air pollution control district
SANTA BARBARA COUNTY

HEARING BOARD STAFF REPORT

TYPE: **MODIFICATION OF FINAL COMPLIANCE DATE AND MODIFICATION OF CONDITIONS OF REGULAR VARIANCE**

CASE NO: 2021-12-M1

DATE: December 7, 2022

1.0 GENERAL INFORMATION:

1.1 PETITIONER COMPANY NAME: Mustang Renewable Power Ventures, LLC

1.2 EQUIPMENT LOCATION: Tajiguas Landfill, 11470 Calle Real, Goleta, California

1.3 PERMIT NUMBER(S): Authority to Construct 14500-05

1.4 FACILITY NAME/ID: County of Santa Barbara – Tajiguas Anerobic Digestion / FID 11480

1.5 FACILITY DESCRIPTION: The Tajiguas Landfill is owned by the County of Santa Barbara. To extend the life of the Tajiguas Landfill, reduce the amount of material landfilled, increase the recovery rate of recyclable materials, and generate renewable energy, the County installed equipment as part of the Tajiguas Resource Recovery Project (TRRP) at the landfill. In addition, SB 1383 requires the Tajiguas Landfill to reduce the amount of organic waste disposed of in the landfill by 50% by 2014. It further requires a 75% reduction in landfilled organics by 2025.

The TRRP is owned by the County of Santa Barbara and operated by the Petitioner, Mustang Renewable Power Ventures, LLC. The TRRP is composed of the Material Recovery Facility (MRF), Anaerobic Digestion Facility (ADF), Compost Management Unit (CMU), paper recycling and support systems.

The facility is located 26 miles west of the City of Santa Barbara in a canyon known as Cañada de la Pila. Immediately south of the landfill site are U.S. Highway 101, which provides access to the site, Union Pacific Railroad tracks, and the Pacific Ocean. The southern portion of the site is within the California Coastal Zone.

2.0 REASON FOR THE VARIANCE REQUEST: On October 11, 2021, the Alisal wildfire impacted the Tajiguas landfill operations in various ways. The embers sparked a fire in the MRF biofilter which consumed the MRF biofilter woodchip media. The fire migrated to the biofilter scrubbers on the north and south side of the biofilter and the acid storage tank on the southside. The acid scrubber vessels and the acid storage tank were destroyed by the fire and generated significant heat contributing to the destruction of the baghouse filter fans on both the north and south side of the biofilter.

The Petitioner's current permit requires the baghouses, scrubbers, and biofilters to be in operation when the MRF is receiving/processing waste. As a result, the Petitioner initially requested variance coverage in 2021, resulting in the granting of Variance Order 2021-12-R.

However, the Petitioner was unable to return to compliance within the requested duration. As a result, the Petitioner is requesting to extend variance coverage.

In addition, the Petitioner has submitted a permit modification (ATC 145000-10) to remove from permit the equipment associated with this variance request. However, the permit application has been deemed incomplete and is awaiting additional information from the Petitioner.

Some of the previously applicable conditions were removed during permit modifications that were issued since Variance Order 2021-12-R was granted, resulting in the renumbering of permit conditions. Therefore, the Petitioner is not pursuing further variance coverage from those conditions. As a result, the Petitioner requested a Modification of Conditions of Regular Variance 2021-12-R, per Health and Safety Code section 42356.

Because the Petitioner remains out of compliance, additional relief is being sought. In accordance with Health and Safety Code section 42357, the Petitioner is requesting a Modification of Final Compliance Date specified in Variance Order 2021-12-R, to extend variance coverage. If granted, Variance Order 2021-12-M1, would allow continued operation of the MRF without the following emission control equipment that was damaged by the Alisal Fire: MRF baghouses, MRF scrubbers, and MRF biofilters.

3.0 **BACKGROUND**: Variance Order 2021-12-R was granted by the Hearing Board on December 1, 2021. On October 3, 2021, the Petitioner submitted a Petition to request a Modification Conditions and Modification of Final Compliance Date of Regular Variance Order 2021-12-R.

According to the monthly reports submitted by the Petitioner, weekly indoor air monitoring at 13 locations at the MRF, ammonia and hydrogen sulfide were measured less than an average of 3 – 5% of the post-biofilter control permitted limits.

4.0 **PERMITTING HISTORY**: The Petitioner submitted an application for ATC 14500-02 on August 18, 2017. ATC 14500-02 was issued on October 17, 2018. Some of the equipment listed in ATC 14500-02 began operations in December 2020. On March 30, 2020, the Petitioner submitted a permit modification application (ATC 14500-05) for modifications to the TRRP project. ATC 14500-05, was issued on February 1, 2022, and superseded ATC 14500-02. On June 24, 2021, the Petitioner submitted a permit modification application (ATC 14500-08) for a renewable gas project. This application was deemed incomplete on February 2, 2022, and is pending additional information from the Petitioner. On March 11, 2022, the Petitioner submitted a permit modification application (ATC 14500-09), to include the use of a deodorizing misting system. The permit modification application (ATC 14500-09) was deemed complete on April 13, 2022, and issued final on August 18, 2022. On July 5, 2022, the Petitioner submitted a permit modification application (ATC 14500-10) for additional modifications and new equipment. The permit modification application (ATC 14500-10) was deemed incomplete on August 4, 2022, and again on November 10, 2022, and is pending additional information from the Petitioner.

5.0 **COMPLIANCE HISTORY:** In the past three years, the following Notices of Violations (NOVs) were issued to Mustang Renewable Power Ventures, LLC:

- NOV 12923 issued on March 2, 2022, for installing an odor control device at the ADF without a District permit.
- NOV 12924 issued on March 2, 2022, for failing to submit the 2021 second half Semi-Annual compliance Verification Report (CVR) by the March 1, 2022 deadline.
- NOV 13195 issued on September 20, 2022, for failing to obtain written approval prior to conducting source testing on the ADF engines.
- NOV 13196 issued on September 20, 2022, for failing to obtain written approval prior to conducting source testing on the ADF flare.
- NOV 13215 issued on November 10, 2022, for failing to submit the monthly reports by the due date for 10 reporting periods as required by Variance order 2021-12-R.

6.0 **REGULATORY ANALYSIS**: The Petitioner requested the below permit conditions and rules be included in the Variance Order.

- **Authority to Construct 14500-05, Conditions:**
  - 9.C.2.b.iii
    - *Materials Sorting Area Exhaust:* All materials sorting area room exhaust shall be vented to the materials sorting area baghouse whenever MSW or CSSR are being handled.
  - 9.C.4.a.i
    - *Operational Restrictions:* The permittee shall not accept or handle MSW or CSSR in the tipping area or materials sorting area when their respective baghouses are not in operation. The permittee shall not process wet paper products in the rolling bed dryer when the paper recycling baghouse is not in operation.
  - 9.C.4.a.ii
    - *Tipping Area Baghouse Pressure Drop:* Except during startup operations as defined below, the tipping area baghouse shall operate within a pressure drop range of 0.5" to 6" water column measured across the baghouse. If the pressure drop falls outside the permitted range, immediate corrective action shall be taken return the pressure drop to the permitted range. Startup operations begin with powering up the exhaust blower associated with the baghouse and end with the pressure drop across the baghouse reaching steady state or when the elapsed time since powering up reaches 3 hours, whichever is sooner.
  - 9.C.4.a.iii
    - *Material Sorting Baghouse Pressure Drop:* Except during startup operations as defined below, the material sorting area baghouse shall operate within a pressure drop range of 0.5" to 6" water column measured across the baghouse. If the pressure drop falls outside the permitted range, immediate corrective action shall be taken return the

pressure drop to the permitted range. Startup operations begin with powering up the exhaust blower associated with the baghouse and end with the pressure drop across the baghouse reaching steady state or when the elapsed time since powering up reaches 3 hours, whichever is sooner.

- 9.C.4.a.v
  - *Tipping Area Baghouse Air Flow Rate:* The tipping area baghouse exhaust air flow shall not exceed 52,000 scfm.

- 9.C.4.a.vi
  - *Materials Sorting Area Baghouse Air Flow Rate:* The materials sorting area baghouse exhaust air flow shall not exceed 55,022 scfm.

- 9.C.4.a.viii
  - *Tipping Area and Materials Sorting Area Baghouse Operational Limits:* The tipping area and materials sorting area baghouses each shall not exceed 24 hours/day and 8,322 hours/year of operations.

- 9.C.4.a.x
  - *Bags:* The bags in each baghouse shall be maintained as to not exhibit any tears, perforations, or other defects that would allow unfiltered material to bypass the bags. The bags shall be free of excessive caked material and allow sufficient air flow through them.

- 9.C.4.a.xi
  - *Baghouse Exhaust:* All tipping area and materials sorting area baghouse exhaust shall be vented to a biofilter.

- 9.C.4.b.i
  - *Pressure Drop:* The permittee shall install and maintain District-approved electronic pressure meters and recording systems to measure the inlet and outlet pressures of each baghouse. The differential pressures shall be continuously measured and recorded. The pressure meters shall be accurate to within 5 percent of the full-scale reading. The pressure meters and recording systems shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and the calibration records shall be made available to the District upon request.

- 9.C.4.b.ii
  - *Air Flow Rate:* The permittee shall install and maintain District-approved electronic flowrate meters and recording systems to measure the inlet flowrate of each baghouse. The flowrates shall be continuously measured and recorded. The flowrate meters shall be accurate to within 5 percent of the full-scale reading. The flowrate meters and recording systems shall be calibrated, maintained, and operated in accordance

with the manufacturer's specifications and the calibration records shall be made available to the District upon request.

- 9.C.4.b.iii
  - *Bags:* The permittee shall check the bags in the baghouses for rips and tears on a calendar weekly basis. Any ripped or torn bag shall be repaired or replaced before commencing operations.

- 9.C.4.c.i
  - *Pressure Drop:* The permittee shall continuously record the differential pressure across the baghouses. The permittee shall record the date and time of each excursion from the permitted differential pressure range, the cause of each excursion, the corrective action taken, and the date and time that the differential pressure was returned to the permitted range.

- 9.C.4.c.ii
  - *Air Flow Rate:* The permittee shall continuously record the flowrate from the baghouse inlets. The permittee shall record the dates and times of each excursion from the permitted maximum flowrate, the cause of each excursion, the corrective action taken, and the date and time that the flowrate was returned to below the permitted maximum value.

- 9.C.4.c.iii
  - *Maintenance Records*: The permittee shall maintain baghouse maintenance records that include the baghouse malfunctions and maintenance activities. The log shall include a malfunction summary specifying:

    1. Date of malfunction or preventive maintenance activity.

    2. Description of activity.

    3. Date and time taken to remedy the malfunction or perform maintenance.

    Monitoring and recording this information does not fulfill breakdown reporting required by Rule 505 or Rule 1305.

- 9.C.5.b.i
  - *Operational Restrictions:* The permittee shall not accept or handle MSW or CSSR in the tipping area or materials sorting area when the associated biofilters are not in operation. The permittee shall not accept or handle food waste, green waste, or digestate in the ADF when the ADF biofilter is not in operation. Biofilters are considered to be operational as long as half of the cells are abating the exhaust sent to the filter.

- 9.C.5.b.ii
  - *Tipping Area Biofilter Inlet Flowrate:* The inlet flowrate to the tipping area biofilter shall not exceed 52,000 scfm.

- 9.C.5.b.iii
  - *Materials Sorting Area Biofilter Inlet Flowrate:* The inlet flowrate to the materials sorting area biofilter shall not exceed 55,022 scfm.

- 9.C.5.b.v
  - *Tipping Area Inlet Temperature:* The temperature of the tipping area biofilter inlet stream shall not exceed 105 °F.

- 9.C.5.b.vi
  - *Materials Sorting Area Inlet Temperature:* The temperature of the materials sorting area biofilter inlet stream shall not exceed 105 °F.

- 9.C.5.b.viii
  - *Biofilter Media Moisture Content:* The permittee shall maintain biofilter media moisture content between 40 and 60 percent.

- 9.C.5.b.xi
  - *Biofilter Subsurface Hydrogen Sulfide:* The hydrogen sulfide concentration at each biofilter subsurface shall not exceed 1 ppmv averaged over 10 points. Compliance with this condition shall be based on the monitoring conditions of this permit.

- 9.C.5.b.xii
  - *Biofilter Subsurface Ammonia:* The ammonia concentration at each biofilter subsurface shall not exceed 5 ppmv @ 15% O_2 averaged over 10 points. Compliance with this condition shall be based on the monitoring conditions of this permit.

- 9.C.5.b.xv
  - *Uniform Inlet Air Flowrate:* The permittee shall ensure that the inlet air flowrate to each cell of biofilters is uniform. Compliance with this condition shall be based on source testing.

- 9.C.5.c.i
  - *Inlet Flowrate:* The permittee shall install and maintain District-approved electronic flowrate meters and recording systems to measure the inlet flowrate of each biofilter. The flowrates shall be continuously measured and recorded. The flowrate meters shall be accurate to within 5 percent of the full-scale reading. The flowrate meters and recording systems shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and the calibration records shall be made available to the District upon request.

- 9.C.5.c.ii
  - *Inlet Temperature:* The permittee shall install and maintain District-approved electronic temperature measuring and recording systems to measure the inlet temperatures of each biofilter. The temperatures shall be continuously measured and recorded. The temperature meters shall be accurate to within 5 percent of the full-scale reading. The temperature measuring and recording systems shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and the calibration records shall be made available to the District upon request.

- 9.C.5.c.iv
  - *Biofilter Media Replacement Hydrogen Sulfide Measurements:* When a biofilter is shut down for media replacement, perimeter hydrogen sulfide monitoring shall be conducted downwind of the biofilter in the direction of the closest offsite receptor at least once every 4 hours from 6:30 am to 4 pm (otherwise on call) using a District-approved meter. Monitoring shall be conducted until the biofilter is in operation.

- 9.C.5.c.v
  - *Biofilter Water System:* The permittee shall conduct daily inspections of each biofilter water spray system and water pump to ensure the equipment is properly operating and maintaining the biofilter media sufficiently moist.

- 9.C.5.c.vi
  - *Biofilter Media Surface Inspections:* The permittee shall conduct daily inspections to ensure that each biofilter media surface does not contain any openings or excessive vegetation.

- 9.C.5.c.vii
  - *Biofilter Subsurface Moisture Monitoring:* On a calendar weekly basis, the permittee shall measure each biofilter subsurface media moisture content using a District-approved moisture sensor at a location of at least 6 inches of depth into the biofilter, at a minimum of 5 locations. The moisture sensor shall be calibrated prior to each monitoring event.

    1. Within 10 calendar days of a measurement outside the permitted range, corrective action must be taken by the owner or operator such as, but not limited to, maintenance to the biofilter, biofilter scrubber, and sprayers, and the biofilter subsurface must be re-monitored. If the re-monitoring of the location shows a second measurement outside the permitted range, additional corrective action must be taken and the location must be re-monitored again no later than 10 calendar days after the second exceedance. If the re-monitoring shows a third measurement outside the permitted range, the owner or owner or operator must replace the biofilter media no later than 30 calendar days after detecting the third measurement.

- 9.C.5.c.viii
  - *Biofilter Surface Hydrogen Sulfide Monitoring:* The hydrogen sulfide concentration at each biofilter surface shall be monitored on a calendar weekly basis using colorimetric detection tubes or a District-approved equivalent. The measured hydrogen sulfide concentration shall not exceed 1 ppmv averaged over a minimum of 10 points. If any exceedances are measured, the permittee shall take the following actions:

    1. Within 10 calendar days of a measured exceedance, corrective action must be taken by the owner or operator such as, but not limited to, maintenance to the biofilter, biofilter scrubber, and sprayers, and the biofilter surface must be re-monitored. If the re-monitoring of the location shows a second exceedance, additional corrective action must be taken and the location must be re-monitored again no later than 10 calendar days after the second exceedance. If the re-monitoring shows a third exceedance, the owner or owner or operator must replace the biofilter media no later than 30 calendar days after detecting the third exceedance.

- 9.C.5.c.ix
  - *Biofilter Surface Ammonia Monitoring:* The ammonia concentration at each biofilter surface shall be monitored on a calendar weekly basis using colorimetric detection tubes or a District-approved equivalent. The measured ammonia concentration shall not exceed 5 ppmv @ 15% O_2 averaged over a minimum of 10 points on the surface of a biofilter. If any exceedances are measured, the permittee shall take the following actions:

    1. Within 10 calendar days of a measured exceedance, corrective action must be taken by the owner or operator such as, but not limited to, maintenance to the biofilter, biofilter scrubber, and sprayers, and the biofilter surface must be re-monitored. If the re-monitoring of the location shows a second exceedance, additional corrective action must be taken and the location must be re-monitored again no later than 10 calendar days after the second exceedance. If the re-monitoring shows a third exceedance, the owner or owner or operator must replace the biofilter media no later than 30 calendar days after detecting the third exceedance.
- 9.C.5.d.i
  - *Inlet Flowrate:* The permittee shall continuously record the flowrates from the biofilter inlets. The permittee shall record the dates and times of each excursion from the permitted maximum flowrates, the cause of each excursion, the corrective action taken, and the date and time that the flowrate was returned to below the permitted maximum value.

- 9.C.5.d.ii
  - *Inlet Temperature:* The permittee shall continuously record the temperature of the biofilter inlets. The permittee shall record the date and time of each excursion from the permitted maximum temperatures, the cause of each excursion, the corrective action taken, and the date and time that the temperature was returned to below the permitted maximum value.

- 9.C.5.d.v
  - *Biofilter Surface Hydrogen Sulfide Monitoring*: The hydrogen sulfide concentration at each biofilter surface shall be monitored on a weekly basis using colorimetric detection tubes. The measured hydrogen sulfide concentration shall not exceed 1 ppmv averaged over a minimum of 10 points.

- 9.C.5.d.vi
  - *Biofilter Media Surface Inspections:* The permittee shall record all corrective actions taken as a result of the daily biofilter media surface inspections.

- 9.C.5.d.vii
  - *Biofilter Subsurface Moisture Monitoring:* The permittee shall record the results of the calendar weekly biofilter media moisture content measurements and if the media moisture content was in the permitted range. All corrective actions taken as a result of the weekly measurements shall be recorded including the re-test dates, location of exceedances, and re-test results.

- 9.C.5.d.viii
  - *Biofilter Surface Hydrogen Sulfide Monitoring:* The permittee shall record the results of the calendar weekly biofilter surface hydrogen sulfide measurements, if the average of the measurements was below 1 ppmv, and if any single reading exceeded 5 ppmv. All corrective actions taken as a result of the calendar weekly measurements shall be recorded including the re-test dates, location of exceedances, and re-test results.

- 9.C.5.d.ix
  - *Biofilter Surface Ammonia Monitoring:* The permittee shall record the results of the calendar weekly biofilter surface ammonia measurements, if the average of the measurements was below 5 ppmv @ 15% O_2, and if any single reading exceeded 20 ppmv @ 15% O_2. All corrective actions taken as a result of the calendar weekly measurements shall be recorded including the re-test dates, location of exceedances, and re-test results.

- 9.C.6.a.i
  - *Operational Restrictions:* The permittee shall not accept or handle MSW or CSSR in the tipping area or materials sorting area when the associated biofilter scrubbers are not in operation. The permittee shall not accept or handle food waste, green waste, or digestate in the ADF when the ADF biofilter scrubbers are not in operation. Anaerobic digesters that have been loaded with material may continue the digestion process when the ADF biofilter is down. However, no new material may be loaded into the digesters when the ADF biofilter is down.

- 9.C.6.a.ii
  - *Recirculation Water pH:* The permittee shall maintain the pH of the recirculated water in each biofilter scrubber between 4 and 7.

- 9.C.6.a.iii
  - *Recirculating Flow:* The permittee shall maintain the water recirculating flowrate for each biofilter scrubber between 12 and 14 gallons per minute.

- 9.C.6.a.iv
  - *Pressure Drop*: The permittee shall maintain each biofilter scrubber pressure drop between 1.2" and 3.2" water column.

- 9.C.6.b.i
  - *Recirculation Water pH:* The permittee shall install and maintain District-approved electronic pH measuring and recording systems to measure biofilter scrubber recirculation water pHs. The pHs shall be continuously measured and recorded. The pH meters shall be accurate to within 5 percent of the full-scale reading. The pH measuring and recording systems shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and the calibration records shall be made available to the District upon request.

- 9.C.6.b.ii
  - *Recirculation Water Flowrate:* The permittee shall install and maintain District-approved electronic flowrate meters and recording systems to measure the biofilter scrubber recirculation water flowrates. The recirculation water flowrates shall be continuously measured and recorded. The recirculation water flowrate meters shall be accurate to within 5 percent of the full-scale reading. The recirculation water flowrate measuring and recording systems shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and the calibration records shall be made available to the District upon request.

- 9.C.6.b.iii
  - *Pressure Drop:* The permittee shall install and maintain District-approved electronic pressure meters and recording system to measure the inlet and outlet pressures of the biofilter scrubbers. The differential pressures shall be continuously measured and recorded. The pressure meters shall be accurate to within 5 percent of the full-scale reading. The pressure meters and recording systems shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and the calibration records shall be made available to the District upon request.

- 9.C.6.c.i
  - *Recirculation Water pH:* The permittee shall continuously record the pHs of the biofilter scrubber recirculation water. The permittee shall record the date and time of each excursion from the permitted pH range, the cause of each excursion, the corrective action taken, and the date and time that the pH was returned to the permitted range.

- 9.C.6.c.ii
  - *Recirculation Water Flowrate:* The permittee shall continuously record the recirculation water flowrates for each biofilter scrubber. The permittee shall record the dates and times of each excursion from the permitted maximum recirculation water flowrate, the cause of each excursion, the corrective action taken, and the date and time that the recirculation water flowrate was returned to below the permitted maximum value.

- 9.C.6.c.iii
  - *Pressure Drop:* The permittee shall continuously record the differential pressures across the each biofilter scrubber. The permittee shall record the date and time of each excursion from the permitted differential pressure range, the cause of each excursion, the corrective action taken, and the date and time that the differential pressure was returned to the permitted range.

- 9.C.18 (tipping area and materials sorting area biofilters only)
  - **Source Testing.** The source testing provisions listed below shall apply:

    a. The permittee shall conduct source testing of air emissions and process parameters listed in Table 4.5 through Table 4.11 of this permit. The ADF CHP engines, ADF enclosed flare (purging and engine offline), MRF enclosed flare, MRF CHP engines, tipping area biofilter, materials sorting area biofilter, ADF biofilter, and windrows shall be source tested not less than once every 12 months based on the date of the previous source test.

The HAP emissions source testing for an ADF CHP engine, ADF enclosed flare (purging and engine offline), MRF enclosed flare, ADF biofilter, and windrows shall be conducted upon equipment start up and upon written District request thereafter.

The ADF CHP engines, ADF enclosed flare (purging and engine offline), MRF enclosed flare, MRF CHP engines, tipping area biofilter, materials sorting area biofilter, ADF biofilter, and windrows shall be source tested during the SCDP to confirm compliance with BACT emission standards. More frequent source testing may be required if the equipment does not comply with permitted limitations or if other compliance problems, as determined by the District, occur. Source testing shall be performed on a schedule using the date of the SCDP source test as the anniversary date.

b. The permittee shall submit a written source test plan to the District for approval at least thirty (30) days prior to initiation of each source test. The source test plan shall be prepared consistent with the District's Source Test Procedures Manual (revised May 1990 and any subsequent revisions). The permittee shall obtain written District approval of the source test plan prior to commencement of source testing. The District shall be notified at least ten (10) calendar days prior to the start of source testing activity to arrange for a mutually agreeable source test date when District personnel may observe the test.

c. Source test results shall be submitted to the District within forty-five (45) calendar days following the date of source test completion and shall be consistent with the requirements approved within the source test plan. Source test results shall document the permittee's compliance status with BACT requirements, mass emission rates in Table 5.1-3, Table 5.2-3, Table, 5.3-3, Table 5.4-3, Table 5-5.3, and applicable permit conditions, rules and NSPS (if applicable). All District costs associated with the review and approval of all plans and reports and the witnessing of tests shall be paid by the permittee as provided for by District Rule 210.

A source test for an item of equipment shall be performed on the scheduled day of testing (the test day mutually agreed to) unless circumstances beyond the control of the operator prevent completion of the test on the scheduled day. Such circumstances include mechanical malfunction of the equipment to be tested, malfunction of the source test equipment, delays in source test contractor arrival and/or set-up, or unsafe conditions on site. Except in cases of an emergency, the operator shall seek and obtain District approval before deferring or discontinuing a scheduled test, or performing maintenance on the equipment item on the scheduled

test day. If the test cannot be completed on the scheduled day, then the test shall be rescheduled for another time with prior authorization by the District. Once the sample probe has been inserted into the exhaust stream of the equipment unit to be tested (or extraction of the sample has begun), the test shall proceed in accordance with the approved source test plan. In no case shall a test run be aborted except in the case of an emergency or unless approval is first obtained from the District. Failing to perform the source test of an equipment item on the scheduled test day without a valid reason and without District's authorization shall constitute a violation of this permit. If a test is postponed due to an emergency, written documentation of the emergency event shall be submitted to the District by the close of the business day following the scheduled test day.

- 9.C.19.b.i – 9.C.19.b.vi
  - Sample ports shall be provided at the device process flow entry point and/or exit point at the locations on each device listed below:

    i. Tipping Area Biofilter (Device ID: 388341)

    ii. Tipping Area Biofilter Scrubber (Device ID: 388799)

    iii. Tipping Area Baghouse (Device ID: 388339)

    iv. Materials Sorting Area Biofilter (Device ID: 388346)

    v. Materials Sorting Area Biofilter Scrubber (Device ID: 388797)

    vi. Materials Sorting Area Baghouse (Device ID: 388344)

- 9.C.33.a and f
  - **Documents Incorporated by Reference.** The documents listed below, including any District-approved updates thereof, are incorporated herein and shall have the full force and effect of a permit condition for this operating permit. These documents shall be implemented for the life of the Project and shall be made available to District inspection staff upon request.

    a. Baghouse Inspection and Maintenance Plan (approved December 1, 2020)

    f. Biofilter Monitoring Plan (approved November 30, 2020)

7.0 **EMISSIONS ANALYSIS**: The Petitioner reported weekly indoor air monitoring at 13 locations at the MRF for the duration of Variance Order 2021-12-R. No excess emissions were reported, and ammonia and hydrogen sulfide were measured less than an average of 3 – 5% of the post biofilter control permitted limits.

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 – Variance Order 2021-12-R
- Attachment 2 – Variance Order 2021-12-R monthly updates
- Attachment 3 – DRAFT Variance Order 2021-12-M1

November 22, 2022

Aimee Long, Air Quality Specialist
Compliance Division

Date