



air pollution control district
SANTA BARBARA COUNTY

HEARING BOARD STAFF REPORT

TYPE: REGULAR VARIANCE

CASE NO: 2020-20-R

DATE: February 3, 2021

1.0 GENERAL INFORMATION:

- 1.1 **PETITIONER COMPANY NAME:** County of Santa Barbara, Public Works, Resource Recovery and Waste Management
- 1.2 **EQUIPMENT LOCATION:** 14470 Calle Real, Santa Barbara
- 1.3 **PERMIT NUMBER(S):** Part 70 Permit to Operate 15136
- 1.4 **FACILITY NAME/ID:** Tajiguas Landfill Flare/FID 11648
- 1.5 **FACILITY DESCRIPTION:** The Tajiguas Landfill receives refuse from the City of Santa Barbara, City of Goleta, unincorporated areas of Montecito and Summerland, rural areas of southern Santa Barbara County, the Santa Ynez Valley and Cuyama Valley. It is located in a canyon known as Cañada de la Pila, approximately 26 miles west of the City of Santa Barbara. Landfill gas (LFG) is generated in the subsurface landfill by anerobic biological decomposition of organic matter deposited in the landfill. The LFG collection system is made up of wells and piping that transport collected gas to the treatment and control systems.

- 2.0 **REASON FOR THE VARIANCE REQUEST:** Part 70 Permit to Operate 15136 requires the enclosed ground flare to operate at all times when LFG is routed to the flare system. In addition, the enclosed ground flare downtime shall not exceed one hour. The Petitioner is requesting operation of the enclosed ground flare in violation of District Rule 206, Part 70 Permit to Operate 15136, Conditions 9.C.2.b.iv and 9.C.2.b.v, until June 30, 2021, the date specified in ATC Mod 14500-06 Condition 9.C.17.c.iv., or until the new anaerobic digestion project, which includes re-routing the LFG to new control equipment as it is brought online, whichever occurs first.

- 3.0 **BACKGROUND:** The LFG collection system is made up of wells and piping that transport collected gas to the treatment and control systems. At this time, after treatment, the LFG is routed to an enclosed ground flare control device consisting of low flow and high flow burners (APCD Device IDs 101983 and 006524). Until October 20, 2020, two control devices were utilized, the enclosed ground flare and a cogeneration engine, providing a redundant system, these were operated by Fortistar Methane Group. On October 20, 2020, Fortistar Methane Group ceased operations and removed the cogeneration engine. After submitting a transfer of owner/operator application, the Petitioner became the new operator of the enclosed ground flare.

With the new anerobic digestion project, a new enclosed ground flare and other control equipment will replace the need for the existing ground flare. The District received a startup notification for the new flare and operations began on December 17, 2020. The intent of this variance request is to allow for temporary operation of the existing flare in violation of flare downtime until the new equipment is online.

Due to circumstances beyond the control of the Petitioner, they are unable to respond to flare downtime within the allowable 1-hour response time. As a result, the Petitioner has requested a modified flare downtime response.

4.0 **PERMITTING HISTORY:** Part 70 Permit to Operate 15136 was issued on August 28, 2018. The transfer of owner operator was deemed complete on November 16, 2020.

5.0 **COMPLIANCE HISTORY:** There are no enforcement actions for failing to continuously route LFG to a control device and/or exceeding flare downtime since the Petitioner became the new operator.

6.0 **REGULATORY ANALYSIS:** The following permit conditions and rule requirements are applicable to the variance request:

- **Part 70 Permit to Operate 15136, Condition 9.C.2.b.iv (Downtime)**
 - The enclosed ground flare periods of downtime shall not exceed one hour.
- **Part 70 Permit to Operate 15136, Condition 9.C.2.b.v (Flare Operations)**
 - The enclosed ground flare shall operate at all times when LFG is routed to the flare system.

7.0 **EMISSIONS ANALYSIS:** The maximum estimated excess emissions from the granting of this variance are 30.19 lbs/hr ROC.

8.0 ***RESERVED***

9.0 **OTHER FACTORS:** None.

10.0 **DISTRICT RECOMMENDATION:** The District supports the Petitioner's variance request.

11.0 **ATTACHMENTS:**

- Attachment 1 – Draft Regular Variance Order 2020-20-R



Aimee Long, Air Quality Specialist
Compliance Division

January 15, 2021
Date