ENGINEERING EVALUATION
AUTHORITY TO CONSTRUCT

Facility Name:	Sycamore Landfill, Inc.
Application Number:	APCD2024-APP-008534
Site ID:	APCD1989-SITE-03596
Fee Sched:	48A
Equipment Type:	Modification for PTO 971111 (Landfill)
Equipment Address:	8514 Mast Blvd, Santee, CA 92071
Facility Contact:	Jesus Torres
Contact Title:	Environmental Manager
Contact Phone:	619-449-9156
Permit Engineer:	Peter Ossowski
Date Application Received:	December 26, 2024
Date A/C Evaluation Completed:	TBD (Draft)
Senior Engineer Approval:	TBD (Draft)

1.0 BACKGROUND

1.1 Type of Application

This application is to modify Permit 971111 (an active non-hazardous waste landfill with associated operations). Under this application, the Applicant proposed the final interim expansion of the landfill from 55,350,373 cubic yards to 147,908,000 cubic yards (an additional 92,557,627 cubic yards). In addition, the applicant has also applied separately for a revision to the daily waste acceptance rates for the landfill allowed by the solid waste permit from 5,000 tons/day to 7,500 tons/day, which also will potentially increase hourly and daily emissions. The new daily waste acceptance rate will be updated via condition change. The proposed flare will be installed on the west side of the entrance road instead of the east side of the entrance road. See Attachment 1 for the facility's submitted application package.

At the time of this application the active face will remain within the same area as previously evaluated. The flare relocation from originally evaluated location will be evaluated in this evaluation.

1.2 Permit History

Sycamore Landfill (Site ID: APCD1989-SITE-03596) began accepting waste in 1967 and is currently an active landfill. Permit 971111 was issued in 1998 after the District started requiring permits for landfills in 1997. The facility currently has two active permits: Permit APCD2008-PTO-971111 for the landfill and its associated operations and equipment (being modified by this application) and Permit APCD2012-PTO-001203 for three engines used to grind green waste (not being modified by this application). The landfill was recently modified by APCD2020-APP-006303 and APCD2024-APP-008071.

1.3 Facility Description

Sycamore Landfill is a municipal non-hazardous waste landfill facility that includes quarrying, municipal waste disposal, waste compaction, cover material application, haul road activities, green

waste management, diesel engines and landfill gas flaring. Sycamore Energy (Site ID: APCD1984-SITE-03594) located next to Sycamore Landfill is a landfill gas to energy facility. Martin Marietta (Site ID: APCD2003-SITE-04824) located next to Sycamore Landfill is a mineral processing facility that also operates at direction of the landfill to produce daily cover and other materials used in the landfill. Sycamore Landfill, Sycamore Energy and Martin Marietta have separate Site ID's and are issued separate permits; however, they are contiguous and are inter-related either by contractual arrangements/as a support facility (Martin Marietta) or as an integral part of meeting regulatory requirements applicable to one facility (Sycamore Energy is subject to requirements as a control device for landfill gas). Therefore, in accordance with District Rules 2, 20.1-20.3 and Regulation XIV (Title V), the District considers Sycamore Landfill, Sycamore Energy and Martin Marietta one stationary source for the purposes of Title V, NSR and Rule 1200 and will be evaluated this way under this application.

In addition to this application, the Stationary Source has the following open applications (list does not include Title V applications, since these are not part of the review process):

Facility Name	Application	Notes/Comments
Sycamore Landfill	APCD2024-APP-008269	Addition of new flare (included in review of the previous expansion application)
Sycamore Landfill	APCD2024-APP-008534	Final Expansion (will be reviewed separately, and consider any circumvention considerations)
Sycamore Landfill	APCD2025-APP-008726	Greenwaste Equipment. (will be reviewed with final expansion or separately, based on how it relates to those projects)
Sycamore Landfill	APCD2025-APP-008727	Greenwaste Equipment. (will be reviewed with final expansion or separately, based on how it relates to those projects)
Martin Marietta	APCD2024-APP-008439	Modification to Aggregate Equipment, minimal impact
Martin Marietta	APCD2024-APP-008440	Modification to Aggregate Equipment, minimal impact
Martin Marietta	APCD2025-RRP-990005	Risk Reduction Plan (decrease in emissions)

(APCD2024-APP-008269) for the installation of a new flare to control the increase of gas generation from the expansions and has been evaluated prior to this evaluation. Application APP-008701 has been evaluated prior to this evaluation to include any requirements that may apply to or consider some aspects of this project (e.g. CEQA, NSR) to avoid circumvention.

Review of open applications at these facilities indicates that Sycamore Energy does not have any open applications. Martin Marietta has open applications, however these propose equipment changes related to the wet sand processing line and other minor changes to permit conditions of the rock crushing plant. These changes do not impact emissions and therefore do not impact this application.

1.4 Other Background Information

Sycamore Landfill is a Title V facility and has an active Title V permit APCD2008-TVP-971226. Martin Marietta (APCD2015-TVP-00042) and Sycamore Energy (APCD2015-TVP-00042) maintain separate

Title V permits for their own respective equipment but are still considered one stationary source. The facility informed the District that the new flare will be constructed on the west side of the main road due to other projects onsite. More details can be found in the Rule 1200 section.

2.0 PROCESS DESCRIPTION

2.1 Equipment Description (showing proposed modifications to Permit 971111)

An active non-hazardous waste landfill (147,908,000 cubic yard or 117,364,998 ton capacity[1]) 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.

Addition of the following equipment to the existing landfill under permit APCD2008-PTO-971111: Enclosed ULE Flare: Manufacturer: John Zink Model: Zink Ultra Low Emissions Flare (ZULE) S/N: tbd maximum rated heat input: 151.8 MMBtu/hr Stack height: 50'1", stack diameter: 13'7"

2.2 Process

Municipal non-hazardous solid waste is disposed at the facility and covered daily. Quarrying, land excavation and waste compaction are conducted to optimize land use. The landfill gas is collected by vertical and horizontal pipes and is either sent to electric generating turbines owned and operated by Sycamore Energy or combusted by the facility's landfill gas flares.

2.3 Facility Emission Sources

The waste disposed at the facility decomposes and produces landfill gas. The landfill gas is emitted as fugitive emissions coming from the surface or it is collected and combusted in turbines or flares. Vehicles coming in and out to dispose waste and vehicles moving materials within the facility creates haul road emissions. Tailpipe emissions from these vehicles are not regulated and evaluated under this Application. The District also considered how other sources of emissions at the facility could be affected by the capacity and daily waste acceptance rates of the landfill increasing. These must be considered because increases in emissions from these emission sources must be included when determining new source review and Rule 1200 requirements. These sources include:

- Earthmoving operations: quarrying, drilling, blasting, excavating.
- Rock crushing
- Waste compaction, landfill covering
- Construction of landfill gas collection and monitoring wells
- Borrow area operations
- Wind-driven fugitive dust
- Silt basin operations
- Combustion of landfill gas

Some of these sources are assumed not to have increases in emissions after review, and others are included in calculations as noted in section 3 of this report.

2.4 Emissions Controls

[1] Volumetric (cubic yard) capacity requested by Sycamore Landfill under Application 008534. Weight (tons) capacity based on volumetric capacity and a waste density of ~1587 lbs/yd3.

Sycamore Landfill's landfill gas collection system is assumed to have a collection efficiency of 85%, and this is considered enforceable based on standards of the CARB methane rule and federal landfill regulations [2]. The collected landfill gas is typically first sent to Sycamore Energy as fuel for electrical generating turbines. Any excess landfill gas that cannot be combusted in the turbines are sent to the facility's enclosed landfill gas flares to be burned. The remaining 15% of the generated landfill gas is assumed to be emitted as uncontrolled fugitive emissions.

2.5 Attachments
Attachment 1. Submitted application package.

3.0 EMISSIONS

The following tables present the most relevant emission calculations. Additional detailed calculations are found in attached calculation spreadsheets.

[2] The 85% collection efficiency is from CARB's Staff Report: Initial Statement of Reasons for the Proposed Regulation to Reduce Methane Emissions from Municipal Solid Waste Landfills

Table 1. Criteria Pollutant Emissions Increase – Total Project

	NOx											
	Pre-Project - Actual			Pre-Project - PTE			Post-Project			Emission Increase		
Emission Source	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr
Diesel Engines (PTO-001203)	NA	NA	NA	4.84	58.12	9.07	4.84	58.12	9.07	0	0	0
LFG Combustion	5.3	126.7	23.1	13.2	317.5	58.0	18.0	431.3	78.7	12.7	304.5	55.6
Total				18.1	375.7	67.0	22.8	489.4	87.8	12.7	304.5	55.6
Total (with stationary source limits)				18.1	375.7	67.0	22.8	489.4	55.0	12.7	304.5	22.8
	CO											
	Pre-Project - Actual			Pre-Project - PTE			Post-Project			Emission Increase		
	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr
Diesel Engines (PTO-001203)	NA	NA	NA	0.16	1.87	0.29	0.16	1.87	0.29	0	0	0
LFG Combustion	33.8	811.5	148.1	67.1	1609.3	293.7	67.2	1613.6	294.5	33.4	802.1	146.4
Fugitive LFG Emissions	0.4	8.6	1.6	0.5	10.9	2.0	1.1	27.4	5.0	0.8	18.8	3.4
Total				67.7	1622.1	296.0	68.5	1642.9	299.8	34.2	820.9	149.9
Total (with stationary source limits)				67.7	1622.1	296.0	68.5	1350.0	249.0	34.2	528.0	99.0
	VOC											
	Pre-Project - Actual			Pre-Project - PTE			Post-Project			Emission Increase		
	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr
Diesel Engines (PTO-001203)	NA	NA	NA	0.06	0.75	0.12	0.06	0.75	0.12	0	0	0
LFG Combustion	0.6	14.9	2.7	0.8	18.9	3.4	2.0	47.5	8.7	1.4	32.5	5.9
Fugitive LFG Emissions	8.23	197.47	36.04	10.38	249.22	45.48	26.12	627.0	114.43	17.9	429.52	78.39
Total				11.2	268.8	49.0	28.2	675.2	123.2	19.3	462.0	84.3
Total (with stationary source limits)				11.2	268.8	49.0	28.2	675.2	63	19.3	462.0	24.1

	SOx											
	Pre-Project - Actual			Pre-Project - PTE			Post-Project			Emission Increase		
	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr
Diesel Engines (PTO-001203)	NA	NA	NA	0.01	0.12	0.02	0.01	0.12	0.02	0	0	0
LFG Combustion	1.7	41.3	7.5	2.2	52.1	9.5	5.5	131.0	23.9	3.7	89.7	16.4
Total				2.2	52.2	9.5	5.5	131.1	23.9	3.7	89.7	16.4
	PM-10											
	Pre-Project - Actual			Pre-Project - PTE			Post-Project			Emission Increase		
	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr
Diesel Engines (PTO-001203)	NA	NA	NA	0.05	0.56	0.088	0.05	0.56	0.088	0	0	0
LFG Combustion	1.2	28.6	5.2	3.0	70.9	12.9	7.4	178.4	32.6	6.2	149.8	27.3
Material Handling	118.8	1271.8	198.8	135.3	1444.3	225.8	49.8	547.7	85.9	-69.0	-724.1	-113.0
Total				138.3	1515.8	238.8	57.3	729.7	118.5	-62.7	-574.3	-85.6

Table 2. VOC Emission Increase (Landfill – Fugitive)

	Pre-Project Actual			Pre-Project Potential			Post Project Potential			Emission Increase (Actual-Potential)		
	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr
VOC	8.2	197.5	36.0	10.4	249.2	45.5	26.1	627.0	114.4	17.9	429.5	78.4
CO	0.36	8.64	1.58	0.45	10.91	1.99	1.14	27.45	5.01	0.78	18.80	3.43

Table 3. Landfill Increase (Combustion)

	Pre-Project Actual			Pre-Project Potential			Post Project Potential			Emission Increase (Actual-Potential)		
Pollutant	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr
NOX	5.28	126.75	23.13	13.23	317.54	58.0	17.97	431.27	78.7	12.69	304.53	55.58
CO	33.81	811.52	148.10	67.06	1609.32	293.70	67.23	1613.59	294.48	33.42	802.06	146.38
SOX	1.72	41.25	7.53	2.2	52.1	10	5.5	132.9	24.3	3.82	91.63	16.72
TOG	3.90	93.63	17.09	4.9	118.2	22	12.6	301.6	55.0	8.67	207.99	37.96
ROG	0.62	14.95	2.73	0.8	18.9	3	2.0	48.2	8.8	1.38	33.21	6.06
TSP	1.19	28.62	5.22	3.0	70.9	13	7.5	181.0	33.0	6.35	152.42	27.82
PM10	1.19	28.62	5.22	3.0	70.9	13	7.5	181.0	33.0	6.35	152.42	27.82

Table 4. Landfill PM-10 Haul Road/Fugitive Emission Increase

	Pre-Project (actual)			Pre-Project (potential)			Post-Project			Emission Increase		
Source	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr
Material Handling	0.9	11.2	1.8	0.9	11.2	1.8	1.1	13.0	2.0	0.1	1.8	0.3
Open Material Storage	3.8	63.0	10.3	3.8	63.0	10.3	3.8	63.0	10.3	0.0	0.0	0.0
Paved Haul Roads (MSW)	5.7	59.7	9.3	6.5	68.3	10.7	9.1	95.7	14.9	3.4	35.9	5.6
Paved Haul Roads (Imp. Base)	0.4	4.0	0.6	0.4	4.5	0.7	0.6	6.3	1.0	0.2	2.4	0.4
Paved Haul Roads (Green Waste)	0.3	3.0	0.5	0.3	3.4	0.5	0.5	4.8	0.7	0.2	1.8	0.3
Paved Haul Roads (C&D)	0.2	2.0	0.3	0.2	2.3	0.4	0.3	3.2	0.5	0.1	1.2	0.2
Unpaved Haul Roads (MSW)	93.5	982.2	153.2	107.0	1123.7	175.3	30.0	314.6	49.1	-63.6	-667.6	-104.1
Unpaved Haul Roads (Imp. Base)	5.2	54.7	8.5	6.0	62.6	9.8	1.7	17.5	2.7	-3.5	-37.2	-5.8
Unpaved Haul Roads (Green Waste)	5.7	59.4	9.3	6.5	67.9	10.6	1.8	19.0	3.0	-3.8	-40.4	-6.3
Unpaved Haul Roads (C&D)	3.1	32.6	5.1	3.5	37.3	5.8	1.0	10.4	1.6	-2.1	-22.1	-3.5
Total	118.8	1271.8	198.8	135.3	1444.3	225.8	49.8	547.7	85.9	-69.0	-724.1	-113.0

3.1 Emission Estimate

This evaluation is to review the proposed interim expansion of the landfill from a permitted capacity of 55,350,373 cubic yards to 147,908,000 cubic yards. Only emission increases associated with the

proposed interim expansion is evaluated under this application. The following main parameters were used to estimate emissions:

a) Broadly speaking, the emission changes from this projects stem from two factors. The first is that the increase in permitted capacity may result in an increase in emissions on an annual basis from the increased generation of landfill gas. This potentially results in an emission increase of fugitive landfill gas emissions from the landfill and combustion emissions from either the flares or turbines. Additionally, review of waste acceptance data provided by the facility, along with the solid waste permit and associated environmental review documents, indicated that part of the project involves an expansion in daily waste acceptance. This also means that there is a potential increase in haul road emissions from waste truck traffic, and other fugitive emissions sources.
b) Because this facility is a major source of emissions of many pollutants, emission increases of these pollutants must be examined on an actual-to-potential basis to ensure that if the modifications to the facility also allow it to increase actual operations or result in actual emission concentrations increasing, these increases are analyzed and subject to applicable emission requirements. However, because this facility is a landfill, it is not expected that operations will increase more than a few percent per year (as shown in recent trends), which is much lower than these calculations show.
c) To estimate emissions and potential emission increases, many assumptions were made for various parameters and specific data from specific years was utilized. All of these assumptions and data are described in attached detailed calculations. A key point of uncertainty is that landfill gas generation cannot be directly measured and can only be estimated from assumptions about the solid waste properties and biological degradation kinetics.
d) To estimate landfill gas emissions, the California Air Resources Board Landfill Gas Tool (CARB Tool) is used determine the percent increase of fugitive landfill gas generation between specific calendar years. See Attachment 2. The landfill gas collection system is assumed to have a collection efficiency of 85%. This value is based on California Air Resources Board (CARB) Staff Report: Initial Statement of Reasons for the Proposed Regulation to Reduce Methane Emissions from Municipal Solid Waste Landfills (May 2009), page IV-6. See Attachment 3
e) Though the District has a default landfill gas composition, two landfill gas analyses were conducted at the facility in 2015 and 2019. For this evaluation, these facility-specific landfill gas analyses are considered appropriate since the District initiated the testing, approved the test reports and are the most recent site-specific samples from the facility. The most recent samples are believed to the best information to use when estimating emissions for this evaluation. See Attachment 4 for the District analytical reports. See Attachment 5 for a compilation of the District analytical reports.
f) The accepted waste is assumed to have a density of 1,587 lbs/cubic yards (a 30-year average density reported by the facility). This amount was presented by the facility and is considered appropriate.
g) The primary reason that the calculations show that there are large emission increases for NOx and CO is because the combustion emission sources typically operate at much lower than required emission concentrations, and when comparing actual emissions to potential emissions for NSR purposes, this has the effect of appearing as a large emission increase. However, in practice the increase in landfill capacity would not likely cause concentrations of pollutants to increase, so the actual increase in emissions from this project is likely much less than described in these calculations. However, due to some of the magnitudes of emission increases, limits on facility-wide emissions of VOC, CO, and NOx are necessary to ensure that certain major source NSR requirements don't apply. Specifics of these requirements will be discussed under the applicable sections.
h) This calculation does not include PM10/2.5 emissions from Martin Marietta's operations since these do not need to be considered as part of this application to determine requirements, outside of potential increases which are accounted for in contemporaneous calculations.

i) The date the landfill reaches capacity was calculated, assuming constant growth of the annual waste that is deposited into the landfill. From 2019 to 2024 the maximum permitted tonnage for disposal was 5000 tons per day. During this time period the average tonnage increased by 3% per year. In November 2025, the facility increased their maximum permitted tonnage for disposal on their solid waste permit to 7500 tons per day. An increase of 3%/5000*7500=4.5% per year was used to assume the amount of waste deposited each year. The facility will increase its maximum permitted tonnage to 11450 tons per day in the future as that was what was evaluated through CEQA.

j) The 4.5% increase per year was floored once the annual waste deposited equaled 11450*365=4,179,250 tons per year. This yielded a closure date of 2055. The estimated closure date listed on the EIR in 2012 was 2042. The annual tonnage that will be allowed by this permit is 7500*365=2,737,500 tons per year. The facility is assumed to reach the 2.7 million annual tonnage by 2044 and reach the 4.2 million annual tonnage by 2054.

3.2 Emission Calculations

3.2.1. Fugitive Landfill Gas Emissions

During the writing of this evaluation, the total amount of waste deposited for calendar year 2025 is yet to be determined, therefore the projected capacity is used to determine emissions. Based on the facility's waste acceptance data, the District estimated that annual waste deposition conservatively could increase at 4.5% per year. Potential to emit was calculated based on the highest gas generation rate predicted is always the year after the landfill stops accepting waste. This data is analyzed in the attached calculations.

District calculation procedures for landfill operations were used to estimate fugitive landfill gas emissions. See Attachment 9. For estimating pre-project emissions of fugitive landfill gas, the actual amount of landfill gas collected and combusted as reported by Sycamore Landfill and Sycamore Energy on their 2020 Emissions Inventory was used as a starting point. The California Air Resources Board Landfill Gas Tool (CARB Tool) calculates the amount of landfill gas generated for each calendar year. Using calendar year 2020 as the starting point and assuming 4.5 % annual increase in waste deposition rate, a maximum gas generation rate was estimated for the year that the landfill would hit the revised waste capacity. The CARB tool is based on accepted IPCC methodology for estimating emissions from landfills.

District Engineering's emission calculation procedures state actual landfill gas generation rates are calculated by using actual landfill gas collected and applying an 85% landfill gas collection efficiency obtained from CARB's Staff Report for landfills. The emissions presented below are only for fugitive landfill gas emissions and used an alternative determination of landfill gas generation rate based on a total 9% overall increase in generation rate (the district agrees that this approach is also acceptable).

Table 5. Fugitive Landfill Gas TAC Emissions

Pollutant	Pre-Project (2024)		Post-Project (2028)		Emission Increase	
	Hourly, lbs/hr	Annual, lbs/yr	Hourly, lbs/hr	Annual, lbs/yr	Hourly, lbs/hr	Annual, lbs/yr
1,1,1-Trichloroethane	7.41E-04	6.49E+00	1.32E-03	1.15E+01	5.75E-04	5.03E+00
1,1,2,2-Tetrachloroethane	9.32E-04	8.16E+00	1.65E-03	1.45E+01	7.23E-04	6.33E+00
1,1,2-Trichloroethane	7.41E-04	6.49E+00	1.32E-03	1.15E+01	5.75E-04	5.03E+00
1,1-Dichloroethane	5.50E-04	4.81E+00	9.76E-04	8.55E+00	4.26E-04	3.73E+00
1,1-Dichloroethene (Vinylidene Chloride)	5.38E-04	4.71E+00	9.55E-04	8.37E+00	4.17E-04	3.66E+00
1,2-Dibromoethane	1.04E-03	9.14E+00	1.85E-03	1.62E+01	8.09E-04	7.09E+00
1,2-Dichloroethane (Ethylene Dichloride)	3.96E-03	3.46E+01	7.02E-03	6.15E+01	3.07E-03	2.69E+01
1,3-Butadiene	3.00E-04	2.63E+00	5.33E-04	4.67E+00	2.33E-04	2.04E+00
1,4-Dichlorobenzene	5.11E-03	4.48E+01	9.08E-03	7.95E+01	3.96E-03	3.47E+01
1,4-Dioxane	4.89E-04	4.28E+00	8.68E-04	7.61E+00	3.79E-04	3.32E+00

2-Butanone (MEK)	2.34E-01	2.05E+03	4.15E-01	3.63E+03	1.81E-01	1.59E+03
2-Propanol (IPA)	4.35E-01	3.81E+03	7.72E-01	6.77E+03	3.37E-01	2.96E+03
Acetaldehyde	2.38E-02	2.09E+02	4.23E-02	3.71E+02	1.85E-02	1.62E+02
Acrolein	6.22E-04	5.45E+00	1.11E-03	9.68E+00	4.83E-04	4.23E+00
Acrylonitrile	5.90E-04	5.16E+00	1.05E-03	9.17E+00	4.57E-04	4.01E+00
Allyl Chloride	4.25E-04	3.72E+00	7.54E-04	6.61E+00	3.29E-04	2.89E+00
Benzene	9.81E-03	8.59E+01	1.74E-02	1.53E+02	7.61E-03	6.67E+01
Benzyl Chloride (a-Chlorotoluene)	7.03E-04	6.16E+00	1.25E-03	1.09E+01	5.45E-04	4.78E+00
Bromomethane	5.27E-04	4.61E+00	9.36E-04	8.20E+00	4.09E-04	3.58E+00
Carbon Disulfide	7.09E-04	6.21E+00	1.26E-03	1.10E+01	5.50E-04	4.82E+00
Carbon Tetrachloride	8.54E-04	7.48E+00	1.52E-03	1.33E+01	6.62E-04	5.80E+00
Chlorobenzene	6.25E-04	5.48E+00	1.11E-03	9.72E+00	4.85E-04	4.25E+00
Chloroform	6.63E-04	5.81E+00	1.18E-03	1.03E+01	5.14E-04	4.50E+00
Ethylbenzene	5.44E-02	4.76E+02	9.66E-02	8.46E+02	4.22E-02	3.70E+02
Hexane	7.13E-03	6.24E+01	1.27E-02	1.11E+02	5.53E-03	4.84E+01
Hydrogen Sulfide	3.54E-01	3.10E+03	6.28E-01	5.50E+03	2.74E-01	2.40E+03
m & p-Xylenes	1.08E-01	9.42E+02	1.91E-01	1.67E+03	8.35E-02	7.31E+02
Methanol	4.67E-01	4.09E+03	8.30E-01	7.27E+03	3.63E-01	3.18E+03
Methyl Tert Butyl Ether (MTBE)	4.89E-04	4.28E+00	8.68E-04	7.61E+00	3.79E-04	3.32E+00
Methylene Chloride (Dichloromethane)	5.95E-03	5.21E+01	1.06E-02	9.25E+01	4.61E-03	4.04E+01
Naphthalene	7.12E-04	6.23E+00	1.26E-03	1.11E+01	5.52E-04	4.84E+00
o-Xylene	3.16E-02	2.77E+02	5.61E-02	4.91E+02	2.45E-02	2.15E+02
Propene	5.35E-02	4.69E+02	9.51E-02	8.33E+02	4.15E-02	3.64E+02
Styrene	7.51E-03	6.58E+01	1.33E-02	1.17E+02	5.82E-03	5.10E+01
Tetrachloroethene (PCE)	6.77E-03	5.93E+01	1.20E-02	1.05E+02	5.25E-03	4.60E+01
Vinyl Acetate	9.56E-04	8.37E+00	1.70E-03	1.49E+01	7.42E-04	6.50E+00
Vinyl Chloride	3.47E-04	3.04E+00	6.16E-04	5.40E+00	2.69E-04	2.36E+00

For calculations, refer to Attachments 6.

3.2.2. Landfill Gas Generation

District Engineering considers the measured amount landfill gas collected and reported by the facilities to be the most accurate data when estimating the amount of landfill gas generated. To determine the amount of landfill gas generated for past years, the District divides the amount of landfill gas collected and reported by the facilities by 85%. The 85% is the landfill gas collection efficiency presented in CARB's Staff Report for landfills. To estimate future landfill gas generation, the CARB Tool is used. The CARB Tool uses a 1st order decay model to calculate landfill gas generation which is considered technically valid and calculates an amount of landfill gas generated for each year. The actual amount of waste deposited and green waste for calendar years 1967-2024 as reported by the facility was entered into the CARB Tool. The District assumed a 4.5% annual growth rate which is conservative and still realistic based on observed data from recent years. The growth rate for waste deposited has increased by an average of 4.99% since 1967 with the first year, 1967, accepting 115,200 tons and 2024 accepting 1,169,792 tons.

3.2.3. Landfill Gas Composition

Though District Engineering's emission calculation procedures presents default composition of landfill gas, for this evaluation the landfill gas composition is based on the two most recent analytical reports dated October 14, 2015 and November 25, 2019. These source test reports were approved by District M&TS Division. See Attachment 4. Attachment 5 compiles the test date and averages the test results. The average concentrations were then used to calculate emissions of toxic air contaminants. The following toxic air contaminants presented by the facility were not included in this evaluation since they were not part of the reports and are not listed in the District Engineering's emission calculation

procedures: 1,2-dichloroethene, carbonyl sulfide, fluorotrichloromethane, mercury (total), propane, arsine and trimethylarsine (TMA).

3.2.4. Flare and Turbine Emissions
Using the rated capacity for each flare and turbine, along with data on actual combustion and emission factors, the District calculated the maximum emission increase possible, assuming that any increase in generated and collected landfill gas is combusted in the highest emitting source, and that source emits at it's maximum allowed emission rate. However, in practice it is more likely that emissions will only increase proportional to the increase in gas generation. However, to ensure that emissions do not exceed applicable NSR thresholds, additional facility-wide permit limits were added to the permit.

3.2.4 Haul Road Emissions
Potential haul road emissions also were evaluated because of increases to predicted waste acceptance rates. The length of the haul roads are also assumed to be the same since the modification is not expected to significantly alter the design of the landfill. Other factors including the weight of the empty vehicles, the number of tires on the vehicles and other operating parameters are assumed to remain the same. Additionally, during the time considered for pre-project emissions, the facility implemented a risk reduction plan in accordance with the requirements of District Rule 1210. As part of the facility's risk reduction plan, the facility proposed to use a soil stabilizer that resulted in an overall net reduction in haul road emissions. The risk reduction plan has been implemented on April 29, 2023, and approved by the District on June 7, 2023.

4.0 APPLICABLE RULES

4.1 Prohibitory Rules

4.1.1 Rule 50 – Visible Emissions
No visible emissions are expected from the proposed landfill expansion presented for this application. The facility's existing active permits are expected to continue to comply with Rule 50.

4.1.2 Rule 51 – Nuisance
No nuisance complaints are expected.

4.1.3 Rule 52 – Particulate Matter
No particulate matter emissions are expected from the proposed interim landfill expansion presented for this application. Particulate matter emissions from the facility's existing active permits are not expected to exceed 0.10 grain per dry standard cubic foot of gas.

4.1.4 Rule 53 – Specific Air Contaminants
No sulfur compound emissions are expected from the proposed interim landfill expansion presented for this application. The facility's existing active permits are expected to continue to have sulfur compounds calculated as sulfur dioxide be 0.05 percent or less by volume, on a dry basis. Additionally, emissions of combustion particulates are expected to be less than 0.10 grains per dry standard cubic foot of gas standardized to 12 percent carbon dioxide by volume.

4.1.5 Rule 54 – Dust and Fumes
No dust and fumes are expected from the proposed interim landfill expansion presented for this application. The facility's existing active permits are expected to continue to comply with Rule 54.

4.1.6 Rule 55 – Fugitive Dust Control
No fugitive dust is expected from the proposed interim landfill expansion presented for this application. The facility's existing active permits are expected to continue to comply with Rule 55.

4.1.7 Rule 59 – Control of Waste Disposal Site Emissions
The proposed interim landfill expansion presented for this application is not expected to alter requirements for the landfill under this rule, and therefore compliance with the facility's existing active permit conditions for operation of the landfill will ensure compliance with the rule.

4.1.8 Rule 59.1 – Municipal Solid Waste Landfills
The proposed interim landfill expansion presented for this application is not expected to alter requirements for the landfill under this rule, and therefore compliance with the facility's existing active permit conditions for operation of the landfill will ensure compliance with the rule.

4.1.9 Rule 68 – Fuel-Burning Equipment – Oxides of Nitrogen
This rule is less stringent than Rule 69.7, and therefore compliance with all requirements of Rule 69.7 ensures compliance with these requirements.

4.1.10 Rule 69.7 – Landfill Gas Flares.
This rule applies to all landfill gas flares at MSW landfills where the aggregate actual or potential emissions, from such flares, are at or above the federal major stationary source threshold for nitrogen oxides (NOx). Compliance with all requirements of Rule 69.7 is ensured through the conditions added via APP-008071.

4.2 Rules 20.1 and 20.3 – New Source Review
This rule applies to any new or modified stationary source, to any new or modified emission unit and to any relocated emission unit being moved from a stationary source provided that after completion of the project, the stationary source is a major stationary source.

Rule 20.1(c)(39) and (c)(41) - Major Stationary Source and Major Modification
For the purposes of this evaluation, the facility is determined to be both Sycamore Landfill and Sycamore Energy. The Sycamore Landfill and Sycamore Energy's is an existing Federal Major/Major stationary source based on the calculations presented in table 1 as shown below.

Pollutant	Maj. Threshold	Fed. Maj. Threshold	PTE	Major?
NOx	50	25	55	Both
CO	100	100	249	Both
VOC	50	25	63	Both
SOx	100	100	24.3	No
PM10/2.5	100	100	119	Major (Not Fed. Maj.)

This means Rule 20.3 applies, and Rules 20.2 and 20.4 are not applicable. Note that the facility is considered a major source of both PM10 and PM2.5. However, it is not a federal major source because a significant quantity of the emissions are fugitive which are not considered when determining federal major source status. Sufficiently enforceable requirements will be added to the permit to ensure that PM10/2.5 emissions do not exceed the threshold (see AQIA below).

Major source requirements for modified stationary sources are based on whether the project constitutes a major modification for each pollutant. Major modification status is determined on whether the project results in a contemporaneous net emission increase for the facility, and for federal major modifications if the project also results in a significant net emission increase for the facility, that is above the major modification thresholds. The contemporaneous emission increase considered the following emission increases since they occurred within the previous 4 years or are anticipated in the year following the implementation of the project:

			Increases			
Application	Operator	Description	NOx	VOC	PM10	CO

APCD2022-APP-007574	Martin Marietta	Add belt filter press, no emissions	0	0	0	0
APCD2023-APP-007602	Martin Marietta	Minor Changes to aggregate equipment, no increase	0	0	0	0
APCD2023-APP-007643	Martin Marietta	Like Kind Replacement	0	0	0	0
APCD2023-APP-008024	Martin Marietta	Like Kind Replacement	0	0	0	0
APCD2024-APP-008295	Martin Marietta	NA (RRP Dummy APP)	0	0	0	0
APCD2024-APP-008440	Martin Marietta	Minor Changes to aggregate equipment, assume no increase	0	0	0	0
APCD2022-APP-007372	Martin Marietta	Like Kind Replacement	0	0	0	0
APCD2023-APP-007604	Martin Marietta	Minor Changes to aggregate equipment, no increase	0	0	0	0
APCD2024-APP-008294	Martin Marietta	NA (RRP Dummy APP)	0	0	0	0
APCD2024-APP-008439	Martin Marietta	Minor Changes to aggregate equipment, assume no increase	0	0	0	0
APCD2023-RRP-990004	Martin Marietta	Risk Reduction Plan - no increases	0	0	0	0
APCD2025-RRP-990005	Martin Marietta	Risk Reduction Plan - no increases	0	0	0	0
APCD2020-APP-006303	Sycamore Landfill	First Interim Expansion (increase included with 008534)	0	0	0	0
APCD2024-APP-008071	Sycamore Landfill	Second Interim Expansion (increase included with 008534)	0	0	0	0
APCD2024-APP-008534	Sycamore Landfill	Final Expansion	22.8	24.1	-1130	99.0
APCD2024-APP-008269	Sycamore Landfill	New Flare (increase included with 008071)	0	0	0	0
APCD2025-APP-008726	Sycamore Landfill	Diesel Engine	TBD	TBD	TBD	TBD
APCD2025-APP-008727	Sycamore Landfill	Screen	TBD	TBD	TBD	TBD

The facility has accepted a facility-wide cap on annual VOC emissions to enforce emissions to be below the major and federal major modification thresholds. The District and the facility are confident the actual VOC emissions will be below the thresholds due to organic percent of accepted waste going down over time due to green waste and waste diversion programs in addition to recent trends. Permit conditions will be used to ensure that facility-wide emissions do not exceed the specified annual limits for VOC. Annual limits for NOx and CO were placed on this permit in previous expansion evaluation.

4.2.2. Rule 20.3(d)(1)
Any new or modified emission unit which has any increase in its potential to emit particulate matter (PM10), oxides of nitrogen (NOx), volatile organic compounds (VOC), or oxides of sulfur (SOx) and which unit has a post-project potential to emit 10 pounds per day or more of PM10, NOx, VOC or SOx shall be equipped with BACT for each such air contaminant.

For the purposes of BACT, the only emission units considered to be modified are those that are undergoing physical modifications. For this application, that means the landfill and collection system. Other emission units, including the landfill gas turbines, existing flares, haul roads, and other fugitive PM emission sources.

The applicant has proposed the use of a landfill gas collection system and combustion equipment which meet the requirements of applicable NSPS, NESHAP requirements and the CARB methane rule (notably, 85% capture of VOC and 98% destruction of collected gas). There are no more stringent emission limits or emission controls which are considered achieved in practice or technologically feasible, and therefore the proposed equipment meets best available control technology requirements for VOC that apply to the increase in emissions from the landfill.

4.2.3 Rule 20.3(d)(2) – Air Quality Impact Analysis (AQIA)
New or modified sources with an emission increase that exceed the emissions limits in the table below are required to perform an AQIA.

Table 10: AQIA Emission Limits

	Emission Rate		
Air Contaminant	(lb/hr)	(lb/day)	(tons/yr)
Particulate Matter (PM10)	---	100	15
Oxides of Nitrogen (NOx)	25	250	40
Oxides of Sulfur (SOx)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	---	3.2	0.6

The emission increase for this project will be limited so as not to exceed the above emission thresholds, and therefore, an AQIA is not required to be performed. A permit condition limiting daily emissions of CO facility-wide will be added to the permit to ensure that the daily CO emissions do not exceed this increase level. A permit condition limiting daily and annual emissions of PM10 facility-wide will be added to the permit to ensure that the daily and annual PM10 emissions do not exceed this increase level.

4.2.4 Rule 20.3(d)(3) – Prevention of Significant Deterioration (PSD)
A source with a post-project potential to emit greater than 250 tons/year of particulate matter, oxides of nitrogen, volatile organic compounds, oxides of sulfur or carbon monoxide is subject to PSD requirements.

This project does not result in a PSD modification of any pollutants, and therefore PSD requirements do not apply. Additionally, the facility-wide limit for CO emissions ensures that the project is no longer a PSD source.

4.2.5 Rule 20.3(d)(4) – Public Comment
Because this application results in an emission increase in excess of 250 lb/day VOC, a public notice is required in accordance with this section. Such public notice will be conducted prior to issuance of the authority to construct for this project.

4.2.6 Rule 20.3(d)(5) - Emission Offset
Except as provided for in Subsection (b)(3), the Air Pollution Control Officer shall not issue an Authority to Construct or modified Permit to Operate for any new or modified stationary source, new or modified emission unit, replacement or relocated emission unit or project which results in an emissions increase that constitutes a new major stationary source, a new federal major source, a major modification, or a federal major modification for NOx or VOC, or for any air contaminant, or its precursor air contaminants, for which the San Diego Air Basin has been designated by EPA as nonattainment for the NAAQS for such air contaminant, unless emission offsets are provided, on a pollutant-specific basis.

This project was not considered a major or federal major modification because a facility wide cap will be placed on VOC emissions keeping the emissions increase below the major and federal major modification thresholds. In the previous application, NOx was given a facility-wide cap on emissions. With NOx and VOC emissions being limited below the major and federal major modification threshold, emission offsets are not required at this time.

If the facility approaches its annual VOC emission limit, it must either apply to increase the limit by providing emission offsets or submit an application detailing measures to ensure emissions remain below the limit. This will be required by permit condition.
4.3 Rule 1200 – Toxic New Source Review
Rule 1200 is applicable to any new, relocated, or modified emission unit which may increase emissions of one or more toxic air contaminant(s). The increase in maximum incremental cancer risk at every receptor location is required to be equal to or less than one in one million for any project not equipped with T-BACT. If the project is equipped with T-BACT, the increase in maximum incremental cancer risk at

every receptor location is required to be equal to or less than 10 in one million. Additional requirements apply if the cancer risk is expected to exceed ten in a million. The increase in the total acute and chronic noncancer health hazard indices (HHI) at every receptor location as a result of the project is equal to or less than one unless the Air Pollution Control Officer, after consulting with the state OEHHA, determines that an alternate total acute noncancer health hazard index is sufficiently health protective.

The increase in toxic emissions for this Project/Application exceeded the District's de minimis levels. Therefore, a health risk assessment (HRA) was conducted by the District. This HRA demonstrated the emission increase from both the interim expansion proposed in this application and the final landfill expansion (evaluated to prevent piecemealing) complies with the requirements of Rule 1200.

2021 Approved Hot Spots HRA
Cancer risk (MEIR) = 2.53 in a million
Chronic HHI (MEIR) = 0.4*
Acute HHI (PMI) = 0.55*
*Includes on-site worker receptors which are not reviewed for Rule 1200

Post-Project Emissions

Cancer risk (MEIR) = 3.11 in a million,
Cancer risk (MEIR) (without flare emissions) = 5.6E-03,
Chronic HHI (MEIR) = 0.17,
Acute HHI (PMI) = 0.31

The flare's new proposed location is equidistant to the MEIR from the previously evaluated location. The elevations for each location are roughly the same and the flare is moving less than 100m, as well. This should result in similar risks after rounding and the project is still well below the 10 in a million limit, thus remodeling is unnecessary.

In addition, Martin Marietta has 5 open applications and 3 applications that were approved within 6 months of receiving this application. Sycamore Energy has no applications within this timeframe. The applications and emissions increases are shown in the table below.

Table 11. Open Applications at neighboring facilities that comprise the stationary source

App #	Description	Emission Increase
APCD2023-APP-007931	Title V. Adding conveyors to reduce drop distance for fines	Reduction
APCD2023-APP-008024	Like Kind Replacement – Adding conveyors to reduce drop distance for fines	Reduction
APCD2024-APP-008201	Title V. Modification to clarify equipment description	No change
APCD2024-APP-008294	Risk Reduction Plan – Sand Wash Plant Permit	Reduction in PM
APCD2024-APP-008295	Risk Reduction Plan – Rock Plant Permit	Reduction in PM
APCD2024-APP-008438	Title V. Like equipment replacements	No change
APCD2024-APP-008439	Title V. Like equipment replacements	No change
APCD2024-APP-008440	Title V. Like equipment replacements	No change

See APP-008269 for discussion on T-BACT for the flare.

The District also evaluated whether the project would require any adjustments to the Risk Reduction Audit and Plan (RRAP) because Rule 1210 requires that the plan include any foreseeable increases in emissions. The risk values and health impacts listed above include the total emissions from the facility as defined by the Hot Spots Program (not just the increase in emissions). Since the total health impacts from the facility do not exceed the risk thresholds of Rule 1210, the existing RRAP continues to meet the requirements of Rule 1210 and does not require adjustment.

See Attachment 7 for the Rule 1200 HRA Report.

4.4 AB3205 –There are no schools within a 1,000 feet of the facility. See Attachment 8. AB3205 map from County APCD GIS mapping tool.

4.5 NSPSs and ATCMs
4.5.1 NSPS (New Source Performance Standard) - With the previous interim expansion presented in application APP-006303, Sycamore Landfill was subjected to NSPS Subpart XXX. Prior to that construction, the facility was subject to NSPS Subpart WWW. The facility has opted to demonstrate compliance with NSPS Subparts XXX, 40 CFR 62 Subpart OOO (California's Landfill Methane Regulation LMR), and Emission Guidelines (EG) Subparts Cc and/or Cf by complying with the similar or corresponding requirements in NESHAPs Subpart AAAA During APP-006303. The proposed expansion does not affect any requirements of these rules, so compliance with the existing conditions ensures compliance with the rule.

4.5.2. NESHAP (National Emissions Standards for Hazardous Air Pollutants) - Landfills are subject to NESHAP Subpart AAAA if the landfill has a design capacity equal to or greater than 2.5 million cubic meters and has estimated uncontrolled emission (of total hazardous air pollutants) equal to or great than 50 megagrams per year.

Sycamore Landfill is subject to NESHAP Subpart AAAA since it is greater than 2.5 million cubic meters and has uncontrolled emissions equal to or greater than 50 megagrams per year. The current conditions include the applicable requirements of NESHAP Subpart AAAA. The proposed expansion does not affect any requirements of these rules, so compliance with the existing conditions ensures compliance with the rule.

4.5.3 ATCM (Airborne Toxic Control Measure) – There are no applicable ATCM's for landfills.

4.6 Title V
This facility is a Title V facility. A minor modification application is required to be submitted by the facility prior to operating under the Authority to Construct issued under this application.

Title V permit is under APCD2008-TVP-971226. The last Title V permit renewal was issued on September 29, 2023.

4.7 CEQA
The project being permitted is expected to comply with all applicable requirements in accordance with a previously approved Environmental Impact Report (EIR) (SCH No. 2003041057 can be found in documentum), for which City of San Diego was the Lead Agency and had thoroughly analyzed the potential environmental impacts of the project.

4.8 Greenhouse Gas Emissions

CCR Title 17, Article 4- Regulations to Achieve Greenhouse Gas Emission Reductions, Subarticle 6 Methane Emissions from Municipal Solid Waste Landfills.

The landfill is subject to this regulation and conditions addressing these requirements were already on the existing permit and presented below as part of the Authority to Construct conditions.

4.9 Attachments

Attachment 1. Submitted Application package dated January 2024

Attachment 2. The California Air Resources Board's Gas Tool (CARB Tool).
See Excel Workbook titled "Sycamore LF Final calcs"
The CARB Tool Excel workbook was modified to allow calculations to go beyond calendar year 2020 and to account for Sycamore Landfill's gas collection efficiency of 85% (instead of the 75% collection efficiency programmed in the original workbook template). Modifications made to the template (added spreadsheets and cells) are highlighted in orange.

Attachment 3. CARB Staff Report: Initial Statement of Reasons for the Proposed Regulation to Reduce Methane Emissions from Municipal Solid Waste Landfills (May 2009), page IV-6.

Attachment 4. District approved Landfill Gas Composition test reports.

Attachment 5. "LFG comp" spreadsheet in Excel workbook titled "Sycamore LF Final calcs".

Attachment 6. "APP-008534_Calculations" Excel workbook contains the emissions calculations.

Attachment 7. Rule 1200 Health Risk Assessment Report dated September 13, 2024.

Attachment 8. AB3205 map from County APCD GIS mapping tool.

Attachment 9. District Engineering's calculation procedure for landfills.

5.0 RECOMMENDATION

Compliance with all applicable rules is expected. An Authority to Construct is recommended with the following conditions.

6.0 RECOMMENDED A/C CONDITIONS

The purpose of the application was to modify the equipment description and Condition 36 to allow the expansion, including additional conditions to ensure that the project does not constitute a major or PSD modification. Condition 36 will be modified as follows:

36. The active waste disposal operation shall not exceed the maximum elevation of 1,050 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 ~~55,350,373~~ 147,908,000 cubic yards or ~~43,920,518~~ 117,364,998 ton capacity. [Rule 21]

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]

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)

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)

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)

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)

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)

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))

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)