



**SAN DIEGO COUNTY**  
**AIR POLLUTION CONTROL DISTRICT**  
10124 Old Grove Road, San Diego, CA 92131-1649  
Office: (858) 586-2600; [www.sdapcd.org](http://www.sdapcd.org)

Sectors: 3, H  
Site Record: APCD1989-SITE-03596

Application Record: APCD2024-APP-008534



Sycamore Landfill Inc  
8514 Mast Bl  
Santee, CA 92071

Sycamore Landfill Inc  
Jordana Bjorkman  
8514 Mast Bl  
Santee, CA 92071

## **AUTHORITY TO CONSTRUCT (Draft Version)**

EXPIRES:

After examination of your Application for an Air Pollution Control District (hereinafter referred to as "the District") Authority to Construct and Permit to Operate for equipment located at the above location, the District has decided on the following actions:

Authority to Construct is granted pursuant to Rule 20 of the Air Pollution Control District Rules and Regulations for equipment to consist of:

An active non-hazardous waste landfill (147,908,000 cubic yard or 117,364,998 ton capacity) operation that includes quarrying, municipal waste disposal, waste compaction, cover material application, haul road activities, and a landfill gas monitoring, collection, and flare system consisting of: Landfill Gas (LFG) collection wells with associated fittings, piping and individual well shut off valves; offsite LFG migration probes with associated fittings and sampling ports; 4 LFG blowers with associated fittings, valves and piping; flame arrestor; liquid knockout vessel; 59 MM BTU/hr John Zink enclosed ground flare (approximately 8 ft dia x 30 ft high) and a 54 MM Btu/hr Perennial enclosed ground flare (approximately 8 ft dia x 40 ft high) equipped with optical flame detectors, automatic shut off valves and auxiliary fuel. The flares are equipped with condensate injection atomizing gun, stack temperature probes, in-line LFG oxygen analyzers, and LFG flow meters at flare station.

This Authority to Construct is issued with the following conditions:

1. The Permittee shall comply with all current and future applicable requirements of District Rule 59, District Rule 59.1, 40 CFR 60 Subpart XXX and 40 CFR 63 Subpart AAAAA, including but not limited to the requirements listed in this permit, such as compliance provisions, monitoring of operations, specifications for active control systems, and recording keeping requirements.
  - (a) Permittee shall implement the compliance provisions in accordance with 40 CFR Subpart AAAAA, 63.1960.
  - (b) Permittee shall monitor operations in accordance with 40 CFR Subpart AAAAA, 63.1961.
  - (c) Permittee shall comply with the specifications for active collection systems in accordance with 40 CFR Subpart AAAAA, 63.1962.
  - (d) Permittee shall submit reports in accordance with 40 CFR Subpart AAAAA, 63.1981.
  - (e) Permittee shall maintain records in accordance with 40 CFR Subpart AAAAA, 63.1983.
2. The Permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if the requirements of this subpart have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the District which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.  
[40 CFR Subpart AAAAA, 63.1955]
3. The collection and control system may be capped, removed, or decommissioned if the following criteria are met:
  - (a) The landfill is a closed landfill (as defined in 40 CFR Subpart AAAAA, 63.1990). A closure report must be submitted to the District as provided in 40 CFR Subpart AAAAA, 63.1981(f);
  - (b) The gas collection and control system has been in operation a minimum of 15 years or the Permittee

demonstrates that the gas collection and control system will be unable to operate for 15 years due to declining gas flow; and

(c) Following the procedures specified in 40 CFR Subpart AAAAA, 63.1959(c), the calculated NMOC emission rate at the landfill is less than 50 Mg/yr on three successive test dates. The test dates must be no less than 90 days apart, and no more than 180 days apart.

[40 CFR Subpart AAAAA, 63.1957(b)]

4. The Permittee shall 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:
  - (a) 5 years or more if active; or
  - (b) 2 years or more if closed or at final grade;[40 CFR Subpart AAAAA, 63.1958(a)]
5. The Permittee shall operate the collection system with negative pressure at each wellhead except under the following conditions:
  - (a) A fire or increased well temperature. Permittee shall record instances when positive pressure occurs in efforts to avoid a fire. These records must be submitted with the semi-annual reports as provided in 40 CFR Subpart AAAAA, 63.1981(h);
  - (b) Use of a geomembrane or synthetic cover. Permittee shall develop acceptable pressure limits in the design plan;
  - (c) A decommissioned well. A well may experience a static positive pressure after shut down to accommodate for declining flows. All design changes must be approved by the District as specified in 40 CFR Subpart AAAAA, 63.1981(d)(2);[40 CFR Subpart AAAAA, 63.1958(b)]
6. The Permittee shall operate each interior wellhead in the collection system with a landfill gas temperature less than 62.8 degrees Celsius (145 degrees Fahrenheit). Permittee may establish a higher operating temperature value at a particular well. A higher operating value demonstration must be submitted to the District for approval and must include supporting data demonstrating that the elevated parameter neither causes fires nor significantly inhibits anaerobic decomposition by killing methanogens. The demonstration must satisfy both criteria in order to be approved (i.e., neither causing fires nor killing methanogens is acceptable).  
[40 CFR Subpart AAAAA, 63.1958(c)]
7. The Permittee shall operate the collection system so that the methane concentration is less than 500 parts per million (ppm) 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 no more than 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 shall may establish an alternative traversing pattern that ensures equivalent coverage. A surface monitoring design plan must be developed that includes a topographical map with the monitoring route and the rationale for any site-specific deviations from the 30-meter intervals. Areas with steep slopes or other dangerous areas may be excluded from the surface testing. [40 CFR Subpart AAAAA, 63.1958(d)(1)]
8. The Permittee shall:
  - (a) Conduct surface testing using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in 40 CFR Subpart AAAAA, 63.1960(d).
  - (b) Conduct surface testing at all cover penetrations. Thus, the Permittee shall monitor any cover penetrations that are within an area of the landfill where waste has been placed and a gas collection system is required.
  - (c) Determine the latitude and longitude coordinates of each exceedance using an instrument with an accuracy of at least 4 meters. The coordinates must be in decimal degrees with at least five decimal places.[40 CFR Subpart AAAAA, 63.1958(d)(2)]
9. The Permittee shall operate the system in accordance to 40 CFR Subpart AAAAA, 63.1955(c) such that all collected gases are vented to a control system designed and operated in compliance with 40 CFR Subpart AAAAA, 63.1959(b)(2)(iii).  
[40 CFR Subpart AAAAA, 63.1958(e)(1)]
10. In the event the collection or control system is not operating:
  - (a) The gas mover system must be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere must be closed within 1 hour of the collection or control system not operating; and
  - (b) Efforts to repair the collection or control system must be initiated and completed in a manner such that downtime is kept to a minimum, and the collection and control system must be returned to operation.[40 CFR Subpart AAAAA, 63.1958(e)(1)]
11. The Permittee shall operate the control system at all times when the collected gas is routed to the system.  
[40 CFR Subpart AAAAA, 63.1958(f)]
12. If monitoring demonstrates that the operational requirements in Conditions 5, 6, 7, and 8 of this Permit are not met, corrective action must be taken as specified in 40 CFR Subpart AAAAA, 63.1960(a)(3) and (5) or (c). If

corrective actions are taken as specified in 40 CFR Subpart AAAAA, 63.1960, the monitored exceedance is not a deviation of the operational requirements in section 63.1958.

[40 CFR Subpart AAAAA, 63.1958(g)]

13. Three-hour block averages used to demonstrate compliance shall be calculated according to 40 CFR Subpart AAAAA, 63.1983(b)(2)(i) and 63.1983(c)(1)(i) and the data collected during the events listed below shall be included in any average computed under 40 CFR Subpart AAAAA (Sections 63.1930-1990):
  - (a) Monitoring system breakdowns, repairs, calibration checks, and zero (low-level) and high-level adjustments.
  - (b) Startups.
  - (c) Shutdowns.
  - (d) Malfunctions.[40 CFR Subpart AAAAA, 63.1975]
14. The permittee shall operate, adjust and maintain the gas collection system to prevent excessive quantities of air from being drawn into the landfill. An oxygen analyzer designed to be accurate to +/- 0.5% by volume shall be installed in the collection piping at the flare station, maintained in good working condition and calibrated at least biennially. The concentration of oxygen in landfill gas at the flare station shall not exceed 3.5% by volume. Oxygen analyzer calibration records shall be maintained for at least five years and made available to the District upon request. [Rules 21 and 59.1]
15. The permittee shall route all the collected landfill gas to the landfill gas destruction system. [Rule 59.1; 17 CCR 95464(b)(1)(A)]
16. The landfill gas destruction system shall be operated to reduce non-methane organic compounds (NMOC) by 98 weight percent or reduce the NMOC outlet concentration to less than 20 ppmv on a dry basis as hexane at 3 percent oxygen. [Rule 59.1]
17. The permittee shall monitor the flare exhaust gas temperature. The gas temperature monitoring device shall be equipped with a continuous recorder which has an accuracy of +/- 1 percent of the temperature being measured. [Rule 59.1; 17 CCR 95464(b)(2)(A)]
18. A thermocouple designed to be accurate to +/- 50° F at 1500° F shall be installed in the flare stack and maintained in good working condition. The temperature of the exhaust gas in the flare stack shall be displayed at the flare station during incineration. [Rules 21 and 59.1]
19. The permittee shall monitor and record gas flow from the collection system to the flare at least once every 15 minutes. [Rule 59.1; 17 CCR 95969(b)(1)(B)]
20. The system shall be continuously monitored for the presence of a flare flame. [Rules 21 and 59.1]
21. In the event that the gas collection system or the gas combustion device is inoperable, the gas mover system shall be shut down and all valves in the collection system and gas combustion device contributing to venting of the gas to the atmosphere shall be closed within 1 hour. This provision does not apply to the gas combustion device during periods of start-up, shutdown, or malfunction provided the duration of start-up, shutdown, or malfunction does not exceed 1 hour. [Rule 59.1]
22. The flow rate of landfill gas into each flare shall not exceed 1800 scfm. A meter shall be installed at the flare station which measures and displays the landfill gas flow rate. Permittee shall calibrate this meter at least biennially. [Rules 21 and 59.1]
23. A shut-off valve shall be in place and maintained at each well head. [Rules 21 and 59.1].
24. Except for a flare ignition and startup not to exceed 15 minutes, permittee shall ensure complete combustion of landfill gases during operation by maintaining the stack gas exit temperature at no less than 1500° F or as otherwise specified by the flare manufacturer, averaged over any 15 minute period. Supplemental fuel (natural gas or propane) shall be added as necessary to maintain the required stack gas exit temperature. [Rule 20.3(d)(1)]
25. An automatic shutoff device shall stop the flow of Landfill Gas to the Flare whenever conditions of flame-out, excessive exhaust gas temperature (>1800° F), or excessive Landfill Gas Oxygen content (>3.5% by volume) occur. [Rules 21 and 59.1]
26. There shall be no leaks of landfill gas from the collection system and flare equipment in excess of 1375 ppmv (measured as methane) at a distance of 1/2 inch from the transfer path other than non-repeatable, momentary readings. This requirement does not apply during active maintenance, repair or sampling activities. [Rules 21 and 59.1(d)(2)(ii)]
27. The equipment shall be properly maintained in good operating condition at all times. Calibration and maintenance records required by this Permit shall be retained for at least five (5) years and be made available to the District on request. [17 CCR 95470(a)]
28. The Permittee shall inspect each off-site gas migration probe with a combustible gas indicator for the presence of Methane on a minimum quarterly basis and retain records. Inspection records shall be made available to the District on request. [Rule 21]

29. Should the District, San Diego County Health Department or any health agency of the State of California determine that an imminent, life endangering threat to human life requiring immediate action exists on-site, the Permittee shall take whatever actions are deemed necessary by the District and/or the health agency to protect human health. [California Health and Safety Code Section 25358.3]
30. Emissions of sulfur compounds from this emission unit, calculated as sulfur dioxide, shall not exceed 0.05% by volume on a dry basis . [Rule 53]
31. Emissions of combustion particulates shall not exceed 0.10 grains per dry standard cubic foot of gas standardized to 12 percent carbon dioxide by volume. [Rule 53]
32. If requested by the District or EPA, emissions of sulfur compounds and/or combustion particulates shall be measured in accordance with EPA Reference Methods or equivalent methods as approved by the District. [Rule 21]
33. Visible emissions from any part of the landfill shall not exceed Number 1 designation on the Ringelmann Chart (equivalent to 20% opacity) for a period or periods aggregating more than three minutes in any 60 consecutive minutes. [Rule 50]
34. At no time shall the subject equipment cause or contribute to a public nuisance as specified in District Rule 51. If compliance with Rule 51 cannot be demonstrated to the satisfaction of the District, the permittee will take whatever corrective action necessary to meet applicable requirements. If corrective action requires any physical change or modification to the subject equipment the permittee shall apply for and obtain an Authority to Construct for all such modifications prior to making any physical change. [Rule 51]
35. There shall be no leachate or condensate from any part of the landfill which reaches any surface and results in the discharge of toxic air contaminants or non-methane organic compounds to the atmosphere. [Rules 21 and 59.1]
36. The active waste disposal operation shall not exceed the maximum elevation of 1050 feet above mean sea level and area size of 520 acres as specified in the Integrated Waste Management Board Permit Number 37-AA-0023. These limits are equivalent to a design capacity of approximately 147,908,000 cubic yards or 117,364,998 ton capacity. [Rule 21]
37. The Permittee is subject to Title 17 California Code of Regulations (CCR) Division 3, Chapter 1, Subchapter 10, Article 4, SUBARTICLE 6. METHANE EMISSIONS FROM MUNICIPAL SOLID WASTE LANDFILLS (§§ 95460 thru 95476 and Appendix I), which includes, but may not be limited to, the requirements cited in this permit. [17 CCR § 95461]
38. The Permittee shall operate the gas collection and control system in accordance with 17 CCR section 95464(b), which includes, but is not limited to, the following:
  - a. Route the collected gas to a gas control device or devices except as provided in 17 CCR sections 95464(d) - well raising, and 95464(e) - Repairs and Temporary Shutdown of Gas Collection System Components;
  - b. Operate the gas collection and control system so that there is no landfill gas leak that exceeds 500 ppmv, measured as methane, at any component under positive pressure. Measurement for this determination shall be made at a distance of one half of an inch or less for a component source that exceeds 500 parts per million by volume (ppmv), excluding non-repeatable, momentary readings; measurement of leaks from any vault must be taken within 3 inches above the surface of the vault exposed to the atmosphere. [17 CCR § 95464(b)(1)(B) and the definition of component leak at § 95475];
  - c. The gas collection system must be designed and operated so that all the landfill gas is drawn toward the gas control device or devices;
  - d. Each wellhead must be operated under a vacuum (negative pressure), except under the following conditions:
    - (1) Use of a geomembrane or synthetic cover, provided the Permittee establishes acceptable pressure limits for the wellheads and includes them in the Design Plan;
    - (2) A decommissioned well;
    - (3) Well raising activities in which new fill is being added or compacted in the immediate vicinity around the well, or a well extension that, once installed, is sealed or capped until the raised well is reconnected to a vacuum source.
 [17 CCR §§ 95464(b)(1), 95464(c), 95464(d) and 95475]
39. Except as provided in sections 95464(d), 95464(e), and 95466, no location on the landfill surface may exceed either of the following concentrations of methane:
  - a. 500 ppmv, other than non-repeatable, momentary readings, as determined by instantaneous surface emissions monitoring, measured at a distance of 3 inches above surface as required by § 95471(c)(1)(A);
  - b. An average of 25 ppmv as determined by integrated surface emissions monitoring.
 [17 CCR § 95465]
40. Prior to using the unpaved haul road, the unpaved haul road shall be watered or determined to be visibly wet. During use, the unpaved haul roads shall be watered at intervals such that the period between waterings do not exceed four hours unless the road surface is visibly wet. If the unpaved haul road is visibly wet, it shall be logged as "visibly wet" in lieu of conducting watering. If the unpaved haul road is not used, it shall be logged as "not in use" in lieu of conducting watering. A log recording actual road watering and road conditions shall be maintained

on-site for a period of five years and made available to District personnel upon request. [Rule 1210]

41. The Permittee shall apply the dust suppressant at intervals such that the period between dust suppressant applications does not exceed 140 days unless otherwise approved by the APCD in accordance with the specifications and frequency provided by the manufacturer. If there will be a rain event that will wash away the dust suppressant the applicant must make a note in the logbook of the date(s) the rain event occurred along with the rescheduled application date. The rescheduled date must occur within 7 days of the end of the rain event. [Rule 1210]
42. Unpaved haul roads shall be constructed and maintained in accordance with appropriate official specifications or guidance provided by the manufacturer of the haul road dust suppressant. Road construction and maintenance documentation shall be made available to District personnel upon request. [Rule 1210]
43. The haul road dust suppressant shall be used, maintained and reapplied on all unpaved haul roads in accordance with the manufacturer specifications and correspond to a control efficiency of at least 60%. The manufacturer specification, including application rate, maintenance requirements, and corresponding control efficiency for the dust suppressant shall be made available to District personnel upon request. [Rule 1210]
44. Records of the time, date, locations and square footage of each area where dust suppressant is applied on the property, and the quantity (lbs) of dust suppressant usage in each area that demonstrate the dust suppressant was used in accordance to the manufacturer specifications shall be maintained on-site for a period of five years and made available to District personnel upon request. [Rule 1210]
45. The Permittee may be required to revise and resubmit a risk reduction audit and plan if the District receives new information regarding the air toxics emissions from the Sycamore Landfill or alternative air toxic risk reduction measures that would significantly impact or reduce health risks to exposed persons. A revised risk reduction audit and plan shall be submitted by the Permittee within 60 days of such notification. [Rule 1210(e)(10)]
46. The requirements of section 95465 do not apply to the working face of the landfill or to areas of the landfill surface where the landfill cover material has been removed and refuse has been exposed for the purpose of installing, expanding, replacing, or repairing components of the landfill gas, leachate, or gas condensate collection and removal system, or for law enforcement activities requiring excavation. [17 CCR § 95466]
47. If the Permittee operates a flare for the control of landfill gas, the flare must meet the following requirements:
  - a. Achieves a methane destruction efficiency of at least 99 percent by weight;
  - b. Is equipped with automatic dampers, an automatic shutdown device, a flame arrester, and continuous recording temperature sensors;
  - c. During startup or restart there must be sufficient flow of propane or commercial natural gas to the burners to prevent unburned collected methane from being emitted to the atmosphere;
  - d. The gas control device must be operated within the parameter ranges established during the initial or most recent source test.[17 CCR § 95464(b)(2)(A)]
48. If the Permittee operates a landfill gas control device other than a flare, the device must meet the following requirements:
  - a. Achieves a methane destruction efficiency of at least 99 percent by weight. Lean burn internal combustion engines must reduce the outlet methane concentration to less than 3,000 ppmv, dry basis, corrected to 15 percent oxygen.
  - b. If a boiler or a process heater is used as the gas control device, the landfill gas stream must be introduced into the flame zone. Where the landfill gas is not the primary fuel for the boiler or process heater, introduction of the landfill gas stream into the flame zone is not required.
  - c. The gas control device must be operated within the parameter ranges established during the initial or most recent source test.
49. The Permittee must conduct an annual source test for any gas control device subject to the requirements of sections 95464(b)(2)(A) or 95464(b)(3)(A) using the test methods identified in 17 CCR 95471(f). Each succeeding complete annual source test must be conducted no later than 45 days after the anniversary date of the initial source test.

If a gas control device remains in compliance after three consecutive source tests the Permittee may conduct the source test every three years. If a subsequent source test shows the gas collection and control system is out of compliance the source testing frequency will return to annual. [17 CCR § 95464(b)(4)]
50. The requirements of 17 CCR sections 95464(b)(1)(A), 95464(b)(1)(B), and 95464(c) do not apply to individual landfill gas collection system components that must be temporarily shut down in order to repair the components, due to catastrophic events such as earthquakes, to connect new landfill gas collection system components to the existing system, to extinguish landfill fires, or to perform construction activities pursuant to section 95466, provided the following requirements are met:
  - a. Any new gas collection system components required to maintain compliance with 17 CCR 95464 must be included in the most recent Design Plan pursuant to section 95464(a)(4);
  - b. Methane emissions must be minimized during shutdown pursuant to section 95464(a)(1)(D).[17 CCR § 95464(e)(1-2)]

51. The Permittee must monitor each individual wellhead monthly to determine the gauge pressure. If there is any positive pressure reading other than as provided in 17 CCR sections 95464(d) and 95464(e), the Permittee must take the following actions:
- Initiate corrective action within five calendar days of the positive pressure measurement;
  - If the problem cannot be corrected within 15 days of the date the positive pressure was first measured, the Permittee must initiate further action, including, but not limited to, any necessary expansion of the gas collection system, to mitigate any positive pressure readings;
  - Corrective actions, including any expansion of the gas collection and control system, must be completed and any new wells must be operating within 120 days of the date the positive pressure was first measured, or it is a violation.
- [17 CCR § 95469(c)]
52. Components containing landfill gas that are under positive pressure must be monitored quarterly for leaks (not to exceed 500 ppmv as methane pursuant §95464(b)(1)(B)). Any component leak must be tagged and repaired within 10 calendar days, or it is a violation.
- [17 CCR § 95469(b)(3)]
53. Component leak testing at MSW landfills having landfill gas-to-energy facilities may be conducted prior to scheduled maintenance or planned outage periods.
- [17 CCR § 95469(b)(3)(A)]
54. The Permittee must conduct quarterly surface monitoring in accordance with 17 CCR section 95469 using the equipment and procedures specified in section 95471. Instantaneous surface monitoring shall be conducted using either an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications given at 17 CCR § 95471(a) and using the applicable procedures given at 17 CCR § 95471(c) including, but not limited to, the monitoring grid layout.
- [17 CCR § 95469(a)]
55. Pursuant to section 95465(a)(1), any landfill surface reading exceeding 500 ppmv, other than non-repeatable, momentary readings, as determined by instantaneous surface emissions monitoring, must be recorded as an exceedance and the following actions taken:
- The Permittee must record the date, location, and value of each exceedance, along with re-test dates and results. The location of each exceedance must be clearly marked and identified on a topographic map of the MSW landfill, drawn to scale with the location of both the grids and the gas collection system clearly identified.
  - Corrective action must be taken by the Permittee such as, but not limited to, cover maintenance or repair, or well vacuum adjustments and the location must be re-monitored within ten calendar days of a measured exceedance.
    - If the re-monitoring of the location shows a second exceedance, additional corrective action must be taken and the location must be re-monitored again no later than 10 calendar days after the second exceedance.
    - If the re-monitoring shows a third exceedance, the Permittee must install a new or replacement well, unless an alternative solution is identified and approved by the District, as determined to achieve compliance no later than 120 calendar days after detecting the third exceedance, or it is a violation of this subarticle.
  - Any closed or inactive MSW landfill, or any closed or inactive areas on an active MSW landfill that has no monitored exceedances of the 500 ppmv methane limit specified in section 95465(a)(1) after four consecutive quarterly monitoring periods may monitor annually. Any exceedances of this limit detected during the annual monitoring that cannot be remediated within 10 calendar days will result in a return to quarterly monitoring of the landfill.
  - Any exceedances of the 500 ppmv methane limit specified in section 95465(a)(1) detected during any compliance inspections will result in a return to quarterly monitoring of the landfill.
  - Any instantaneous methane measurement of 200 ppmv or greater must be recorded as a reportable reading pursuant to 17 CCR 95971(a)(1)(D).
- [17 CCR §§ 95969(a)(2) and 95971]
56. Any reading exceeding an average of 25 ppmv as specified in 17 CCR section 95465(a)(2) must be recorded as an exceedance and the following actions must be taken:
- The Permittee must record the average surface concentration measured as methane for each grid along with re-test dates and results. The location of the grids and the gas collection system must be clearly marked and identified on a topographic map of the MSW landfill drawn to scale.
  - Within 10 calendar days of a measured exceedance, corrective action must be taken by the Permittee such as, but not limited to, cover maintenance or repair, or well vacuum adjustments and the grid must be re-monitored.
    - If the re-monitoring of the grid shows a second exceedance, additional corrective action must be taken and the location must be re-monitored again no later than 10 calendar days after the second exceedance.
    - If the re-monitoring in section 95469(a)(2)(B)1. shows a third exceedance, the Permittee must install a new or replacement well as determined to achieve compliance no later than 120 calendar days after detecting the third exceedance, or it is a violation of this subarticle.
  - Any closed or inactive MSW landfill, or any closed or inactive areas on an active MSW landfill that has no monitored exceedances of the limit specified in section 95465(a)(2) after 4 consecutive quarterly monitoring

periods may monitor annually. Any exceedances of the limits specified in section 95465(a)(2) detected during the annual monitoring that cannot be remediated within 10 calendar days will result in a return to quarterly monitoring of the landfill.

d. Any exceedances of the limits specified in section 95465(a)(2) detected during any compliance inspections will result in a return to quarterly monitoring of the landfill.

[17 CCR § 95969(a)(2)]

57. The Permittee of a closed or inactive MSW landfill, or any closed or inactive area on an active MSW landfill, that can demonstrate that in the three years before the effective date of this subarticle that there were no measured exceedances of the limits specified in section 95465 by annual or quarterly monitoring may monitor annually. Any exceedances of the surface methane emission limits specified in section 95465 detected during the annual monitoring that cannot be remediated within 10 calendar days will result in a return to quarterly monitoring. [17 CCR § 95469(a)(3)]
58. Components containing landfill gas and under positive pressure must be monitored quarterly for leaks. Any component leak must be tagged and repaired within 10 calendar days, or it is a violation. Component leak testing at MSW landfills having landfill gas-to-energy facilities may be conducted prior to scheduled maintenance or planned outage periods. [17 CCR § 95969(b)(3)]
59. The Permittee may request alternatives to the compliance measures, monitoring requirements, test methods and procedures of sections 95464, 95469, and 95471. Any alternatives requested by the Permittee must be submitted in writing to the Control Officer of the Air Pollution Control District, San Diego County. Alternative compliance option requests may include, but are not limited to, the following:
- a. Semi-continuous operation of the gas collection and control system due to insufficient landfill gas flow rates.
  - b. Additional time allowance for leak repairs for landfills having consistent issues related to the procurement and delivery of necessary parts to complete the repair, or adverse weather conditions that impede repair work.
  - c. Alternative wind speed requirements for landfills consistently having winds in excess of the limits specified in this subarticle.
  - d. Alternative walking patterns to address potential safety and other issues, such as: steep or slippery slopes, monitoring instrument obstructions, and physical obstructions.
  - e. Exclusion of construction areas and other dangerous areas from landfill surface inspection.
  - f. Exclusion of paved roads that do not have any cracks, pot holes, or other penetrations from landfill surface inspection. [17 CCR § 95468(a)]
60. In addition to any other records required by this permit, the Permittee must maintain the following records for at least five (5) years:
- a. All gas collection system downtime exceeding five calendar days, including individual well shutdown and disconnection times, and the reason for the downtime.
  - b. All gas control system downtime in excess of one hour, the reason for the downtime, and the length of time the gas control system was shutdown.
  - c. Expected gas generation flow rate calculated pursuant to section 95471(e) 2006 Intergovernmental Panel on Climate Change (IPCC) Guidelines for National Greenhouse Gas Inventories, Chapter 3, using a recovery rate of 75%.
  - d. Records of all instantaneous surface readings of 200 ppmv or greater; all exceedances of the limits in sections 95464(b)(1)(B) or 95465, including the location of the leak (or affected grid), leak concentration in ppmv, date and time of measurement, the action taken to repair the leak, date of repair, any required re-monitoring and the re-monitored concentration in ppmv, and wind speed during surface sampling; and the installation date and location of each well installed as part of a gas collection system expansion.
  - e. Records of any positive wellhead gauge pressure measurements, the date of the measurements, the well identification number, and the corrective action taken.
  - f. Annual solid waste acceptance rate and the current amount of waste-in-place.
  - g. Records of the nature, location, amount, and date of deposition of non-degradable waste for any landfill areas excluded from the collection system.
  - h. Results of any source tests conducted pursuant to section 95464(b)(4).
  - i. Records describing the mitigation measures taken to prevent the release of methane or other emissions into the atmosphere:
    - (1) When solid waste was brought to the surface during the installation or preparation of wells, piping, or other equipment;
    - (2) During repairs or the temporary shutdown of gas collection system components;
    - (3) When solid waste was excavated and moved.
  - j. Records of any construction activities pursuant to section 95466. The records must contain the following information:
    - (1) A description of the actions being taken, the areas of the MSW landfill that will be affected by these actions, the reason the actions are required, and any landfill gas collection system components that will be affected by these actions.
    - (2) Construction start and finish dates, projected equipment installation dates, and projected shut down times for individual gas collection system components.

(3) A description of the mitigation measures taken to minimize methane emissions and other potential air quality impacts.

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

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

(2) For boilers or process heaters, whenever there is a change in the location at which the vent stream is introduced into the flame zone pursuant to section 95464(b)(3)(A)2.

(3) For any Permittee who uses a boiler or process heater with a design heat input capacity of 44 megawatts (150 MMBtu/hr) or greater to comply with section 95464(b)(3), all periods of operation of the boiler or process heater (e.g., steam use, fuel use, or monitoring data collected pursuant to other federal, State, local, or tribal regulatory requirements).

[17 CCR § 95470(a)(1)]

61. The Permittee must maintain the following records for the life of each gas control device:

a. The control device vendor specifications.

b. The expected gas generation flow rate as calculated pursuant to section 95471(e).

c. The percent reduction of methane achieved by the control device determined pursuant to section 95471(f).

d. For a boiler or process heater, the description of the location at which the collected gas vent stream is introduced into the boiler or process heater over the same time period of the performance test.

e. For an open flare: the flare type (i.e., steam-assisted, air-assisted, or non-assisted); all visible emission readings, heat content determination, flow rate or bypass flow rate measurements, and exit velocity determinations made during the performance test as specified in 40 CFR § 60.18 (as last amended 73 Fed. Reg. 78209 (December 22, 2008), which is incorporated by reference herein; and records of the flare pilot flame or flare flame monitoring and records of all periods of operations during which the pilot flame or the flare flame is absent.

[17 CCR § 95470(a)(2)]

62. The Permittee must maintain copies of the records and reports required by this subarticle and provide them to the District within five business days upon request. Records and reports must be kept at a location within the State of California.

[17 CCR § 95470(a)(3)]

63. Except as given in 17 CCR section 95463, the Permittee must prepare an annual report for the period of January 1 through December 31 of each year. Each annual report must be submitted to the District by March 15 of the following year and must contain the following information:

a. MSW landfill name, Permittee, address, and solid waste information system (SWIS) identification number.

b. Total volume of landfill gas collected (reported in standard cubic feet).

c. Average composition of the landfill gas collected over the reporting period (reported in percent methane and percent carbon dioxide by volume).

d. Gas control device type, year of installation, rating, fuel type, and total amount of landfill gas combusted in each control device.

e. The date that the gas collection and control system was installed and in full operation.

f. The percent methane destruction efficiency of each gas control device(s).

g. Type and amount of supplemental fuels burned with the landfill gas in each device.

h. Total volume of landfill gas shipped off-site, the composition of the landfill gas collected (reported in percent methane and percent carbon dioxide by volume), and the recipient of the gas.

i. Most recent topographic map of the site showing the areas with final cover and a geomembrane and the areas with final cover without a geomembrane with corresponding percentages over the landfill surface.

j. The information records cited herein and required by sections 95470(a)(1)(A), 95470(a)(1)(B), 95470(a)(1)(C), 95470(a)(1)(D), 95470(a)(1)(E), and 95470(a)(1)(F), 95470(a)(1)(H), and 95470(a)(1)(K).

[17 CCR § 95470(b)(3)]

64. If the MSW landfill contains less than 450,000 tons of waste-in-place, or the landfill contains 450,000 tons or more of waste-in-place and landfill gas recovery reaches or exceeds 3.0 MMBtu/hr, as given by section 95463(a) or section 95643(b)(2)(B)3., the Permittee must report the following information to the District:

a. MSW landfill name, Permittee, address, and solid waste information system (SWIS) identification number.

b. The landfill's status (active, closed, or inactive) and the estimated waste-in-place, in tons.

c. Most recent topographic map of the site showing the areas with final cover and a geomembrane and the areas with final cover without a geomembrane with corresponding percentages over the landfill surface.

[17 CCR § 95470(b)(4)]

65. The Permittee must calculate the landfill gas heat input capacity as required by section 95463(b) (i.e., gas heat input capacity report requirement for landfills greater than or equal to 450,000 tons of waste-in-place) using the procedures specified in section 95471(b) (i.e., procedure as specified in Appendix I, as applicable) and report the results to the District within 90 days of the effective date of this subarticle or upon reaching 450,000 tons of

waste-in-place. The calculation, along with relevant parameters, must be provided as part of the report. [17 CCR § 95470(b)(5)]

66. Any report, or information submitted pursuant to 17 CCR subarticle 6 must contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this subarticle, must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [17 CCR § 95470(b)(6)]
67. Each part of 17 CCR Subarticle 6 is deemed severable, and in the event that any part of this subarticle is held to be invalid, the remainder of this subarticle continues in full force and effect. [17 CCR § 95476]
68. Daily acceptance of municipal solid waste shall not exceed 7,500 tons in any calendar day. Records of daily waste acceptance shall be maintained on site and made available to SDAPCD personnel upon request. (Rule 20.3)
69. Emissions of carbon monoxide (CO) from this stationary source, including all sources of emissions from combustion of collected landfill gas, shall not exceed 249 tons per rolling 12 calendar month period. (Rule 20.3)
70. Emissions of carbon monoxide (CO) from this stationary source, including all sources of emissions from combustion of collected landfill gas, shall not exceed 1350 pounds per calendar day. (Rule 20.3)
71. Emissions of oxides of nitrogen (NOx) from this stationary source, including all sources of emissions from combustion of collected landfill gas, shall not exceed 55 tons per rolling 12 calendar month period. (Rule 20.3)
72. Emissions of volatile organic compounds (VOC) from this stationary source, including all sources of emissions from combustion of collected landfill gas, shall not exceed 63 tons per rolling 12 calendar month period. (Rule 20.3)
73. If emissions of VOC from this stationary source exceed 58.8 tons in any rolling 12 calendar month period, the owner or operator shall comply with one of the following requirements no later than six calendar months following the month in which emissions first exceeded this level:
  - a. Submit an application to SDAPCD which includes a proposal to increase allowable VOC emissions to greater than 63 tons per rolling 12 month period, and including a proposal to surrender emission offsets equal to the proposed emission increase and based on a pre-project emission level of 38.8 tons VOC per rolling 12 month period.
  - b. Submit an application to SDAPCD detailing the measures to be taken to ensure emissions from the stationary source will not exceed the VOC emission limit described in this permit. (Rule 20.3(d)(5))
74. The owner or operator shall keep records of emissions of VOC, CO, and NOx from this stationary source, including from all sources of combustion of landfill gas. Records of VOC and NOx emissions shall be kept on at least a calendar month basis, and records of CO shall be kept on at least a calendar day basis. Emissions shall be calculated in accordance with standard APCD calculation methods or other method approved in writing by the District. If requested by District personnel, the owner or operator shall provide an updated calculation within a reasonable time period as necessary to collect and analyze any data. (Rule 20.3)
75. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.
76. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
77. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)

This Authority to Construct does not authorize operation of the above-specified equipment until written notification has been provided to the District indicating that construction (or modification) has been completed in accordance with this Authority to Construct. Upon submission of this notification, temporary Permit to Operate shall take effect and will remain in effect, unless withdrawn or modified by the District, until the equipment is inspected by the District and a revised temporary permit (Startup Authorization) is issued or a Permit to Operate is granted or denied.

This Authority to Construct shall be posted on or within 25 feet of the above described equipment or maintained readily available at all times on the operating premises.

Upon completion of construction (or modification) in accordance with this Authority to Construct, and prior to commencing operation, the applicant must complete and mail, deliver or email to [apcdpermits@sdapcd.org](mailto:apcdpermits@sdapcd.org) the enclosed Construction Completion Notice to the District. After mailing, delivering or emailing the notice, the applicant may commence operation of the equipment. Operation must be in compliance with all the conditions of this Authority to Construct and applicable District Rules.

This Authority to Construct does not relieve the holder from obtaining permits or authorizations, which may be required by other governmental agencies. This Authority to Construct is not authority to exceed any applicable emission standard

established by this District or any other governmental agency. This authorization is subject to cancellation if any emission standard or condition is violated.

Within 30 days after receipt of this Authority to Construct, the applicant may petition the Hearing Board for a hearing on any conditions imposed herein in accordance with Rule 25.

This Authority to Construct will expire on unless an extension is granted in writing.

This is not a Permit to Operate. Please be advised that installation or operation of this process or equipment without written authorization may be a misdemeanor subject to fines and penalties.

If you have any questions regarding this action, please contact me at () - or via email at [Peter.Ossowski@sdapcd.org](mailto:Peter.Ossowski@sdapcd.org).

Peter Ossowski  
Assoc Air Pollution Cntrl Eng

CC: Compliance Division