

**SAN JOAQUIN VALLEY UNIFIED  
AIR POLLUTION CONTROL DISTRICT  
COMPLIANCE DEPARTMENT**

**COM 2245**

**APPROVED:** \_\_\_\_\_ **SIGNED** \_\_\_\_\_ **DATE:** March 8, 2007  
**Jon Adams**  
**Director of Compliance**

**TITLE:** **RULE 4642 – SOLID WASTE DISPOSAL SITES**

**SUBJECT:** **DETERMINATION OF COMPLIANCE WITH RULE 4642**

**OBJECTIVE:**

To establish a policy and the procedures for implementation of Rule 4642 – Solid Waste Disposal Sites.

**PURPOSE:**

The purpose of this rule is to reduce volatile organic compound (VOC) emissions from solid waste disposal sites. In addition, it is meant to ensure that staff determines compliance while uniformly interpreting the requirements of Rule 4642 during inspections.

**POLICY STATEMENT:**

District staff shall enforce Rule 4642 and permit conditions, if applicable, pertaining to the VOC emissions from solid waste disposal sites. Failure to comply with this rule and applicable permit conditions is a violation, which is subject to enforcement action. The goal of a successful compliance inspection is to ensure that the owner/operator has sufficient information and understanding of the rule and any applicable permit conditions to maintain continued compliance, including remaining free from creating nuisances. The provisions of this rule apply to any solid waste disposal site which has a gas collection system and/or control device in operation, or that is undergoing maintenance or repair.

## **I. GENERAL GUIDELINES**

### **A. Inspection Assignments**

Area inspectors are responsible for inspecting Rule 4642 sources in order to determine compliance.

### **B. Complaint Assignments**

Area inspectors will conduct complaint investigations and inspections associated with permitted and non-permitted equipment/operations. If the area inspector is unable to respond, the complaint will be assigned to a back-up inspector.

### **C. Landfills are also regulated by Regulation VIII, Fugitive Dust.**

## **II. PERMIT REQUIREMENTS**

### **A. Solid Waste Disposal Site Gas Collection System**

The gas collection system shall be operated in such a manner that the surface emissions testing of the landfill shows that the concentrations of total organic compounds (measured as methane) do not exceed 1,000 ppmv at any point on the surface of the site or along the gas transfer path of the gas collection system. Sampling ports shall be installed on each wellhead. Surface emissions testing shall be conducted according to Section 6.1.1.

1. The gas collection system shall be operated in a manner which maximizes the amount of landfill gas extracted while preventing overdraw that can cause fires or damage the gas collection system.
2. All landfill gas collected by a gas collection system shall be controlled by a control device, which meets the District destruction efficiency requirements.
3. A control device shall achieve a VOC destruction efficiency of at least 98% by weight, or reduce the VOC concentration to 20 ppmv or less (measured as methane) corrected to 3 percent.
4. For control devices which have an Authority to Construct (ATC) issued prior to July 20<sup>th</sup>, 1995, such control devices shall achieve a destruction efficiency of at least 90 % by weight or reduce the VOC concentrations to 30 ppmv or less (measured as methane) corrected to 3 % oxygen.

5. An enclosed flare or an open flare may be used as a control device provided the operator submits supporting data of compliant VOC destruction efficiency.
6. Both an enclosed flare and an open flare shall be operated in accordance with the applicable provisions of 40 CFR.
7. Whenever buried solid waste is brought to the surface during the installation or preparation of wells, trenches, piping, or other equipment or when waste is excavated or removed, the waste/soil shall be covered using plastic sheeting, fresh soil, or vapor retarding foam to prevent odorous emissions and to minimize the release of landfill gas.
8. During maintenance of the gas collection system and/or control device, the District must be notified at least 24 hours prior to any work which requires the system to be shut down. Notification must include a description of work, the date(s) of work, and the amount of time needed to complete the maintenance. The gas collection system/control device shall not be shut down for more than 144 cumulative hours in any one calendar year.

B. Permit Exemptions

The requirements of this rule shall not apply to:

1. Active disposal areas in a landfill
2. Hazardous waste disposal sites
3. Any solid waste site which is subject to the requirements of 40 CFR, Part 60, Subpart WWW (Standards of Performance for Municipal Solid waste Landfills)

C. Violations

A Notice of Violation (or Notice to Comply as allowed by policy) shall be issued for:

1. Lack of ATC/Permit to Operate (PTO), where a permit is required
2. Modifications made without an ATC, where a permit is required
3. Violations of ATC/PTO conditions
4. Creating a public nuisance

### **III. INSPECTION PROCEDURES**

#### **A. Pre-Inspection Procedures**

Preparation for a routine compliance inspection includes, but is not limited to, the following:

1. Review the facility permit and previous inspections
2. Check facility for complaints, tests required and compliance due dates
3. Print and review active PTOs/ATCs
4. Check all necessary safety equipment needed

### **IV. POST-INSPECTION PROCEDURE**

#### **A. The following elements should be covered with the owner/operator in a post inspection interview:**

1. Discuss overall condition of the gas collection system. Include all testing requirements, reports and downtime on the system.
2. Review the rule and advise the source of any upcoming rule changes.
3. Review, if applicable, the ATC or PTO, including the need for proper posting of the permit and compliance with appropriate conditions.
4. Discuss any permit conditions that appear to be incorrect.
5. Review the results of the equipment inspection.
6. Issue the appropriate NOV/NTC and review compliance options.
7. Advise the source of District procedures applicable to any new equipment or modifications to permitted equipment.
9. Provide compliance assistance information as necessary, including how to obtain copies of the rule. Make appropriate recommendations to improve compliance and facilitate future inspections.

### **V. ADMINISTRATIVE REQUIREMENTS**

#### **A. Surface Emissions Testing**

The operator shall perform the emissions testing of solid waste disposal sites in accordance with Sections 6.1.1 and 6.3.1 to

ensure that the requirements of Section 5.1 are met. Prior to testing, the operator shall submit a written Surface Emission Testing Protocol for approval by the Air Pollution Control Officer (APCO). The destruction efficiency of the control device shall also be evaluated.

B. Compliance Testing

The operator shall notify the District no later than 30 days prior to any compliance testing required by Section 6.3.1 and 6.3.2. Compliance test results shall be submitted to the District within 60 days of the completion of testing.

C. Emission Control Plan

The operator of a solid waste disposal site that is subject to Rule 4642 shall submit an Emission Control Plan as required by Section 7.3, to the APCO indicating the actions to be taken to comply with the Rule. A written approval of the plan shall be obtained from the APCO prior to implementing the plan. As operating experience is gained and site conditions change, the plan may be revised which is again subject to the approval of the APCO.

## **VI. RECORDKEEPING**

The operator shall maintain written records of all required testing and permit conditions for a period of five years from the date of each entry. The records shall be made available during normal business hours from Monday through Friday, and shall be submitted to the APCO upon request.