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

A Public Waste Management Agency

February 13, 2015

Mr. Dan Searcy
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

PART 70 ANNUAL COMPLIANCE CERTIFICATION 2014 REPORT
VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT PERMIT
NO. 01399 – OXNARD LANDFILLS

Enclosed is the Part 70 Annual Compliance Certification 2014 Report for the Oxnard Landfills.

Please call David F. Thomas at 805-658-4672 if you have any questions.

FRANK KIESLER – 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:	Date: 2/13/15
Title: DIRECTOR OF OPERATIONS	

Time Period Covered by Compliance Certification

01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (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	•Annual compliance certification •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)	•Records of waste in place and annual waste acceptance rate •Records of flare testing •Records of flare temperature and landfill gas flow to the flare •Records of existing wells, newly installed wells, and planned wells •Records of methane concentration at the landfill surface •Records of asbestos-containing or non-degradable waste •Records of exceedances	•Reports of exceedances •Reports of new wells	•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 AAAA	•Annual compliance certification •Comply with 40 CFR Part 60, Subpart Cc •Develop a startup, shutdown, malfunction (SSM) plan	•Records of SSM plan	•SSM plan reports		
CARB CH4from MSW	Title 17, CCR, Sections 95460 to 95476, Methane Emissions From MSW Landfills	•Annual compliance certification •Annual source testing to demonstrate compliance with methane destruction efficiency •Quarterly landfill surface monitoring	•Pursuant to Section 95470	None	•Pursuant to Section 95471(c)	

I.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	•Annual compliance certification •Monthly records of throughput and consumption	•Monthly records of throughput and consumption	None	None	
PO1399PC1 - Condition No. 2	Rule 29 Solvent Recordkeeping	•Annual compliance certification	•Maintain a list of exempt solvents	None	None	
PO1399PC2 - Condition No. 1	Rule 26 Annual Flare Combustion Limit	•Annual compliance certification •Landfill gas flow rate and heating value	•Landfill gas flow rate and heating value	None	None	
PO1399PC2 – Condition No. 2	Rule 29 Flare Out of Service	•Annual compliance certification	None	None	None	
PO1399PC2 - Condition No. 3	Rule 26 Flare BACT Limits	•Annual compliance certification •Flare temperature •Testing every 2 years (ROC,NOx)	•Records of flare temperature •Records of source tests	None	• ROC-EPA Test Method 25 or 18 •NOx – EPA Method 7	
PO1399PC2 - Condition No. 4	Rule 54	•Annual compliance certification •Source test every 4 years •Modeling upon request	•Records of source tests	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	•Annual compliance certification	•None	None	None	Not required based on District EPA emission factor analysis
PO1399PC2 - Condition No. 6	Rule 26 Flare Equipment Requirements	•Annual compliance certification	•None	None	None	

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

PO1399PC2 - Condition No. 7	Rule 26 Calibration Requirements	•Annual compliance certification •Calibration records	•Records of calibration and function checks	None	None	
PO1399PC2 - Condition No. 8	Rule 26 Landfill Gas Control Requirements During Maintenance	•Annual compliance certification •Written notification requirements •Reporting requirements	•Records of maintenance activities	None	None	
PO1399PC2 - Condition Nos. 9 and 10	Rule 51 Toxics Testing and HRA Requirements	•Source testing	•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	•Routine surveillance •Visual inspections •Annual compliance certification, including a formal survey •Opacity readings upon request •Notification required for uncorrectable visible emissions	•All occurrences of visible emissions for periods>3min in any one hour •Annual formal survey of all emissions units	None	•Opacity - EPA Method 9	
54.B.1	Rule 54.B.1	•Annual compliance certification •Follow monitoring requirements under Rule 64 •Upon request, source test for sulfur compounds at point of discharge	None	None	•Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A,16B, or SCAQMD Method 307-94, as appropriate	•Compliance with Rule 64 ensures compliance with this rule based on District analysis
54.B.2	Rule 54.B.2	•Annual compliance certification •Determine ground or sea level concentrations of SO_2, upon request	•Representative fuel analysis or exhaust analysis and compliance demonstration	None	•SO_2 - BAAQMD Manual of Procedures, Vol. VI, Section 1, Ground Level Monitoring for H_2S and SO_2	
57.1	Rule 57.1	•Annual compliance certification	None	None	None	•Not required based on District analysis
64.B.1	Rule 64.B.1	•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)	•Annual fuel gas analysis if gas is other than PUC-quality gas, propane, or butane	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	•Annual compliance certification •Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)	•Fuel supplier's certification, or fuel test per each delivery	None	•ASTM Method D4294-83 or D2622-87	
74.6	Rule 74.6	•Annual compliance certification •Maintain current solvent information •Routine surveillance of solvent cleaning activities •Upon request, solvent testing	•Records of current solvent information	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	•Annual compliance certification •Maintain identification records of large water heaters and small boilers	•Records of current information of large water heaters and small boilers	None	None	•Rule only applies to future installation of large water heaters and small boilers
74.22	Rule 74.22	•Annual compliance certification •Maintain furnace identification records	•Records of current furnace information	None	None	•Rule only applies to future installation of natural gas-fired, fan-type furnaces

I.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	•Annual compliance certification •Routine surveillance and visual inspections of abrasive blasting operation •Abrasive blasting records	•Abrasive blasting records	None	•Visible emission evaluation- Section 92400 of CCR	
74.2	Rule 74.2	•Annual compliance certification •Routine surveillance •Maintain VOC records of coatings used	•Maintain VOC records of coatings used	None	•Rule 74.2.G	
74.4.D	Rule 74.4.D	•Annual compliance certification •Test ROC content of oil sample being proposed for usage	•Records of oil analyses	None	•ASTM D402	
74.28	Rule 74.28	•Annual compliance certification •Visual inspection to ensure proper vapor control during roofing kettle operation	None	None	None	
74.29	Rule 74.29	•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	•Weekly measurements of soil decontamination operation vapor concentration •Date and quantity of soil aerated	None	•Vapor concentration- EPA Method 21 •Wt. % of contaminant in soil-EPA Method 8015B	
40CFR.61.M	40 CFR Part 61, Subpart M	•Annual compliance certification •See 40 CFR Part 61.145 for inspection procedures	•See 40 CFR Part 61.145 for recordkeeping procedures	•See 40 CFR Part 61.145 for notification procedures	•See 40 CFR Part 61.145 for test methods	

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
74.17.1N3, Conditions 4.a, 4.b, and 4.d	Non-Operational 40.5 MMBtu/hr Sur-Lite Enclosed Landfill Gas Flare - FCI Flow Meter	Begin: July 2, 2014 End: August 29, 2014 When Discovered: Date & Time July 2, 2014
D. Parameters monitored: CH_4, CO_2, O_2, Balance, Pressure, Flow Compliance Source Test Results See Attachment A	E. Limit: n/a	F. Actual: n/a
G. Probable Cause of Deviation: Coastal Flare – FCI Flowmeter Failure	H. Corrective actions taken: Petitioned (July 7, 2014) and Granted (August 4, 2014) Short Variance No. 854	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
		Begin: _____ End: _____ When Discovered: Date & Time _____
D. Parameters monitored:	E. Limit:	F. Actual:
G. Probable Cause of Deviation:	H. Corrective actions taken:	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
		Begin: _____ End: _____ When Discovered: Date & Time _____
D. Parameters monitored:	E. Limit:	F. Actual:
G. Probable Cause of Deviation:	H. Corrective actions taken:	

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

A. Attachment # or Permit Condition #: 74.17.1N3	D. Frequency of monitoring:
B. Description: Rule 74.17.1	Continuous, monthly, quarterly, annual, and bi-annually
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A & B
C. Method of monitoring: • Monitor flare gas flow rate and 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)	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): Y *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 40CFR63AAAA	D. Frequency of monitoring:
B. Description: 40CFR Part 63, Subpart AAAA	Annual, as needed.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment B
C. Method of monitoring: • Annual source testing to determine compliance with methane destruction efficiency • Develop and implement a Startup, Shutdown, Malfunction Plan (SSMP).	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: CARB CH4 from MSW	D. Frequency of monitoring:
B. Description: Title 17, CCR, Sections 95460 to 95476, Methane Emissions From MSW Landfills	Quarterly, Annual
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment B
C. Method of monitoring: • Annual source testing to determine compliance with methane destruction efficiency • Quarterly landfill surface monitoring	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

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

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): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *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 See Deviation Summary Form and Attachment A
C. Method of monitoring: Landfill gas flow rate is recorded by a totalizer continuous temperature recording device and landfill gas flow totalizer	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): Y *If yes, attach Deviation Summary Form

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

A. Attachment # or Permit Condition #: P01399PC2	D. Frequency of monitoring:
B. Description: Condition No. 2 – Rule 29 Flare Out of Service	Not Applicable. E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Flare #2 is out of service and will not be operated.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P01399PC2	D. Frequency of monitoring:
B. Description: Condition No. 3 – Rule 26 Flare BACT Limits	Continuous and Bi-annually E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A
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.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): Y *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P01399PC2	D. Frequency of monitoring:
B. Description: Condition No. 4 – Rule 54 Sulfur Compounds	Quadrennially E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment B
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. ** See SCEC 2014 Toxics and Criteria Pollutant Source Test Report No. 2001.1045.rpt2	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

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

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

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

A. Attachment # or Permit Condition #: P01399PC2	D. Frequency of monitoring:
B. Description: Condition 8 – Rule 26 Landfill Gas Control Requirements During Maintenance	As needed
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Records of maintenance activities.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P01399PC2	D. Frequency of monitoring:
B. Description: Condition No. 9 & 10 – Rule 51 Toxics Testing and HRA Requirements	Every 1000 hours, but not less than 10 years and not more than every 4 years
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment B
C. Method of monitoring: Source testing of the flare for Toxics using APCD approved testing protocol. See SCEC 2014 Toxic and Criteria Pollutant Source Test Report No 2001.1045.rpt2	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

A. Attachment # or Permit Condition #: 54.B.1	D. Frequency of monitoring:
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.	Not applicable E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Compliance with Rule 64 ensures compliance with this rule based on District analysis.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 54.B.2	D. Frequency of monitoring:
B. Description: Rule 54.B.2 Sulfur Dioxide 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	Bi-annually E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment B
C. Method of monitoring: Exhaust analysis and compliance demonstration. Source test exhaust value of Sulfur Dioxide of 0.06 lb/hr.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

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A. Attachment # or Permit Condition #: 64.B.1	D. Frequency of monitoring: Annually
B. Description: Rule 64.B.1	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: See Attachment B
C. Method of monitoring: Annual fuel gas analysis of hydrogen sulfide by source test using ASTM D4084-94.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 76.6	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): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

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A. Attachment # or Permit Condition #: 74.11.1	D. Frequency of monitoring:
B. Description: Rule 74.11.1 Large Water Heaters and Small Boilers	Not applicable.
	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): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

A. Attachment # or Permit Condition #: 74.1	D. Frequency of monitoring:
B. Description: Rule 74.1 Abrasive Blasting	As needed
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Only Rule 74.1 compliant abrasives are used on site.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

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

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 2014.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *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 2014.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

A. Attachment # or Permit Condition #: 74.29	D. Frequency of monitoring:
B. Description: Rule 74.29 Soil Decontamination Operations	As needed.
	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 2014.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 40CFR.61.M	D. Frequency of monitoring:
B. Description: 40 CFR, Part 61, Subpart M – National Emission Standard for Asbestos	As needed
	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 2014.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *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

Attachment A

COUNTY OF VENTURA
AFFIDAVIT OF MAILING

AIR POLLUTION CONTROL DISTRICT
HEARING BOARD - PETITION NO. 854

STATE OF CALIFORNIA
County of Ventura

DECLARATION OF MAILING

I, ROSA GONZALEZ, Senior Deputy Clerk, on behalf of Michael Powers, Clerk of the Board of the County of Ventura, State of California, declare under penalty of perjury that I am not a party to the within action or proceeding, and that on the date shown below I deposited with postage prepaid, in sealed envelopes, in the United States Post Office at the City of Ventura/Interoffice Mail of the County of Ventura, a full, true and correct copy of the Short Variance for Petition No. 854, in the matter of Ventura Regional Sanitation District, enclosed in separate envelopes, one of which was addressed to each of the persons named below, at the address shown. Each of the addresses specified is the place of residence/business of the person, and there is a regular daily communication by the United States Mail/Interoffice Mail of the County of Ventura between the place of mailing and the place so addressed.

Dated and executed at Ventura, California, on August 28, 2014.

Michael Powers,
Clerk of the Board of Supervisors

By: _____
Senior Deputy Clerk of the
Air Pollution Control District Hearing Board

Mike Villegas, Air Pollution Control District - Interoffice Brown Mail

Roberto Orellana, Assistant County Counsel - Interoffice Brown Mail

Jeffrey Barnes, Assistant County Counsel - Interoffice Brown Mail

Michael Stubblefield
1230 East Collins Street
Oxnard, CA 93030-1805

Daniel Murphy
2800 Lynnview Street
Newbury Park, CA 91320

Robert Karman
760 S. Hill Road
Ventura, CA 93003

Stephen Hurlock
3426 Lathrop Avenue
Simi Valley, CA 93063

Steven Bansbach
2141 Trentham Road
Lake Sherwood, CA 91361

California Air Resource Board
Compliance Division
P.O. Box 2815
Sacramento, CA 95812

Petitioner
Ventura Regional Sanitation District
Attn: Mark Lawler
1001 Partridge Drive, Suite 150
Ventura, CA 93003

BEFORE THE HEARING BOARD
OF THE
VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
STATE OF CALIFORNIA

In the matter of the application of Ventura Regional Sanitation District 1001 Partridge Drive, Suite 150 Ventura, CA 93003-0704 Facility and Location: Oxnard Landfills: includes the Bailard, Coastal, and Santa Clara Landfills Located near the intersection of Victoria Avenue, and the Santa Clara River in Oxnard, CA For a variance from: Rule 29.C, Conditions on Permits - Violation of Title V Federal Operating Permit Number 01399 Attachment PO1399PC2-rev191, Condition 7.a. Attachment 74.17.1N3, Condition 7.b.(2)(i)	)	Docket No. 854 ORDER GRANTING SHORT VARIANCE
Title V Federal Operating Permit Number: 01399 EPA AIRS Number: 0611101399	)	Granted: August 4, 2014 Effective through: October 31, 2014

INTRODUCTION

On July 7, 2014, Petitioner, Ventura Regional Sanitation District (hereinafter "VRSD"), filed a petition with this Hearing Board for a short variance pursuant to California Health and Safety Code section 42350(a). The petitioner requested that the Hearing Board grant a short variance from Air Pollution Control District (District) Rule 29 Conditions on Permits, Section C, Violation of Title V Federal Operating Permit Number 01399, Attachment PO1399PC2-rev191, Condition 7.a., and Attachment 74.17.1N3, Condition 7.b.(2)(i).

Petitioner is requesting authorization to continue operating while their flare's flow meter is repaired or replaced. Notice of the application and hearing was given for at least 10 days.

On August 4, 2014, a hearing on the petition for short variance was held. The District was represented by Mr. Daniel Searcy, Compliance Division Manager, and Ms. Chris Cote, Air Quality Specialist. The Petitioner was represented by Frank Kiesler, Director of Operations, and Richard H. Baldwin, Air Quality Consultant. All persons, including the public, were given the opportunity to give testimony or make comment.

The Hearing Board declared the hearing closed after receiving testimony and took the matter under submission for decision. The Hearing Board made the following findings of fact.

EQUIPMENT AND LOCATION

Petitioner is in the business of operating municipal solid waste landfills and wastewater treatment facilities. VRSD operates the Oxnard Landfills located in western Ventura County in the city of Oxnard, near the intersection of the Santa Clara River, the Ventura (101) Freeway, and Victoria Avenue. The facility, collectively called Oxnard Landfills, consists of three separate parcels: the Bailard Landfill, the Coastal Landfill, and the Santa Clara Landfill. VRSD conducts operations at all three landfill sites. The operations are authorized by Title V Federal Operating Permit Number 01399.

The equipment that is the subject of this variance consists of a landfill gas collection system, a 40.5 million British thermal units per hour (MMBtu/Hr) Sur-Lite Model Sacramento enclosed landfill gas flare (Flare), and a VeriCal Model GF90 Gas Mass Flow Meter, located at the Coastal Landfill. The flare is referred to as the Coastal Flare. The flare is used to destruct the landfill gas generated by the Oxnard Landfills. The gas flow meter measures the amount of landfill gas sent to the flare for combustion. The Coastal Flare was installed in 1992.

BACKGROUND

The Oxnard Landfills have been closed for a number of years. Bailard Landfill was closed in 1998, Coastal Landfill in 1989, and Santa Clara Landfill in 1982. The last refuse that was accepted by the landfills was in 1996. The Oxnard Landfills continue to generate landfill gas that contains non-methane organic compounds (NMOC) caused by the decomposition of municipal solid waste that has been placed in the Oxnard Landfills over many years. NMOC is also referred to as reactive organic compounds (ROC).

For a number of years Covanta Power operated a series of cogeneration engines using this landfill gas to generate electricity. Over the years the volume of landfill gas generated declined to such an extent that it no longer was economical to generate electricity. Covanta took the engines out of service in November 2009.

The Flare is an integral part of VRSD's gas collection and control system for the Oxnard Landfills. The gas collection system draws a vacuum on numerous gas collection wells that are located throughout the Oxnard Landfills. The collected gas is routed to the 40.5 MMBTU/hr Sur-Lite flare. This gas collection and control system prevents the release of methane and NMOC from the surface of the landfill. The Flare reduces the collected NMOC to levels specified by the Oxnard Landfill's Federal Operating Permit No. 01399, Attachment 74.17.1N3, Condition 2, and the NMOC destruction efficiency requirements of Ventura County APCD Rule 74.17.1. The flare is required by its permit to have a flow meter in use at all times to monitor the total landfill gas being combusted in the flare.

On Wednesday, July 2, 2014, the Coastal Flare shut down several times.

7:18 AM the flare automatically shut down due to a power grid low voltage anomaly.
7:22 AM the flare was restarted and shut down again 8:37 AM.
8:45 AM the flare was restarted and shut down again at 9:09 AM.
9:18 AM the flare was restarted and continued operating normally.

An instrument technician was onsite at 9:18 AM to check all instrumentation and found the flow meter was not operating. The instrument technician made a preliminary determination that the flow meter had been damaged beyond repair, most likely from low voltage to the circuit. The VeriCal Model GF90 Gas Mass Flow Meter is no longer produced, but some parts are available. The instrument technician has estimated VRSD will need approximately six weeks for order, delivery, and installation of a new flow meter.

On Wednesday, July 2, at 12:54 PM, VRSD reported the breakdown to the District and asked about an emergency variance. Due to the upcoming Fourth of July Holiday, a decision was made to schedule the emergency variance hearing on Monday, July 7, 2014.

On July 7, 2014, VRSD petitioned for and was granted Emergency Variance No. 853. The emergency variance required that a hearing for a short variance be held on or before August 4, 2014.

VRSD and the Oxnard Landfills will be operating in violation until the fuel meter can be repaired or replaced.

RULE REQUIREMENTS AND VIOLATIONS

The operations at the facility are subject to Federal, and California statutes, and District Rules and Regulations. VRSD's Title V Federal Operating Permit contains permit conditions that enforce the requirements of District Rule 74.17.1, Municipal Solid Waste Landfills. District Rule 29.C, Conditions on Permits, requires permit holders to comply with the conditions on their permits. VRSD's Title V Federal Operating Permit Number 01399, Attachment PO1399PC2-rev191, Condition 7.a., and Attachment 74.17.1N3, Condition 7.b.(2)(i), require that VRSD "install, calibrate and maintain a gas flow measuring device that records the flow to the control device at least once every 15 minutes".

VRSD is unable to achieve immediate compliance because the flow meter is non-operational. Until the current flare flow meter is repaired or replaced, VRSD will be in violation of District Rule 29.C.

The Oxnard Landfills continuously generate landfill gas (as do all landfills) and there is no way to stop generating the landfill gas. The flare is operational and reducing emissions as required, but the flow meter cannot report the total landfill gas being combusted each day. By continuing to operate the flare, VRSD will ensure that the gas generated by the Oxnard Landfills will continue to be controlled as required by VRSD's Federal Operating Permit.

FINDINGS OF FACT

Pursuant to Health and Safety Code 42352, and District Rule 123, Findings, Variance or Abatement Order, the following findings have been made:

1. The petitioner is, or will be, in violation of the District Rule 29.C, Conditions on Permits.

   VRSD's Federal Operating Permit No. 01399, Attachment PO1399PC2-rev191, Condition 7.a., and Attachment 74.17.1N3, Condition 7.b(2)(i), require that VRSD "install, calibrate and maintain a gas flow measuring device that records the flow to the control device at least once every 15 minutes". The flow meter has been damaged. VRSD has contracted with a service company to either attempt to repair the flow meter, or if the meter cannot be repaired, then to order and install a replacement meter. The estimated time for replacement is six weeks. Until the current flare flow meter is repaired or replaced, VRSD will be in violation of APCD Rule 29.C.

2. Due to conditions beyond the reasonable control of the petitioner, requiring compliance would result in either (A) an arbitrary or unreasonable taking of property, or (B) the practical closing and elimination of a lawful business.

The Coastal Flare automatically shut down on Wednesday, July 2, 2014 at 7:18 AM due to a power grid low voltage anomaly. An instrument technician was onsite at 9:18 AM to check all instrumentation and found the flow meter was not operating. The instrument technician made a preliminary determination that the flow meter had been damaged beyond repair, most likely from low voltage to the circuit. The instrument technician estimated VRSD would need approximately six weeks for order, delivery, and installation of a new flow meter.

There is no way to achieve immediate compliance with the permit condition to operate a flow meter unless the 40.5 MMBTU/hr Sur-Lite is shut down. However, if the flare were to be shut down then VRSD would be in violation of its permit requirement to operate a flare on a continuous basis while the Oxnard Landfills are generating landfill gas. The Oxnard Landfills continuously generate landfill gas and there is no way to stop this natural process.

Shutting the flare down will possibly result in the emission of uncontrolled NMOC from the surface of the Oxnard Landfills. NMOC emissions are precursors to the formation of ozone. The uncontrolled release of surface emissions from the Oxnard Landfills may also contain compounds identified as toxic air contaminants. By continuing to operate the flare, VRSD will ensure that the gas generated by the Oxnard Landfills will continue to be controlled as required by VRSD's Federal Operating Permit.

California Health and Safety Code Section 42352 includes a "landfill gas control or processing facility" as an essential public service.

3. Closing the business or taking the property would be without a corresponding benefit in reducing air contaminants.

There is no way to achieve immediate compliance. The Oxnard Landfills have been closed for a number of years, and they no longer accept municipal solid waste. However, they continue generating landfill gas. The flare is operational and reducing emissions as required, but the flow meter cannot report the total landfill gas being combusted each day. Shutting down the flare system may result in uncontrolled surface emissions of NMOC/ROC, thus exacerbating Ventura County's ozone air quality problem and increasing emissions of toxic air contaminants.

4. The applicant for the variance has given consideration to curtailing operations of the source in lieu of obtaining a variance

Curtailment is not feasible. If the flare system is shut down, there is a chance that surface emissions of NMOC in excess of permit and rule limits may occur. The missing flow meter does not affect the emission reduction effectiveness of the landfill gas flare. It does

affect VRSD's ability to show to APCD that the gas flow limits in the permit are being complied with. However, as the Oxnard Landfills have aged, its gas generation has declined on a continuous basis. VRSD is currently burning significantly less landfill gas than its permit allows.

5. During the period the variance is in effect, the applicant will reduce excess emissions to the maximum extent feasible.

   During the variance period, VRSD will continue to operate the blower for the gas collection and control system and combust the landfill gas in the flare until the flow meter has been repaired or replaced.

6. During the period the variance is in effect, the applicant will monitor or otherwise quantify emission levels from the source, if requested to do so by the District, and report these emission levels to the District pursuant to a schedule established by the District.

   Since the flare will continue operating during the variance period there is nothing additional to do to ensure compliance with the Oxnard Landfill's emission limits and permit conditions, other than the requirement to operate a flow meter.

7. A nuisance as defined in District Rule 51, Nuisance, is not expected to occur as a result of this variance

   A nuisance to the general public as specified in Rule 51 is not expected to occur.

8. Continued operation is not likely to create an acute threat or hazard to public health or safety.

   VRSD staff does not believe that the granting of the requested variance will create an acute threat or hazard to the public health or safety. No excess emissions are anticipated during the variance

9. The increments of progress specified in this Order are reasonable. They allow VRSD to continue operating while they repair or replace the flow meter, and the District to monitor the progress. The increments are expeditious as practicable. (H&SC 42362)

CONCLUSIONS AND ORDER

NOW, THEREFORE, THE HEARING BOARD ORDERS that Ventura Regional Sanitation District (VRSD), is granted a Short Variance from District Rule 29, Conditions on Permits, Section C, Violation of Title V Federal Operating Permit Number 01399, Attachment PO1399PC2-rev191, Condition 7.a., and Attachment 74.17.1N3, Condition 7.b.(2)(i), for a non-operational flow meter on the 40.5 MMBtu/hr Sur-Lite enclosed landfill gas flare, to be effective from, August 4, 2014, to October 31, 2014, or until compliance is achieved, whichever occurs sooner. This variance is subject to the following conditions:

OPERATING REQUIREMENTS

VRSD will continue to comply with the requirements specified by the Oxnard Landfill's Federal Operating Permit No. 01399, Attachment 74.17.1N3, Conditions 2 and 4, and the NMOC destruction efficiency requirements of District Rule 74.17.1.

Attachment 74.17.1N3, Condition 4, specifies the following requirements:

Condition 4.a: Operate the collection system such that gas is collected from each area, cell, or group of cells in the MSW (municipal solid waste) landfill in which solid waste has been in place for two years or more.

Condition 4.b: Operate the collection system with negative pressure at each wellhead.

Condition 4.c: Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Centigrade (131 degrees Fahrenheit) and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent.

Condition 4.d: Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill.

Condition 4.e: Operate the system such that all collected gases are routed to a treatment system that processes the collected gas for subsequent sale or transfer to an off-site facility for use as fuel in internal combustion engines, or vented to the landfill gas flares designed and operated in compliance with Condition 2.

Condition 4.f: Operate the treatment system and landfill gas flares at all times when the collected gas is routed to the treatment system or flares.

Condition 4.g: If monitoring demonstrates that the operational requirements in Condition Nos. 4.b, 4.c, and 4.d are not met, corrective action shall be taken.

INCREMENTS OF PROGRESS

1. VRSD shall continue operating the landfill gas collection system and 40.5 MMBtu/Hr flare to minimize landfill gas emissions, and conduct maintenance as necessary.

2. The flow meter on the 40.5 MMBtu/Hr flare shall be installed and operational no later than October 31, 2014.

REPORTING REQUIREMENTS

1. VRSD shall provide weekly progress reports on the progress of flow meter repair/replacement to the District until compliance is demonstrated; the first report will be due on Monday, August 11, 2014. Subsequent reports are due every Monday during the period of this Order. Reports may be submitted by mail or email to dans@vcapcd.org and chrisc@vcapcd.org.

2. If delay is anticipated in meeting the final compliance date in this Variance Order, the Petitioner shall notify the District in writing of the anticipated delay and the reasons for such delay. Notification of delay is not to be misconstrued as an extension of this Variance Order.

3. Any modification of the final compliance date of this Variance Order must be brought before the Hearing Board.

4. Due date for filing a petition to extend or modify this Order must be received by Ventura County Air Pollution Control District no later than October 1, 2014.

5. No later than 5 days after the date for achievement of final compliance date in this Variance Order, the Petitioner shall notify the District of its compliance or non-compliance with the requirement.

6. All written submittals and notifications to the District pursuant to this Variance Order shall be made to Mr. Dan Searcy and Ms. Chris Cote, via email or by mail to the following address: Ventura County Air Pollution Control District, 669 County Square Drive, Ventura, CA 93003.

GENERAL

1. Except as provided in this Order, compliance with this Order shall not relieve Petitioner from liability under the District's Rules for any violation, thereof, and shall not preclude the District from pursuing remedies in accordance with the Health and Safety Code in the event of any violation.

2. The failure to abide by any condition of this decision and Order shall subject the party receiving the Variance to penalties set forth in Health and Safety Code Section 42402.

3. Each day during which a violation occurs is a separate offense.

4. Petitioner shall retain the obligation to comply with all other local, state and federal regulations not specifically referenced in this Variance Order.

5. Petitioner shall pay the Hearing Board fees specified in District Rule 41.

Steven E. Bansbach, M.D.	Yes
Stephen C. Hurlock, Ph.D.	Yes
Robert M. Karman	Yes
Daniel J. Murphy	Yes
Michael D. Stubblefield	Yes

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
DANIEL J. MURPHY, HEARING BOARD CHAIR

3/10/14
DATE

HB854s VRSD Oxnard Landfills-Fuel Meter final

VENTURA REGIONAL SANITATION DISTRICT
1001 PARTRIDGE DRIVE, SUITE 150 ▪ VENTURA, CA 93003-0704

A Public Waste Management Agency

September 15, 2014

Dan Searcy
Compliance Division Manager
Ventura County APCD
669 County Square Drive, 2nd Floor
Ventura, CA 93003

VARIANCE ORDER NUMBER 854 – COASTAL FLARE

Dear Mr. Searcy:

The Ventura Regional Sanitation District (VRSD) submits this letter to notify the Air Pollution Control District, the Coastal Flare has achieved compliance as of today's date relative to the requirement to measure and record landfill gas flow to the flare.

As reported previously, the replacement flow meter was installed and calibrated on August 29, 2014 and has operated without incident since that date. Given the consistent operation of the unit over the last two weeks, VRSD believes the unit to be reliable. Therefore, with the flare now operating in compliance, VRSD has determined Variance Order Number 854 is no longer necessary and request its formal closure.

If you have any questions or require additional information, please contact me at 805-658-4675. Thank you for your assistance with this matter.

FRANK KIESLER – DIRECTOR OF OPERATIONS

c: Chris Cote
File

Attachment B

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (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: 0.16 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: 06/17-18/14

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: NOx
C. Measured Emission Rate: 0.80 lb/hr (as NO2) 0.043 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: 06/17-18/14

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: CO
C. Measured Emission Rate: 0.26 lb/hr 0.014 lb/MMBtu	D. Limited Emission Rate: 8.1 lb/hr 0.2 lb/MMBtu	E. Specific Source Test or Monitoring Record Citation: EPA Method 10	F. Test Date: 06/17-18/14

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: SOx
C. Measured Emission Rate: 0.05 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: 06/17-18/14

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: Toxics
C. Measured Emission Rate: **See SCEC 2014 Toxics and Criteria Pollutant Source Test Report No. 2001.1045.rpt2	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date: 06/17-18/14

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: Destruction Eff.%
C. Measured Emission Rate: >99.9	D. Limited Emission Rate: >98%	E. Specific Source Test or Monitoring Record Citation:	F. Test Date: 06/17-18/14

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:

5.0 SUMMARY OF RESULTS

TABLE 5-1
SUMMARY OF RESULTS vs PERMIT CONDITIONS
VRSD Coastal
Flare 1 Exhaust
June 17 & 18, 2014

SUMMARY OF RESULTS vs PERMIT CONDITIONS
VRSD Coastal
Flare 1 Exhaust
June 17 & 18, 2014

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O_2, %	1.85	14.44	
CO_2, %	23.82	5.26	
N_2, %	37.48	80.30	
H_20, %	3.14	6.70	
Flow Rate, wscfm	779.7	12,194	
Flow Rate, dscfm	755.2	11,378	
Temperature, °F (measured at sample ports)	98	1,273	
Temperature, °F (measured at monitoring thermocouple)		1,601	>1,106
Btu/scf	394		
MMBtu/Hr	18.43		
NOx:			
ppm		9.8	
ppm @ 3% O_2		27.2	
lb/hr (as NO_2)		0.80	2.43
lb/day (as NO_2)		19.2	
lb/MMBtu (as NO_2)		0.043	0.06
lb/MMCF (as NO_2)		17.65	
CO:			
ppm		5.2	
ppm @ 3% O_2		14.7	
lb/hr		0.26	8.1
lb/day		6.30	
lb/MMBtu		0.014	0.2
lb/MMCF		5.79	
Hydrocarbons:			
CH_4, ppm	368,233	< 1.0	
CH_4, lb/hr	693.2	0.028	
Destruction Eff. % CH_4		99.97	99
TGNMO, ppm (as CH_4)	587	5.23	
TGNMO, ppm @ 3% O_2 (as methane)		14.51	
TGNMO, lb/hr (as CH_4)	1.1	0.16	1.59
TGNMO, lb/MM Btu (as CH_4)		0.009	
TGNMO, lb/day (as CH_4)	27.3	3.81	
TGNMO, ppm (as hexane)		0.87	
TGNMO, ppm @ 3% O_2 (as hexane)		2.42	<20 NSPS [1]
TGNMO, lb/hr (as hexane)		0.14	
Destruction Eff. %		85.6	>98% [1]
lb/MMCF		3.14	
Hexavalent Chromium:			
lb/hr		7.14E-06	NA
Hydrogen Chloride:			
lb/hr		9.77E-03	NA
Hydrogen Flouride:			
lb/hr		8.36E-03	NA
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	6.6		
SOx Exhaust, lb/hr (as SO_2)		0.05	
SOx Exhaust, lb/day(as SO_2)		1.22	
SOx Exhaust, lb/MMBtu(as SO_2)		0.003	
lb/MMCF		1.12	

Notes:
The results in this table are the averages of all measurements.
[1] NSPS require that a flare meet the concentration standard or DRE

TABLE 5-3
GENERAL RESULTS
VRSD Coastal
Flare 1 Exhaust
June 17, 2014

Parameter	INLET First Run	Second Run	Third Run	Average	EXHAUST First Run	Second Run	Third Run	Average
O_2, %	1.44	2.08	2.03	1.85	14.58	14.47	14.27	14.44
CO_2, %	24.7	23.4	23.4	23.8	5.17	5.20	5.41	5.26
N_2, %	34.2	39.2	39.1	37.5	80.3	80.3	80.3	80.3
H_20, %	3.2	3.2	3.1	3.1	5.88	7.29	6.94	6.70
Flow Rate, wscfm	791.6	786.9	760.8	779.7	12,371	12,117	12,095	12,194
Flow Rate, dscfm	766.4	761.9	737.4	755	11,643	11,234	11,256	11,378
Temperature, °F	99	99	97	98	1,270	1,280	1,271	1,273
Btu/scf	394	394	394	394				
MMBtu/Hr	18.71	18.60	17.98	18.43				
NOx:								
ppm					8.33	9.81	11.33	9.83
ppm @ 3% O_2					23.6	27.3	30.6	27.2
lb/hr (as NO_2)					0.70	0.79	0.91	0.80
lb/MM Btu (as NO_2)					0.037	0.042	0.051	0.043
CO:								
ppm					10.33	3.81	1.55	5.23
ppm @ 3% O_2					29.24	10.62	4.19	14.68
lb/hr					0.524	0.187	0.076	0.262
lb/MM Btu					0.028	0.010	0.004	0.014
Hydrocarbons:								
CH_4, ppm	396,700	353,500	354,500	368,233	< 1	< 1	< 1	< 1
CH_4, lb/hr	757.39	670.93	651.22	693.18	0.03	0.03	0.03	0.03
Destruction Eff. % CH_4					99.9962	99.9958	99.9957	99.9959
Ethane, ppm	< 10	< 10	< 10	< 10	< 1	< 1	< 1	< 1
TGNMO, ppm (as CH_4)	469	662	629	587	< 5.00	< 5.30	< 5.40	< 5.23
TGNMO, lb/hr (as CH_4)	0.92	1.30	1.19	1.14	0.15	0.16	0.16	0.16
TGNMO, ppm (as hexane)	78.2	110.3	104.8	97.8	0.83	0.88	0.90	0.87
TGNMO, ppm @ 3% O_2 (as hexa	71.9	104.9	99.4	92.1	2.36	2.46	2.43	2.42
TGNMO, lb/hr (as hexane)	0.83	1.16	1.07	1.02	0.14	0.14	0.15	0.14
Destruction Eff. %					83.34	87.67	85.70	85.57
Hexavalent Chromium:								
lb/hr					3.48E-06	6.39E-06	1.16E-05	7.14E-06
Hydrogen Chloride:								
lb/hr					6.20E-03	1.36E-02	9.52E-03	9.77E-03
Hydrogen Flouride:								
lb/hr					7.73E-03	9.11E-03	8.24E-03	8.36E-03
Sulfur Compounds:								
H_2S, ppm	4.74	4.69	4.78	4.74				
Carbonyl Sulfide, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Methyl Mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Ethyl Mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Dimethyl Sulfide, ppm	< 0.1	< 0.1	< 0.1	0.10				
Carbon Disulfide, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
isoprpyl mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
n-propyl mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Dimethyl Disulfide,ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Total Sulfur Compounds, Total Reduced Sulfur Inlet, ppm	6.40	6.66	6.60	6.55				
SOx Exhaust, lb/hr (as SO_2)'''					0.050	0.052	0.050	0.051

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 C

VCAPCD Rule 64.B.1, Sulfur Content
Annual Compliance Survey

Survey Information:

By: David Thomas
Date: June 17, 2014
Time(s): 11:25 AM, 11:45 AM and 11:55 AM
Emissions Unit: Oxnard Landfills Flare #1

Verification: On the above date and times, three (3) Tedlar bag samples were collected and analyzed by Atmospheric Analysis & Consulting, Inc. Laboratory in Ventura, Ca. for hydrogen sulfide, and other compounds, at the 12" header leading to the Coastal Flare #1. These samples are part of the Coastal Flare biennial source testing requirement. The average hydrogen sulfide for the three samples (4.74, 4.69, and 4.78) is 4.74 ppm.

David F Thomas

DAVID F THOMAS – ENVIRONMENTAL RESOURCE ANALYST

Attachment D

VCAPCD Rule 50, Opacity
Annual Compliance Survey

Survey Information:

By: David Thomas
Date: June 17, 2014
Time: 8:30 AM to 9:00 AM
Emissions Unit: Oxnard Landfill Flare

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

David F Thomas

DAVID F. THOMAS – ENVIRONMENTAL RESOURCE ANALYST