

RV 11/04/25

PETITION FOR VARIANCE
BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

2025 SEP 30 PM 3: 04

PETITIONER: USA WASTE OF CALIFORNIA, El Sobrante Landfill

CASE NO: 5139-7

FACILITY ID: 113674

FACILITY ADDRESS: 10910 Dawson Canyon Road, Corona, CA 92883

[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: See above

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

INTERIM SHORT REGULAR EMERGENCY EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

Malcolm Weiss, Esq.

Timothy Miller, Esq.

Hunton Andrews Kurth LLP

Waste Management

550 S. Hope Street, 20th floor

800 S. Temescal St.

Los Angeles, CA Zip 90071

Corona, CA Zip 92879

(213) 532-2130 Ext.

(832) 707-1466 Ext.

Fax ()

Fax ()

E-mail Mweiss@hunton.com

E-mail Tmille32@wm.com

3. RECLAIM Permit Yes No

Title V Permit Yes No

Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov.

If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

N/A

5. Briefly describe the type of business and processes at your facility.

El Sobrante Landfill (the Facility), an essential public service per SCAQMD Rule 1302(m)(7), is a regional facility that provides safe and convenient disposal services for communities, businesses and industries in Southern California. Its footprint is 1,322 acres, of which 688 acres are wildlife preserve. The Facility opened in 1986.

Flare # 5, which is the subject of this petition, is part of a flaring system used to control landfill gas (LFG) emissions generated by the waste decomposition process. The system also includes an automatic air damper, propane pilot, and a combustion air blower.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Flare No. 5 (John Zink)	A/N 647970 (see Attachment A)	N/A	N/A

*Attach copy of denial letter

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

Flare # 5 is part of a flaring system used to control LFG emissions generated by the waste decomposition processes at the Facility. Petitioner received a Permit to Construct (PTC) for the Flare # 5 system dated January 17, 2025 (A/N 647970), which is incorporated into the Facility's Permit to Operate. See Facility ID PTO 113674 (v. 21) (hereinafter, the Permit), pdf pp. 64-75. Petitioner anticipates that Flare # 5 construction will be complete as of late October 2025 or early November, with startup planned shortly thereafter.

At present, the Facility currently operates two other flares (Flare # 3 and Flare # 4) to control LFG emissions, as required under the Permit and applicable rules.

See **Attachment B** ("Process Diagram") for a diagram of these systems.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes No

If yes, how often: _____ Date of last maintenance and/or inspection: N/A, as Flare # 5 is new.

Describe the maintenance and/or inspection that was performed.

Once Flare # 5 is operational, Petitioner will follow manufacturer recommendations for regular maintenance and inspections.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
Permit Condition # 35	Under Condition # 35 of the Permit, sulfur concentrations (as H ₂ S) at the Flare # 5 inlet are limited to 60 ppmv (averaged monthly) and 85 ppmv (averaged daily). SO _x emissions from Flare # 5 are limited to 5.45 lb/hr and 2,810 lb/month. Based upon testing of LFG inlet concentrations which is required under the current variance for Flare # 4 sulfur limits, Petitioner has determined it will not be able to comply with these limits in Condition # 35 for Flare # 5.
Rule 203(b)	Rule 203(b) says equipment cannot be operated contrary to conditions in the applicable permit to operate. Petitioner will not be able to operate Flare # 5 in accordance with Condition # 35 of the Permit.
Tit. V Rule 3002(c)(1)	Rule 3002(c)(1) provides that all equipment located at a Title V facility must be operated at all times in compliance with all terms, requirements, and conditions of the Permit. Petitioner will not be able to operate Flare # 5 in accordance with Condition # 35 of the Permit.

10. Are the equipment or activities subject to this request currently under variance coverage? Yes No

Case No.	Date of Action	Final Compliance Date	Explanation

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes No

Case No.	Date of Action	Final Compliance Date	Explanation
5139-3	August 6, 2024 (interim variance hearing)	October 3, 2024	An interim variance was granted due to the exceedance of permitted sulfur limits for Flare # 4.
5139-3	October 3, 2024 (regular variance hearing)	August 5, 2025	A regular variance was granted due to the exceedance of permitted sulfur limits for Flare # 4.
5139-3	July 16, 2025 (variance modification on consent)	August 5, 2026 or the date that SCAQMD takes final action on A/N 655059 to establish modified total sulfur/SO _x limits that Petitioner can comply with, as demonstrated by Facility data, whichever comes first.	The final compliance date for the aforementioned Flare # 4 was extended.

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes No

If yes, you must attach a copy of each notice.

(Note: Flare # 5 is not yet operational.)

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes No

(Note: Flare # 5 is not yet operational.)

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

LFG at the Flare # 5 inlet is currently subject to a 60 ppmv (monthly average) limit for sulfur as H₂S. See Permit Condition # 35 for Flare # 5 (hereinafter "Condition # 35"), pdf p. 75. Concentrations of sulfur as H₂S at the Flare # 5 inlet are also subject to an 85 ppmv (daily average) limit. *Id.* SOx emissions from Flare # 5 are subject to 5.45 lb/hr and 2,810 lb/month limits. *Id.*

It is beyond Petitioner's reasonable control to comply with these sulfur limits in Condition # 35 due to Dimethyl Sulfide (DMS) concentrations in LFG generated at the Facility. These DMS increases are believed to be attributable to higher operating temperatures at the Facility. DMS is not susceptible to removal through the Facility's carbon absorption filter system, which is used to control other sulfur compounds in LFG prior to combustion in the flares. Further, there is currently no commercially available treatment system that can physically reduce the DMS component of SOx emissions in LFG. And because the landfill is an essential public service, Petitioner is not able to curtail operations nor reduce the amount of existing waste at the facility that is the source of the DMS at issue.

Petitioner currently operates Flare # 4 under a variance granted last year (and recently extended) in Case No. 5139-3 due to these same circumstances, *i.e.*, high DMS concentrations in the LFG being routed to the flare. The variance for Flare # 4 concerns sulfur limits similar to those at issue in this petition for Flare # 5.

Flare # 5, once operational, will combust the same LFG that is currently routed to LFG Flare # 4. Petitioner thus will also be in violation of the Flare # 5 sulfur limits in Condition # 35 once Flare # 5 is turned on. It is necessary for the Facility to bring Flare # 5 online because Flare # 3 and Flare # 4 are reaching their permitted throughput capacity.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

In anticipation of Flare # 5 construction completion and prospective startup, Petitioner undertook a review of gas throughput levels and data on DMS generation at the Facility. Based upon this review, Petitioner became aware that it will be in violation of the sulfur limits in Condition # 35 of the Permit once Flare # 5 becomes operational. In light of this, Petitioner promptly prepared and submitted this petition.

16. List date(s) and action(s) you have taken since that time to achieve compliance. That the Petition Form HB-V, and any related instructions, include requirement that the Petitioner include a timeline in suitable, chronological format to address the events, dates, and actions called for by Questions 15 and 16, including the dates of communication with the South Coast AQMD to notify them of the occurrence(s) giving rise to the requested variance.

As noted, due to current gas quantities generated at the Facility and sulfur concentrations in the Facility's LFG, Petitioner became aware that it will be in violation of the Flare # 5 sulfur limits in Condition # 35 once the flare becomes operational. Since that time, Petitioner has been focused on evaluating its permitting options (and preparing needed applications) and filing this petition. Petitioner also alerted SCAQMD by outreach to District Counsel on September 24, 2025.

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses: \$ _____ See below _____

Number of employees laid off (if any): _____

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

If the requested variance is not granted, harm to the business identified so far would include penalties imposed by SCAQMD for violations of Condition # 35. Because it is an essential public service, the Facility must continue operating to meet obligations for managing public waste.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

No. The DMS causing the exceedance of Condition # 35 limits is a by-product of LFG generated by waste that Petitioner estimates was landfilled prior to 2005. Because Petitioner manages municipal solid waste, the Facility provides an essential public service and cannot curtail or terminate operations (such curtailment of operations would not, in any event, mitigate the emissions at issue, as they are a product of the decomposition of existing waste at the landfill). Further, the flares at the Facility are necessary to control LFG generated by waste decomposition. Due to the volume of gas being generated and throughput limitations on each flare at the Facility, Petitioner must utilize Flare # 5 capacity.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
SOx (upon startup of Flare # 5)	(To be provided at a later date)		

* Column A minus Column B = Column C

Excess Opacity: _____ N/A _____ %

20. Show calculations used to estimate quantities in No. 19, or explain why there will be no excess emissions.

To be provided at a later date, once Flare # 5 construction has been completed.

[Empty box]

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible

See responses to Questions 14, 16, and 18 above. In addition, Petitioner will continue to prioritize the use of Flare # 3 to the maximum extent feasible.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

Petitioner will test emissions in compliance with District Rules, Permit conditions, and any testing requirements imposed as a condition of this variance. Petitioner will also estimate emission levels using actual daily LFG flow rates to Flare # 5 once it becomes operational and multiply that by the total sulfur concentration reported in the most recent total sulfur laboratory test result.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

Petitioner is actively engaged in developing the materials and documentation necessary to file an application for Permit modifications needed for compliance. Petitioner has also planned and undertaken a suite of activities to address DMS production in the area of concern at the Facility, which are anticipated to help reduce LFG sulfur concentrations. These activities were presented to the Board in the Flare # 4 variance proceedings (Case No. 5139-3) and are addressed in the increments of progress approved by the Hearing Board in that matter.

24. State the date you are requesting the variance to begin: Upon completion of Flare # 5 construction; and the date by which you expect to achieve final compliance: Within one (1) year of being granted this variance.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:
N/A

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

Mary Reichert, Senior Deputy District Counsel

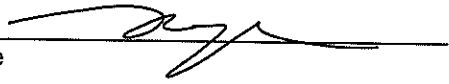
Ext. 2575

If the petition was completed by someone other than the petitioner, please provide their name and title below.

Malcolm C. Weiss Hunton Andrews Kurth LLC Attorney

The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on 09/30/2025, at Corona, California

Signature 

David Meyer
Print Name

Title: Senior District Manager

ATTACHMENT A

Facility Permit to Operate (Excerpts)



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

Title Page	
Facility ID:	113674
Revision #:	21
Date:	June 18, 2025

FACILITY PERMIT TO OPERATE


USA WASTE OF CAL (EL SOBRANTE LANDFILL)
10910 DAWSON CANYON RD
CORONA, CA 92883

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Wayne Nastri
Executive Officer

By 
Jason Aspell
Deputy Executive Officer
Engineering and Permitting



**FACILITY PERMIT TO OPERATE
USA WASTE OF CAL (EL SOBRANTE LANDFILL)**

SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR: USA WASTE OF CAL (EL SOBRANTE LANDFILL)
LEGAL OPERATOR (if different than owner):
EQUIPMENT LOCATION: 10910 DAWSON CANYON RD
CORONA, CA 92883
MAILING ADDRESS: 10910 DAWSON CANYON RD
CORONA, CA 92883
RESPONSIBLE OFFICIAL: MICHAEL HAMMER
TITLE: PRESIDENT
TELEPHONE NUMBER: (818) 252-3148
CONTACT PERSON: LINDA LOCKHART
TITLE: EP SPECIALIST
TELEPHONE NUMBER: (951) 277-5109
TITLE V PERMIT ISSUED: November 28, 2017
TITLE V PERMIT EXPIRATION DATE: November 27, 2022

TITLE V	RECLAIM
YES	NOx: NO SOx: NO CYCLE: 0 ZONE: INLAND



**FACILITY PERMIT TO OPERATE
USA WASTE OF CAL (EL SOBRANTE LANDFILL)**

PERMIT TO CONSTRUCT

**A/N 647970
Granted as of 1/17/2025**

Equipment Description:

Landfill Gas Flaring System Consisting of:

1. One (1) Knockout Vessel/Gas Filter with Mist Eliminator.
2. One (1) Autoblock Shutoff Valve.
3. Two (2) Actuated Valves to Control LFG Flow.
4. One (1) Flame Arrestor.
5. Blower Skid with Two (2) Landfill Gas Blowers, One Standby, Each 6,050 SCFM, with Variable Frequency Drive Controller.
6. One (1) Combustion Air Blower, 43,000 SCFM, with Inlet Silencer and Particulate Filter.
7. One (1) Enclosed Flare No. 5, John Zink, Model No. FBF Zule 130X70 LF, Landfill Gas-fired, Ultra Low NOx, 167.15 MMBtu/hr (HHV), 13'-8" Dia. X 70"-1.25" H., with Propane Pilot, Automatic Air-Fuel Ratio Control and Damper System, Thermocouples, UV Flame Scanner, Electronic Spark Ignitor, and Automatic Restart System.

Conditions:

1. Construction and operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]
3. This equipment shall be operated by personnel properly trained in its operation.
[Rule 204]
4. Identification tag(s) or nameplate(s) shall be displayed on the equipment to show manufacturer, model number, and the rated heat input capacity (HHV). The tag(s) or nameplate(s) shall be issued by the manufacturer and shall be affixed to the equipment in a permanent and conspicuous position.
[Rule 204, 1118.1]
5. The flare shall be in full operation whenever landfill gas (LFG) is being vented to the flare.
[Rule 1150.1, 1303(a)(1)-BACT, 40CFR 63 Subpart AAAAA]
6. The operator shall maintain a copy of the manufacturer's, distributor's, installer's or maintenance company's written maintenance schedule and instructions.
[Rule 1118.1]
7. The operator shall perform maintenance of the flare in accordance with the manufacturer's schedule and specifications.
[Rule 1118.1]



**FACILITY PERMIT TO OPERATE
USA WASTE OF CAL (EL SOBRANTE LANDFILL)**

8. The flare shall be equipped with an automatic shut-down system with a failure alarm and an automatic combustion air control system to automatically isolate the flare from the landfill gas supply line, shut off the blowers, and immediately notify a responsible party of the shut-down or as otherwise approved in writing by the South Coast AQMD. The automatic shut-down safety system shall be tested monthly for proper operation of the flare and after 12 consecutive monthly tests which demonstrate proper operation and do not result in corrective action of the automatic shut-down system then the testing frequency thereafter may change to every calendar year. The results shall be recorded.
[Rule 1303(a)(1)-BACT]
9. The flare shall be designed and operated so that the flame in the flare remains below the height of the flare's operating thermocouple at all times.
[Rule 204]
10. The flare shall be equipped with a sufficient number of view ports to allow visual inspection of the pilot and burner. The ultraviolet flame scanner system shall be installed and properly maintained and operated by trained personnel. Safe and adequate access shall be provided for all view ports upon request by South Coast AQMD personnel.
[Rule 204, 217]
11. A sufficient number of sampling ports shall be maintained in the exhaust stack at least one-half duct diameter upstream of the exhaust outlet, and at least two duct diameters downstream from the nearest flow disturbances (e.g. elbows, tees, and fans). Each sampling port shall consist of a four-inch coupling with plug. All ports shall be properly centered. An equivalent method of emission sampling may be used upon approval of the South Coast AQMD. Adequate and safe access to all source test ports shall be provided within 48 hours' notice by the South Coast AQMD.
[Rule 204, 217]
12. The heat input through the flare shall not exceed 167.15 MMBtu/hr (HHV), on a 1-hour average. A log shall be kept and maintained indicating the total heating value of the landfill gas burned in the flare based on the recorded flow rate and weekly Btu content reading.
[Rule 204, 1303(b)(1)-Modeling, 1303(b)(2)-Offsets, 1401]
13. The volume of landfill gas burned in Flare No. 5 shall not exceed 6,325 SCFM.
[Rule 1303(b)(2)-Offsets]
14. A continuous flow indicating and recording system shall be installed and maintained in the landfill gas supply line(s) to the flare to measure and record the quantity of landfill gas (in SCFM) being combusted in the flare at least every fifteen minutes and shall be operated whenever the flare is in operation.
[Rule 204, Rule 1303(b)(2)-Offsets, 40 CFR 63 Subpart AAAA]
15. At least on a weekly basis, readings of Btu content (Btu/scf) (HHV) of the landfill gas supplied to the flare shall be taken using an instrument or method approved in writing by the South Coast AQMD. All results shall be recorded and the operator shall maintain records of the results in a manner acceptable to the South Coast AQMD.
[Rule 204, 1303(b)(1)-Modeling, 1303(b)(2)-Offsets]



**FACILITY PERMIT TO OPERATE
USA WASTE OF CAL (EL SOBRANTE LANDFILL)**

16. The flare shall be equipped with a continuous temperature indicator and recording system which measures and records the gas temperature in the exhaust stack. The temperature measuring device shall be accurate to within plus-minus one percent of the temperature being measured expressed in degrees Celsius or Fahrenheit and shall be calibrated at least once every calendar year. The temperature indicator and recorder shall operate whenever the flare is in operation. The temperature shall be measured at a location above the flame zone at least 0.6 second downstream of the burner and not less than five feet from the top of the stack.
[Rule 1150.1, 1303(a)(1)-BACT, 40 CFR 63 Subpart AAAA]
17. Whenever the flare is in operation, a temperature of not less than 1,400 degrees Fahrenheit, 15-minute average, as measured by the temperature indicator and recording system shall be maintained except during periods of startup and shutdown. Startup is defined as the period from flare ignition to the time when 1,400 degrees Fahrenheit is achieved, not to exceed 30 minutes. Shutdown is the period from when the gas valve begins to be shut and completely shuts off, not to exceed 30 minutes.
[Rule 1150.1, 1303(a)(1)-BACT]
18. Either a pilot flame or landfill gas combustion flame shall be maintained in the flare whenever landfill gas may be venting to the flare.
[Rule 204]
19. A sampling port shall be maintained at the inlet gas line to the flare to allow the collection of landfill gas samples.
[Rule 204, 217, 431.1, 1150.1]
20. The flare shall be enclosed and/or equipped with a shroud which will ensure complete flame retention within the shroud.
[Rule 1303(a)(1)-BACT]
21. The maximum flare skin temperature at any location shall not exceed 250 degrees Fahrenheit, upon request by South Coast AQMD personnel.
[Rule 217]
22. All landfill gas shall be directed to this equipment for combustion and/or appropriate landfill gas combustion equipment which has an appropriate valid Permit to Construct or Operate approved by South Coast AQMD.
[Rule 1150.1, 1303(a)(1)-BACT, 40 CFR 63 Subpart AAAA]
23. The exhaust stack shall have a height at least 70'-0" above grade.
[Rule 204, 1303(b)(2)-Modeling, 140i]
24. Any breakdown of the landfill gas treatment system which results in a violation of any rule or permit condition not specified in Rule 430(b)(3)(B) shall be reported to the South Coast AQMD within one hour of breakdown, or within one hour of the time said person knew or reasonably should have known of its occurrence.
[Rule 430]
25. Operation of this equipment shall not result in the release of raw or treated landfill gas into the atmosphere. Any malfunction which results in emissions of raw or treated landfill gas prior to combustion shall be reported to the South Coast AQMD (1-800-CUT-SMOG) within one hour of occurrence, or within one hour of the time the owner or operator knew or reasonably should have known of its occurrence, and immediate remedial measures shall be undertaken to correct the problem and prevent further emissions into the atmosphere.
[Rule 204, 402, 1150.1]



**FACILITY PERMIT TO OPERATE
USA WASTE OF CAL (EL SOBRANTE LANDFILL)**

26. This equipment shall be operated in compliance with all applicable provisions of Rules 431.1, 1118.1, and 1150.1 or South Coast AQMD-approved compliance plans.
[Rule 431.1, 1118.1, 1150.1]
27. A source test protocol shall be submitted to South Coast AQMD (Attn: Waste Management Permitting Team) and sourcetesting@aqmd.gov (and/or other recipient as approved in writing by South Coast AQMD) no later than 90 days before the proposed test date (unless otherwise approved in writing by the South Coast AQMD) and shall be approved by South Coast AQMD before the test commences. At a minimum, the source test protocol should include the following:
- A. The name, address, and contact information of the unit operator and the South Coast AQMD-approved source testing contractor that will conduct the test(s);
 - B. The application and permit number;
 - C. A copy of the current valid approved permit;
 - D. A description of the equipment tested. Include a process schematic indicating sampling locations/ports, and sampling duct/stack dimensions along with upstream and downstream flow disturbances (e.g. elbows, tees and fans);
 - E. A brief process description;
 - F. Operating conditions under which the test will be performed, including flow rate, temperature, pressure, number of tests to be conducted, and operating loads;
 - G. A description of the sampling and analytical methods for each constituent measured;
 - H. Complete calculations for flow rates, concentrations, emission rates, and efficiencies;
 - I. A description of the calibration and quality assurance procedures;
 - J. Copy of LAP approval for methods being used in the source test; and
 - K. A statement determining that the testing laboratory qualifies as an "independent testing laboratory" under Rule 304 (no conflict of interest), signed by the responsible authority.
[Rule 204, 217, 304, 1118.1, 1150.1, 1303(a)(1)-BACT, 1303(b)(2)-Offsets, 1401, 40 CFR 63 Subpart AAAAA]
28. A valid previously South Coast AQMD-approved protocol may be used for recurring source test(s) and pursuant to Rule 1118.1(f)(2) as applicable. A subsequent source test protocol shall be submitted if the unit has been altered in a manner that requires a permit alteration, if emission limits for the unit have changed since the previous source test, or if requested by the South Coast AQMD.
[Rule 1118.1, 1150.1, 1303(a)(1)-BACT, 1303(b)(2)-Offsets, 1401, 40 CFR 63 Subpart AAAAA]
29. The operator shall conduct a source test on the flare at the maximum landfill gas flow rates achievable at that time, within 90 days after the flare is able to achieve a firing period of at least 60 minutes, but not later than 180 days after initial startup, unless otherwise approved in writing by South Coast AQMD. Thereafter, the operator shall conduct subsequent source tests on the flare at least every year or five years and in accordance with Rule 1118.1 and Rule 1150.1 and as indicated below, in as-found condition. Initial and subsequent source testing shall be conducted under the following conditions, unless otherwise approved in writing by South Coast AQMD:
- A. The source test(s) shall include the testing of the inlet to the flare and the flare exhaust for the following, unless otherwise approved in writing by South Coast AQMD:
 - i. Methane (lb/hr, destruction efficiency by weight).
 - ii. VOC/Non-methane organic compounds (NMOC) as hexane, (lbs/hr, lb/MMBtu, ppmvd, ppmvd @3% O₂, destruction efficiency by weight).
 - iii. Oxides of nitrogen as NO₂ (exhaust only) (lb/hr, lb/MMBtu).
 - iv. Carbon monoxide (exhaust only) (ppmvd with 15 minute average, lb/hr, lb/MMBtu).



FACILITY PERMIT TO OPERATE
USA WASTE OF CAL (EL SOBRANTE LANDFILL)

- v. Total particulates (PM10) (exhaust only) (lb/hr, grains/dscf).
 - vi. Total sulfur compounds, as H2S and speciated sulfur compounds of LFG (ppmv) (inlet only).
 - vii. Carbon dioxide (percent by volume).
 - viii. Speciated organics, including, but not limited to, Rule 1150.1 Table 1 Carcinogenic and Toxic Air Contaminants (ppmv, lb/hr).
 - ix. Oxygen (percent by volume).
 - x. Nitrogen (exhaust only) (percent by volume).
 - xi. Moisture Content (percent by volume).
 - xii. Temperature (exhaust only) (Fahrenheit).
 - xiii. Flow rate of LFG (inlet only) (scfm).
 - xiv. Flow rate of exhaust gas (scfm).
 - xv. Btu content (HHV) of LFG (inlet only) (Btu/scf).
- B. Testing shall be conducted by an approved contractor under the South Coast AQMD Laboratory Approval Program (LAP) and in compliance with South Coast AQMD Rule 304 (no conflict of interest).
- C. The LAP contractor shall not conduct any pre-tests for compliance.
- D. Sampling facilities shall comply with South Coast AQMD "Guidelines for Construction of Sampling and Testing Facilities" pursuant to Rule 217.
- E. At least one week prior to the scheduled source test, South Coast AQMD (Attn: Waste Management Permitting Team) and sourcetesting@aqmd.gov shall be notified of the scheduled source test date unless otherwise approved in writing by the South Coast AQMD. If a scheduled source test is delayed, an owner or operator shall notify the South Coast AQMD within 24 hours from the time that an owner or operator knew of the delay. An owner or operator shall provide at least 7 days prior notice of the rescheduled date of the source test or arrange a rescheduled date with the South Coast AQMD by mutual agreement.
- F. The source test(s) shall be conducted in accordance with South Coast AQMD approved test methods and procedures pursuant to a valid South Coast AQMD source test protocol.
- G. Source test report(s) shall be submitted to the South Coast AQMD Waste Management Permitting Team and sourcetesting@aqmd.gov (and/or other recipient as approved in writing by South Coast AQMD) within 60 days after completion of the source test, unless otherwise approved in writing by the South Coast AQMD.
- H. The source tests for NMOC and methane shall be conducted at least annually or pursuant to a valid approved Rule 1150.1 Compliance Plan. The initial source test report shall be submitted to South Coast AQMD Waste Management Permitting Team and sourcetesting@aqmd.gov (and/or other recipient as approved in writing by South Coast AQMD) no later than 180 days after start-up or pursuant to a valid approved Rule 1150.1 Compliance Plan. Subsequent annual source tests shall be conducted no later than 45 days after the anniversary date of the initial source test or pursuant to a valid approved Rule 1150.1 Compliance Plan. Subsequent annual source test reports shall be submitted to South Coast AQMD (Attn: Waste Management Permitting Team) and sourcetesting@aqmd.gov no later than 45 days after the anniversary date of the initial source test or pursuant to a valid approved Rule 1150.1 Compliance Plan.
- I. Source testing for all other pollutants shall be conducted at least once every five years.
[Rule 204, 217, 304, 408, 1118.1, 1150.1, 1303(a)(1)-BACT, 1303(b)(2)-Offsets, 1401, 3004(a)(4), 40 CFR 63 Subpart AAAA]
30. The operator shall operate and maintain this equipment according to the following requirements:
- The exhaust temperature for the flare shall be maintained at a minimum 1,400 degrees Fahrenheit whenever the equipment is in operation.
- The continuous exhaust temperature monitoring and recording system shall be pursuant to the operating and maintenance requirements specified in the 40 CFR Part 64.7. Such a system shall have an accuracy of within $\pm 1\%$



**FACILITY PERMIT TO OPERATE
USA WASTE OF CAL (EL SOBRANTE LANDFILL)**

of the temperature being monitored and shall be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer's specifications using an applicable South Coast AQMD approved method.

For the purpose of this condition, a deviation shall be defined as when a temperature of less than 1,400 degrees Fahrenheit occurs during normal operation except during startups and shutdowns, not to exceed 30 minutes per event. Exhaust temperature shall be averaged over a 15 minute period, and hourly average shall be computed from such data points. The operator shall review the records of temperature on a daily basis to determine if a deviation has occurred or shall install an alarm system to alert the operator when a deviation occurs.

For each semi-annual reporting period specified in condition No. 23 in Section K, whenever a deviation occurs from 1,400 degrees Fahrenheit, the operator shall take immediate corrective action and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken.

All deviations shall be reported to the South Coast AQMD on a semi-annual basis pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of this permit.

The operator shall submit an application with a Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the South Coast AQMD if an accumulation of deviations exceeds five percent duration of this equipment's total operating time for any semi-annual reporting period specified in Condition No. 23 in Section K of this permit. The required QIP shall be submitted to the South Coast AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

The operator shall keep adequate records in a format that is acceptable to the South Coast AQMD to demonstrate compliance with all applicable requirements specified in this condition and 40 CFR Part 64.9 for a minimum of five years.

[40 CFR 64]

31. The operator shall provide written notification of completion of construction to the South Coast AQMD (Attn: Waste Management Permitting Team) within 7 days of the completion of construction.
[Rule 204]
32. The operator of this equipment shall submit final as-built specifications (make, model, dimensions, size, maximum capacities) and P&I diagrams to South Coast AQMD (Attn: Waste Management Permitting Team), within 60 days of completing construction of this equipment, unless otherwise approved by South Coast AQMD. The submittal shall identify the equipment location, initial operation date, and application number.
[Rule 204]
33. This Permit to Construct shall expire if construction of this equipment is not completed within one year from the date of issuance unless an extension is granted by the South Coast AQMD. At least 30 days prior to the expiration date of the Permit to Construct, the facility shall submit a written request for and obtain an extension of time to construct this equipment on at least an annual basis until such time construction is completed and a written notification has been submitted reporting the date construction was completed and the date operation of the equipment is intended to be operated. Each extension request shall include the following information:
 - A. The permit number and application number for which an extension is requested.
 - B. The increments of construction progress that have been completed thus far, with schematics, specification, and/or photos (if available).
 - C. The increments of construction progress that have yet to be completed for construction to be complete.



**FACILITY PERMIT TO OPERATE
USA WASTE OF CAL (EL SOBRANTE LANDFILL)**

- D. Explanation and description of any delays or circumstance necessitating the extension.
- E. The proposed date being requested for the Permit to Construct.
[Rule 205]

34. All records required to demonstrate compliance with this permit shall be kept and maintained for at least five (5) years and shall be made available to South Coast AQMD personnel upon request.
[Rule 204, 1118.1, 1150.1, 3004(a)(4), 40 CFR 63 Subpart AAAA]

Emissions and Requirements:

35. This equipment is subject to the applicable requirements of the following rules and regulations:

CO:	2000 ppmvd (15 minute average), Rule 407
CO:	0.06 lb/MMBtu, Rule 1118.1, 1303(a)(1)-BACT/LAER
CO:	10.03 lb/hr, Rule 1303(b)(2)-Offsets
CO:	7,321.90 lb/month, Rule 1313(g)
NOx:	0.025 lb/MMBtu, Rule 1118.1, 1303(a)(1)-BACT/LAER
NOx:	4.18 lb/hr, Rule 1303(b)(1)-Modeling, 1303(b)(2)-Offsets
NOx:	3,051.40 lb/month, Rule 1313(g)
PM:	Rule 404, see Appendix B for emission limits
PM:	0.1 gr/scf, Rule 409
PM/PM10:	5.0 lb/MMscf of inlet gas, Rule 1303(a)(1)-BACT/LAER
PM/PM10:	1.90 lb/hr, Rule 1303(b)(1)-Modeling, 1303(b)(2)-Offsets
PM/PM10:	1,387.00 lb/month, Rule 1313(g)
Sulfur as H ₂ S:	150 ppmv in inlet, Rule 431.1
Sulfur as H ₂ S:	60 ppmv, inlet LFG averaged monthly, Rule 1303(a)(1)-BACT/LAER
Sulfur as H ₂ S:	85 ppmv, inlet LFG averaged daily, Rule 1303(a)(1)-BACT/LAER
SOx:	5.45 lb/hr, Rule 1303(b)(2)-Offsets
SOx:	2,810.00 lb/month, Rule 1303(b)(2)-Offsets, 1313(g)
NMOC:	<20 ppmv as hexane @3% O ₂ or 98% by weight reduction, Rule 1150.1, 40 CFR 63 Subpart AAAA
Methane:	99% by weight reduction, Rule 1150.1
VOC:	0.038 lb/MMBtu (HHV) as hexane (South Coast AQMD Method 25.3, MW/C of 14.36), Rule 1118.1
VOC:	0.006 lb/MMBtu (HHV) as hexane (South Coast AQMD Method 25.3, MW/C of 14.36), Rule 1303(a)(1)-BACT/LAER
VOC:	1.00 lb/hr as hexane (South Coast AQMD Method 25.3, MW/C of 14.36), Rule 1303(b)(2)-Offsets
VOC:	730.00 lb/month as hexane (South Coast AQMD Method 25.3, MW/C of 14.36), Rule 1313(g)

ATTACHMENT B

Process Diagram

