

**ENGINEERING EVALUATION REPORT
GUADALUPE RUBBISH DISPOSAL COMPANY
APPLICATION NUMBER 009780**

BACKGROUND:

The Guadalupe Rubbish Disposal Company, P# 3294, has applied for modifications to their permit to operate the Guadalupe Landfill as follows:

S-9: Active Solid Waste Landfill with Gas Collection System – Installation of (20) Vertical Landfill Gas Extraction Wells, (8) Horizontal Trench Collectors, the replacement of up to (15) Existing Landfill Gas Wells, and the Decommissioning of up to (12) Vertical Wells and (4) Horizontal Trench Collectors

These modifications were approved as under the District's Accelerated Permit Program on 07/06/04. Upon completion of construction, the total number of permitted wells at the landfill will be (53) vertical gas collection wells and (13) trench collectors.

In addition they have requested that the existing Trommel Screen S-11, the Diesel IC Engines for the Trommel Screen; S-21 and S-22, and the Water Spray System for the Trommel Screen; A-11 be removed from the permit. These sources are no longer located at the facility.

They also requested that the Plant Contact and Responsible Official for this site be changed from Paul Michael to Joe Morse.

It is recommended that the Major Facility Review (Title V) permit for this facility be revised to reflect these changes. The proposed changes constitute a Minor Permit Revision because they are neither "Significant" as defined in BAAQMD Regulation 2-6-226 nor "Administrative" as defined in BAAQMD Regulation 2-6-201.

EMISSIONS DISCUSSION:

Guadalupe estimates that the above modifications will result in a net landfill gas collection system flow increase of 430 standard cubic feet per minute (scfm). The gas collection and control system currently collects and processes approximately 1,950 scfm. Therefore, upon completion the estimated total volume of collected landfill gas will be 2,380 scfm. Collected landfill gas from this facility is either processed on-site in the Landfill Gas Flare A-9 or off-site in IC Engines located at Gas Recovery Systems (P# 11669). The combined capacity of the flare and engines is approximately 3,125 scfm. It is therefore assumed that sufficient capacity exists to process the increase in collected landfill gas.

Since emissions from the flare and IC engines have already been fully accounted for in previous permit applications, there is no increase of emissions for this application.

MONITORING ANALYSIS:

The existing monitoring for the facility is adequate to demonstrate compliance with all applicable emissions limits. The proposed modifications to the Title V permit will not change the current monitoring requirements, except where equipment has been removed.

STATEMENT OF COMPLIANCE:

There are no new District or Federal regulations triggered by the proposed landfill gas collection system modification. However, changing the number of gas collection wells at the landfill will require that the Title V permit for the facility be modified. The Title V revision required as a result of the actions taken in this application is being issued under this permit application.

MODIFIED PERMIT CONDITIONS:

It is recommended that part 2 of Condition #6188 be changed as shown below to reflect the correct number of wells at the landfill.

2. The gas collection system at S-9 is currently permitted for ~~45~~**53** vertical collection wells and ~~913~~ trench collectors as identified in the Collection and Control System Design Plan and Permit Applications ~~#8118~~ **and #9907**. Prior to increasing or decreasing the number of landfill gas wells from the authorized total, or significantly changing the locations, depths or lengths of existing wells or collectors, an Authority to Construct shall be obtained from the APCO. (basis: Regulation 2-1-301, Regulation 8-34-301.1, Regulation 8-34-305)

SUMMARY OF PROPOSED CHANGES TO THE PERMIT:

Changes to the Title V permit are shown in ~~strikeout~~/underline format in the proposed version of the permit. In summary, the following changes have been made:

Title Page:

- The Responsible Official and Plant Contact was changed from Paul Michael to Joe Morse.

Section I: Standard Conditions

- The dates of adoption and approval of rules in Standard Condition 1.A have been updated.
- The following language was added to Standard Condition I.B: "If the permit renewal has not been issued by [], but a complete application for renewal has been submitted in accordance with the above deadlines, the existing permit will continue in force until the District takes final action on the renewal application." This is the "application shield," set forth in BAAQMD Regulation 2-6-407.

Section II: Equipment

- The number of Vertical Gas Collection Wells given in Table IIA was updated from 45 to 53 wells.
- The Trommel Screen S-11, the Diesel IC Engines for the Trommel Screen; S-21 and S-22, and the Water Spray System for the Trommel Screen; A-11 were removed from Tables IIA and IIB. This equipment is no longer located at the facility.

Section III: Generally Applicable Requirements

- Language has been added to Section III to clarify that this section contains requirements that may apply to temporary sources. This provision allows contractors that have "portable" equipment permits that require them to comply with all applicable requirements to work at the facility on a temporary basis, even if the permit does not specifically list the temporary source. Examples are temporary sand-blasting or soil-vapor extraction equipment.
- Section III has been modified to say that SIP standards are now found on EPA's website and are not included as part of the permit.
- Table III has been updated to remove outdated SIP requirements and add rules and requirements as necessary to conform to the current District standard.
- The dates of adoption or approval of the rules and their "federal enforceability" status in Table III were updated as necessary.
- The Note concerning the differences between BAAQMD rules and the SIP rules was added to clarify the permit holder's compliance obligations under both.

Section IV: Source-Specific Applicable Requirements

- Section IV has been modified to say that SIP standards are now found on EPA's website and are not included as part of the permit.
- Tables IV-D and IV-H were removed because the Trommel Screen S-11 and the Diesel IC Engines for the Trommel Screen; S-21 and S-22 are no longer located at the facility. The letter designations of the remaining tables were changed accordingly.

Section VI: Permit Conditions

- Condition #6188, Part 2 was changed to update the number of active landfill gas collection wells from 45 to 53 vertical collection wells and from 9 to 13 horizontal trench collectors.
- Conditions #12063 and #21191 were deleted because the Trommel Screen S-11 and the Diesel IC Engines for the Trommel Screen; S-21 and S-22 have been removed.

Section VII: Applicable Limits & Compliance Monitoring Requirements

- A note was added to the standard text to state that Sections I-VI take precedence if there is a conflict with the VII Tables.
- Tables VII-D and VII-H were removed because the Trommel Screen S-11 and the Diesel IC Engines for the Trommel Screen; S-21 and S-22 are no longer located at the facility. The letter designations of the remaining tables were changed accordingly.

By: _____
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