

VENTURA REGIONAL SANITATION DISTRICT

1001 PARTRIDGE DRIVE, SUITE 150 • VENTURA, CA 93003-0704



February 10, 2011

Mr. Keith Duvall
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

**PART 70 ANNUAL COMPLIANCE CERTIFICATION REPORT
VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT PERMIT
NO. 01399 – OXNARD LANDFILLS**

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Enclosed is the Part 70 Compliance Certification Report for the Oxnard Landfills.

Please call Jason Siegert at 805-658-4617 if you have any questions.



SALLY COLEMAN – DIRECTOR OF OPERATIONS



Ventura County
Air Pollution
Control District

**ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM**

A copy of each Annual Compliance Certification shall be submitted to EPA, Region 9, at the following address:


Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Confidentiality

All information in a Part 70 permit compliance certification is public information. The Part 70 permit is also public information.

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this compliance certification are true, accurate, and complete.

Signature and Title of Responsible Official:  Title: DIRECTOR OF OPERATIONS	Date: 2/10/11
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Time Period Covered by Compliance Certification <u>01 / 01 / 10</u> (MM/DD/YY) to <u>12 / 31 / 10</u> (MM/DD/YY)

1.c. PERIODIC MONITORING SUMMARY

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

- Table 1.c.1 - Specific Applicable Requirements
- Table 1.c.2 - Permit-Specific Conditions
- Table 1.c.3 - General Applicable Requirements
- Table 1.c.4 - General Requirements for Short-Term Activities

1.c.1. Specific Applicable Requirements

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.17.1N3	Rule 74.17.1	<ul style="list-style-type: none"> • Annual compliance certification • Monitor landfill gas flow rate to off-site engines • Monitor flare gas flow rate and flare temperature • Monitor wells and collection header (temperature, pressure, nitrogen, oxygen) • Monitor methane concentration at the surface of the landfill • Source test flare every 2 years (NMOC, NOx, and CO) 	<ul style="list-style-type: none"> • Records of waste in place and annual waste acceptance rate • Records of landfill gas flow rate to off-site engines • Records of flare testing • Records of flare temperature and landfill gas flow to the flare • Records of existing wells, newly installed wells, and planned wells • Records of methane concentration at the landfill surface • Records of asbestos-containing or non-degradable waste • Records of exceedances • Records of SSM plan 	<ul style="list-style-type: none"> • Reports of exceedances • Reports of new wells 	<ul style="list-style-type: none"> • NMOC-EPA Test Method 25 or 18 • NOx - EPA Method 7 • CO - EPA Method 10 • Calorific value - ASTM Method D1826-77 • O2 - EPA Method 3A • Exhaust Flow - F Factor EPA Method 19 • Surface Methane - EPA Method 21 	
40CFR63AAAA	40 CFR Part 63, Subpart AAAAA	<ul style="list-style-type: none"> • Annual compliance certification • Comply with 40 CFR Part 60, Subpart Cc • Develop a startup, shutdown, malfunction (SSM) plan 		<ul style="list-style-type: none"> • SSM plan reports 		

1.c.2. Permit-Specific Conditions

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1399PC1 - Condition No. 1	Rule 26 General Recordkeeping	<ul style="list-style-type: none"> Annual compliance certification Monthly records of throughput and consumption 	<ul style="list-style-type: none"> Monthly records of throughput and consumption 	None	None	
PO1399PC1 - Condition No. 2	Rule 29 Solvent Recordkeeping	<ul style="list-style-type: none"> Annual compliance certification 	<ul style="list-style-type: none"> Maintain a list of exempt solvents 	None	None	
PO1399PC2 - Condition No. 1	Rule 26 Annual Flare Combustion Limit	<ul style="list-style-type: none"> Annual compliance certification Landfill gas flow rate and heating value 	<ul style="list-style-type: none"> Landfill gas flow rate and heating value 	None	None	
PO1399PC2 - Condition No. 2	Rule 29 No Simultaneous Use	<ul style="list-style-type: none"> Annual compliance certification Daily usage records 	<ul style="list-style-type: none"> Daily usage records 	None	None	
PO1399PC2 - Condition No. 3	Rule 26 Flare BACT Limits	<ul style="list-style-type: none"> Annual compliance certification Flare temperature Testing every 2 years (ROC, NOx) 	<ul style="list-style-type: none"> Records of flare temperature Records of source tests 	None	<ul style="list-style-type: none"> ROC-EPA Test Method 25 or 18 NOx - EPA Method 7 	
PO1399PC2 - Condition No. 4	Rule 54	<ul style="list-style-type: none"> Annual compliance certification Source test every 4 years Modeling upon request 	<ul style="list-style-type: none"> Records of source tests 	None	<ul style="list-style-type: none"> Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307, 94, as appropriate 	
PO1399PC2 - Condition No. 5	Rule 57.1	<ul style="list-style-type: none"> Annual compliance certification 	<ul style="list-style-type: none"> None 	None	None	Not required based on District EPA emission factor analysis
PO1399PC2 - Condition No. 6	Rule 26 Flare Equipment Requirements	<ul style="list-style-type: none"> Annual compliance certification 	<ul style="list-style-type: none"> None 	None	None	

I.c.2. Permit-Specific Conditions (Continued)

PO1399PC2 - Condition No. 7	Rule 26 Calibration Requirements	<ul style="list-style-type: none"> Annual compliance certification Calibration records 	<ul style="list-style-type: none"> Records of calibration and function checks 	None	None	
PO1399PC2 - Condition No. 8	Rule 26 Landfill Gas Control Requirements During Maintenance	<ul style="list-style-type: none"> Annual compliance certification Written notification requirements Reporting requirements 	<ul style="list-style-type: none"> Records of maintenance activities 	None	None	
PO1399PC2 - Condition Nos. 9 and 10	Rule 51 Toxics Testing and HRA Requirements	<ul style="list-style-type: none"> Source testing 	<ul style="list-style-type: none"> Records of source tests 	None	APCD approved test protocol	District enforceable only

1.c.2. General Applicable Requirements

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	<ul style="list-style-type: none"> • Routine surveillance • Visual inspections • Annual compliance certification, including a formal survey • Opacity readings upon request • Notification required for uncorrectable visible emissions 	<ul style="list-style-type: none"> • All occurrences of visible emissions for periods > 3 min in any one hour • Annual formal survey of all emissions units 	None	<ul style="list-style-type: none"> • Opacity - EPA Method 9 	
54.B.1	Rule 54.B.1	<ul style="list-style-type: none"> • Annual compliance certification • Follow monitoring requirements under Rule 64 • Upon request, source test for sulfur compounds at point of discharge 	None	None	<ul style="list-style-type: none"> • Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate 	<ul style="list-style-type: none"> • Compliance with Rule 64 ensures compliance with this rule based on District analysis
54.B.2	Rule 54.B.2	<ul style="list-style-type: none"> • Annual compliance certification • Determine ground or sea level concentrations of SO₂, upon request 	<ul style="list-style-type: none"> • Representative fuel analysis or exhaust analysis and compliance demonstration 	None	<ul style="list-style-type: none"> • SO₂ - BAAQMD Manual of Procedures, Vol. VI, Section 1, Ground Level Monitoring for H₂S and SO₂ 	
57.1	Rule 57.1	<ul style="list-style-type: none"> • Annual compliance certification 	None	None	None	<ul style="list-style-type: none"> • Not required based on District analysis
64.B.1	Rule 64.B.1	<ul style="list-style-type: none"> • Annual compliance certification • None for PUC-quality gas, propane, or butane • Annual test if gas is other than PUC-quality gas, propane, or butane (submit with annual compliance certification) 	<ul style="list-style-type: none"> • Annual fuel gas analysis if gas is other than PUC-quality gas, propane, or butane 	None	<ul style="list-style-type: none"> • SCAQMD Method 307-94 	

I.c.3. General Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
64.B.2	Rule 64.B.2	<ul style="list-style-type: none"> Annual compliance certification Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification) 	<ul style="list-style-type: none"> Fuel supplier's certification, or fuel test per each delivery 	None	<ul style="list-style-type: none"> ASTM Method D4294-83 or D2622-87 	
74.6	Rule 74.6	<ul style="list-style-type: none"> Annual compliance certification Maintain current solvent information Routine surveillance of solvent cleaning activities Upon request, solvent testing 	<ul style="list-style-type: none"> Records of current solvent information 	None	<ul style="list-style-type: none"> ROC content-EPA Test Method 24 Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85 True vapor pressure or composite partial pressure -ASTM D2879-86 or other methods per Rule 74.6.G.5 Initial boiling point-ASTM 1078-78 or published source Spray gun active/passive solvent losses-SCAQMD Method (10-3-89) 	
74.11.1	Rule 74.11.1	<ul style="list-style-type: none"> Annual compliance certification Maintain identification records of large water heaters and small boilers 	<ul style="list-style-type: none"> Records of current information of large water heaters and small boilers 	None	None	<ul style="list-style-type: none"> Rule only applies to future installation of large water heaters and small boilers
74.22	Rule 74.22	<ul style="list-style-type: none"> Annual compliance certification Maintain furnace identification records 	<ul style="list-style-type: none"> Records of current furnace information 	None	None	<ul style="list-style-type: none"> Rule only applies to future installation of natural gas-fired, fan-type furnaces

1.c.4. General Requirements for Short-Term Activities

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.1	Rule 74.1	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance and visual inspections of abrasive blasting operation Abrasive blasting records 	<ul style="list-style-type: none"> Abrasive blasting records 	None	<ul style="list-style-type: none"> Visible emission evaluation- Section 92400 of CCR 	
74.2	Rule 74.2	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance Maintain VOC records of coatings used 	<ul style="list-style-type: none"> Maintain VOC records of coatings used 	None	<ul style="list-style-type: none"> Rule 74.2.G 	
74.4.D	Rule 74.4.D	<ul style="list-style-type: none"> Annual compliance certification Test ROC content of oil sample being proposed for usage 	<ul style="list-style-type: none"> Records of oil analyses 	None	<ul style="list-style-type: none"> ASTM D402 	
74.28	Rule 74.28	<ul style="list-style-type: none"> Annual compliance certification Visual inspection to ensure proper vapor control during roofing kettle operation 	None	None	None	
74.29	Rule 74.29	<ul style="list-style-type: none"> Annual compliance certification Weekly measurements of in-situ soil bioventing or bioremediation Weekly measurements of soil aeration Date and quantity of soil aerated Routine surveillance Notification required for excavation 	<ul style="list-style-type: none"> Weekly measurements of soil decontamination operation vapor concentration Date and quantity of soil aerated 	None	<ul style="list-style-type: none"> Vapor concentration- EPA Method 21 Wt. % of contaminant in soil-EPA Method 801.5B 	
40CFR.61.M	40 CFR Part 61, Subpart M	<ul style="list-style-type: none"> Annual compliance certification 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for recordkeeping procedures 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for notification procedures 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for test methods 	

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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 10 (MM/DD/YY) to 12 / 31 / 10 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 74.17.1N3</p>	<p>D. Frequency of monitoring: Continuous, quarterly and bi-annually</p>
<p>B. Description: Rule 74.17.1</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.</p>
<p>C. Method of monitoring:</p> <ul style="list-style-type: none"> • Monitor flare gas flow rate and temperature. • Monitor wells (temperature, pressure, nitrogen, oxygen). • Monitor methane concentration at surface of landfill. • Source test flare every 2 years (NMOC, NOx and CO). 	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40CFR63AAAA</p>	<p>D. Frequency of monitoring: As needed.</p>
<p>B. Description: 40CFR Part 63, Subpart AAAAA</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Develop and implement a Startup, Shutdown, Malfunction Plan (SSMP).</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: P01399PC1</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Condition No. 1 – Rule 26 General Recordkeeping</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Monthly records of throughput and consumption.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 01 / 01 / 10 (MM/DD/YY) to 12 / 31 / 10 (MM/DD/YY)

A. Attachment # or Permit Condition #: P01399PC1	D. Frequency of monitoring: Annually
B. Description: Condition No. 2 – Rule 29 Solvent Recordkeeping	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain a list of exempt solvents.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P01399PC2	D. Frequency of monitoring: Continuous
B. Description: Condition No. 1 – Rule 26 Annual Flare Combustion Limit The annual amount of landfill gas combusted in the flare shall not exceed 350,000 MMBtU per year.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Landfill gas flow rate is recorded by a totalizer.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P01399PC2	D. Frequency of monitoring: Daily
B. Description: Condition No. 2 – Rule 29 No Simultaneous Use	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Daily usage records.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form



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<p>A. Attachment # or Permit Condition #: P01399PC2</p>	<p>D. Frequency of monitoring: Continuous and Bi-annually</p>
<p>B. Description: Condition No. 3 – Rule 26 Flare BACT Limits</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.</p>
<p>C. Method of monitoring: The flare is equipped with a continuous temperature recording device and landfill gas flow totalizer. Source testing every 2 years using EPA test method 25 or 18 and 7.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: P01399PC2</p>	<p>D. Frequency of monitoring: Quadrennially</p>
<p>B. Description: Condition No. 4 – Rule 54 Sulfur Compounds</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.</p>
<p>C. Method of monitoring: Source test flare every 4 years for sulfur compounds using EPA test method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD method 307-94, as appropriate.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: P01399PC2</p>	<p>D. Frequency of monitoring: Not Applicable.</p>
<p>B. Description: Condition No. 5 – Rule 57.1 Particulate Matter Emissions from Fuel Burning Equipment</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Not required based on District EPA emission factor analysis.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: P01399PC2</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Condition No. 6 – Rule 26 Flare Equipment Requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Monthly function checks of the flare equipment.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: P01399PC2</p>	<p>D. Frequency of monitoring: Monthly and annually</p>
<p>B. Description: Condition No. 7 – Rule 26 Calibration Requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual calibration and monthly function checks of control and recording of the landfill gas flow totalizer to the flare.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: P01399PC2</p>	<p>D. Frequency of monitoring: As needed.</p>
<p>B. Description: Condition No. 8 – Rule 26 Landfill Gas Control Requirements During Maintenance</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Records of maintenance activities.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: P01399PC2</p>	<p>D. Frequency of monitoring: Every 1000 hours, but not less than 10 years and not more than every 4 years.</p>
<p>B. Description: Condition No. 9 & 10 – Rule 51 Toxics Testing and HRA Requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.</p>
<p>C. Method of monitoring: Source testing of the flare for Toxics using APCD approved testing protocol.</p>	<p>F. Currently in Compliance? (Y or N): <u> Y </u> G. Compliance Status? (C or I): <u> C </u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u> N </u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 50</p>	<p>D. Frequency of monitoring: Annually</p>
<p>B. Description: Rule 50 Opacity</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment B.</p>
<p>C. Method of monitoring: Routine surveillance and visual inspections of the flare emissions. Annual formal survey of flare emissions.</p>	<p>F. Currently in Compliance? (Y or N): <u> Y </u> G. Compliance Status? (C or I): <u> C </u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u> N </u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 54.B.1</p>	<p>D. Frequency of monitoring: Not applicable.</p>
<p>B. Description: Rule 54.B.1 Sulfur Compounds APCD memos Rule 54, Sulfur Compounds 12/9/97 and SOx Rule Comparison for Combustion of Gaseous Fuel 12/2/97.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Compliance with Rule 64 ensures compliance with this rule based on District analysis.</p>	<p>F. Currently in Compliance? (Y or N): <u> Y </u> G. Compliance Status? (C or I): <u> C </u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u> N </u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: 54.B.2</p>	<p>D. Frequency of monitoring: Bi-annually</p>
<p>B. Description: Rule 54.B.2 Sulfur Dioxide</p> <p>According to APCD memo from Terri Thomas, 5/23/96, subject Rule 54.B.2 compliance is an emission rate of 0.23 lb/hr would produce a 1 hour maximum concentration of 0.06 ppmv and a 24 hour maximum concentration of 0.03 ppmv, 100 meters from stack</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.</p>
<p>C. Method of monitoring: Exhaust analysis and compliance demonstration. Source test exhaust value of Sulfur Dioxide of 0.06 lb/hr.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 57.1</p>	<p>D. Frequency of monitoring: Not applicable.</p>
<p>B. Description: Rule 57.1 Particulate Matter Emissions from Fuel Burning Equipment</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Not required based on District analysis dated 12/3/1997.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 64.B.1</p>	<p>D. Frequency of monitoring: Annually</p>
<p>B. Description: Rule 64.B.1</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.</p>
<p>C. Method of monitoring: Annual fuel gas analysis of hydrogen sulfide by source test using Modified SCAQMD 307-91.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 01 / 01 / 10 (MM/DD/YY) to 12 / 31 / 10 (MM/DD/YY)

A. Attachment # or Permit Condition #: 64.B.2	D. Frequency of monitoring: Not applicable.
B. Description: Rule 64.B.2 Fuel Supplier's Certification	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Fuel supplier's certification is supplied by the fuel manufacturer.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.6	D. Frequency of monitoring: Annually
B. Description: Rule 74.6 Surface Cleaning and Degreasing	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain records of current solvent information.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.11.1	D. Frequency of monitoring: Not applicable.
B. Description: Rule 74.11.1 Large Water Heaters and Small Boilers	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: There are no large water heaters or small boilers at this location that fall under this rule.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form



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Period Covered by Compliance Certification: 01 / 01 / 10 (MM/DD/YY) to 12 / 31 / 10 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 74.22</p>	<p>D. Frequency of monitoring:</p> <p>Not applicable.</p>
<p>B. Description: Rule 74.22 Natural Gas-Fired Fan-Type Furnaces.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: There are no natural gas-fired fan-type furnaces at this location that fall under this rule.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 74.1</p>	<p>D. Frequency of monitoring:</p> <p>As needed.</p>
<p>B. Description: Rule 74.1 Abrasive Blasting</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: No abrasive blasting was conducted in 2010.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 74.2</p>	<p>D. Frequency of monitoring:</p> <p>Annually</p>
<p>B. Description: Rule 74.2 Architectural Coatings</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Maintain VOC records of coatings used. Only coatings that are in compliance with rule 74.2 are used.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 01 / 01 / 10 (MM/DD/YY) to 12 / 31 / 10 (MM/DD/YY)

A. Attachment # or Permit Condition #: 74.4.D	D. Frequency of monitoring: As needed.
B. Description: Rule 74.4.D Cut Back Asphalt	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No road oils were applied in 2010.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.28	D. Frequency of monitoring: As needed.
B. Description: Rule 74.28 Asphalt Roofing Operations	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No asphalt roofing operations were conducted in 2010.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.29	D. Frequency of monitoring: As needed.
B. Description: Rule 74.29 Soil Decontamination Operations	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No soil decontamination operations were conducted in 2010.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form



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Period Covered by Compliance Certification: 01 / 01 / 10 (MM/DD/YY) to 12 / 31 / 10 (MM/DD/YY)

A. Attachment # or Permit Condition #: 40CFR.61.M	D. Frequency of monitoring: As needed.
B. Description: 40 CFR, Part 61, Subpart M – National Emission Standard for Asbestos	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No asbestos demolition or renovation activities were conducted in 2010.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #:	D. Frequency of monitoring:
B. Description:	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring:	F. Currently in Compliance? (Y or N): _____ G. Compliance Status? (C or I): _____ H. *Excursions, exceedances, or other non-compliance? (Y or N): _____ *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.29	D. Frequency of monitoring:
B. Description:	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring:	F. Currently in Compliance? (Y or N): _____ G. Compliance Status? (C or I): _____ H. *Excursions, exceedances, or other non-compliance? (Y or N): _____ *If yes, attach Deviation Summary Form

Attachment A



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ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 10 (MM/DD/YY) to 12 / 31 / 10 (MM/DD/YY)

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: NMOC
C. Measured Emission Rate: 0.06 lb/hr (as CH4)	D. Limited Emission Rate: 1.59 lb/hr (as CH4)	E. Specific Source Test or Monitoring Record Citation: Modified EPA Method 25	F. Test Date: 06/22/10

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: NOx
C. Measured Emission Rate: 1.21 lb/hr (as NO2) 0.056 lb/MMBtu (as NO2)	D. Limited Emission Rate: 2.43 lb/hr (as NO2) 0.06 lb/MMBtu (as NO2)	E. Specific Source Test or Monitoring Record Citation: EPA Method 7E	F. Test Date: 06/22/10

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: CO
C. Measured Emission Rate: 0.79 lb/hr 0.037 lb/hr	D. Limited Emission Rate: 8.1 lb/hr 0.2 lb/hr	E. Specific Source Test or Monitoring Record Citation: EPA Method 10	F. Test Date: 06/22/10

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: SOx
C. Measured Emission Rate: 0.06 lb/hr (as SO2) 0.003 lb/MMBtu (as SO2)	D. Limited Emission Rate: 0.40 lb/hr (as SO2) 0.02 lb/MMBtu (as SO4)	E. Specific Source Test or Monitoring Record Citation: Modified SCAQMD 307-91	F. Test Date: 06/22/10

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: Toxics
C. Measured Emission Rate: **See Attached Test Results	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date: 06/22/10

5.0 SUMMARY OF RESULTS

TABLE 5-1
SUMMARY OF RESULTS vs PERMIT CONDITIONS
VRSD Coastal
Flare 1 Exhaust
June 22 & 23, 2010

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O ₂ , %	3.78	13.77	
CO ₂ , %	26.77	5.98	
N ₂ , %	27.53	80.26	
H ₂ O, %	2.68	8.38	
Flow Rate, wscfm	911.7	11,303	
Flow Rate, dscfm	887.2	10,556	
Temperature, °F (measured at sample ports)	94	1,419	inlet 1,500
Temperature, °F (measured at monitoring thermocouple)		1,601	>1,500
Btu/scf	394		
MMBtu/Hr	21.55		
NO_x:			
ppm		16.1	
ppm @ 3% O ₂		40.3	
lb/hr (as NO ₂)		1.21	2.43
lb/day (as NO ₂)		29.1	
lb/MMBtu (as NO ₂)		0.056	0.06
lb/MMCF (as NO ₂)		22.75	
CO:			
ppm		17.4	
ppm @ 3% O ₂		43.2	
lb/hr		0.79	8.1
lb/day		19.01	
lb/MMBtu		0.037	0.2
lb/MMCF		14.88	
Hydrocarbons:			
CH ₄ , ppm	401,667	< 1.0	
TGNMO, ppm (as CH ₄)	1,327	2.07	
TGNMO, ppm @ 3% O ₂ (as methane)		5.20	
TGNMO, lb/hr (as CH ₄)	3.0	0.06	1.59
TGNMO, lb/MM Btu (as CH ₄)	-	0.003	
TGNMO, lb/day (as CH ₄)	72.4	1.39	
TGNMO, ppm (as hexane)		0.35	
TGNMO, ppm @ 3% O ₂ (as hexane)		0.88	<20 NSPS
TGNMO, lb/hr (as hexane)		0.05	
Destruction Eff. %		98.0	>98%
lb/MMCF		0.97	
Hexavalent Chromium:			
lb/hr		1.87E-06	NA
Hydrogen Chloride:			
lb/hr		1.05E-02	NA
Hydrogen Fluoride:			
lb/hr		5.99E-03	NA
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	6.6		
SO _x Exhaust, lb/hr (as SO ₂)		0.06	0.40
SO _x Exhaust, lb/day (as SO ₂)		1.43	
SO _x Exhaust, lb/MMBtu (as SO ₂)		0.003	0.02
lb/MMCF		1.12	

Notes:

The results in this table are the averages of all measurements.

5.0 SUMMARY OF RESULTS (Continued)

TABLE 5-2 VOC Emissions
(Three-Run Averages)
VRSD Coastal

	RUN 1	RUN 2	RUN 3	AVERAGE
	<u>Emissions</u> (lbs/hr)	<u>Emissions</u> (lbs/hr)	<u>Emissions</u> (lbs/hr)	<u>Emissions</u> (lbs/hr)
1) Freon-12	< 2.92E-04	< 2.45E-04	< 2.60E-04	< 2.65E-04
2) Methyl chloride	< 1.91E-04	< 1.60E-04	< 1.70E-04	< 1.74E-04
3) Freon-114	< 4.84E-04	< 4.06E-04	< 4.32E-04	< 4.41E-04
4) Vinyl chloride	< 1.77E-04	< 1.48E-04	< 1.58E-04	< 1.61E-04
5) Methyl bromide	< 3.59E-04	< 3.01E-04	< 3.20E-04	< 3.27E-04
6) Acetone	6.98E-04	5.81E-04	4.92E-04	5.90E-04
7) Freon-11	< 3.61E-04	< 3.03E-04	< 3.22E-04	< 3.29E-04
8) 1,1-dichloroethylene	< 3.63E-04	< 3.04E-04	< 3.24E-04	< 3.30E-04
9) Dichloromethane	< 3.70E-04	< 3.10E-04	< 3.30E-04	< 3.37E-04
10) Freon-113	< 5.31E-04	< 4.45E-04	< 4.74E-04	< 4.83E-04
11) 1,1-dichloroethane	< 3.70E-04	< 3.10E-04	< 3.30E-04	< 3.37E-04
12) c-1,2-dichloroethene	< 3.63E-04	< 3.04E-04	< 3.24E-04	< 3.30E-04
13) Chloroform	< 3.39E-04	< 2.84E-04	< 3.02E-04	< 3.08E-04
14) 1,2-dichloroethane	< 3.70E-04	< 3.10E-04	< 3.30E-04	< 3.37E-04
15) 1,1,1-trichloroethane	< 3.78E-04	< 3.17E-04	< 3.38E-04	< 3.44E-04
16) Benzene	< 2.21E-04	< 1.85E-04	< 1.97E-04	< 2.01E-04
17) Carbon tetrachloride	< 4.36E-04	< 3.66E-04	< 3.89E-04	< 3.97E-04
18) 1,2 dichloropropane	< 5.34E-04	< 4.47E-04	< 4.76E-04	< 4.86E-04
19) Trichloroethene	< 3.71E-04	< 3.11E-04	< 3.31E-04	< 3.38E-04
20) t-1,3-dichloropropene	< 3.71E-04	< 3.11E-04	< 3.31E-04	< 3.37E-04
21) c-1,3-dichloropropene	< 3.71E-04	< 3.11E-04	< 3.31E-04	< 3.37E-04
22) 1,1,2-trichloroethane	< 4.52E-04	< 3.79E-04	< 4.03E-04	< 4.12E-04
23) Toluene	3.89E-03	2.62E-04	< 2.79E-04	< 1.48E-03
24) 1,2-dibromoethane	< 6.29E-04	< 5.27E-04	< 5.61E-04	< 5.73E-04
26) Chlorobenzene	< 3.83E-04	< 3.21E-04	< 3.41E-04	< 3.48E-04
27) Ethylbenzene	< 3.61E-04	< 3.02E-04	< 3.22E-04	< 3.28E-04
28) m + p-xylenes	< 3.61E-04	< 3.02E-04	< 3.22E-04	< 3.28E-04
29) Styrene	< 3.54E-04	< 2.97E-04	< 3.16E-04	< 3.22E-04
30) 1,1,2,2-tetrachloroethane	< 4.76E-04	< 3.99E-04	< 4.25E-04	< 4.33E-04
31) o-xylene	< 3.61E-04	< 3.02E-04	< 3.22E-04	< 3.28E-04
32) 4-ethyl-toluene	< 4.09E-04	< 3.43E-04	< 3.65E-04	< 3.72E-04
33) 1,3,5-trimethylbenzene	< 4.08E-04	< 3.42E-04	< 3.64E-04	< 3.71E-04
34) 1,2,4-trimethylbenzene	< 4.08E-04	< 3.42E-04	< 3.64E-04	< 3.71E-04
35) 1,3-dichlorobenzene	< 4.17E-04	< 3.49E-04	< 3.72E-04	< 3.79E-04
36) 1,4-dichlorobenzene	< 4.17E-04	< 3.49E-04	< 3.72E-04	< 3.79E-04
38) 1,2-dichlorobenzene	< 4.17E-04	< 3.49E-04	< 0.0003718	< 3.79E-04
39) 1,2,4-trichlorobenzene	< 6.86E-04	< 5.75E-04	< 0.0006118	< 6.24E-04
40) Hexachlorobutadiene	< 9.85E-04	< 8.26E-04	< 0.0008792	< 8.97E-04

ND laboratory results are represented as the reported analytical detection limit.

5.0 SUMMARY OF RESULTS (Continued)

TABLE 5-3
GENERAL RESULTS
VRSD Coastal
Flare 1 Exhaust
June 22 & 23, 2010

Parameter	INLET				EXHAUST			
	First Run	Second Run	Third Run	Average	First Run	Second Run	Third Run	Average
O ₂ , %	4.44	3.68	3.23	3.78	14.27	13.25	13.78	13.77
CO ₂ , %	25.5	26.8	28.0	26.8	5.62	6.40	5.91	5.98
N ₂ , %	30.3	27.5	24.8	27.5	80.1	80.3	80.3	80.3
H ₂ O, %	2.8	2.7	2.6	2.7	8.39	8.23	8.51	8.38
Flow Rate, wscfm	898.1	922.2	914.7	911.7	10,838	11,533	11,538	11,303
Flow Rate, dscfm	873.3	897.1	891.2	887	11,156	9,929	10,584	10,556
Temperature, °F	101	98	84	94	1,413	1,421	1,422	1,419
Btu/scf	394	394	394	394				
MMBtu/Hr	21.23	21.80	21.62	21.55				
NOx:								
ppm					14.81	17.72	15.67	16.07
ppm @ 3% O ₂					40.0	41.5	39.4	40.3
lb/hr (as NO ₂)					1.18	1.26	1.19	1.21
lb/MM Btu (as NO ₂)					0.056	0.058	0.055	0.056
CO:								
ppm					4.90	16.59	30.78	17.42
ppm @ 3% O ₂					13.23	38.83	77.42	43.16
lb/hr					0.238	0.718	1.420	0.792
lb/MM Btu					0.011	0.033	0.066	0.037
Hydrocarbons:								
CH ₄ , ppm	378,000	401,000	426,000	401,667	< 1	< 1	< 1	< 1
Ethane, ppm	< 10	< 10	< 10	< 10	< 1	< 1	< 1	< 1
TGNMO, ppm (as CH ₄)	1,180	1,360	1,440	1,327	2.77	1.86	1.58	2.07
TGNMO, lb/hr (as CH ₄)	2.64	3.12	3.28	3.02	0.07	0.05	0.05	0.06
TGNMO, ppm (as hexane)	196.7	226.7	240.0	221.1	0.46	0.31	0.26	0.35
TGNMO, ppm @ 3% O ₂ (as hexane)	213.9	235.6	243.1	230.9	1.25	0.73	0.66	0.88
TGNMO, lb/hr (as hexane)	2.37	2.80	2.94	2.70	0.07	0.05	0.04	0.05
Destruction Eff. %					97.17	98.29	98.49	97.98
Hexavalent Chromium:								
lb/hr					2.14E-06	1.78E-06	1.70E-06	1.87E-06
Hydrogen Chloride:								
lb/hr					1.04E-02	1.05E-02	1.05E-02	1.05E-02
Hydrogen Fluoride:								
lb/hr					5.95E-03	5.27E-03	6.77E-03	5.99E-03
Sulfur Compounds:								
H ₂ S, ppm	6.20	6.46	6.40	6.35				
Carbonyl Sulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Methyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Ethyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Sulfide, ppm	0.20	0.20	0.20	0.20				
Carbon Disulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
isopropyl mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
n-propyl mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Disulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Total Sulfur Compounds,								
Total Reduced Sulfur Inlet, ppm	6.40	6.66	6.60	6.55				
SOx Exhaust, lb/hr (as SO ₂) ⁽¹⁾					0.057	0.061	0.060	0.060

The exhaust volume flow values are based on EPA Method 19.

The HCl/HF and Cr6+ lb/hr emissions were calculated based on the measured exhaust volume flows EPA Method 2-4, conducted concurrently with each sample.

Attachment B

**VCAPCD Rule 50, Opacity
Annual Compliance Survey**

Survey Information:

By: Jason Siegert

Date: April 15, 2010

Time: 10:00 AM to 10:30 AM

Emissions Unit: Oxnard Landfills Flare #1

Verification: On the above date I observed no visible emissions (including uncombined water) greater than zero percent for a period or periods aggregating more than three (3) minutes during the time observed (0.5 hour).



JASON SIEGERT – SOURCE CONTROL INSPECTOR