transferable from one location to another unless the equipment is specifically listed as being portable. (APCD Rule 20)
- 4. If, within a reasonable amount of time, any permittee refuses to furnish information requested by the District, the District may suspend this permit to operate. The permittee will be informed, in writing, of the permit suspension and the reasons for the suspension. (APCD Rule 27)

M:\TITLEV\Attachments updated\POGNCN.docx

## 11. MISCELLANEOUS FEDERAL PROGRAM CONDITIONS

This section contains miscellaneous federal program conditions that are not emission unit-specific or short-term. These federal requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or short-term activities. Permit conditions associated with these miscellaneous federal program requirements are listed in an individual attachments. The attachment is identified with the label "Attachment 40CFR(Part No.) \_\_" in the lower left corner of each attachment.

M:\TITLEV\Attachments updated\PERMIT11std.docx

# Ventura County Air Pollution Control District Permit Shield – Compliance Assurance Monitoring 40 CFR Part 64

40 CFR Part 64, "Compliance Assurance Monitoring"

#### **Permit Shield:**

The Compliance Assurance Monitoring requirement regulation does not apply to this stationary source. The following discussion details the determination of this permit shield for this stationary source.

Through 40 CFR Part 64, EPA promulgated regulations to implement compliance assurance monitoring (CAM) for major stationary sources of air pollution that are required to obtain operating permits under Title V of the Clean Air Act. Subject to certain exemptions, the regulations require owners or operators of such sources to conduct monitoring that satisfies particular criteria established in the rule to provide a reasonable assurance of compliance with applicable requirements under the Clean Air Act.

The District adopted Rule 74.17.1, "Municipal Solid Waste Landfills", to implement the requirements of 40 CFR Part 60, Subpart Cc, "Emissions Guidelines and Compliance Times for Municipal Solid Waste Landfills". The EPA published the original proposal for the Emission Guidelines in the Federal Register on May 30, 1991 (56 FR 33790). The Emission Guidelines implement Section 111 of the Clean Air Act.

Pursuant to 40 CFR Part 64.2(b)(1)(i), emission units and activities subject to emission limitations or standards proposed by EPA after November 15, 1990 pursuant to Section 111 or 112 of the Clean Air Act are not subject to CAM. Therefore, Compliance Assurance Monitoring Requirements under 40 CFR Part 64 do not apply to the landfill gas collection and control equipment.

M:\TITLEV\TV Permits\Po7340\Permit III\Shield-40CFRPart64.doc

Section No. 11 Attachment SHIELD-40CFR64

Page: 1

# Ventura County Air Pollution Control District 40 CFR Part 68 Applicable Requirements Accidental Release Prevention and Risk Management Plans

40 CFR Part 68, "List of Regulated Substances and Thresholds for Accidental Release Prevention" Federally-Enforceable

## Applicability:

This attachment applies to regulated substances that are contained in a process at this facility and that exceed the threshold quantity, as presented in 40 CFR Part 68.130. This regulation addresses the requirements of section 112(r) of the federal Clean Air Act as amended. Specifically, this attachment applies to a facility that has stated that a federal Risk Management Plan pursuant to section 112(r) is currently not required, but where flexibility is desired to preclude a permit reopening should 40 CFR Part 68 become an applicable requirement.

#### **Conditions:**

Should the stationary source, as defined in 40 CFR Part 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

M:\TITLEV\Attachments updated\CFR68.docx

# Ventura County Air Pollution Control District 40 CFR Part 82 Applicable Requirements Protection of Stratospheric Ozone

40 CFR Part 82, "Protection of Stratospheric Ozone"
40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners"
40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction"
Federally Enforceable (last revised 11/18/16)

#### Applicability:

This attachment applies to activities conducted at this facility that involve producing, importing, exporting, or consuming of the specified controlled substances described under 40 CFR Part 82.4. Specifically, this attachment includes the requirements of 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners," and 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction."

As stated in 40 CFR Part 82.30, 40 CFR Part 82, Subpart B applies to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

As stated in 40 CFR Part 82.150, 40 CFR Part 82, Subpart F applies to any person maintaining, servicing, or repairing appliances containing class I, class II, or non-exempt substitute refrigerants. This subpart also applies to persons disposing of such appliances (including small appliances and motor vehicle air conditioners), refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recovery and/or recycling equipment, approved recovery and/or recycling equipment testing organizations, and persons buying, selling, or offering to sell class I, class II, or non-exempt substitute refrigerants.

As defined in 40 CFR82.152, appliance means any device which contains and uses a class I or class II substance or substitute as a refrigerant and which is used for household or commercial purposes, including any air conditioner, motor vehicle air conditioner, refrigerator, chiller, or freezer. For a system with multiple circuits, each independent circuit is considered a separate appliance. Refrigerant means, for purposes of this subpart, any substance, including blends and mixtures, consisting in part or whole of a class I or class II ozone-depleting substance or substitute that is used for heat transfer purposes and provides a cooling effect.

#### **Conditions:**

1. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable

requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners."

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

2. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee is subject to all of the applicable requirements as specified in 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction."

M:\TITLEV\Attachments updated\CFR82 11-18-16.docx

Page: 2

#### 12. PART 70 PERMIT APPLICATION PACKAGE

The Part 70 permit application, which was submitted by this facility, is included in this section for reference only and is not a part of the Part 70 permit.

During the processing of the permit application, additional information was submitted by the facility in response to District requests. This additional information is included with the application. If the applicant was asked to replace a page or a portion of the application, the original submittal is stamped "REPLACED" and the replacement page or section is placed in front of the original. The applicant and District correspondence for the Part 70 permit application is located in the District permit file for this stationary source.

M:\TITLEV\Attachments updated\PERMIT12std.docx