

HEARING BOARD MEETING

SacMetro AQMD
777 12th Street, 3rd Floor
Sacramento, California 95814

AGENDA



Tuesday

July 18, 2017

4:00 PM

Hearing Board Members

Chair

Stephen Weyers MD

John German
Stacy Moak

Tim Olson
Darrel Woo

CALL TO ORDER

HEARING ITEMS

1. **Sacramento Area Flood Control Agency (SAFCA)**
Regular Variance
Recommendation: Staff recommends that the Board grant the requested variance.
2. **City of Sacramento 28th Street Landfill**
Short-term Variance
Recommendation: District staff does not oppose the grant of a short-term variance.

PUBLIC COMMENTS

ANNOUNCEMENTS

ADJOURN

Agenda Revision: This agenda may be revised. A final agenda will be posted on the website (www.airquality.org) and at the meeting site 72 hours in advance of the meeting. Materials submitted within 72 hours of the meeting and after distribution of the agenda packets will be made available on the SMAQMD website subject to staff's ability to post the documents prior to the meeting. The order of the agenda items are listed for reference and may be taken in any order deemed appropriate by the Hearing Board. The agenda provides a general description and staff recommendation; however, the Hearing Board may take action other than what is recommended.

Testimony: The Hearing Board welcomes and encourages participation in Board meetings. When it appears there are several members of the public wishing to address the Board on a specific item, at the outset of the item the Chair of the Board will announce the maximum amount of time that will be allowed for presentation of the testimony. Matters under the jurisdiction of the Board and not on the posted agenda may be addressed by the general public immediately prior to the close of the meeting under Public Comments. The Board limits testimony on matters not on the agenda to five minutes per person and not more than 15 minutes for a particular subject.

Information: Full staff reports are available for public review on the District's website (www.airquality.org), including all attachments and exhibits, or for public inspection at the District's office at 777 12th Street, Suite 300, Sacramento, CA. Copies of items prepared by staff and distributed for the first time at the meeting will be available at the back of the meeting room or may be obtained from the Clerk. Copies of items that were not prepared by staff may be obtained after the meeting from the Clerk. Materials related to an item on this Agenda submitted to SMAQMD after distribution of the agenda packet are available for public inspection in the Clerk of the Board's office during normal business hours. For information regarding this agenda, please contact Virginia Muller, Clerk of the Hearing Board, at 916-874-4809.

Hearing Date 7/18/2017
Petitioner Sacramento Area Flood Control Agency (SAFCA)
Petition Type Regular Variance
Petition Number 2017-004



Petitioner Request

SAFCA is requesting relief from Condition No. 7 of Permits to Operate Numbers 12018, 12019 and 12020 to be allowed to operate over their permitted limits of 200 hours/year for each engine.

The Hearing Board previously heard the requested variance at its May, 2017 meeting. The Board did not take action, and instead requested that SAFCA return with additional information regarding its historical pumping levels. The requested information is attached.

Recommendation

Staff recommends that the Board grant the requested variance.

Petitioner Address

1007 7th Street, 7th Floor
Sacramento, CA 95814

Equipment Location

5334 East Levee Road, Sacramento.

Discussion

No variance may be granted unless the Hearing Board makes all of the six findings set forth under section 42352 (a). It is Petitioner's burden to prove, by a preponderance of the evidence, facts sufficient to support the mandatory findings.

BACKGROUND

The Sacramento Area Flood Control Agency (SAFCA) was formed in 1989 to address the Sacramento area's vulnerability to catastrophic flooding. This vulnerability was exposed during the record flood of 1986 when Folsom Dam exceeded its normal flood control storage capacity and several area levees nearly collapsed under the strain of the storm. In response, the City of Sacramento, the County of Sacramento, the County of Sutter, the American River Flood Control District and Reclamation District No. 1000 created SAFCA through a Joint Exercise of Powers Agreement to provide the Sacramento region with increased flood protection along the American and Sacramento Rivers.

SAFCA was granted three permits on 12/29/1997 for three standby engines each directly driving a pump for flood control purposes. The engines are located at the Natomas East Main Drainage Canal (NEMDC) storm water pumping station (D-15). The purpose of the NEMDC station is to reduce the possibility of flooding in Elverta and Western Rio Linda. Each engine is subject to a total operation (maintenance and emergency) time of 200 hours/year. Due to the high amount of rain this season, the engines have come close to these limits. Two of the engines are at or above 140 hour/year of operation, with more anticipated use during the last quarter of this year. The engines must also be operated periodically for maintenance and testing purposes.

FINDINGS

The six findings below are set forth under Health and Safety Code 42352, subs. (a)(1-6).

Finding 1 - Violation

"That the petitioner for a variance is, or will be, in violation of 41701 [opacity] or of any rule, regulation, or order of district."

Petitioner will be in violation of condition 7 of permits 12018 through 12020 that limits the total operation of each engine to 200 hours/year if high rainfall results in potential flooding.

Finding 2 - Reasonable Control

"That, due to conditions beyond the reasonable control of 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. In making those findings where the petitioner is a public agency, the hearing board shall consider whether or not immediate compliance would impose an unreasonable burden on an essential public service."

The question here is two-fold:

- i. *Whether the cause of the violation is beyond Petitioner's reasonable control.*

Due to the abnormally high rainfall this season, the engines have accumulated hours that are nearing their yearly threshold of 200 hours. The facility has three engines each serving a flood control pump that they can alternate to avoid exceeding the limits. But if there is a high amount of rainfall, all of the engines will have to be used to avoid flooding.

- ii. *Whether, because of its inability to comply, the denial of a variance would result in either an arbitrary or unreasonable taking of property or the practical closing or elimination of its business.*

In making this finding, the Board may consider whether requiring immediate compliance would place an unreasonable burden on the petitioner. If the petitioner is a public agency, as SAFCA is, the Hearing Board may consider whether denying the variance would impact essential public services.

SAFCA provides flood control to a considerable population within the District, but flood control is not one of the "essential" services explicitly listed in Health and Safety Code provisions. However, requiring immediate compliance could place an unreasonable burden on SAFCA. This is a flood control pumping station that relies on the emergency pumps to provide essential emergency flood control in the event of heavy rainfall. SAFCA indicates that inability to use the engines could result in safety hazards, up to and including loss of life.

Finding 3 - Relative Benefit to Air Quality

"That the closing or taking would be without a corresponding benefit in reducing air contaminants.";

The purpose of the flood control pumps is to reduce the possibility of flooding and avoid loss of property and life. The acute risk of potential loss of life through flooding outweighs the potential chronic risk of exposure to diesel particulate matter. The cleanup after a flood would result in higher diesel particulate emissions due to the need of construction equipment including the use of trucks to haul the debris.

Finding 4 - Curtailment of Operations

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

The facility has three engines that can alternate operation to avoid exceeding the permitted limits. But during a severe storm, the facility will need to operate all of the engines. The engines directly drive the flood control pumps, which makes it infeasible to bring in replacement engines. These engines are also rated at 1,250 hp each, which are not readily available.

Finding 5 - Reduction of Excess Emissions

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

During a severe storm, all three engines will have to be operated. The applicant will minimize the maintenance operation of the engines to the maximum extent possible to reduce excess emissions.

Finding 6 - Monitoring

"During the period the variance is in effect, that 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."

The District will not request any emissions monitoring, but will require the facility to keep track of the hours operated by each engine.

NUISANCE FINDING

"No variance shall be granted if the operation will result in a violation of Section 41700."

Staff has not identified any violation of 41700 that may result from the granting of this variance.

OTHER REQUIREMENTS

The Hearing Board may prescribe other requirements as set forth under Health and Safety Code 42353.

ATTACHMENTS:

Description	Type	Upload Date
Historical Pump Info (rcvd June 2017)	Supporting Documents	6/15/2017
Regular Variance Petition	Petitions	6/14/2017
Pumping Station Operational Parameters	Supporting Documents	6/14/2017
2017 Hours of Operation	Graphs/Charts/Tables	6/14/2017
Table of Required Findings to Grant Variance	Supporting Documents	6/14/2017

Approvals/Acknowledgements

Division Manager or Designee: Angela Thompson, Report Approved 7/12/2017

District Counsel or Designee: Kathrine Pittard, Approved as to Form 7/12/2017



SacMetro AQMD
777 12th Street, 3rd Floor
Sacramento, CA 95814

Attention: Clerk of the SMAQMD Hearing Board

SUBJECT: SAFCA VARIANCE PETITIONS FOR STORM WATER PUMPING PLANT

On April 17, 2017, the Sacramento Area Flood Control Agency (SAFCA) submitted a Petition Application to the SMAQMD for a variance for storm water pumping plant permits located in the D-15 NEMDC Storm Water Pumping Station. As the staff report states, the subject pumps are only operated during periods of rainfall where flood protection is needed and periodically for maintenance and testing.

On May 2, 2017, the SMAQMD Hearing Board continued the item requesting additional information regarding historical pump operation times and supporting information regarding Finding 1 – Violation.

The following letter provides supporting information regarding the request for variance of permits 12018, 12019 & 12020. The permitted operating hours are limited to 200 hours per year for each storm water pump engine.

In accordance with Health and Safety Code Section 42352, SAFCA presents the following information as it relates to the required six findings necessary to grant the variance.

Finding 1 – Violation "The petitioner is, or will be, in violation of, a rule or permit condition."

As indicated in the variance petition, during the period of January 8, 2017 and February 25, 2017, the three subject pumps operated for a combined 400.1 hours. Weather data from the National Oceanic & Atmospheric Administration (NOAA) provides that 15.49 inches of precipitation occurred during this period. The amount of rainfall for this period in a normal season is 6.83 inches. The extremely wet season in January and February resulted in excessive run times for each pump. Existing Engine Run Time totals can be found in (Exhibit 1) along with totals for the previous five years (Exhibit 2) to this letter.

The sequence of operation for the plant typically calls for more than one pump to run during a storm event. Depending on the availability of each pump the runtime for any one pump could be required to go beyond the permitted 200

Office 916-874-7606
Fax 916-874-8289

1007 - 7th Street, 7th Floor
Sacramento, CA 95814-3407

1007-7th - 20

hours. Based on historical normal rainfall, SAFCA anticipates an estimated additional 180 hours of runtime for the months of October, November and December of 2017. Furthermore, historical NOAA data indicates that rainfall totals exceed the normal levels for periods of 2 to 3 years following a drought season, and the fall of 2017 would be the second year following a drought period. Should Sacramento receive above normal rainfall this fall, the pump station will exceed the permitted operating hours for the permit period from January 1 to December 31, 2017.

SAFCA would like to also submit the processing time for future variance requests may not be adequate should the variance request be denied or continued to a future date when a violation is certain. Because the operation of the storm water pump station is weather dependent, forecasting of a violation is likely limited to a 10-day period. As presented in Exhibit 1, the pumps operated for 337 hours within a 30-day period. The period to have a hearing and avoid being in violation may not be feasible. SAFCA requests that the variance be approved to avoid being in violation should weather events requiring the D-15 Pumps Station to operate this fall.

Please refer to the Petition and Staff report regarding Findings 2 through 6.

The Hearing Board's consideration of this request is greatly appreciated.

Respectfully,



Jason D. Campbell
Deputy Executive Director

D-15 NEMDC Stormwater Pumping Station
Summary of Engine Run Times

3/21/2017

2017 Calendar Year

SMAQMD Permit Engine Serial No. Engine Model # Engine BHP	Pump #1 12018 33134474 KTA50-01600 1250	Pump #2 12019 33134476 KTA50-01600 1250	Pump #3 12020 33134465 KTA50-01600 1250	Generator 13366 45394771 6BT5.9-G2 166
1/1 - 1/7	0.0	0.0	0.0	0.0
1/8 - 1/14	13.3	143.5	84.8	0.0
1/15 - 1/21	0.0	0.0	0.0	0.0
1/22 - 1/28	0.0	0.0	0.0	0.0
1/19 - 2/4	0.0	0.0	0.0	0.0
2/5 - 2/11	71.8	1.4	23.1	0.0
2/12 - 2/18	12.3	0.0	0.0	0.3
2/19 - 2/25	48.7	0.0	1.2	0.0
2/26 - 3/4	0.0	0.0	0.0	0.0
3/5 - 3/11	0.0	0.0	0.0	0.0
3/12 - 3/18	0.0	0.0	0.0	0.0
3/19 - 3/25	0.0	0.0	0.0	0.0
3/26 - 4/1	0.0	0.0	0.0	0.0
4/2 - 4/8	0.0	0.0	0.0	0.0
4/9 - 4/15	0.0	0.0	0.0	0.0
4/16 - 4/22	0.0	0.0	0.0	0.0
4/23 - 4/29	0.0	0.0	0.0	0.0
	146.1	144.9	109.1	0.3

EXHIBIT 1

D-15 NEMDC Stormwater Pumping Station
Yearly Summary of Engine Run Times

5/11/2017

SMAQMD Permit Engine Serial No. Engine Model # Engine BHP	Pump #1 12018 33134474 KTA50-01600 1250	Pump #2 12019 33134476 KTA50-01600 1250	Pump #3 12020 33134465 KTA50-01600 1250	Generator 13366 45394771 6BT5.9-G2 166
2012	48.9	21.5	16.8	20.0
2013	13.3	13.2	13.3	14.1
2014	14.7	25.1	14.4	13.9
2015	8.7	9.0	8.5	14.3
2016	7.5	33.8	17.2	18.6

SMAQMD permits require records to be retained for 5 years.
Therefore, no records are available prior to 2012.

EXHIBIT 2

**BEFORE THE HEARING BOARD
OF THE
SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT**

PETITION APPLICATION

Petitioner's Name, Business Name, and Address Sacramento Area Flood Control Agency 1007 7th Street, 7th Floor Sacramento, CA 95814 Telephone No: (916) 874-7606	For Office Use Only Variance No. _____ <input type="checkbox"/> Filing Fee Received, Receipt No: _____ _____ Day Notice of Hearing Required
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INSTRUCTIONS

- A. Please fill in the petitioner's name, business name, address, and telephone number in the above space.
- B. The petitioner is (check one):
- ☐ Individual ☐ Partnership ☐ Corporation ☒ Other (specify) **Joint Powers Agency**
- C. Please refer to the applicable sections of the California Health & Safety Code (H&S Code) and the Rules and Regulations of the Sacramento Metropolitan Air Quality Management District (SMAQMD) when completing the petition. The SMAQMD staff and the Business Environmental Resource Center are available to assist Small Businesses with the technical aspects of filling out this form and the development of compliance schedules.¹
- D. Please complete attached pages with thorough and documented factual responses. Review Rule 601, Procedure Before the Hearing Board, carefully to ensure the petition is complete. The petition and anything you supply in support of your petition will become part of the public record.
- E. Please submit this form and filing fee to SMAQMD, 777 12th Street, Third Floor, Sacramento, California 95814. The submittal date for a petition shall be the date on the receipt issued by the District acknowledging the petitioner's full payment of the required initial fee and the newspaper publication fee (if required). After receipt, SMAQMD will notify you of the time and date of your hearing.

¹ See Health and Safety Code section 42323. The Business Environmental Resource Center's Telephone number is (916) 649-0225.

TO: Variance Petitioners

FROM: Clerk of the SMAQMD Hearing Board

SUBJECT: Variance Petitions

DATE: January 22, 2010

If your business is or will be in violation of one of the Sacramento Metropolitan Air Quality Management District's (SMAQMD) rules, you may petition the SMAQMD Hearing Board for a variance. If granted, a variance will give you temporary relief from the rule requirements that are being violated. A specified amount of time will be allowed during which you must bring your business into compliance.

A petition form is enclosed. SMAQMD staff will explain the form if requested. We will also assist you in estimating excess emissions. Copies of Rule 601—PROCEDURE BEFORE THE HEARING BOARD and Rule 302—HEARING BOARD FEES are available on the District web site. Please review these documents carefully to familiarize yourself with the hearing process.

You may also use the enclosed petition to appeal the Air Pollution Control Officer's permitting decisions. For instance, if you believe your permit was incorrectly denied, you may petition the Hearing Board to make that determination.

Please be sure to review the findings that the Hearing Board must adopt when making a decision. The findings are in the petition form. **IMPORTANT: You must supply the evidence in support of those findings.** If the Hearing Board cannot make one of the required findings, the Hearing Board must deny the petition.

Anything that you supply in support of your petition, as well as the petition itself, will become part of the public record. If any information included in such materials is confidential information, please contact the SMAQMD Office of District Counsel **before** disclosing the confidential information.

An incomplete or inadequately documented petition or presentation at the hearing may delay the proceedings. Depending upon the complexity and nature of the situation, some petitioners use legal counsel to prepare the petition and hearing presentation.

After you submit your petition, SMAQMD must provide a public notice for the hearing. The length of notice required will depend upon the type of Hearing Board action you request. The Hearing Board has established a regular hearing schedule that is available on the District web site. **Please submit your completed petition and initial filing fee no later than the deadline shown on the schedule.** All regularly scheduled Hearing Board meetings are held in the SMAQMD conference room at 4:00 P.M.

Emergency variances necessitated by the breakdown of emission control equipment are scheduled on an as needed basis. You must contact the SMAQMD office and fill out a separate form to initiate a breakdown procedure.

Information regarding the initial filing fees is on the following pages. You may be charged fees in addition to the initial fee—per Rule 302.

If you have any questions or need assistance, please call the Clerk of the Hearing Board at (916) 874-4809.

- F. Please use a check mark in the ☐ to identify the type of petition being submitted and circle the appropriate fee. Fee amounts include the newspaper publishing fee (when required). Fees in parentheses are for small business as defined by Rule 302:

Variance Petitions		Fee
<input type="checkbox"/> Interim Variance		\$1,024 (\$765)
<input type="checkbox"/> Short-Term Variance		\$1,024 (\$765)
<input checked="" type="checkbox"/> Regular Variance		\$1,084 (\$825)
<input type="checkbox"/> Emergency Variance		\$495 (\$495)

Product Variance Petitions		
<input type="checkbox"/> Interim Product Variance		\$1,024 (\$765)
<input type="checkbox"/> Product Variance		\$1,084 (\$825)

Petition to Modify an Order Permitting a Variance		
<input type="checkbox"/> Interim Variance		\$1,084 (\$825)
<input type="checkbox"/> Short-term Variance		\$1,084 (\$825)
<input type="checkbox"/> Regular Variance		\$1,084 (\$825)
<input type="checkbox"/> Interim Product Variance		\$1,084 (\$825)
<input type="checkbox"/> Product Variance		\$1,084 (\$825)

Petition to Modify Increments of Progress		
<input type="checkbox"/> Interim Authorization—Variance		\$1,024 (\$765)
<input type="checkbox"/> Interim Authorization—Product Variance		\$1,024 (\$765)
<input type="checkbox"/> Variance		\$1,024 (\$765)
<input type="checkbox"/> Product Variance		\$1,024 (\$765)

Petition to Modify a Final Compliance Date		
<input type="checkbox"/> Variance		\$1,084 (\$825)
<input type="checkbox"/> Product Variance		\$1,084 (\$825)

Permit Action Petition		
<input type="checkbox"/> Review of Permit Denial		\$1,084 (\$825)
<input type="checkbox"/> Review of Conditional Approval		\$1,084 (\$825)
<input type="checkbox"/> Review of Permit Suspension		\$1,084 (\$825)

Other Petitions		
<input type="checkbox"/> Rehearing of a Variance Decision		\$1,084 (\$825)
<input type="checkbox"/> Review of an Emission Reduction Credit Refusal		\$1,084 (\$825)
<input type="checkbox"/> Petition by an Aggrieved Party		\$1,084 (\$825)

- G. Please enclose filing fee with each petition. Make checks payable to the SMAQMD. No petition will be processed unless filing fee is submitted with petition.

In addition to the filing fee, SMAQMD may subsequently charge a petitioner a fee for staff time exceeding 7.5 hours and/or an "excess duration fee." See sections 301.2 and 301.4 of Rule 302—HEARING BOARD FEES.

CONTENTS OF PETITION FOR VARIANCE

(Please type or print clearly)

1. Name, title, address, and phone number of person authorized to receive notices regarding the petition:

Name, Title, and Address

Telephone Number

JASON CAMPBELL

(916) 874-7606

Deputy Executive Director, SAFCA

1007 7th Street, 7th Floor

Sacramento, CA 95814

2. Names and addresses of partners or officers:

Name(s)

Address(es)

Richard Johnson

Executive Director

John Bassett

Director of Engineering

3. Name and location of business or activity if different from #1 above:

Same

4. Briefly describe the nature of your business:

A Joint Powers Flood Control Agency comprised of City of Sacramento,
County of Sacramento, Sacramento County Water Agency, Sutter County, Sutter
County Water Agency, Reclamation District No. 1000, and American River Flood
Control District

5. Briefly describe the equipment which is the subject of this petition. List SMAQMD Permit Nos., indicate if equipment is exempt from Permit requirements, or answer No. 6 below:

No. 12018, 12019, 12020

See Permit. Internal combustion diesel engines running standby flood control pumps

6. I have not received permit(s) yet. My application for a Permit To Operate was submitted on

7. Have you been issued a Notice of Violation concerning the operation of this equipment?

☐ YES ☒ NO

8. California Health and Safety Code section 41700 states:

"Except as otherwise provided in Section 41705² no person shall discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

Is your company or agency (or will your company or agency be) in violation of California Health and Safety Code section 41700?

☐ YES ☒ NO

If yes, please explain:

If yes, please also attach the name(s) and address(es) of any complainant(s).

² Among other things, section 41705 exempts (from section 41700) odors from agricultural operations. See section 41705 for details.

9. Is your company or agency (or will your company or agency be) in violation of:
- California Health and Safety Code section 41701³ or
 - Any Sacramento Metropolitan Air Quality Management District (SMAQMD) Rule, regulation, order, and/or Permit condition?

If so, please explain the violation and please cite the statute, Rule, regulation, order, and/or Permit condition that is being, or will be, violated.

No.

Please attach a copy of the pertinent Permit(s) to this petition. Remember, if any Permit or other information you supply as part of this variance petition process contains confidential information, please contact SMAQMD Office of District Counsel before disclosing such confidential material.

10. If you are required to comply immediately with the statute, Rule, regulation, order, or Permit condition (cited in your response to Question No. 9 above), are there conditions beyond your reasonable control that would result in any of the following situations:
- An arbitrary or unreasonable taking of your property; or
 - The practical closing or elimination of a lawful business; or
 - An unreasonable burden on a publicly owned or operated "essential public service," i.e., a prison, detention facility, police or fire fighting facility, school, health care facility, landfill, gas control or processing facility, sewage treatment works, or water delivery operation?

Please discuss the evidence supporting your conclusion:

Yes - C. Inability to run flood control pumps resulting in flooding of private property (homes, roadways, commercial businesses, etc.)

Please be prepared to supply documentation or other proof of your evidence to the Hearing Board or the SMAQMD staff.

³ Among other things, section 41701 pertains to the opacity of visible air pollution such as smoke. The section specifies that emissions shall not be as dark as, or darker than, the No. 2 shade designation on a Ringelmann Chart.

11. Would the taking of property, closing or elimination of a lawful business, or unreasonable burden on an essential public service be without a corresponding benefit in reducing air contaminants?

Please discuss your evidence:

Yes. The cost of flood damage as described above would exceed benefit of reducing air contaminants. Rerouting of traffic due to flooded road may increase air contaminants as would hauling personal property.

Please be prepared to supply documentation or other proof of your evidence to the Hearing Board or the SMAQMD staff.

12. Please discuss the consideration your company or agency has given to:

- Curtailing the operation of the source in lieu of obtaining a variance, and
- Enacting other alternatives to the variance (besides curtailment), and
- Why operation curtailment or other alternatives are less desirable or feasible than seeking this variance.

Pumps are needed for community health and safety for reducing impact of flood waters.

13. During the period the variance is in effect, do you agree to monitor or otherwise quantify emission levels from the source, if requested to do so, and report these emission levels to SMAQMD pursuant to a schedule established by the District?

☒ YES ☐ NO

Monitoring of emission levels is often necessary while a variance is in effect. Monitoring helps to guarantee minimal environmental consequences while a source is out of compliance with District regulations. In the absence of a monitoring program, the Hearing Board may be unable to find that a non-compliant activity will not be a public nuisance.

If you are unwilling to monitor emission levels, please explain why not and describe why your non-compliant activity will not create a public nuisance:

[illegible]

14. Estimate the *excess emissions* that may occur while your requested variance is in effect. *Excess emissions* are emissions of air pollutants beyond the emissions allowed by SMAQMD Rules, regulations, orders or Permit conditions. SMAQMD staff may be able to assist you with this estimate:

POLLUTANT(S) (e.g., VOC, NO _x , PM ₁₀ , PM _{2.5} , Hexavalent Chromium)	LBS. PER DAY OF EXCESS EMISSIONS	NO. OF DAYS EXCESS EMISSIONS PRODUCED	% OPACITY (If Applicable)
See table in permits. Actual emissions			
will depend on needed operating hours.			

Please Note: SMAQMD will charge a petitioner an "excess duration fee" for a variance that:

- Is in effect for more than 3 months, and
- Is issued for equipment identified by SMAQMD staff report as an excess emissions source.

The excess duration fee is:

- \$165 per month exceeding 3 months for small businesses, or
- \$275 per month exceeding 3 months for large businesses.

See section 301.4 in Rule 302—HEARING BOARD FEES. SMAQMD will charge the "excess duration fee" following completion of the staff report for the variance. The fee is in addition to the initial filing fees collected by SMAQMD.

15. Please describe the action you will take to reduce *excess emissions* to the maximum extent feasible. If you considered a specific course of action, but excluded it as infeasible, please list the action and explain why it is infeasible.

Pumps will only run when needed. Gravity flow parameters will be optimized.

16. What are the advantages and disadvantages to the residents of the District from requiring compliance or resulting from granting this petition request?

The Advantages:

Advantages to the residents of the community if the petition is granted include the continued protection from flooding of property and infrastructure. In addition, should there be a flood, the cleanup activities required would likely result in increased air emissions resulting from cleanup and construction related repair activities resulting from flood damage.

The Disadvantages:

Disadvantages for the granting of the petition include a slight increase in runtime for the flood control pumps resulting in slightly higher levels of emissions from the permitted stationary units.

17. Please discuss your past diligence in complying with the applicable standards:

Station has been in operation since 1997 and operated within permit conditions.

18. Describe your method of achieving compliance, detailing any equipment to be installed or modifications to be made:

19. Fill in the date on which you expect to be in compliance with the rules and/or regulations:

January 1, 2018

If more than one year, attach a schedule of increments of progress, identifying the dates of each milestone. The schedule shall include, but not be limited to, the date for (a) submitting plans, (b) awarding contracts, (c) commencing construction, (d) completing construction, and (e) achieving final compliance.

NOTE: Do not overly rely on a potential future change in the law, including SMAQMD Rules and regulations, as a means of coming into compliance. The Hearing Board may not and does not control the regulatory agenda of any law-making body such as the District's Board of Directors.

Any Additional Information:

This application has been amended to reflect changes in the original emergency variance request submitted on February 17, 2017.

Any person who knowingly provides false information in this petition or any supporting documentation may be subject to penalties up to \$35,000 under Health and Safety Code Section 42402.4.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: _____

Date: _____

Name (Print): _____

Title: _____

9/13/17
JOHN CAMPBELL
DEPUTY EXECUTIVE DIRECTOR



PERMIT TO OPERATE

ISSUED TO: SACRAMENTO AREA FLOOD

EQUIPMENT LOCATION: 5334 EAST LEVEE RD, SACRAMENTO

PERMIT NO.: EQUIPMENT DESCRIPTION:

12018 IC ENGINE STANDBY, MAKE: CUMMINS, MODEL: KTA50-01600, SERIAL
NO.: 33134474, 1250 BHP, DIESEL FIRED, DRIVING AN EMERGENCY
STANDBY FLOOD CONTROL PUMP

SUBJECT TO THE FOLLOWING CONDITIONS

GENERAL

1. THE EQUIPMENT SHALL BE PROPERLY MAINTAINED
2. THE AIR POLLUTION CONTROL OFFICER AND/OR AUTHORIZED REPRESENTATIVES, UPON THE PRESENTATION OF CREDENTIALS, SHALL BE PERMITTED:
 - A. TO ENTER UPON THE PREMISES WHERE THE SOURCE IS LOCATED OR IN WHICH ANY RECORDS ARE REQUIRED TO BE KEPT UNDER THE TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - B. AT REASONABLE TIMES TO HAVE ACCESS TO AND COPY ANY RECORDS REQUIRED TO BE KEPT UNDER THE TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - C. TO INSPECT ANY EQUIPMENT, OPERATION, OR METHOD REQUIRED IN THIS PERMIT TO OPERATE, AND
 - D. TO SAMPLE EMISSIONS FROM THE SOURCE OR REQUIRE SAMPLES TO BE TAKEN.
3. THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26, PART 4, CHAPTER 3, OF THE CALIFORNIA HEALTH AND SAFETY CODE OR THE RULES AND REGULATIONS OF THE AIR QUALITY MANAGEMENT DISTRICT.
4. A LEGIBLE COPY OF THIS PERMIT SHALL BE MAINTAINED ON THE PREMISES WITH THE EQUIPMENT.

EMISSION LIMITATIONS

5. THE IC ENGINE SHALL NOT DISCHARGE INTO THE ATMOSPHERE ANY VISIBLE AIR CONTAMINANTS OTHER THAN UNCOMBINED WATER VAPOR, FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE MINUTES IN ANY ONE HOUR, WHICH IS AS DARK OR DARKER THAN RINGELMANN 1 OR EQUIVALENT TO OR GREATER THAN 20% OPACITY.

DATE ISSUED: 12/29/1997
DATE AMENDED: 12/31/05
EXPIRATION DATE: 8/6/2006 (UNLESS RENEWED)

LARRY GREENE
AIR POLLUTION CONTROL OFFICER

BY: *Julie Lukashovsky*

6. THE EMISSIONS FROM THE IC ENGINE SHALL NOT EXCEED THE FOLLOWING LIMITS:

POLLUTANT	EMISSION FACTOR (GRAMS/HP-HR)	BASIS FOR EMISSION FACTOR	MAXIMUM ALLOWABLE EMISSIONS (A)	
			POUNDS/QUARTER	POUNDS/YEAR
ROC	0.22	MFR'S DATA	121	121
NO _x	10.3	MFR'S DATA	5,677	5,677
SO _x	0.1645	0.05% SULFUR CONTENT	91	91
PM10	0.24	AP-42	132	132
CO	2.3	MFR'S DATA	1,268	1,268
HC+NO _x	N/A	N/A	N/A	N/A

(A) EMISSIONS ARE BASED ON 1250 BHP, 200 HOURS/QUARTER AND 200 HOURS/YEAR OF OPERATION.

EQUIPMENT OPERATION

7. THE IC ENGINE SHALL OPERATE ONLY FOR THE FOLLOWING PURPOSES AND SHALL NOT OPERATE MORE THAN THE FOLLOWING HOURS:

TYPE OF OPERATIONAL HOURS	MAXIMUM ALLOWABLE OPERATION	
	HOURS/QUARTER	HOURS/YEAR
MAINTENANCE PURPOSES (A)	30	30
ALL OPERATION - MAINTENANCE (A) AND EMERGENCY (B)	200	200

(A) MAINTENANCE PURPOSES IS DEFINED AS: THE OPERATION OF AN IC ENGINE IN ORDER TO PRESERVE THE INTEGRITY OF THE IC ENGINE, ITS ASSOCIATED GENERATOR OR THE FACILITY'S ELECTRICAL DISTRIBUTION SYSTEM, OR WHEN REQUIRED BY THE SMAQMD TO VERIFY COMPLIANCE WITH THE APPLICABLE RULES AND REGULATIONS.

(B) EMERGENCY IS DEFINED AS: WHEN ELECTRICAL SERVICE FROM THE SERVING UTILITY IS INTERRUPTED BY AN UNFORESEEABLE EVENT.

8. THE IC ENGINE SHALL BE EQUIPPED WITH A NON-RESETTING HOUR METER, WITH A MINIMUM DISPLAY CAPABILITY OF 999 HOURS, TO ENSURE COMPLIANCE WITH CONDITION NUMBERS 6 AND 7.
9. UPON REQUEST OF THE AIR POLLUTION CONTROL OFFICER OR DESIGNEE, ONCE EACH YEAR, DURING DAYLIGHT HOURS, THE IC ENGINE SHALL BE RUN AT MAXIMUM ANTICIPATED LOAD, FROM A COLD START CONDITION, FOR OBSERVATION OF COMPLIANCE WITH OPACITY LIMITATIONS.
10. THE IC ENGINE SHALL BE FUELED WITH CARB DIESEL FUEL, OR AN ALTERNATIVE DIESEL FUEL THAT MEETS THE REQUIREMENTS OF THE VERIFICATION PROCEDURE (AS CODIFIED IN TITLE 13, CCR, SECTIONS 2700-2710), OR AN ALTERNATIVE FUEL, OR CARB DIESEL FUEL USED WITH FUEL ADDITIVES THAT MEETS THE REQUIREMENTS OF THE VERIFICATION PROCEDURE, OR ANY COMBINATION OF FUELS LISTED IN THIS CONDITION.

RECORD KEEPING

11. THE FOLLOWING RECORDS SHALL BE CONTINUOUSLY MAINTAINED ONSITE FOR THE MOST RECENT THREE YEAR PERIOD AND SHALL BE MADE AVAILABLE TO THE AIR POLLUTION CONTROL OFFICER UPON REQUEST. MONTHLY, QUARTERLY, AND YEARLY RECORDS SHALL BE MADE AVAILABLE WITHIN 30 DAYS OF END OF REPORTING PERIOD.

FREQUENCY	INFORMATION TO BE RECORDED
WHEN OPERATED	A. DATE. B. PURPOSE – EITHER MAINTENANCE (M) OR EMERGENCY POWER (E) C. NUMBER OF HOURS OF OPERATION.
MONTHLY	D. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/MONTH).
QUARTERLY	E. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/MONTH).
YEARLY	F. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/YEAR).
ALL FUEL DELIVERIES	G. RETAIN FUEL PURCHASE RECORDS THAT ACCOUNT FOR ALL FUEL PURCHASED FOR USE IN THE ENGINE. FUEL PURCHASE RECORDS SHALL INCLUDE: 1. IDENTIFICATION OF TYPE OF FUEL (I.E. CARB DIESEL, ALTERNATE DIESEL, ETC.) 2. QUANTITY OF FUEL PURCHASED. 3. DATE OF FUEL PURCHASE. 4. SIGNATURE OF PERSON RECEIVING FUEL. 5. SIGNATURE OF FUEL PROVIDER INDICATING THAT FUEL WAS DELIVERED.

YOUR APPLICATION FOR THIS AIR QUALITY PERMIT TO OPERATE WAS EVALUATED FOR COMPLIANCE WITH SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT (AQMD), STATE AND FEDERAL AIR QUALITY RULES. THE FOLLOWING LISTED RULES ARE THOSE THAT ARE MOST APPLICABLE TO THE OPERATION OF YOUR EQUIPMENT. OTHER RULES MAY ALSO BE APPLICABLE.

<u>AQMD RULE NUMBER</u>	<u>RULE TITLE</u>
201	GENERAL PERMIT REQUIREMENTS
202	NEW SOURCE REVIEW
401	RINGELMANN CHART
406	SPECIFIC CONTAMINANTS
420	SULFUR CONTENT OF FUELS
904	AIR TOXICS CONTROL MEASURES - STATIONARY COMPRESSION IGNITION ENGINES

IN ADDITION, THE CONDITIONS ON THIS PERMIT TO OPERATE MAY REFLECT SOME, BUT NOT ALL, REQUIREMENTS OF THESE RULES. THERE MAY BE OTHER CONDITIONS THAT ARE APPLICABLE TO THE OPERATION OF YOUR EQUIPMENT. FUTURE CHANGES IN PROHIBITORY RULES MAY ESTABLISH MORE STRINGENT REQUIREMENTS WHICH MAY SUPERSEDE THE CONDITIONS LISTED HERE. FOR FURTHER INFORMATION PLEASE CONSULT YOUR AQMD RULEBOOK OR CONTACT THE AQMD FOR ASSISTANCE.



PERMIT TO OPERATE

ISSUED TO: SACRAMENTO AREA FLOOD

EQUIPMENT LOCATION: 5334 EAST LEVEE RD, SACRAMENTO

PERMIT NO.: EQUIPMENT DESCRIPTION:

12019 IC ENGINE STANDBY, MAKE: CUMMINS, MODEL: KTA50-01600, SERIAL
NO.: 33134476, 1250 BHP, DIESEL FIRED, DRIVING AN EMERGENCY
STANDBY FLOOD CONTROL PUMP

SUBJECT TO THE FOLLOWING CONDITIONS

GENERAL

1. THE EQUIPMENT SHALL BE PROPERLY MAINTAINED
2. THE AIR POLLUTION CONTROL OFFICER AND/OR AUTHORIZED REPRESENTATIVES, UPON THE PRESENTATION OF CREDENTIALS, SHALL BE PERMITTED:
 - A. TO ENTER UPON THE PREMISES WHERE THE SOURCE IS LOCATED OR IN WHICH ANY RECORDS ARE REQUIRED TO BE KEPT UNDER THE TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - B. AT REASONABLE TIMES TO HAVE ACCESS TO AND COPY ANY RECORDS REQUIRED TO BE KEPT UNDER THE TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - C. TO INSPECT ANY EQUIPMENT, OPERATION, OR METHOD REQUIRED IN THIS PERMIT TO OPERATE, AND
 - D. TO SAMPLE EMISSIONS FROM THE SOURCE OR REQUIRE SAMPLES TO BE TAKEN.
3. THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26, PART 4, CHAPTER 3, OF THE CALIFORNIA HEALTH AND SAFETY CODE OR THE RULES AND REGULATIONS OF THE AIR QUALITY MANAGEMENT DISTRICT.
4. A LEGIBLE COPY OF THIS PERMIT SHALL BE MAINTAINED ON THE PREMISES WITH THE EQUIPMENT.

EMISSION LIMITATIONS

5. THE IC ENGINE SHALL NOT DISCHARGE INTO THE ATMOSPHERE ANY VISIBLE AIR CONTAMINANTS OTHER THAN UNCOMBINED WATER VAPOR, FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE MINUTES IN ANY ONE HOUR, WHICH IS AS DARK OR DARKER THAN RINGELMANN 1 OR EQUIVALENT TO OR GREATER THAN 20% OPACITY.

DATE ISSUED: 12/29/1997
DATE AMENDED: 12/31/05
EXPIRATION DATE: 8/6/2006 (UNLESS RENEWED)

LARRY GREENE
AIR POLLUTION CONTROL OFFICER

BY: *Julie Lukashovsky*

6. THE EMISSIONS FROM THE IC ENGINE SHALL NOT EXCEED THE FOLLOWING LIMITS:

POLLUTANT	EMISSION FACTOR (GRAMS/HP-HR)	BASIS FOR EMISSION FACTOR	MAXIMUM ALLOWABLE EMISSIONS (A)	
			POUNDS/QUARTER	POUNDS/YEAR
ROC	0.22	MFR'S DATA	121	121
NOx	10.3	MFR'S DATA	5,677	5,677
SOx	0.1645	0.05% SULFUR CONTENT	91	91
PM10	0.24	AP-42	132	132
CO	2.3	MFR'S DATA	1,268	1,268
HC+NOx	N/A	N/A	N/A	N/A

(A) EMISSIONS ARE BASED ON 1250 BHP, 200 HOURS/QUARTER AND 200 HOURS/YEAR OF OPERATION.

EQUIPMENT OPERATION

7. THE IC ENGINE SHALL OPERATE ONLY FOR THE FOLLOWING PURPOSES AND SHALL NOT OPERATE MORE THAN THE FOLLOWING HOURS:

TYPE OF OPERATIONAL HOURS	MAXIMUM ALLOWABLE OPERATION	
	HOURS/QUARTER	HOURS/YEAR
MAINTENANCE PURPOSES (A)	30	30
ALL OPERATION - MAINTENANCE (A) AND EMERGENCY (B)	200	200

(A) MAINTENANCE PURPOSES IS DEFINED AS: THE OPERATION OF AN IC ENGINE IN ORDER TO PRESERVE THE INTEGRITY OF THE IC ENGINE, ITS ASSOCIATED GENERATOR OR THE FACILITY'S ELECTRICAL DISTRIBUTION SYSTEM, OR WHEN REQUIRED BY THE SMAQMD TO VERIFY COMPLIANCE WITH THE APPLICABLE RULES AND REGULATIONS.

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8. THE IC ENGINE SHALL BE EQUIPPED WITH A NON-RESETTING HOUR METER, WITH A MINIMUM DISPLAY CAPABILITY OF 999 HOURS, TO ENSURE COMPLIANCE WITH CONDITION NUMBERS 6 AND 7.
9. UPON REQUEST OF THE AIR POLLUTION CONTROL OFFICER OR DESIGNEE, ONCE EACH YEAR, DURING DAYLIGHT HOURS, THE IC ENGINE SHALL BE RUN AT MAXIMUM ANTICIPATED LOAD, FROM A COLD START CONDITION, FOR OBSERVATION OF COMPLIANCE WITH OPACITY LIMITATIONS.
10. THE IC ENGINE SHALL BE FUELED WITH CARB DIESEL FUEL, OR AN ALTERNATIVE DIESEL FUEL THAT MEETS THE REQUIREMENTS OF THE VERIFICATION PROCEDURE (AS CODIFIED IN TITLE 13, CCR, SECTIONS 2700-2710), OR AN ALTERNATIVE FUEL, OR CARB DIESEL FUEL USED WITH FUEL ADDITIVES THAT MEETS THE REQUIREMENTS OF THE VERIFICATION PROCEDURE, OR ANY COMBINATION OF FUELS LISTED IN THIS CONDITION.

RECORD KEEPING

11. THE FOLLOWING RECORDS SHALL BE CONTINUOUSLY MAINTAINED ONSITE FOR THE MOST RECENT THREE YEAR PERIOD AND SHALL BE MADE AVAILABLE TO THE AIR POLLUTION CONTROL OFFICER UPON REQUEST. MONTHLY, QUARTERLY, AND YEARLY RECORDS SHALL BE MADE AVAILABLE WITHIN 30 DAYS OF END OF REPORTING PERIOD.

FREQUENCY	INFORMATION TO BE RECORDED
WHEN OPERATED	A. DATE. B. PURPOSE – EITHER MAINTENANCE (M) OR EMERGENCY POWER (E) C. NUMBER OF HOURS OF OPERATION.
MONTHLY	D. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/MONTH).
QUARTERLY	E. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/MONTH).
YEARLY	F. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/YEAR).
ALL FUEL DELIVERIES	G. RETAIN FUEL PURCHASE RECORDS THAT ACCOUNT FOR ALL FUEL PURCHASED FOR USE IN THE ENGINE. FUEL PURCHASE RECORDS SHALL INCLUDE: 1. IDENTIFICATION OF TYPE OF FUEL (I.E. CARB DIESEL, ALTERNATE DIESEL, ETC.) 2. QUANTITY OF FUEL PURCHASED. 3. DATE OF FUEL PURCHASE. 4. SIGNATURE OF PERSON RECEIVING FUEL. 5. SIGNATURE OF FUEL PROVIDER INDICATING THAT FUEL WAS DELIVERED.

YOUR APPLICATION FOR THIS AIR QUALITY PERMIT TO OPERATE WAS EVALUATED FOR COMPLIANCE WITH SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT (AQMD), STATE AND FEDERAL AIR QUALITY RULES. THE FOLLOWING LISTED RULES ARE THOSE THAT ARE MOST APPLICABLE TO THE OPERATION OF YOUR EQUIPMENT. OTHER RULES MAY ALSO BE APPLICABLE.

<u>AQMD RULE NUMBER</u>	<u>RULE TITLE</u>
201	GENERAL PERMIT REQUIREMENTS
202	NEW SOURCE REVIEW
401	RINGELMANN CHART
406	SPECIFIC CONTAMINANTS
420	SULFUR CONTENT OF FUELS
904	AIR TOXICS CONTROL MEASURES - STATIONARY COMPRESSION IGNITION ENGINES

IN ADDITION, THE CONDITIONS ON THIS PERMIT TO OPERATE MAY REFLECT SOME, BUT NOT ALL, REQUIREMENTS OF THESE RULES. THERE MAY BE OTHER CONDITIONS THAT ARE APPLICABLE TO THE OPERATION OF YOUR EQUIPMENT. FUTURE CHANGES IN PROHIBITORY RULES MAY ESTABLISH MORE STRINGENT REQUIREMENTS WHICH MAY SUPERSEDE THE CONDITIONS LISTED HERE. FOR FURTHER INFORMATION PLEASE CONSULT YOUR AQMD RULEBOOK OR CONTACT THE AQMD FOR ASSISTANCE.



PERMIT TO OPERATE

ISSUED TO: SACRAMENTO AREA FLOOD

EQUIPMENT LOCATION: 5334 EAST LEVEE RD, SACRAMENTO

PERMIT NO.: EQUIPMENT DESCRIPTION:

12020 IC ENGINE STANDBY, MAKE: CUMMINS, MODEL: KTA50-01600, SERIAL
NO.: 33134465, 1250 BHP, DIESEL FIRED, DRIVING AN EMERGENCY
STANDBY FLOOD CONTROL PUMP

SUBJECT TO THE FOLLOWING CONDITIONS

GENERAL

1. THE EQUIPMENT SHALL BE PROPERLY MAINTAINED
2. THE AIR POLLUTION CONTROL OFFICER AND/OR AUTHORIZED REPRESENTATIVES, UPON THE PRESENTATION OF CREDENTIALS, SHALL BE PERMITTED:
 - A. TO ENTER UPON THE PREMISES WHERE THE SOURCE IS LOCATED OR IN WHICH ANY RECORDS ARE REQUIRED TO BE KEPT UNDER THE TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - B. AT REASONABLE TIMES TO HAVE ACCESS TO AND COPY ANY RECORDS REQUIRED TO BE KEPT UNDER THE TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - C. TO INSPECT ANY EQUIPMENT, OPERATION, OR METHOD REQUIRED IN THIS PERMIT TO OPERATE, AND
 - D. TO SAMPLE EMISSIONS FROM THE SOURCE OR REQUIRE SAMPLES TO BE TAKEN.
3. THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26, PART 4, CHAPTER 3, OF THE CALIFORNIA HEALTH AND SAFETY CODE OR THE RULES AND REGULATIONS OF THE AIR QUALITY MANAGEMENT DISTRICT.
4. A LEGIBLE COPY OF THIS PERMIT SHALL BE MAINTAINED ON THE PREMISES WITH THE EQUIPMENT.

EMISSION LIMITATIONS

5. THE IC ENGINE SHALL NOT DISCHARGE INTO THE ATMOSPHERE ANY VISIBLE AIR CONTAMINANTS OTHER THAN UNCOMBINED WATER VAPOR, FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE MINUTES IN ANY ONE HOUR, WHICH IS AS DARK OR DARKER THAN RINGELMANN 1 OR EQUIVALENT TO OR GREATER THAN 20% OPACITY.

DATE ISSUED: 12/29/1997
DATE AMENDED: 12/31/05
EXPIRATION DATE: 8/6/2006 (UNLESS RENEWED)

LARRY GREENE
AIR POLLUTION CONTROL OFFICER

BY:

Julio Lukemovsky

6. THE EMISSIONS FROM THE IC ENGINE SHALL NOT EXCEED THE FOLLOWING LIMITS:

POLLUTANT	EMISSION FACTOR (GRAMS/HP-HR)	BASIS FOR EMISSION FACTOR	MAXIMUM ALLOWABLE EMISSIONS (A)	
			POUNDS/QUARTER	POUNDS/YEAR
ROC	0.22	MFR'S DATA	121	121
NOx	10.3	MFR'S DATA	5,677	5,677
SOx	0.1645	0.05% SULFUR CONTENT	91	91
PM10	0.24	AP-42	132	132
CO	2.3	MFR'S DATA	1,268	1,268
HC+NOx	N/A	N/A	N/A	N/A

(A) EMISSIONS ARE BASED ON 1250 BHP, 200 HOURS/QUARTER AND 200 HOURS/YEAR OF OPERATION.

EQUIPMENT OPERATION

7. THE IC ENGINE SHALL OPERATE ONLY FOR THE FOLLOWING PURPOSES AND SHALL NOT OPERATE MORE THAN THE FOLLOWING HOURS:

TYPE OF OPERATIONAL HOURS	MAXIMUM ALLOWABLE OPERATION	
	HOURS/QUARTER	HOURS/YEAR
MAINTENANCE PURPOSES (A)	30	30
ALL OPERATION - MAINTENANCE (A) AND EMERGENCY (B)	200	200

(A) MAINTENANCE PURPOSES IS DEFINED AS: THE OPERATION OF AN IC ENGINE IN ORDER TO PRESERVE THE INTEGRITY OF THE IC ENGINE, ITS ASSOCIATED GENERATOR OR THE FACILITY'S ELECTRICAL DISTRIBUTION SYSTEM, OR WHEN REQUIRED BY THE SMAQMD TO VERIFY COMPLIANCE WITH THE APPLICABLE RULES AND REGULATIONS.

(B) EMERGENCY IS DEFINED AS: WHEN ELECTRICAL SERVICE FROM THE SERVING UTILITY IS INTERRUPTED BY AN UNFORESEEABLE EVENT.

8. THE IC ENGINE SHALL BE EQUIPPED WITH A NON-RESETTING HOUR METER, WITH A MINIMUM DISPLAY CAPABILITY OF 999 HOURS, TO ENSURE COMPLIANCE WITH CONDITION NUMBERS 6 AND 7.
9. UPON REQUEST OF THE AIR POLLUTION CONTROL OFFICER OR DESIGNEE, ONCE EACH YEAR, DURING DAYLIGHT HOURS, THE IC ENGINE SHALL BE RUN AT MAXIMUM ANTICIPATED LOAD, FROM A COLD START CONDITION, FOR OBSERVATION OF COMPLIANCE WITH OPACITY LIMITATIONS.
10. THE IC ENGINE SHALL BE FUELED WITH CARB DIESEL FUEL, OR AN ALTERNATIVE DIESEL FUEL THAT MEETS THE REQUIREMENTS OF THE VERIFICATION PROCEDURE (AS CODIFIED IN TITLE 13, CCR, SECTIONS 2700-2710), OR AN ALTERNATIVE FUEL, OR CARB DIESEL FUEL USED WITH FUEL ADDITIVES THAT MEETS THE REQUIREMENTS OF THE VERIFICATION PROCEDURE, OR ANY COMBINATION OF FUELS LISTED IN THIS CONDITION

RECORD KEEPING

11. THE FOLLOWING RECORDS SHALL BE CONTINUOUSLY MAINTAINED ONSITE FOR THE MOST RECENT THREE YEAR PERIOD AND SHALL BE MADE AVAILABLE TO THE AIR POLLUTION CONTROL OFFICER UPON REQUEST. MONTHLY, QUARTERLY, AND YEARLY RECORDS SHALL BE MADE AVAILABLE WITHIN 30 DAYS OF END OF REPORTING PERIOD.

FREQUENCY	INFORMATION TO BE RECORDED
WHEN OPERATED	A. DATE. B. PURPOSE – EITHER MAINTENANCE (M) OR EMERGENCY POWER (E) C. NUMBER OF HOURS OF OPERATION
MONTHLY	D. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/MONTH).
QUARTERLY	E. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/MONTH).
YEARLY	F. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/YEAR).
ALL FUEL DELIVERIES	G. RETAIN FUEL PURCHASE RECORDS THAT ACCOUNT FOR ALL FUEL PURCHASED FOR USE IN THE ENGINE. FUEL PURCHASE RECORDS SHALL INCLUDE: 1. IDENTIFICATION OF TYPE OF FUEL (I.E. CARB DIESEL, ALTERNATE DIESEL, ETC.) 2. QUANTITY OF FUEL PURCHASED. 3. DATE OF FUEL PURCHASE. 4. SIGNATURE OF PERSON RECEIVING FUEL. 5. SIGNATURE OF FUEL PROVIDER INDICATING THAT FUEL WAS DELIVERED.

YOUR APPLICATION FOR THIS AIR QUALITY PERMIT TO OPERATE WAS EVALUATED FOR COMPLIANCE WITH SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT (AQMD), STATE AND FEDERAL AIR QUALITY RULES. THE FOLLOWING LISTED RULES ARE THOSE THAT ARE MOST APPLICABLE TO THE OPERATION OF YOUR EQUIPMENT. OTHER RULES MAY ALSO BE APPLICABLE.

<u>AQMD RULE NUMBER</u>	<u>RULE TITLE</u>
201	GENERAL PERMIT REQUIREMENTS
202	NEW SOURCE REVIEW
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406	SPECIFIC CONTAMINANTS
420	SULFUR CONTENT OF FUELS
904	AIR TOXICS CONTROL MEASURES - STATIONARY COMPRESSION IGNITION ENGINES

IN ADDITION, THE CONDITIONS ON THIS PERMIT TO OPERATE MAY REFLECT SOME, BUT NOT ALL, REQUIREMENTS OF THESE RULES. THERE MAY BE OTHER CONDITIONS THAT ARE APPLICABLE TO THE OPERATION OF YOUR EQUIPMENT. FUTURE CHANGES IN PROHIBITORY RULES MAY ESTABLISH MORE STRINGENT REQUIREMENTS WHICH MAY SUPERSEDE THE CONDITIONS LISTED HERE. FOR FURTHER INFORMATION PLEASE CONSULT YOUR AQMD RULEBOOK OR CONTACT THE AQMD FOR ASSISTANCE.



PERMIT TO OPERATE

ISSUED TO: SACRAMENTO AREA FLOOD

EQUIPMENT LOCATION: 5334 EAST LEVEE RD, SACRAMENTO

PERMIT NO.: EQUIPMENT DESCRIPTION:

13366 IC ENGINE STANDBY, MAKE: CUMMINS, MODEL: 6BT5.9-G2, SERIAL
NO.: 45394771, 166 BHP, DIESEL FIRED, DRIVING AN EMERGENCY
STANDBY GENERATOR

SUBJECT TO THE FOLLOWING CONDITIONS

GENERAL

1. THE EQUIPMENT SHALL BE PROPERLY MAINTAINED
2. THE AIR POLLUTION CONTROL OFFICER AND/OR AUTHORIZED REPRESENTATIVES, UPON THE PRESENTATION OF CREDENTIALS, SHALL BE PERMITTED:
 - A. TO ENTER UPON THE PREMISES WHERE THE SOURCE IS LOCATED OR IN WHICH ANY RECORDS ARE REQUIRED TO BE KEPT UNDER THE TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - B. AT REASONABLE TIMES TO HAVE ACCESS TO AND COPY ANY RECORDS REQUIRED TO BE KEPT UNDER THE TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - C. TO INSPECT ANY EQUIPMENT, OPERATION, OR METHOD REQUIRED IN THIS PERMIT TO OPERATE, AND
 - D. TO SAMPLE EMISSIONS FROM THE SOURCE OR REQUIRE SAMPLES TO BE TAKEN.
3. THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26, PART 4, CHAPTER 3, OF THE CALIFORNIA HEALTH AND SAFETY CODE OR THE RULES AND REGULATIONS OF THE AIR QUALITY MANAGEMENT DISTRICT.
4. A LEGIBLE COPY OF THIS PERMIT SHALL BE MAINTAINED ON THE PREMISES WITH THE EQUIPMENT.

EMISSION LIMITATIONS

5. THE IC ENGINE SHALL NOT DISCHARGE INTO THE ATMOSPHERE ANY VISIBLE AIR CONTAMINANTS OTHER THAN UNCOMBINED WATER VAPOR, FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE MINUTES IN ANY ONE HOUR, WHICH IS AS DARK OR DARKER THAN RINGELMANN 1 OR EQUIVALENT TO OR GREATER THAN 20% OPACITY.

DATE ISSUED: 11/13/1997
DATE AMENDED: 12/31/05
EXPIRATION DATE: 8/6/2006 (UNLESS RENEWED)

LARRY GREENE
AIR POLLUTION CONTROL OFFICER

BY: *Julie Lukamovsky*

6. THE EMISSIONS FROM THE IC ENGINE SHALL NOT EXCEED THE FOLLOWING LIMITS:

POLLUTANT	EMISSION FACTOR (GRAMS/HP-HR)	BASIS FOR EMISSION FACTOR	MAXIMUM ALLOWABLE EMISSIONS (A)	
			POUNDS/QUARTER	POUNDS/YEAR
ROC	0.3	MFR'S DATA	22	22
NO _x	10.65	MFR'S DATA	779	779
SO _x	0.1645	0.05% SULFUR CONTENT	12	12
PM10	0.25	MFR'S DATA	18	18
CO	3.29	MFR'S DATA	241	241
HC+NO _x	N/A	N/A	N/A	N/A

(A) EMISSIONS ARE BASED ON 166 BHP, 200 HOURS/QUARTER AND 200 HOURS/YEAR OF OPERATION.

EQUIPMENT OPERATION

7. THE IC ENGINE SHALL OPERATE ONLY FOR THE FOLLOWING PURPOSES AND SHALL NOT OPERATE MORE THAN THE FOLLOWING HOURS:

TYPE OF OPERATIONAL HOURS	MAXIMUM ALLOWABLE OPERATION	
	HOURS/QUARTER	HOURS/YEAR
MAINTENANCE PURPOSES (A)	30	30
ALL OPERATION - MAINTENANCE (A) AND EMERGENCY (B)	200	200

(A) MAINTENANCE PURPOSES IS DEFINED AS: THE OPERATION OF AN IC ENGINE IN ORDER TO PRESERVE THE INTEGRITY OF THE IC ENGINE, ITS ASSOCIATED GENERATOR OR THE FACILITY'S ELECTRICAL DISTRIBUTION SYSTEM, OR WHEN REQUIRED BY THE SMAQMD TO VERIFY COMPLIANCE WITH THE APPLICABLE RULES AND REGULATIONS.

(B) EMERGENCY IS DEFINED AS: WHEN ELECTRICAL SERVICE FROM THE SERVING UTILITY IS INTERRUPTED BY AN UNFORESEEABLE EVENT.

8. THE IC ENGINE SHALL BE EQUIPPED WITH A NON-RESETTING HOUR METER, WITH A MINIMUM DISPLAY CAPABILITY OF 999 HOURS, TO ENSURE COMPLIANCE WITH CONDITION NUMBERS 6 AND 7.
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10. THE IC ENGINE SHALL BE FUELED WITH CARB DIESEL FUEL, OR AN ALTERNATIVE DIESEL FUEL THAT MEETS THE REQUIREMENTS OF THE VERIFICATION PROCEDURE (AS CODIFIED IN TITLE 13, CCR, SECTIONS 2700-2710), OR AN ALTERNATIVE FUEL, OR CARB DIESEL FUEL USED WITH FUEL ADDITIVES THAT MEETS THE REQUIREMENTS OF THE VERIFICATION PROCEDURE, OR ANY COMBINATION OF FUELS LISTED IN THIS CONDITION.

RECORD KEEPING

11. THE FOLLOWING RECORDS SHALL BE CONTINUOUSLY MAINTAINED ONSITE FOR THE MOST RECENT THREE YEAR PERIOD AND SHALL BE MADE AVAILABLE TO THE AIR POLLUTION CONTROL OFFICER UPON REQUEST. MONTHLY, QUARTERLY, AND YEARLY RECORDS SHALL BE MADE AVAILABLE WITHIN 30 DAYS OF END OF REPORTING PERIOD.

FREQUENCY	INFORMATION TO BE RECORDED
WHEN OPERATED	A. DATE. B. PURPOSE – EITHER MAINTENANCE (M) OR EMERGENCY POWER (E) C. NUMBER OF HOURS OF OPERATION.
MONTHLY	D. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/MONTH).
QUARTERLY	E. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/MONTH).
YEARLY	F. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/YEAR).
ALL FUEL DELIVERIES	G. RETAIN FUEL PURCHASE RECORDS THAT ACCOUNT FOR ALL FUEL PURCHASED FOR USE IN THE ENGINE. FUEL PURCHASE RECORDS SHALL INCLUDE: 1. IDENTIFICATION OF TYPE OF FUEL (I.E. CARB DIESEL, ALTERNATE DIESEL, ETC.) 2. QUANTITY OF FUEL PURCHASED. 3. DATE OF FUEL PURCHASE. 4. SIGNATURE OF PERSON RECEIVING FUEL. 5. SIGNATURE OF FUEL PROVIDER INDICATING THAT FUEL WAS DELIVERED.

YOUR APPLICATION FOR THIS AIR QUALITY PERMIT TO OPERATE WAS EVALUATED FOR COMPLIANCE WITH SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT (AQMD), STATE AND FEDERAL AIR QUALITY RULES. THE FOLLOWING LISTED RULES ARE THOSE THAT ARE MOST APPLICABLE TO THE OPERATION OF YOUR EQUIPMENT. OTHER RULES MAY ALSO BE APPLICABLE.

<u>AQMD RULE NUMBER</u>	<u>RULE TITLE</u>
201	GENERAL PERMIT REQUIREMENTS
202	NEW SOURCE REVIEW
401	RINGELMANN CHART
406	SPECIFIC CONTAMINANTS
420	SULFUR CONTENT OF FUELS
904	AIR TOXICS CONTROL MEASURES - STATIONARY COMPRESSION IGNITION ENGINES

IN ADDITION, THE CONDITIONS ON THIS PERMIT TO OPERATE MAY REFLECT SOME, BUT NOT ALL, REQUIREMENTS OF THESE RULES. THERE MAY BE OTHER CONDITIONS THAT ARE APPLICABLE TO THE OPERATION OF YOUR EQUIPMENT. FUTURE CHANGES IN PROHIBITORY RULES MAY ESTABLISH MORE STRINGENT REQUIREMENTS WHICH MAY SUPERSEDE THE CONDITIONS LISTED HERE. FOR FURTHER INFORMATION PLEASE CONSULT YOUR AQMD RULEBOOK OR CONTACT THE AQMD FOR ASSISTANCE.

COUNTY OF SACRAMENTO

DEPARTMENT OF FINANCE
SACRAMENTO, CALIFORNIA

Warrant Number 1102353163
Document Invoice

Date 04/12/2017
Discount

Page 1
Net Amount

1905680329	VARIANCEPETITION FDPU SAFCA(916) 874-8630	0.00	2,757.00
Warrant Total		0.00	2,757.00

Payment document	Check number	Date	Currency	Payment amount
2025172563	1102353163	04/12/2017	USD	*****2,757.00*

QUESTIONS REGARDING PAYMENT - PLEASE CALL THE PAYMENT SERVICES BUREAU AT: 916-874-7411 OR 1-800-735-2929 (TTY)

PRESENT THROUGH
WELLS FARGO BANK, N.A.
115 Hospital Drive
Van Wert, OH 45891

COUNTY OF SACRAMENTO

DEPARTMENT OF FINANCE
SACRAMENTO, CALIFORNIA

56-382
412 H
VOID SIX MONTHS AFTER DATE DRAWN

04/12/2017

NO. 1102353163

*** TWO THOUSAND SEVEN HUNDRED
FIFTY-SEVEN USD***

*****2,757.00*

AIR QUALITY MANAGEMENT DISTRICT
777 12TH ST
SACRAMENTO CA 95814-1908

Ben Lamera

1102353163 041203824 9600060056

SUMMARY OF OPERATIONAL PARAMETERS OF THE NEMDC STORMWATER PUMPING STATION (D-15)

January 15, 2004

Updated January 31, 2017

1.0 PURPOSE OF THIS DOCUMENT

The purpose of this document is to clarify and summarize the Operational Parameters of the NEMDC Stormwater Pumping Station (D-15), and to provide the operators with an overview of the purpose of the station. This document presents the reasons for the station and operational parameters and setting as described to plant operators on January 13, 2004, by John Bassett, an engineer with the Sacramento Area Flood Control Agency (SAFCA). Mr. Bassett was the project engineer for the design and construction of the pump station.

2.0 PURPOSE OF THE NEMDC STATION

The purpose of the NEMDC Station is to reduce the possibility of houses flooding in Elverta and Western Rio Linda. During a major storm event the station, in conjunction with the adjacent Dry Creek north levee, will prevent storm water that falls in the very large Dry Creek Watershed from flowing north into the much smaller watersheds that encompass the NEMDC East Stream Group in Elverta and Western Rio Linda. The pumps at the station pump storm water from the Elverta / Western Rio Linda area north of the station into the lower Dry Creek floodplain south of the station.

3.0 BACKGROUND

The Natomas East Main Drainage Canal (NEMDC) Stormwater Pumping Station was designed and constructed by SAFCA. Under an Interagency Agreement, Sacramento County maintains and operates the station for SAFCA.

The station was built to reduce the risk of houses flooding in the Elverta and Western Rio Linda areas during a major storm event. The Dry Creek Watershed is extremely large, approximately 100 sq. miles. The storm water that falls in the Dry Creek Watershed flows to the Natomas East Main Drainage Canal (also known as Steelhead Creek) at a location immediately south of the NEMDC Station. The NEMDC Station structure, and the Dry Creek north levee east of the station, prevents Dry Creek Watershed storm water (from a major storm event) from flowing north and flooding homes in the Elverta and Western Rio Linda areas.

Summary of Operational Parameters of the NEMDC Station

January 15, 2004, updated January 31, 2017

2 of 5

In a 100-year event, the storm water can build up as high as 40 feet NGVD29 (42.4 ft NAVD88) in elevation against the levee at the south side of the NEMDC Station. Houses in Elverta and Western Rio Linda will start to flood at an elevation of 33 feet NGVD29 (35.4 ft NAVD88). So during a major storm event the radial gate in the bypass channel at the station will close to prevent Dry Creek Watershed storm water from flowing north into the Upper NEMDC floodplain. During a major storm, the pumps at the station pump water from the Elverta and Western Rio Linda watersheds north of the station to the Dry Creek floodplain south of the station.

During normal wet weather periods (non-major storm events) water is allowed to flow from the Dry Creek floodplain northward through the bypass channel at the station. This northward flow of water helps to supply upstream wetland areas with water.

It is important to recognize that the Upper NEMDC channel has little fall from north to south. This translates into a low channel conveyance capacity. Therefore, even with the pump station and the levee in place, there is an extensive inundated floodplain north of the station as a result of the flows from the Elverta and Western Rio Linda watersheds. Roads, properties and garages in this floodplain will continue to flood during major storm events even with the pumps operating.

4.0 OPERATION ELEVATIONS

The station operates based on internal bubbler systems that provides water surface stages that are based on the National Geodetic Vertical Datum of 1929 (NGVD29). The ALERT Stations at the site report elevations to the Sacramento County ALERT System that are based on the North American Vertical Datum of 1988 (NAVD88). The NAVD88 datum is also currently used by the State's Department of Water Resources California Data Exchange Center (CDEC), which allows the ALERT data for water surface elevations at the station to be compared to regional data on the Sacramento and American Rivers.

The ALERT Station reliability and accuracy is not nearly as good as that of the bubbler system, as it is more susceptible to wind and other influences. ALERT data points are provided in this document so that those monitoring the station from a remote location can easily relate the ALERT data to the station's operational data.



Summary of Operational Parameters of the NEMDC Station

January 15, 2004, updated January 31, 2017

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5.0 STATION OPERATIONS

5.1 Operation of Bypass Channel Radial Gate

The radial gate condition in the bypass channel at the station is NORMALLY OPEN. The closing of the gate is to be based on the elevation of the water in the bypass channel. Therefore, the bypass channel water elevation shall be sensed by the bubbler located in the channel immediately south of the gate. Closing of the gate shall NOT be controlled based on level readings collected by the ALERT Stations at the site. Closing of the gate shall NOT be based on readings collected from the bubbler located in the station's wet well. The radial gate shall automatically close when the water elevation in the bypass channel (south of the gate) reaches **27.0 feet NGVD29 (29.4 ft NAVD88)**.

The amount of water that can flow through the bypass channel exceeds the total pumping capacity of the station (1,000 cfs), IF the upstream water surface elevation in the bypass channel exceeds the downstream water surface elevation in the bypass channel by 0.5 feet (6 inches) or more. At smaller differences between upstream (north of the station) and downstream (south of the station) water surface elevations, gravity flow will still likely exceed pumping flow, particularly at lower water surface elevations when wet well inflow is limited. Therefore the radial gate should be open if, based on readings of the staff gages in the bypass channel, the upstream water surface elevation is higher than the downstream water surface elevation.

The gate shall be opened manually, only. Bypass channel water surface elevation is NOT the only factor to be used in determining when the gate should be opened. The weather forecast for additional or reduced rainfall along with the bypass channel's upstream and downstream water surface elevations may affect the decision to open the gate. There may be a desire to allow storm water to flow from the Dry Creek floodplain north through the station's bypass channel. Therefore, a SAFCA Engineer should be consulted if there are any questions regarding opening the gate.

5.2 Operations of the Pumps

The following section describes operation of the pumps when the radial gate in the bypass channel is closed. This is assumed to be the condition when the downstream water surface elevation in the bypass channel is higher than the upstream water surface elevation

Summary of Operational Parameters of the NEMDC Station

January 15, 2004, updated January 31, 2017

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in the bypass channel and the downstream water surface in the bypass channel is above elevation 27.0 feet NGVD29 (29.4 ft NAVD88). (See also discussions under Section 5.1 above.)

Each of the three pumps has a capacity of 333 cubic feet per second (cfs). The firm pumping capacity of the station is 666 cfs. One pump is provided for redundancy, and is utilized in extreme flood events (high upstream water surfaces) if it is available. The elevation of the top of the concrete sill between the bypass channel and the pump wet well is 26.0 feet NGVD29 (28.4 ft NAVD88). Automatic starting and stopping of the pumps shall be based on the water elevation in the pump wet well.

CONTROL ACTION	Water Level in Pump Wet Well (Feet, NGVD29)	ALERT Level (Feet, NAVD88)
Notify Operators of Anticipated Pump Start	27.8	30.2
Call to start Lead Pump	28.0	30.4
Call to start 2 nd Pump (Lag)	29.0	31.4
Call to start 3 rd Pump (Lag-Lag)	31.0	33.4
Call to stop 3 rd Pump	28.0	30.4
Call to stop 2 nd Pump	27.0	29.4
Call to stop Lead Pump	26.6	29.0

To assure that level sensors are reading a true water level reading before pumps are turned on, there shall be a 5 minute delay between pump call and pump start. This delay shall be a control set point that the operator can increase (to maximum of 30 minutes) to prevent excessive starting and stopping of the pumps due to minor water surface fluctuations (waves, etc.) in the wet well.

It is important to note that calling the 3rd Pump (Lag-Lag) to operate at an elevation lower than the designated set point elevation does not contribute to lowering the upstream floodplain water surface elevation. Operating the 3rd Pump at lower elevations produces pump discharge flows that exceed the channel and wet well inflow capacity. This dewateres the wet well and causes all three pumps to shut down until the water surfaces recover to the station operating levels.



Summary of Operational Parameters of the NEMDC Station

January 15, 2004, updated January 31, 2017

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5.3 Alarm Set Points

Alarms shall be activated based on readings from the water level bubbler sensor in the wet well.

ALARM STATUS	Wet Well Elevation (Feet, NGVD29)	ALERT Level (Feet, NAVD88)
High Alarm	32.0	34.4
Medium High Alarm	30.0	32.4
Low Alarm	22.0	N/A
No Alarm	between 22.0 and 30.0	

6.0 TOTAL ANNUAL ALLOWED HOURS OF OPERATION

The pumps and the backup power generator at the station are powered by diesel engines. These engines operate under permits issued by the Sacramento Metropolitan Air Quality Management District. The permits allow 30 hours of operation each year for maintenance of each engine and 200 hours of total operation for each engine each year. Therefore, it is important to periodically rotate the lead, lag and lag-lag sequencing of the pumps so that each pump is used on a proportional basis for station operation.

7.0 OPERATIONS AND MAINTENANCE INFORMATION

There are three sources of operational or maintenance information for the NEMDC Station:

- Basis of Design Report
- Operation and Maintenance Manual (Prepared by SAFCA)
- Sacramento County's on-site Maintenance Manual.

Original By: Stephen Kenning, Sacramento County Water Resources

Update By: John Bassett, SAFCA



[illegible]

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

Findings Required for Grant of Variance - Checklist

Health and Safety Code section 42352 states that no variance shall be granted unless the hearing board makes all of the following (six) findings:

(1) The petitioner is, or will be, in violation of, a rule or permit condition.	
(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.	
(3) The closing or taking would be without a corresponding benefit in reducing air contaminates.	
(4) The petitioner has given consideration to curtailing operations of the source in lieu of obtaining a variance.	
(5) During the variance period, the petitioner will reduce excess emissions to the maximum extent feasible.	
(6) If requested by staff, Petitioner will monitor and report excess emissions.	

Hearing Date 7/18/2017
Petitioner City of Sacramento 28th Street Landfill
Petition Type Short-term Variance
Petition Number 2017-006



Petitioner Request

Petitioner requests a short-term variance for its landfill gas collection system, which was severely damaged by a fire on June 19, 2017. The City requests relief from Permit to Operate 12762(Rev01), Condition 10, which requires that landfill gas be collected at a "sufficient extraction rate." Landfill gas must be extracted at a rate sufficient to control/eliminate emissions through the surface of the landfill. The extraction rate is a function of the number of wells and the vacuum applied. Fifteen landfill gas (LFG) extraction wells were damaged in the fire and landfill gas cannot be extracted from these wells. City needs time to replace the damaged pipes and wellheads.

Recommendation

District staff does not oppose the grant of a short-term variance.

Petitioner Address

City of Sacramento
Department of Public Works, Recycling and Solid Waste Division
2813 Meadowview Road
Sacramento, CA 95832

Equipment Location

20 28th Street, Sacramento

Discussion

No variance may be granted unless the Hearing Board makes all of the six findings set forth under section 42352 (a). It is Petitioner's burden to prove, by a preponderance of the evidence, facts sufficient to support the mandatory findings.

BACKGROUND

The city of Sacramento Department of Public Works, Recycling and Solid Waste Division operates a landfill gas collection system to continuously collect gas generated from the City's closed 28th Street landfill. The landfill gas is routed to a landfill gas flare for destruction. The gas collection system is comprised of landfill gas wells, interconnecting piping and blowers to extract the gas.

On June 19, 2017, an automobile fire on the adjacent freeway spread to the 28th St. landfill. The subsequent grass fire badly damaged a large section of landfill waste unit WMU-B. Landfill gas wells and piping were damaged or destroyed. Petitioner has isolated the damaged portions of the gas collection system allowing landfill gas to be extracted from the unburned sections of the landfill.

The City notified the District immediately after the fire damage was confirmed by landfill operations staff. An SMAQMD Rule 602 breakdown condition was reported by the City and verified by the District. The breakdown condition reporting form is included in Attachment A. Until the damaged landfill gas wells and piping are repaired, there is a potential for fugitive emissions of landfill gas through the surface of the landfill.

FINDINGS The six findings below are set forth under Health and Safety Code 42352, subs. (a)(1-6).

Finding 1 – Violation

"That the petitioner for a variance is, or will be, in violation of 41701 [opacity] or of any rule, regulation, or order of district."

Petitioner is in violation of Conditions 10, 14 and 15 of its permit to operate. These conditions require continuous operation of the landfill gas extraction system. Additionally, continued non-operation of the landfill gas extraction system is likely to cause a violation of conditions 5 and 6 of the permit to operate that limits fugitive emissions of landfill gas.

Finding 2 - Reasonable Control

"That, due to conditions beyond the reasonable control of 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. In making those findings where the petitioner is a public agency, the hearing board shall consider whether or not immediate compliance would impose an unreasonable burden on an essential public service."

The question here is two-fold:

i. *Whether the cause of the violation is beyond Petitioner's reasonable control.*

The Board may consider the extent to which the Petitioner took reasonable and timely steps to comply with the requirements to seek a variance (Health and Safety Code § 42352.5, subs. (a)(1)). In this case, the Petitioner promptly applied for and received relief from a violation by the Rule 602 Breakdown Condition. The District did not recommend the Petitioner seek a 15-day Emergency Variance because substantial repairs to the landfill gas collection system could not be completed by then.

ii. *Whether, because of its inability to comply, the denial of a variance would result in either an arbitrary or unreasonable taking of property or the practical closing or elimination of its business.*

In making this finding, the Board may consider whether requiring compliance would impose an unreasonable burden on an essential public service, which includes landfill gas control facilities. Here, the permit conditions require the Petitioner to continuously operate the entire landfill gas collection system, but because certain wells and pipes were damaged, they cannot physically be operated. Requiring Petitioner to operate is not merely a burden -- it is an impossibility. The only alternative is to violate its permit pending completion of repairs. In addition, Petitioner states the fire was not caused by its own actions and could not have been reasonably prevented. District staff confirmed the source of the fire was an automobile that burned on the freeway shoulder and that the grass on the landfill had been mowed and was reasonably short.

Finding 3 - Relative Benefit to Air Quality

"That the closing or taking would be without a corresponding benefit in reducing air contaminants."

Maintenance of an adequate landfill gas collection system provides an air quality benefit by minimizing the release of fugitive emissions of volatile organic compounds (VOC) and methane, a greenhouse gas.

Finding 4 - Curtailment of Operations

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

Petitioner has isolated the damaged area and repaired some of the equipment, but operations cannot be curtailed because landfill gas generates continuously.

Finding 5 - Reduction of Excess Emissions

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

There are no operational changes or additional controls available to reduce excess emissions. The continued operation of the undamaged wells will minimize excess emissions in the affected area.

Finding 6 - Monitoring

"During the period the variance is in effect, that 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."

Staff is not requesting any emissions monitoring. The variance will not relieve the Petitioner from existing monitoring and recordkeeping requirements in the permit.

NUISANCE FINDING

"No variance shall be granted if the operation will result in a violation of Section 41700."

Staff has not identified any violation of 41700 that may result from the granting of this variance.

OTHER REQUIREMENTS

The Hearing Board may prescribe other requirements as set forth under Health and Safety Code 42353.

ATTACHMENTS:

Description	Type	Upload Date
Petition for Short-term Variance	Petitions	7/12/2017
Attachment A, Breakdown Report	Supporting Documents	7/10/2017
Table of Required Findings to Grant Variance	Supporting Documents	7/12/2017

Approvals/Acknowledgements

Division Manager or Designee: Angela Thompson, Report Approved 7/12/2017

District Counsel or Designee: Kathrine Pittard, Approved as to Form 7/12/2017



BEFORE THE HEARING BOARD
OF THE
SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

PETITION APPLICATION

Petitioner's Name, Business Name, and Address John Febbo Integrated Waste Planning Superintendent City of Sacramento, Recycling & Solid Waste Division 2812 Meadowview Road, Building 1 Sacramento, CA 95832 Telephone No: (916) 808-3797	For Office Use Only
	Variance No. <u>2017-606, Short-term</u> <input type="checkbox"/> Filing Fee Received, Receipt No: _____ <u>10</u> Day Notice of Hearing Required

Hearing Date July 18, 2017
Public Notice Date July 8, 2017

INSTRUCTIONS

- A. Please fill in the petitioner's name, business name, address, and telephone number in the above space.
- B. The petitioner is (check one):
☐ Individual ☐ Partnership ☐ Corporation ☒ Other (specify)
- C. Please refer to the applicable sections of the California Health & Safety Code (H&S Code) and the Rules and Regulations of the Sacramento Metropolitan Air Quality Management District (SMAQMD) when completing the petition. The SMAQMD staff and the Business Environmental Resource Center are available to assist Small Businesses with the technical aspects of filling out this form and the development of compliance schedules.¹
- D. Please complete attached pages with thorough and documented factual responses. Review Rule 601, Procedure Before the Hearing Board, carefully to ensure the petition is complete. The petition and anything you supply in support of your petition will become part of the public record.
- E. Please submit this form and filing fee to SMAQMD, 777 12th Street, Third Floor, Sacramento, California 95814. The submittal date for a petition shall be the date on the receipt issued by the District acknowledging the petitioner's full payment of the required initial fee and the newspaper publication fee (if required). After receipt, SMAQMD will notify you of the time and date of your hearing.

¹ See Health and Safety Code section 42323. The Business Environmental Resource Center's Telephone number is (916) 649-0225.

- F. Please use a check mark in the ☐ to identify the type of petition being submitted and circle the appropriate fee. Fee amounts include the newspaper publishing fee (when required). Fees in parentheses are for small business as defined by Rule 302:

Variance Petitions		Fee	
<input checked="" type="checkbox"/>	Interim Variance	\$1,024	(\$765)
<input checked="" type="checkbox"/>	Short-Term Variance	\$1,024	(\$765)
<input type="checkbox"/>	Regular Variance	\$1,084	(\$825)
<input type="checkbox"/>	Emergency Variance	\$495	(\$495)

Product Variance Petitions			
<input type="checkbox"/>	Interim Product Variance	\$1,024	(\$765)
<input type="checkbox"/>	Product Variance	\$1,084	(\$825)

Petition to Modify an Order Permitting a Variance			
<input type="checkbox"/>	Interim Variance	\$1,084	(\$825)
<input type="checkbox"/>	Short-term Variance	\$1,084	(\$825)
<input type="checkbox"/>	Regular Variance	\$1,084	(\$825)
<input type="checkbox"/>	Interim Product Variance	\$1,084	(\$825)
<input type="checkbox"/>	Product Variance	\$1,084	(\$825)

Petition to Modify Increments of Progress			
<input type="checkbox"/>	Interim Authorization—Variance	\$1,024	(\$765)
<input type="checkbox"/>	Interim Authorization—Product Variance	\$1,024	(\$765)
<input type="checkbox"/>	Variance	\$1,024	(\$765)
<input type="checkbox"/>	Product Variance	\$1,024	(\$765)

Petition to Modify a Final Compliance Date			
<input type="checkbox"/>	Variance	\$1,084	(\$825)
<input type="checkbox"/>	Product Variance	\$1,084	(\$825)

Permit Action Petition			
<input type="checkbox"/>	Review of Permit Denial	\$1,084	(\$825)
<input type="checkbox"/>	Review of Conditional Approval	\$1,084	(\$825)
<input type="checkbox"/>	Review of Permit Suspension	\$1,084	(\$825)

Other Petitions			
<input type="checkbox"/>	Rehearing of a Variance Decision	\$1,084	(\$825)
<input type="checkbox"/>	Review of an Emission Reduction Credit Refusal	\$1,084	(\$825)
<input type="checkbox"/>	Petition by an Aggrieved Party	\$1,084	(\$825)

- G. Please enclose filing fee with each petition. Make checks payable to the **SMAQMD**. No petition will be processed unless filing fee is submitted with petition.

In addition to the filing fee, SMAQMD may subsequently charge a petitioner a fee for staff time exceeding 7.5 hours and/or an "excess duration fee." See sections 301.2 and 301.4 of Rule 302—HEARING BOARD FEES.

CONTENTS OF PETITION FOR VARIANCE

(Please type or print clearly)

1. Name, title, address, and phone number of person authorized to receive notices regarding the petition:

Name, Title, and Address

Telephone Number

John Febbo

(916) 808-3797

Integrated Waste Planning Superintendent

City of Sacramento, Recycling and Solid Waste Division

2812 Meadowview Road, Building 1

Sacramento, CA 95832

2. Names and addresses of partners or officers:

Name(s)

Address(es)

John Olesen

20 28th Street, Sacramento, CA 95816

Jim Gabrik

20 28th Street, Sacramento, CA 95816

Chris Thoma

2812 Meadowview Road, Bldg. 1, Sacramento, CA 95832

3. Name and location of business or activity if different from #1 above:

4. Briefly describe the nature of your business:

Municipality

5. Briefly describe the equipment which is the subject of this petition. List SMAQMD Permit Nos., indicate if equipment is exempt from Permit requirements, or answer No. 6 below:

The affected equipment, which is covered by Permit to Operate number TV2011-08-01 consists of multiple extraction
landfill gas (LFG) extraction wells used to remove LFG from the 28th Street Landfill, a closed municipal landfill. 15 wells in
Waste Management Unit (WMU) B (Wells 4-18) are damaged and off-line. Another 10 perimeter wells (Wells 45-54) are also
damaged and off-line. Another 12 perimeter wells (Wells 55-66) are undamaged, but off-line due to pipe damage.

6. I have not received permit(s) yet. My application for a Permit To Operate was submitted on

_____.

7. Have you been issued a Notice of Violation concerning the operation of this equipment?

☐ YES ☒ NO

8. California Health and Safety Code section 41700 states:

"Except as otherwise provided in Section 41705² no person shall discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

Is your company or agency (or will your company or agency be) in violation of California Health and Safety Code section 41700?

☐ YES ☒ NO

If yes, please explain:

If yes, please also attach the name(s) and address(es) of any complainant(s).

² Among other things, section 41705 exempts (from section 41700) odors from agricultural operations. See section 41705 for details.

9. Is your company or agency (or will your company or agency be) in violation of:

- a. California Health and Safety Code section 41701³ or
- b. Any Sacramento Metropolitan Air Quality Management District (SMAQMD) Rule, regulation, order, and/or Permit condition?

If so, please explain the violation and please cite the statute, Rule, regulation, order, and/or Permit condition that is being, or will be, violated.

The City of Sacramento is in violation of permit condition 10 of permit 12762. There are 15 wells that are damaged and off-line, which has resulted in no vacuum applied to these LFG extraction wells.

Please attach a copy of the pertinent Permit(s) to this petition. Remember, if any Permit or other information you supply as part of this variance petition process contains confidential information, please contact SMAQMD Office of District Counsel before disclosing such confidential material.

10. If you are required to comply immediately with the statute, Rule, regulation, order, or Permit condition (cited in your response to Question No. 9 above), are there conditions beyond your reasonable control that would result in any of the following situations:

- a. An arbitrary or unreasonable taking of your property; or
- b. The practical closing or elimination of a lawful business; or
- c. An unreasonable burden on a publicly owned or operated "essential public service," *i.e.*, a prison, detention facility, police or fire fighting facility, school, health care facility, landfill, gas control or processing facility, sewage treatment works, or water delivery operation?

Please discuss the evidence supporting your conclusion:

The fire was caused by a vehicle fire on Business 80 Westbound, which is directly adjacent to the City's 28th Street Landfill. Despite the fact that both Sacramento Fire and Solid Waste personnel were on scene immediately, the fire spread quickly, melting pipe and LFG wellheads. City staff needs time to follow appropriate purchasing procedures, as well as allow selected vendors sufficient time to deliver the necessary materials and equipment.

Please be prepared to supply documentation or other proof of your evidence to the Hearing Board or the SMAQMD staff.

³ Among other things, section 41701 pertains to the opacity of visible air pollution such as smoke. The section specifies that emissions shall not be as dark as, or darker than, the No. 2 shade designation on a Ringelmann Chart.

11. Would the taking of property, closing or elimination of a lawful business, or unreasonable burden on an essential public service be without a corresponding benefit in reducing air contaminants?

Please discuss your evidence:

This work is required to resume LFG extraction from the 28th Street Landfill. If the wells do not resume applying a vacuum, there is an increased likelihood of LFG leaving this closed landfill and collecting in nearby residences and businesses.

Please be prepared to supply documentation or other proof of your evidence to the Hearing Board or the SMAQMD staff.

12. Please discuss the consideration your company or agency has given to:

- Curtailing the operation of the source in lieu of obtaining a variance, and
- Enacting other alternatives to the variance (besides curtailment), and
- Why operation curtailment or other alternatives are less desirable or feasible than seeking this variance.

City staff reviewed the situation to see if there are feasible alternatives to requesting this variance. The only viable option is to repair and replace the pipes, wellheads and other equipment that was affected by the fire, which will take longer than the current Permit to Operate will allow.

13. During the period the variance is in effect, do you agree to monitor or otherwise quantify emission levels from the source, if requested to do so, and report these emission levels to SMAQMD pursuant to a schedule established by the District?

☒ YES ☐ NO

Monitoring of emission levels is often necessary while a variance is in effect. Monitoring helps to guarantee minimal environmental consequences while a source is out of compliance with District regulations. In the absence of a monitoring program, the Hearing Board may be unable to find that a non-compliant activity will not be a public nuisance.

If you are unwilling to monitor emission levels, please explain why not and describe why your non-compliant activity will not create a public nuisance:

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

14. Estimate the *excess emissions* that may occur while your requested variance is in effect. *Excess emissions* are emissions of air pollutants beyond the emissions allowed by SMAQMD Rules, regulations, orders or Permit conditions. SMAQMD staff may be able to assist you with this estimate:

POLLUTANT(S) (e.g., VOC, NO _x , PM10, PM2.5, Hexavalent Chromium)	LBS. PER DAY OF EXCESS EMISSIONS	NO. OF DAYS EXCESS EMISSIONS PRODUCED	% OPACITY (If Applicable)
After a similar fire in 2008 at this landfill, the surface emissions were reviewed to see if there were any excess emissions while the system was not applying a vacuum in the affected area. Any increase in surface emissions was found to still be in compliance with the site's Permit to Operate. Similar was found in 2014 when the flare system was off-line for an extended period of time, resulting in no vacuum applied to the LFG extraction system for some time. As a result, City staff assumes the same will occur in this instance.			

Please Note: SMAQMD will charge a petitioner an "excess duration fee" for a variance that:

- Is in effect for more than 3 months, and
- Is issued for equipment identified by SMAQMD staff report as an excess emissions source.

The excess duration fee is:

- \$165 per month exceeding 3 months for small businesses, or
- \$275 per month exceeding 3 months for large businesses.

See section 301.4 in Rule 302—HEARING BOARD FEES. SMAQMD will charge the "excess duration fee" following completion of the staff report for the variance. The fee is in addition to the initial filing fees collected by SMAQMD.

15. Please describe the action you will take to reduce *excess emissions* to the maximum extent feasible. If you considered a specific course of action, but excluded it as infeasible, please list the action and explain why it is infeasible.

City staff views these repairs as a high priority, and will order the necessary materials and equipment as fast as

City policy allows, selecting vendors that can provide these items sooner rather than later.

16. What are the advantages and disadvantages to the residents of the District from requiring compliance or resulting from granting this petition request?

The Advantages:

This system is required to maintain compliance with multiple State of California regulations. As a result,
the City of Sacramento is planning on repairing the affected parts of the LFG extraction system, whether
or not the variance is granted. City staff, however, would appreciate the variance in order to avoid a
Notice of Violation from the SMAQMD and the associated fines.

The Disadvantages:

17. Please discuss your past diligence in complying with the applicable standards:

This landfill experienced a similar fire around Labor Day weekend of 2008. City staff was able to
restore the LFG extraction system within a few months, replacing damaged pipes and wellheads. Since
then, the City has been diligently repairing and upgrading the LFG extraction system, including
installing a new flare, which became operation in February 2016.

18. Describe your method of achieving compliance, detailing any equipment to be installed or modifications to be made:

City staff will replace the damaged pipe as well as the 10 wellheads that were damaged by the fire.

19. Fill in the date on which you expect to be in compliance with the rules and/or regulations:

If more than one year, attach a schedule of increments of progress, identifying the dates of each milestone. The schedule shall include, but not be limited to, the date for (a) submitting plans, (b) awarding contracts, (c) commencing construction, (d) completing construction, and (e) achieving final compliance.

NOTE: Do not overly rely on a potential future change in the law, including SMAQMD Rules and regulations, as a means of coming into compliance. The Hearing Board may not and does not control the regulatory agenda of any law-making body such as the District's Board of Directors.

November 1, 2017

Any Additional Information:

Any person who knowingly provides false information in this petition or any supporting documentation may be subject to penalties up to \$35,000 under Health and Safety Code Section 42402.4.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: 

Date: 11-15-2017

Name (Print): John Febbo

Title: Integrated Waste Planning Superintendent

From: John Febbo
To: Chris Thoma
Subject: RE: Air Board variance petition
Date: Monday, June 26, 2017 5:06:41 PM

Hi Chris,

I reviewed. Looks good to me. Consider this my approval to initial/sign for me. If you need to get home, I can do the sign scan and email later this evening, or in the morning. Just let me know deadline.

Thanks for all your hard work! Have a great vacation.

John

From: Chris Thoma
Sent: Monday, June 26, 2017 5:02 PM
To: John Febbo <JFebbo@cityofsacramento.org>
Cc: John Olesen <JOlesen@cityofsacramento.org>
Subject: Air Board variance petition
Importance: High

John,

Attached is the form. If you like what you see, please print, sign, scan and email it to Don Dumaine (ddumaine@airquality.org) at the Air Board. Or, if you send me an email approval, I can do the same, signing my name with "For John Febbo" on it, with your email attached.

Thank you,
Chris

--
Chris Thoma
Program Analyst
Recycling and Solid Waste Division
City of Sacramento, Department of Public Works
2812 Meadowview Road, Building #1
Sacramento, CA 95832
Phone: (916) 808-4833
Email: cthoma@cityofsacramento.org

505388



AIR QUALITY
MANAGEMENT DISTRICT

PERMIT TO OPERATE

28th Street Landfill
Solid Waste Division
City of Sacramento
2812 Meadowview Road
Sacramento, CA 95832

Equipment Location: 20 28th Street, Sacramento

Permit No.	Equipment Description
12762(Rev01)	Landfill and landfill gas collection system consisting of: <ol style="list-style-type: none">1. Landfill area designated as WMU-A and WMU-B.2. Perimeter wells.3. Interior wells4. Piping system to collect landfill gas from perimeter and interior wells and direct it to the LFG flares (P/O 09313 and P/O 14749).5. Landfill gas blower.

SUBJECT TO THE FOLLOWING CONDITIONS:

GENERAL REQUIREMENTS

1. The equipment shall be properly maintained.
2. The Air Pollution Control Officer and/or authorized representatives, upon the presentation of credentials, shall be permitted:
 - A. To enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this Permit to Operate, and
 - B. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this Permit to Operate, and
 - C. To inspect any equipment, operation or method required in this Permit to Operate, and
 - D. To sample emissions from the source or require samples to be taken.

Date Issued: 03-26-2001
Date Revised: 03-12-2007
Date Expires: 09-01-2007 (unless renewed)

Larry Greene
Air Pollution Control Officer

by: Bruce Nixson

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT
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3. This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26, Part 4, Chapter 3, of the California Health and Safety Code or the rules and regulations of the SMAQMD.
4. A legible copy of this Permit to Operate shall be maintained on the premises with the equipment.

EMISSION LIMIT REQUIREMENTS

5. The landfill gas collection system shall operate such that the methane concentration is less than 500 ppmv above background at the surface of the landfill.
[40 CFR 60.753(d)]
6. The fugitive emissions from the landfill shall not exceed the following:

Pollutant	Maximum Allowable Emissions (A) lb/quarter
ROC	1,601

(A) Emissions are based on the following assumptions:

1. The landfill gas collection system captures 85% of the generated landfill gas. This results in 353 scfm of landfill gas released as a fugitive emission.
2. The landfill gas contains an average NMOC concentration of 822 ppm (as methane).
3. The collection system operates 24 hours/day and 92 days/quarter.
4. As a conservative assumption, all NMOC is treated as ROC. The City of Sacramento may speciate NMOC to account for and exclude exempt (non-ROC) compounds when determining compliance with this condition.

EQUIPMENT OPERATION REQUIREMENTS

7. The maximum design capacity of the 28th Street Landfill shall not exceed 6.514 million cubic yards.
8. The landfill gas collection system shall be designed to handle the maximum expected gas flow rate from that portion of the landfill that warrants control over the intended use period of the landfill gas control system.
[40 CFR 60.752(b)(2)(ii)(A)(1)]
9. Landfill gas shall be collected from each area, cell or group of cells in the landfill in which the initial solid waste has been placed for a period of 5 years or more if active or 2 years or more if closed or at final grade.
[40 CFR 60.753(a)]
10. Landfill gas shall be collected at a sufficient extraction rate.
[40 CFR 60.752(b)(2)(ii)(A)(3)]
11. The landfill gas collection system shall be designed to minimize off-site migration of subsurface landfill gas.
[40 CFR 60.752(b)(2)(ii)(A)(4)]

12. The landfill gas collection system shall operate such that all collected gases are vented to the flares or delivered to Blue Diamond Almond Growers. In the event the collection or control system is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within 1 hour.

[40 CFR 60.753(e)]

13. A sampling port and a temperature measuring device or an access port for temperature measurements shall be installed at each landfill gas wellhead.

[40 CFR 60.756(a)]

14. The landfill gas collection system shall operate such that each landfill gas wellhead exhibits negative pressure except under the following conditions:

A. A fire or increased well temperature. The owner or operator shall record instances when positive pressure occurs in efforts to avoid a fire.

B. Use of a geomembrane or synthetic cover.

C. A decommissioned well.

D. The gas migration well is not placed in refuse (migration control well).

E. A well is temporarily shut-off or disconnected to prevent a fire.

[40 CFR 60.753(b)]

15. A. The landfill gas collection system shall operate such that each interior landfill gas wellhead achieves the following:

i. A landfill gas temperature less than 55°C and

ii. Either a nitrogen level less than 20 percent or an oxygen level less than 5 percent.

B. The owner or operator may establish a higher operating temperature, nitrogen or oxygen value at a particular well. A higher operating value demonstration shall show supporting data that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methanogens.

[40 CFR 60.753(c)]

MONITORING AND CORRECTIVE ACTION REQUIREMENTS

16. A device shall be installed that records flow to or bypass of the flare. The owner or operator shall either:

A. Install, calibrate and maintain a landfill gas flow rate measuring device that shall record the flow to the flare at least every 15 minutes; or

B. Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration.

[40 CFR 60.756(b)(2)]

17. If applicable, a visual inspection of the seal or closure mechanism on the landfill gas bypass valve for the flare or landfill gas treatment system shall be conducted at least once every month to ensure that the valve is maintained in the closed position and that the landfill gas flow is not diverted through the bypass line.

[40 CFR 60.756(b)(2)(ii)]

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT
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18. Gauge pressure shall be measured monthly in the landfill gas collection header at each individual wellhead.

A. If a positive pressure exists, action shall be initiated to correct the exceedance within 5 calendar days, except for the conditions allowed under Condition No. 14. If negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial measurement of positive pressure.

B. Any attempted corrective measure shall not cause exceedances of other operational or performance standards.

[40 CFR 60.755(a)(3) and 40 CFR 60.756(a)(1)]

19. Temperature and either the nitrogen concentration (%) or the oxygen concentration (%) shall be measured monthly for each interior well.

A. The nitrogen level shall be determined using U.S. EPA Method 3C unless an alternative method is established as allowed by 40 CFR 60.752(b)(2)(i).

B. The oxygen level shall be determined using U.S. EPA Method 3A or 3C unless an alternative method is established as allowed by 40 CFR 60.752(b)(2)(i).

C. If a well exceeds the operating parameters stated in Condition No. 15, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance.

D. Any attempted corrective measure shall not cause exceedances of other operation or performance standards.

[40 CFR 60.753(c)(1), 40 CFR 60.753(c)(2), 40 CFR 60.755(a)(5), 40 CFR 60.756(a)(2), 40 CFR 60.756(a)(3)]

20. Surface concentrations of methane shall be measured quarterly around the perimeter of the collection area, along a pattern that traverses the landfill at 30 meter intervals (or a site specific established spacing) and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover. The owner or operator may establish an alternative traversing pattern that ensures equivalent coverage. A surface monitoring design plan shall be developed that includes a topographical map with the monitoring route and the rationale for any site specific deviations from the 30 meter intervals. Areas with steep slopes or other dangerous areas may be excluded from the surface testing.

Any closed landfill that has no monitored exceedances of the operational standard in three consecutive quarterly monitoring periods may skip to annual monitoring. Any methane reading of 500 ppm or more above background detected during the annual monitoring returns the frequency to quarterly monitoring.

[40 CFR 60.756(f)]

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- A. Each area shall be monitored using an organic vapor analyzer, flame ionization detector or other portable monitor.
- B. The organic vapor analyzer, flame ionization detector or other portable monitor shall meet the following specifications:
 - i. The portable analyzer shall meet the instrument specifications provided in Section 3 of U.S. EPA Method 21, except that "methane" shall replace all references to VOC.
 - ii. The calibration gas shall be methane, diluted to a nominal concentration of 500 ppmv in air.
 - iii. To meet the performance evaluation requirements in Section 3.1.3 of U.S. EPA Method 21, the instrument evaluation procedures of Section 4.4 of U.S. EPA Method 21 shall be used.
 - iv. The calibration procedures provided in Section 4.2 of U.S. EPA Method 21 shall be followed immediately before commencing a surface monitoring survey.
- C. The background concentration shall be determined by moving the probe inlet upwind and downwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter wells.
- D. Surface emission monitoring shall be performed in accordance with Section 4.3.1 of U.S. EPA Method 21, except that the probe inlet shall be placed within 5 to 10 centimeters of the ground. Monitoring shall be performed during typical meteorological conditions.
- E. Any reading of 500 ppmv or more of methane above background at any location shall be recorded as a monitored exceedance and the following actions shall be taken. As long as the specified actions listed in subsections i. through v. below are taken, the exceedance is not a violation of Condition No. 5.
 - i. The location of each monitored exceedance shall be marked and the location recorded.
 - ii. Cover maintenance or adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance shall be made and the location shall be re-monitored within 10 calendar days of detecting the exceedance.
 - iii. If the re-monitoring of the location shows a second exceedance, additional corrective action shall be taken and the location shall be monitored again within 10 days of the second exceedance. If the re-monitoring shows a third exceedance for the same location, the action specified in subsection v. below shall be taken, and no further monitoring of that location is required until the action specified in subsection v. below has been taken.
 - iv. Any location that initially showed an exceedance but has a methane concentration less than 500 ppmv methane above background at the 10-day re-monitoring specified in subsection ii. or iii. above shall be re-monitored 1 month from the initial exceedance. If the 1-month remonitoring shows a concentration less than 500 ppmv methane above background, no further monitoring of that location is required until the next quarterly monitoring period. If the 1-month remonitoring shows an exceedance, the actions specified in subsection iii. above or v. below shall be taken.
 - v. For any location where monitored methane concentration equals or exceeds 500 ppmv above background three times within a quarterly period, a new well or other collection device shall be installed within 120 calendar days of the initial exceedance. An alternative remedy to the exceedance, such as upgrading the blower, header pipes or control device, and a corresponding timeline for installation may be submitted to the Air Pollution Control Officer for approval.

[40 CFR 60.753(d), 40 CFR 60.755(c)]

- 21. A program shall be implemented to monitor for cover integrity and implement cover repairs as necessary on a monthly basis.

[40 CFR 60.755(c)(5)]

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PERMIT TO OPERATE**RECORDKEEPING AND REPORTING REQUIREMENTS**

22. The following records shall be continuously maintained onsite for the most recent five year period and shall be made available to the Air Pollution Control Officer upon request. Monthly and quarterly records shall be made available within 30 days of the end of the reporting period.

Frequency	Information to be recorded
At all times	<p>A. The design capacity report which is the basis for this facility being subject to the provisions of 40 CFR 60.752(b), the current amount of solid waste in-place and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable. [40 CFR 60.758(a)]</p> <p>B. The maximum expected gas generation flow rate as calculated using the methodology in 40 CFR 60.755(a)(1). [40 CFR 60.758(b)(1)(i)]</p> <p>C. The density of wells, horizontal collectors, surface collectors or other gas extraction devices determined using the procedures in 40 CFR 60.759(a)(1). [40 CFR 60.758(b)(1)(ii)]</p> <p>D. Continuous record of either:</p> <ul style="list-style-type: none"> i. The indication of landfill gas flow to the flare or the indication of landfill gas bypass flow, or ii. Monthly inspections of car-seals or lock-and-key configurations used to seal landfill gas bypass lines. [40 CFR 60.758(c)(2)] <p>E. Record of all collection system exceedances of the following operational standards at each individual well:</p> <ul style="list-style-type: none"> i. Landfill gas collection wellhead gauge pressure - Condition No. 14. ii. Landfill gas temperature - Condition No. 15.A. iii. Either nitrogen or oxygen concentration - Condition No. 15.A. iv. Surface methane concentrations - Condition No. 5. <p>Where there is an exceedance, the reading in the subsequent month shall be recorded and whether or not the second reading is an exceedance and the location of the exceedance. [40 CFR 60.758(e)]</p> <p>F. Plot map showing each existing and planned landfill gas collector in the system and providing a unique identification location label for each collector. [40 CFR 60.758(d)]</p> <p>G. Record of the installation date and location of all newly installed landfill gas collectors. [40 CFR 60.758(d)(1)]</p>

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Frequency	Information to be recorded
	H. If applicable, documentation of the nature, date of deposition, amount and location of asbestos-containing or non-degradable waste excluded from collection as well as any non-productive areas excluded from collection. [40 CFR 60.758(d)(2)]
Monthly	I. Record of the following equipment operating parameters specified to be monitored at each individual well: i. Landfill gas well head gauge pressure - Condition No. 14. ii. Landfill gas temperature - Condition No. 15.A. iii. Either nitrogen or oxygen level - Condition No. 15.A. [40 CFR 60.758(c)] J. Record of monitoring for cover integrity and any cover repairs implemented.
Quarterly	K. Record of the following: i. Surface methane concentrations - Condition No. 5. [40 CFR 60.758(c)]

23. A written report shall be submitted to the Air Pollution Control Officer by the date indicated and shall contain the following information.

Frequency	Information to be submitted
Report by: (1) July 30 of each year for the six month period: Jan. - June and (2) February 28 of each year for the six month period: July - Dec. [40 CFR 63.1980(a)]	A. Value and length of time for exceedance of the following parameters at each individual well: i. Landfill gas well head gauge pressure - Condition No. 14 a. Identify instances when positive pressure occurs in efforts to avoid a fire. ii. Landfill gas temperature - Condition No. 15.A. iii. Either nitrogen or oxygen concentration - Condition No. 15.A. iv. Surface methane concentrations - Condition No. 5. [40 CFR 60.757(f)(1)] B. If applicable, description and duration of all periods when the landfill gas stream is diverted from the flare through a landfill gas bypass line or the indication of bypass flow as specified to be monitored in Condition No. 16. [40 CFR 60.757(f)(2)] C. If applicable, the results of visual inspection of the seal or closure mechanism on the landfill gas valve bypassing the flare, as specified to be monitored in Condition No. 17, to ensure that the valve is maintained in the closed position and that the landfill gas flow is not diverted through the bypass line. [40 CFR 60.757(f)(2)] D. Description, date and duration of all periods when the control device was not operating for a period of at least one hour. [40 CFR 60.757(f)(3)]

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Frequency	Information to be submitted
	<p>E. All periods when the collection system was not operating in excess of 5 days. [40 CFR 60.757(f)(4)]</p> <p>F. The location of each exceedance of the 500 ppmv methane concentration limit pursuant to Condition No. 20 and the concentration recorded at each location for which an exceedance was recorded in the previous month. [40 CFR 60.757(f)(5)]</p> <p>G. The date of installation and the location of each well or collection system expansion added pursuant to Condition Nos. 19.C and 20.E.v. [40 CFR 60.757(f)(6)]</p>
Within 30 days of the landfill closing and waste acceptance cessation	<p>H. Each owner or operator of a controlled landfill shall submit a closure report within 30 days of waste acceptance cessation.</p> <p>I. The Air Pollution Control Officer may request additional information as may be necessary to verify that permanent closure has taken place in accordance with 40 CFR 258.60.</p> <p>J. If a closure report has been submitted to the Air Pollution Control Officer, no additional wastes may be placed into the landfill without filing a notification of modification as described under 40 CFR 60.7(a)(4). [40 CFR 60.757(d)]</p>
30 days prior to the removal or cessation of control equipment operation	<p>K. Each owner or operator of a controlled landfill shall submit an equipment removal report 30 days prior to removal or cessation of operation of the control equipment.</p> <p>L. The equipment removal report shall contain all of the following items:</p> <ol style="list-style-type: none"> A copy of the closure report submitted in accordance with 40 CFR 60.757(d). A copy of the initial performance test report demonstrating that the 15 year minimum control period has expired. Dated copies of three successive NMOC emission rate reports demonstrating that the landfill is no longer producing 50 megagrams or greater of NMOC per year. <p>M. The Air Pollution Control Officer may request such additional information as may be necessary to verify that all of the conditions for removal in 40 CFR 60.752(b)(2)(v) have been met. [40 CFR 60.757(e)]</p>

24. Startup, Shutdown and Malfunction (SSM) Periodic and Immediate Reports

A. Periodic Reports

- If actions taken during a SSM event are consistent with the procedures specified in the SSM Plan the permittee shall state such information in a SSM Report.

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- ii. The SSM Report shall be submitted by February 28 and July 30 of each year but is only required if a SSM event occurred during the reporting period January 01 - June 30 and July 01 - December 31 of each year.
- iii. The SSM Report shall contain:
 - (a) Number, duration and a brief description of each SSM event.
 - (b) A letter containing the name, title and signature of the responsible official who is certifying the accuracy of the report.

[40 CFR 63.1955(b), 40 CFR 63.1980(b), 40 CFR 63.10(d)(5)(i)]

B. Immediate Reports

- i. If actions taken during a SSM event are not consistent with the procedures specified in the SSM Plan the permittee shall:
 - (a) Report to the Air Pollution Control Officer, by telephone call or facsimile (FAX), within 2 working days after commencing actions inconsistent with the SSM Plan.
 - (b) Follow with a letter to the Air Pollution Control Officer within 7 working days after the end of the SSM event that:
 - (i) Contains the name, title and signature of the responsible official who is certifying the accuracy of the report.
 - (ii) Explains the circumstances of the event.
 - (iii) Explains the reasons for not following the SSM Plan
 - (iv) Explains whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.

[40 CFR 63.1955(b), 40 CFR 63.1980(b), 40 CFR 63.10(d)(5)(ii)]

25. The permittee shall maintain files of all required information (including all reports and notifications) recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks or on microfiche.

[40 CFR 63.1955(b), 40 CFR 63.1980(b), 40 CFR 63.10(d)(5)(ii)]

Frequency	Information to be recorded
At all times	<p>A. The occurrence and duration of each startup, shutdown or malfunction of operation (i.e., process equipment).</p> <p>B. The occurrence and duration of each malfunction of the required air pollution control and monitoring equipment.</p> <p>C. All required maintenance performed on the air pollution control and monitoring equipment.</p> <p>D. Actions taken during periods of startup, shutdown and malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the affected source's Startup, Shutdown and Malfunction Plan.</p>

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Frequency	Information to be recorded
	E. All information necessary to demonstrate conformance with the affected source's Startup, Shutdown and Malfunction Plan when all actions taken during periods of startup, shutdown and malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the Startup, Shutdown and Malfunction Plan may be recorded using a "checklist" or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events)

Your application for this air quality Permit to Operate was evaluated for compliance with Sacramento Metropolitan Air Quality Management District (SMAQMD), state and federal air quality rules. The following listed SMAQMD rules are those that are most applicable to the operation of your equipment. Other rules may also be applicable.

<u>SMAQMD Rule No.</u>	<u>Rule Title</u>
201	General Permit Requirements
202	New Source Review
402	Nuisance
NSPS	40 CFR 60 Subpart WWW New Source Performance Standard: Municipal Solid Waste Landfills
NESHAP	40 CFR 63 Subpart AAAA National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills

In addition, the conditions on this Permit to Operate may reflect some, but not all, requirements of these rules. There may be other conditions that are applicable to the operation of your equipment. Future changes in prohibitory rules may establish more stringent requirements which may supersede the conditions listed here.

For further information please consult your SMAQMD rulebook or contact the SMAQMD for assistance.

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT
INITIAL BREAKDOWN REPORT (Rule 602)

RECEIVING INFORMATION (PLEASE PRINT)

Date received: 6 / 20 / 17 Received by: DES (VOICE MAIL)
Initials
 Time received: 8 : 45 ☒ AM ☐ PM Assigned to: DON DUMAINE

SOURCE REPORTING BREAKDOWN

Representative: JOHN OLSEN Company: CITY OF SACRAMENTO 28TH
First name, Middle Initial, Last name
 Title: OPERATION Street Address: ST. LANDFILL
20 28TH ST.
 Telephone: (916) 202-1081 City/State/Zip: SACRAMENTO, CA

BREAKDOWN INFORMATION

Date observed: 6 / 19 / 17 Equipment: LANDFILL UNIT WNU-B
 Time observed: 3 : 30 ☐ AM ☒ PM Duration: ON GOING
 What Rule is/will be violated? 201/207 SMAQMD Permit Number: 12762, TV2011-08-01
50198
 Does this constitute a breakdown, as defined in SMAQMD Rule 602 (complete page-2)? ☒ Yes ☐ No
 Has an Emergency Variance been requested? ☐ Yes ☒ No

BREAKDOWN CONDITION REPORTING FORM PROVIDED TO SOURCE

Date provided or mailed: N/A / / By: COPY ON SITE Date returned: 6 / 27 / 17

CAUSE OF BREAKDOWN (if known)

A GRASS FIRE DESTROYED MUCH OF THE LANDFILL GAS PILING SYSTEM.

CORRECTIVE MEASURES BEING APPLIED

LANDFILL GAS WELLS AND PIPING MUST BE REPLACED.

FIELD EVALUATION Additional reports and/or documentation attached? ☐ Yes ☐ No

Date of site visit: 6 / 21 / 17 Inspector: DON DUMAINE 12:45 PM
I DROVE AROUND THE 28TH ST LANDFILL AND OBSERVED MOST OF WASTE MANAGEMENT UNIT (WNU) "B" WAS BURNED. EXTRACTION WELLS AND PIPING WERE DAMAGED / MELTED. APPROXIMATELY 11 EXTRACTIONS WELL WERE DAMAGED. PERIMETER WELLS BETWEEN ISO AND WNU-B WERE ALSO DAMAGED. THE NEW FLARE WAS RUNNING AND GAS WAS BEING EXTRACTED FROM WNU-A.

Brkdwn1.frm (Rev. 5/2000) THE CITY OF SACRAMENTO MUST REPAIR ALL DAMAGED WELLS AND PIPING TO RETURN TO COMPLIANCE WITH PERMIT REQUIREMENTS.

Supv. review: 6/28/17

Breakdown Checklist:

For a situation to qualify as a valid breakdown condition, all the following conditions must be met (per Rule 602):

- ☒ It must involve air pollution control equipment, a CEM, or related process equipment.
- ☒ The condition must cause a violation of an emission limit, permit condition, rule requirement, or State law.
- ☒ The failure or malfunction was unforeseeable.
- ☒ The condition is not intentional or the result of negligence.
- ☒ The breakdown was not the result of improper maintenance.
- ☒ This is not a recurrent breakdown of the same equipment.
- ☒ It was not caused by a negligent failure to comply with an air pollution law or regulation.
- ☒ The situation does not constitute a public nuisance.
- ☒ The SMAQMD must be notified within one hour after detecting the breakdown condition, or at the commencement of the next regular working day if it occurred outside normal business hours.
- ☒ The source must complete a *Breakdown Condition Reporting Form*, and return it to the District within seven days.

Tracking Checklist:

- ☐ *Initial Breakdown Report* entered in database. Initial:
- ☐ *Breakdown Condition Reporting Form* entered in database. Initial:

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT
BREAKDOWN CONDITION REPORTING FORM
(Rule 602)

Notice: Complete and return this report to the SMAQMD within 7 days after your breakdown has been corrected.

LOCATION OF BREAKDOWN (PLEASE PRINT OR TYPE)

Name of business: City of Sacramento, 28th St. Landfill

Address: 20 28th St, Sac., CA 95816

Street Address

City

State

Zip Code

Equipment involved: Landfill Gas Collection System

SMAQMD Permit Number: 12762

Name of person providing information: John Olesen

Title: Sr. Landfill Tech.

Date of breakdown: 06 / 19 / 17 Time of breakdown: 4:00 PM

Date reported to SMAQMD: 06/20 /17 Time reported to SMAQMD: 9:00 AM

CAUSE OF BREAKDOWN

Car fire on freeway that burned up the levee and across WMU-B

CORRECTIVE MEASURES TAKEN

Valved off damaged part of gas system so we could restart the flare and continue to extract landfill gas from undamaged section of landfill. Grass had already been cut which was a big help. Began taking inventory of needed repairs to get system fully operational as soon as possible.

ESTIMATED EMISSIONS DURING BREAKDOWN CONDITION (not required for Phase-II vapor recovery systems)

Unknown. In 2008 we were down, due to fire, for 1 ½ months and maintained surface emission compliance. We normally flare approx. 500 scfm and we are now extracting approx. 350 scfm.


Please print or type

I, John S. Olesen hereby certify that the breakdown condition described above

First name,

Middle initial,

Last name

was corrected at Unknown AM  PM on _____ and that the facility is now in
Time Date
compliance with SMAQMD Rules.

X _____ Date: 06 / 27 / 17

Signature

Senior landfill Engineering Technician

Telephone number: (916) 202- 1081

Title

June 27, 2017

Mr. Don Dumaine
Sacramento Metropolitan Air Quality Management District
777 12th Street, 3rd Floor
Sacramento, California 95814-1908

SUBJECT: Breakdown of landfill gas collection system PO #12762

Dear Mr. Dumaine:

The attached Breakdown Condition Reporting Form is submitted for your records in accordance with the 28th Street Landfill, Title V Permit No. TV2011-08-01.

The gas control system at the 28th Street Landfill experienced a breakdown, because of a car fire on the freeway that the wind carried up the slope and across WMU-B of the 28th St. closed landfill. The fire caused damage to the perimeter gas extraction system and the gas collection system on WMU-B.

The perimeter system had damage to ten wells (MW-45 thru MW-54), and approximately 550 ft. of pipe, which causes an additional 12 perimeter wells (MW-55 thru MW-66) to be off-line until repairs are made.

The gas collection system on WMU-B had significant damage. There are 15 extraction wells damaged (Well 4 thru Well 18) and approximately 12,000 ft. of various sizes of pipe.

Our plan is to get the perimeter gas system on line first so we can maintain compliance at the boundary then work on WMU-B. We have already begun the process for obtaining supplies, so we can be up and running completely as soon as possible.

Respectfully submitted,

John Olesen
Sr. landfill Engineering Technician

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

Findings Required for Grant of Variance - Checklist

Health and Safety Code section 42352 states that no variance shall be granted unless the hearing board makes all of the following (six) findings:

(1) The petitioner is, or will be, in violation of, a rule or permit condition.	
(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.	
(3) The closing or taking would be without a corresponding benefit in reducing air contaminates.	
(4) The petitioner has given consideration to curtailing operations of the source in lieu of obtaining a variance.	
(5) During the variance period, the petitioner will reduce excess emissions to the maximum extent feasible.	
(6) If requested by staff, Petitioner will monitor and report excess emissions.	