

August 4, 2022

*Certified Mail*

*Return Receipt Requested* 9171 9690 0935 0268 3968 43

Jeanette Gonzales-Knight  
County of Santa Barbara - Public Works Dpt  
130 E. Victoria Street, Suite 100  
Santa Barbara, CA 93101

FID: 11480  
Permit: AM 14500 10  
SSID: 03707

Re: Incomplete Authority to Construct Application 14500 10

Dear Jeanette Gonzales-Knight:

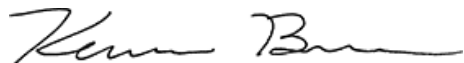
On July 5, 2022, the Santa Barbara County Air Pollution Control District (District) received your application for Authority to Construct (ATC Mod) No. 14500 10 for modifications to the anaerobic digestion project. This letter is to inform you that the application is incomplete. Additional information and/or clarification of information already submitted is required. In order to complete the application, please respond to each of the items listed in the attachment. After we receive the requested information, we will inform you within 30 days if the application is complete.

According to Rule 208.D.4, the application will be denied 120 days after the date of filing if sufficient information needed to deem the application complete has not been submitted, unless the District has, in writing, extended the time.

Please be advised that construction of your facility without a **final** ATC Mod is a violation of District rules and the California Health and Safety Code.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please call me at (805) 979-8313. Thank you for your cooperation.

Sincerely,



Kevin Brown, Air Quality Engineer III  
Engineering Division

Attachment: Incompleteness Items

cc: County of Santa Barbara - Tajiguas Anaerobic Digestion 11480 Project File  
Engr Chron File  
Joddi Leipner  
John Dewey  
Trevor Leiphardt  
Carly Barham  
Charlotte Mountain

\\sbcapcd.org\shares\Groups\ENGR\WPLandfills & WWT\03707 Tajiguas\FID 11480 Tajiguas Anaerobic Digestion\ATC Mod 14500-10\ATC Mod 14500 10 - ATC Incompleteness - 7-29-2022.docx

ATTACHMENT

**ATC MOD NO. 14500 10 INCOMPLETENESS ITEM LIST**

**PERMITTING INCOMPLETENESS ITEMS**

1. **Form-01.** Resubmit Form-01 (link: <https://www.ourair.org/wp-content/uploads/apcd-01.pdf>) with a signature on Page 4.
2. **Trommel Screen Engine.** The District will permit the diesel engine powering the trommel screen as a standard diesel-fired engine and not as a PERP engine. As discussed in the ATC 15915 application, PERP engines cannot be used to replace existing operations and cannot be located at the same location for more than 12 consecutive months. However, the District may permit PERP registered engines if these engines are reviewed under New Source Review. Note that this equipment will not be permitted to operate prior to ATC Mod issuance. No response is needed for this item.
3. **Hydrogen Sulfide and Ammonia Meters.** Submit the manufacturer specifications and most recent calibration records for the Jerome 631-x and Eagle 2 portable analyzers that were used to monitor the MRF hydrogen sulfide and ammonia concentrations when the facility did not have an operational biofilter and ammonia scrubber.
4. **Baghouse Flowrates.** Address the following flowrate discrepancies between the baghouse manufacturer specifications sheets and the marked-up ATC Mod 14500-05 permit.
  - a. Tipping Area Baghouse (CMAXX CM-036) - Manufacturer Specifications: 56,700 scfm vs. Marked-Up Permit: 42,000 scfm
  - b. Materials Sorting Area Baghouse (CMAXX CM-060) - Manufacturer Specifications: 94,500 scfm vs. Marked-Up Permit: 62,000 scfm
5. **ADF Flare Pilot Fuel.** Address the ADF flare pilot fuel composition discrepancy between the marked-up ATC Mod 14500-05 Section 4.10.1 (100% PUC natural gas) and “Revisions to 14500-05” PDF (50% propane, 50% LFG).

Additionally, address the following items related to changing the ADF flare pilot gas composition:

- a. Per ATC Mod 14500-05’s BACT Table 4.1, the ADF flare pilot be propane or PUC natural gas to meet BACT standards. Revise the application to comply with these established BACT standards. Alternatively, provide justification why the existing BACT standards are no longer applicable or provide documentation that new BACT standards have been issued which allow a propane-LFG blend for the ADF flare pilot.
- b. Per ATC Mod 14500-05’s Condition 9.C.10.b.xiv, the ADF flare pilot flame is required to be present whenever combustible gases are vented to the unit. The District has concerns using LFG as a pilot fuel since this fuel source is less reliable compared to propane or natural gas because the HHV has more fluctuations and the LFG collection system cannot be guaranteed to be operational at all times.

6. **Emission Calculations.** Address the following items related to the submitted emission calculations:
  - a. **Baghouse Flowrates.** Revise the Tipping Area Baghouse throughput to 56,700 scfm and Materials Sorting Area Baghouse throughput to 94,500 scfm in Table 5.1-1 to be consistent with the manufacturer specifications.
  - b. **Screening PM Emissions.** Update Tables 5.1-1 through 5.1-3 to include fugitive PM emissions from screening operations. Include the trommel screen included in this permit application as well as the electric screen proposed under ATC 15915. Emission calculations should be based on the screening systems' operational hours, material throughputs, and AP-42 Section 13.2.4 emission factors.
  - c. **ADF CHP Engine SCR Burn-In Fuel.** Revise Table 5.3-1 Operational Scenario B's operational situation description and fuel properties to reflect the proposed SCR burn-in fuel composition of 92% biogas and 8% LFG.
  - d. **ADF CHP Engine Startup/Shutdown Fuel.** Revise Table 5.3-1 Operational Scenario C's operational situation description and fuel properties to reflect the proposed SCR burn-in fuel composition of 92% biogas and 8% LFG.
  - e. **ADF Flare Engine Offline Flowrates.** Per Section 2.1.2.9 of the marked-up ATC Mod 14500-05, 23 scfm of LFG will be routed to the ADF flare when one of ADF CHP engines is non-operational. Revise Table 5.4-1 to account for this additional 23 scfm noted in the marked-up permit or provide an explanation how this additional flowrate has already been accounted for in the emission calculations.
  - f. **Table Notes.** As needed, update the table notes in the spreadsheets for accuracy.

#### **AQIA AND HRA INCOMPLETENESS ITEMS**

7. **AQIA and HRA Modeling.** As an informational note, please address all incompleteness items in this letter before submitting revised AQIA and HRA modeling files. Contact Charlotte Mountain at [MountainC@sbcapcd.org](mailto:MountainC@sbcapcd.org) if you would like to schedule a meeting to discuss the following items before submitting a written response. In order to avoid multiple iterations of modeling file submittals, please do not submit a revised AQIA or HRA at this time. Note that the permit application cannot be deemed complete until the AQIA and HRA are finalized.
8. **Average Annual Emission Calculation Errors.** The following comments refer to errors in the average annual emission calculations in the *Emissions for Modeling* tab of Attachment A.
  - a. **Biofilter ROC Emissions.** The average annual ROC emissions for the CM036 and CM060 sources were calculated by multiplying the daily emissions by 311 days/year. However, the ROC emissions from the tipping area and recycling area occur 365 days/year. Correct the emission calculations in cells C41, C51, C71, and C81 accordingly. This correction will not affect the modeling, as only the short-term ROC emissions are modeled in the AQIA.
  - b. **Windrow ROC Emissions.** The average annual ROC emissions from the windrows do not include the ROC emissions calculated in cell B23 of the *Windrow ROC* tab. Correct the emission calculations in cell C178 of the *Emissions for Modeling* tab. This correction will not affect the modeling, as only the short-term ROC emissions are modeled in the AQIA.

- c. **Fugitive PM Emissions.** The average annual PM<sub>10</sub> and PM<sub>2.5</sub> emissions from the BF\_ADF source were calculated by multiplying the daily emissions by 208 days/year. However, the fugitive PM emissions from transferring the digestate into the truck occur 278 days/year, and the fugitive PM emissions from transferring MSW into the AD facility occur 311 days/year. Correct the emission calculations in cells F61 and G61 accordingly. Ensure these emissions are updated in the final AQIA when submitted.
9. **PM Control Efficiencies.** The following comments refer to the PM<sub>10</sub> and PM<sub>2.5</sub> emission calculations in the *Equipment* tab of Attachment A.
- a. **MRF Equipment.** PM emission calculations for the equipment at the MRF building (i.e. the LIEBHERR LH22M Material Handler, LIEBHERR L566 Loader, CAT 2P-6000 Forklift, and Tennant 800 Sweeper) include a (1-0.999)/(1-0.9) term. Please clarify why the emissions were calculated in this way.
- b. **Loader at ADF.** PM emission calculations for the LIEBHERR L566 Loader at the ADF building use a control efficiency of 99.9%. Describe how the loader exhaust is captured and provide documentation for the selected control efficiency.
- c. **Loaders at Composting Area.** PM emission calculations for the LIEBHERR L566 Loader and LIEBHERR L550 Loader at the Composting Area use a control efficiency of 90%. Describe how the loader exhaust is captured and provide documentation for the selected control efficiency.
10. **MRF Flare Toxics.** Correct the toxic emission factors for the MRF flare under the *MRF Flare Toxics* tab in Attachment A for the pollutants shown in the table below.

Pollutant	LFG Emission Factor (lb/MMscf)
n-Hexane	2.42E-01
Toluene	2.59E-01
Trichloroethylene	3.69E-01
Vinyl Chloride	1.76E-01
Total Xylenes	5.96E-01
1,1,1-TCA	3.75E-01
1,1-Dichloroethane	2.78E-01
Ethylene Dichloride	2.78E-01
1,4-Dioxane	9.90E-01
Acenaphthylene	8.19E-06
Acetonitrile	4.61E-01
Acrylonitrile	5.96E-01
Benzene	2.20E-01
Carbon Tetrachloride	4.32E-01
Chlorobenzene	3.17E-01
Chloroform	3.35E-01
Methylene Chloride	9.56E-01
Ethyl Benzene	2.99E-01
Methanol	9.56E-01
Ethylene Dibromide	5.28E-01
Perchloroethylene	4.66E-01

11. **Baghouse Release Heights.** The two baghouses (Source IDs CM036 and CM060) were modeled with stack heights equal to 50 ft. The submitted manufacturer's specification sheet states that the height of the baghouses is "190 1/4" and does not state the units. A height of 190.25 inches would equal 15.85 ft. Please provide a reference for the modeled release height of 50 ft.
12. **Trommel Screen Stack Parameters.** Provide documentation (e.g., manufacturer's specification sheet) for the trommel screen exhaust's stack parameters (Source ID SCREEN1E).
13. **MRF Fugitive PM.** It appears that the fugitive PM<sub>10</sub> and PM<sub>2.5</sub> emissions calculated in the *MRF Fugitive PM CSSR* tab in Attachment A were not included in the AQIA modeling. No action is required on this item at this time; in the final AQIA, ensure that all emissions are included.
14. **HRA Emissions File.** The District noted the following errors in the HRA emissions file, *JUN22NEWEFNIO\_IMPORTEMS.csv*. No action is required on these items at this time; in the final HRA, ensure that the emissions file is correct.
  - a. **ADCHP1.** The entries for 1,1,1-TCA and methylene chloride are switched.
  - b. **ADCHP2.** The entries for 1,1,1-TCA and methylene chloride are switched.
  - c. **ADFLARE.** There are two entries for 1,4-dioxane emissions from the ADFLARE source. The second entry, in row 176 of the spreadsheet, should be for ethyl benzene instead.
  - d. **MRFFLARE.** There are two entries for 1,4-dioxane emissions from the MRFFLARE source. The second entry, in row 317 of the spreadsheet, should be for ethyl benzene instead.
15. **Refined Acute Analysis.** The District has no comments on the refined acute analysis approach in the submitted modeling files. However, there was no spreadsheet submitted with the refined acute analysis results for the facility-wide HRA (there was a spreadsheet submitted for the project-only refined acute analysis titled *Refined Acute Risk Project Only Sources.xlsx*). No action is required on this item at this time; when submitting the final HRA, include a spreadsheet showing the refined acute analysis results for the facility-wide HRA.

#### **PLANNING INCOMPLETENESS ITEMS**

16. **Land Use Approval and CEQA Lead Agency Documentation.** Provide documentation that the proposed project modifications have been reviewed and approved by County Public Works. Provide documentation of the CEQA determination for the proposed project modifications.
17. **AQ Technical Memorandum.** Please address the following comments:
  - a. **CEQA Thresholds and Impact Methodology.** The County of Santa Barbara CEQA thresholds of significance cited in Table 3-1 are incorrect. According to the County's *Environmental Thresholds and Guidelines Manual*, the County's mass emission thresholds for total operational emissions of criteria pollutants are "Currently 55 pounds per day for NO<sub>x</sub> and ROC, and 80 pounds per day for PM<sub>10</sub>". If impacts from the proposed project are anticipated to exceed the County's air quality and/or greenhouse gas thresholds, the applicant should propose project design changes and/or mitigation measures that will avoid, reduce, or mitigate those impacts. The applicant should consult with the CEQA lead agency (County of Santa Barbara) for direction on appropriate methodology for impact analysis, including determining the appropriate air pollutant emissions baseline for this project.

- b. **GHG Emissions.** A summary table that provides the project's greenhouse gas emissions estimates should be included in Section 3.3.
  - c. The Memo should be updated as needed based on the comments in this letter.
18. **PM Control Efficiencies.** Please see Comment 9 above. After the District receives responses to items 9.a through 9.c, revisions to the project's *Equipment* PM emissions may be required. No response is required for this item.
19. **AD/MRF Fugitive ROC.** The District has previously determined that negligible ROC emissions are generated from the MRF facility since green and food waste spends a limited amount of time in the facility prior to being transported to the ADF. Please consider whether adjustments to the AD/MRF Fugitive ROC emissions are appropriate.

October 10, 2022

*Certified Mail*

*Return Receipt Requested* 9171 9690 0935 0277 6643 77

Jeanette Gonzales-Knight  
County of Santa Barbara - Public Works Dpt  
130 E. Victoria Street, Suite 100  
Santa Barbara, CA 93101

FID: 11480  
Permit: AM 14500 10  
SSID: 03707

Re: Incomplete Authority to Construct Application 14500 10

Dear Jeanette Gonzales-Knight:

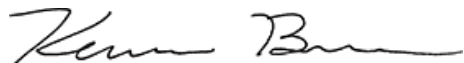
On July 5, 2022, the Santa Barbara County Air Pollution Control District (District) received your application for Authority to Construct (ATC Mod) No. 14500 10 for modifications to the anaerobic digestion project. This letter is to inform you that the application is incomplete. Additional information and/or clarification of information already submitted is required. In order to complete the application, please respond to each of the items listed in the attachment. After we receive the requested information, we will inform you within 30 days if the application is complete.

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Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please call me at (805) 979-8313. Thank you for your cooperation.

Sincerely,



Kevin Brown, Air Quality Engineer III  
Engineering Division

Attachment: Incompleteness Items

cc: County of Santa Barbara - Tajiguas Anaerobic Digestion 11480 Project File  
Engr Chron File  
Joddi Leipner  
John Dewey  
Trevor Leiphardt  
Carly Barham  
Charlotte Mountain

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ATTACHMENT

**ATC MOD NO. 14500 10 INCOMPLETENESS ITEM LIST**

**PERMITTING INCOMPLETENESS ITEMS**

1. **Unpermitted Equipment.** Following a District inspection of the facility, the following unpermitted equipment was found onsite:

- ADF Misting System
- MRF Misting System
- Compost Screening System
- Diesel Fired Engine (used to power the compost screening system)

Revise the permit application to address these pieces of unpermitted equipment including updates to the emission calculations and marked-up permit.

2. **Compost Screening Emission Factor.** Revise the compost screening emission factors in the emission calculations to 0.025 lb/ton for PM and 0.0023 lb/ton for PM<sub>10</sub>/PM<sub>2.5</sub> based on AP-42, Chapter 11, Section 3, Table 11.3-1 for Grinding and Screening Operations for Processing Wet Material.

**AQIA AND HRA INCOMPLETENESS ITEMS**

3. **AQIA and HRA Modeling.** As an informational note, please address all incompleteness items in this letter before submitting revised AQIA and HRA modeling files. Contact Charlotte Mountain at [MountainC@sbcapcd.org](mailto:MountainC@sbcapcd.org) if you would like to schedule a meeting to discuss the following items before submitting a written response. In order to avoid multiple iterations of modeling file submittals, please do not submit a revised AQIA or HRA at this time. Note that the permit application cannot be deemed complete until the AQIA and HRA are finalized.
4. **AD Flare Toxic Emissions.** Because the AD flare was fired on biogas during its source test, the results from that source test should be used for the biogas portion of the modeled flare emissions. Revise the emission factors in column C of the *AD Flare Toxics* tab in Attachment A accordingly.
5. **MRF and AD Flare Toxics.** The ethyl benzene and methanol LFG emission factors in column C of the *MRF Flare Toxics* tab in Attachment A were not updated as indicated in the response to the District's August 4, 2022 incompleteness letter. Furthermore, as the AD flare emission calculations are based on the MRF flare source test results for the LFG portion, the ethyl benzene and methanol LFG emission factors in column E of the *AD Flare Toxics* tab must also be corrected. Revise the emission factors as shown in the table below.

Pollutant	LFG Emission Factor (lb/MMscf)
Ethyl benzene	4.98E-03
Methanol	1.59E-02

6. **MRF Equipment PM.** Regarding incompleteness item no. 9.a from the District's August 4, 2022 incompleteness letter, it is still unclear why the PM<sub>10</sub> and PM<sub>2.5</sub> emission calculations for equipment at the MRF building in the *Equipment* tab in Attachment A are divided by (1-0.9). This comment also applies to the calculations in cells H46 and I46 of the *Fugitive PM CSSR* tab. Please update the emission calculations for clarity.



7. **Chipper Operating Days.** The value used for the annual operating days of the chipper/grinder in cell D84 of the *Fugitive PM CSSR* tab of Attachment A (i.e., 252 days/year) does not match the value in cell H10 of Table 5.1-1 of the submitted *ATC Mod 14500 05 - Emission Calculations - 9-16-2022.xlsx* (i.e., 311 days/year). Please confirm the correct value and update the emission calculations as necessary.

### **PLANNING INFORMATIONAL ITEMS**

#### **Informational Items (No Response Required):**

8. **AQ Technical Memorandum.** Upon finalization of project emission estimates and completion of required air modeling, including AQIA and HRA, the AQ Technical Memorandum should be revised with final emission estimates and AQIA and HRA results. The Memo should be provided to County Public Works for review and consideration, and to the District for peer-review.
9. **Land Use Approval and CEQA Lead Agency Documentation.** When available, documentation that the proposed project modifications have been reviewed and approved by County Public Works should be provided to the District, along with documentation of the CEQA determination for the proposed project modifications.

November 10, 2022

Kevin Brown  
County of Santa Barbara - Public Works Dpt  
130 E. Victoria Street, Suite 100  
Santa Barbara, CA 93101

FID: 11480  
Permit: AM 14500 10  
SSID: 03707

Re: Incomplete Authority to Construct Application 14500 10

Dear Kevin Brown:

On July 5, 2022, the Santa Barbara County Air Pollution Control District (District) received your application for Authority to Construct (ATC Mod) No. 14500 10 for modifications to the anaerobic digestion project at the Tajiguas Landfill. This letter is to inform you that the application is incomplete. Additional information and/or clarification of information already submitted is required. In order to complete the application, please respond to each of the items listed in the attachment. After we receive the requested information, we will inform you within 30 days if the application is complete.

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Please be advised that construction of your facility without a **final** ATC Mod is a violation of District rules and the California Health and Safety Code.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please contact me at (805) 979-8314 or [MountainC@sbcapcd.org](mailto:MountainC@sbcapcd.org). Thank you for your cooperation.

Sincerely,



Charlotte Mountain, Air Quality Engineer III  
Engineering Division

Attachment: Incompleteness Item List

cc: County of Santa Barbara - Tajiguas Anaerobic Digestion 11480 Project File  
Engr Chron File  
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John Dewey  
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Carly Barham

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## ATTACHMENT

### ATC MOD NO. 14500 10 INCOMPLETENESS ITEM LIST

1. **Marked-Up Permit:** As requested in item no. 1 of the District's letter dated October 10, 2022, please provide an updated marked-up permit.
2. **Diesel Screen Engine:** The following comments refer to the diesel-fired Caterpillar C4.4 engine that powers the Phoenix 3300 Trommel Screen.
  - a. The daily operating hours for the diesel screen engine were updated to 9 hr/day in Table 5.6-1 of the permit calculation spreadsheet. However, cell D23 in the *Equipment* tab of Attachment A still uses 8 hr/day. Update Attachment A accordingly.
  - b. Update the SOx calculations for this diesel engine (listed under the Phoenix 3300 Trommel Screen line item) in the *Equipment* tab of Attachment A to match Table 5.6-3 of the permit calculation spreadsheet.
  - c. Correct cell A118 in the *Equipment* tab of Attachment A to read 'Phoenix 3300 Trommel Screen', not 'LIEBHERR L566 Loader (J, KLHAL10.5SQC)'.
3. **Compost Screening:** Provide justification for removing the compost transfer emissions in rows 42 and 43 of the *Fugitive PM CSSR* tab of Attachment A. (AP-42 Section 11.3 does not state that the screening emission factor includes fugitive PM emissions from dropping material into and out of the screen.) Alternatively, add these emissions back into the calculation spreadsheet.

#### **Informational Items (No Response Required):**

4. **AQ Technical Memorandum:** Upon finalization of project emission estimates and completion of required air modeling, including AQIA and HRA, the AQ Technical Memorandum should be revised with final emission estimates and AQIA and HRA results. The Memo should be provided to County Public Works for review and consideration, and to the District for peer-review.
5. **Land Use Approval and CEQA Lead Agency Documentation:** When available, documentation that the proposed project modifications have been reviewed and approved by County Public Works should be provided to the District, along with documentation of the CEQA determination for the proposed project modifications.

December 21, 2022

Kevin Brown  
County of Santa Barbara - Public Works Dpt  
130 E. Victoria Street, Suite 100  
Santa Barbara, CA 93101

FID: 11480  
Permit: AM 14500 10  
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Charlotte Mountain, Air Quality Engineer III  
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ATTACHMENT

**ATC MOD NO. 14500 10 INCOMPLETENESS ITEM LIST**

- Diesel Screen Engine:** In response to comment no. 2.b of the District's November 10, 2022 incompleteness letter, the SO<sub>x</sub> emission calculations for the diesel screen engine in the *Equipment* tab of Attachment A were revised. However, the hourly emissions were erroneously set equal to the emission factor in units of g/bhp-hr. Update the SO<sub>x</sub> emissions to 0.002112 lb/hr in cell F53 of the *Equipment* tab (the daily and annual SO<sub>x</sub> emissions will be corrected by this change as they are calculated based on the hourly emissions). At this time, updates to the SO<sub>x</sub> AQIA modeling are not required; however, please note that any future revisions to SO<sub>x</sub> modeling must include this correction.
- CM036 ROC Variable Emissions:** The submitted variable emissions scenario for ROC from Source ID CM036 includes a variable emission rate factor of 0.10 for the hours between 9PM and 5AM, as shown below. It appears that this factor should have been calculated in cell K36 of the *Emissions for Modeling* tab of Attachment A. However, that cell has an error message because the reference is incorrect. Please submit justification of the 0.10 emission rate factor.

*EMISFACT CM036                      HROFDY 5\*0.10 16\*1 3\*0.10*
- MRF Fugitive PM:** As noted in comment no. 13 of the District's August 4, 2022 letter, it appears that the fugitive PM<sub>10</sub> and PM<sub>2.5</sub> emissions calculated in the *MRF Fugitive PM CSSR* tab in Attachment A were not included in the AQIA modeling. The response to the August 4, 2022 letter did not sufficiently explain where the emissions from the *MRF Fugitive PM CSSR* tab were accounted for in the modeling. Revise the PM<sub>10</sub> and PM<sub>2.5</sub> modeling to include these emissions, or explain how these emissions were accounted for in the submitted modeling files.
- H<sub>2</sub>S from ADF Biofilter:** The *AD Organic TACs* tab of Attachment A states that hydrogen sulfide (H<sub>2</sub>S) emissions from the ADF biofilter were calculated based on a concentration of 0.028 ppmv and ventilation fan flow rate of 35,300 cfm. Confirm that you are comfortable with this concentration and flow rate being enforced by the permit, and submit an explanation of the equation used to calculate the H<sub>2</sub>S emissions in units of lb/hr. Alternatively, use the previously approved calculation methodology for H<sub>2</sub>S emissions from the ADF biofilter in the HRA.
- H<sub>2</sub>S and Ammonia from MRF Baghouses:** H<sub>2</sub>S and ammonia emissions from the MRF tipping and recycling area baghouses were removed from the HRA. As H<sub>2</sub>S and ammonia have been measured within the MRF building, these emissions must be accounted for in the modeling. Propose an H<sub>2</sub>S limit and an ammonia limit to be included in the HRA for the MRF baghouses. The permit will include source testing conditions to ensure compliance with these limits.
- Metals from ADF Biofilter and CMU Windrows:** Per comment nos. 5 and 6 the District's November 4, 2021 letter re: *ATC Model 14500-05 Source Testing of HAPs on CHP Engines, ADF Flare and ADF Biofilter*, the HRA must include the metals from Table 5 of OEHHA's [AB 1900 Biogas Recommendations: Biogas Constituents of Concern and Health-Protective Levels for Biomethane 2020 Update](#) for the ADF biofilter and CMU windrows, unless the metals are source tested. Table 5 is reproduced below for ease of reference.

Table 5: Health-Protective Concentrations for Constituents of Concern in Biomethane	
Biogas Constituent (or Group)	Concentration (mg/m <sup>3</sup> ) (or ppmv as indicated)
1,4-Dichlorobenzene <sup>(a)</sup>	4.3
Alkyl Thiols <sup>(a)</sup>	17 (ppmv)
Antimony <sup>(a,b)</sup>	0.062
Arsenic <sup>(a,b)</sup>	0.00040
Cadmium <sup>(b)</sup>	0.00032
Chlorocarbons (as Cl) <sup>(b,c)</sup>	4.9
Chromium <sup>(b)</sup>	0.00048
Ethylbenzene <sup>(a)</sup>	20
Fluorocarbons (as F) <sup>(b,c)</sup>	7.4
Hydrogen Sulfide <sup>(a)</sup>	63 <sup>(d)</sup>
Lead <sup>(a,b)</sup>	0.047
N-nitroso-di-n-propylamine <sup>(a)</sup>	0.024
Silicon compounds (as Si) <sup>(b,c)</sup>	0.49
Sulfur compounds (as S) <sup>(b,c)</sup>	13
Vinyl Chloride <sup>(a)</sup>	0.63

Address the following comments regarding metals from the ADF biofilter and CMU windrows.

- a. Metal emissions from the ADF biofilter are included in the *AD Organic TACs* tab of Attachment A. The values do not match the referenced table from OEHHA's document. If these values are from a source test, submit the source test report. Alternatively, use the values from OEHHA's Table 5.
  - b. Metal emissions were not included for the CMU windrows. Add metal emissions from the windrows as specified in the District's November 4, 2021 letter and revise the HRA accordingly.
7. **Cobalt in Fugitive Dust:** Cobalt emissions in fugitive dust were quantified in the *Fugitive PM Toxics* tab of Attachment A and the *Motor Vehicle Acute* tab of Attachment B for Source IDs MRFENTRY and MRFCOMP. However, cobalt was marked in red along with pollutants without health risk data, and the cobalt fugitive dust emissions were not included in the HRA. Update Attachments A and B to reflect that cobalt does have health risk data, and include all calculated cobalt emissions in the revised HRA.
8. **HRA Emissions File:** The District noted the following errors in the HRA emissions file, *FACWIDE\_112022\_IMPORTEMS.CSV*. In the final HRA, ensure that the emissions file is correct.
- a. There are two entries for 1,4-dioxane emissions from the ADFLARE source. The second entry, in row 105 of the spreadsheet, should be for ethyl benzene instead.
  - b. There are two entries for 1,4-dioxane emissions from the MRFFLARE source. The second entry, in row 406 of the spreadsheet, should be for ethyl benzene instead.

9. **HRA Variable Emission Rate Factors:** The following comments refer to incorrect variable emission rate factors used in the HRA.
- a. In the project HRA source parameters file for the period averaging time, *period\_ChiQ.SRC*, many of the sources have incorrect variable emission rate factors entered (i.e., Source IDs ADCHP2A, ADCHP2B, MRFCHP1, MRCHP2, PAPERDRY, CM036, CM060 and CM036TAC). The period files for the HRA must use normalized variable emission rate factors (e.g. factors add up to 24 for the HROFDY scenario), as described in Appendix A of the District's [Form-15i](#). Ensure all sources have the correct variable emission rate factors applied in the revised HRA. The District notes that another project HRA source parameters file for the period averaging time was submitted, titled *period\_ChiQ-USHOUWCLFTH63.SRC*; however, this file was not reviewed because the AERMOD input and output files reference the *period\_ChiQ.SRC* file.
  - b. In the project HRA source parameters file for the 1-hour averaging time, *1hour\_ChiQ.SRC*, Source ID CM036 has a factor of 0.07 applied for the hours between 9PM and 5AM. However, based on the emission calculations in the *DPM* tab of Attachment A, a factor of 0.08 should be applied for these hours. Ensure all sources have the correct variable emission rate factors applied in the revised HRA. The District notes that another project HRA source parameters file for the 1-hour averaging time was submitted, titled *1hour\_ChiQ-USHOUWCLFTH63.SRC*; however, this file was not reviewed because the AERMOD input and output files reference the *1hour\_ChiQ.SRC* file.
10. **COMPMAT Emission Rate:** An emission rate of  $7.08165E-04$  g/s/m<sup>2</sup> was entered for Source ID COMPMAT in the project HRA source parameters files, *period\_ChiQ.SRC* and *1hour\_ChiQ.SRC*. As this source has an area of 3056.7 m<sup>2</sup>, this converts to an emission rate of 2.16 g/s. In the revised HRA, ensure the correct unit emission rate is entered.
11. **Refined Acute Analysis:** Address the following comments regarding the refined acute analysis.
- a. The facility-wide refined acute analysis was performed for two receptors (nos. 4341 and 4339). However, the screening acute non-cancer HI exceeded the threshold of 1.0 at two additional receptors (nos. 4180 and 4340). In the revised AQ Technical Memorandum, list all receptors with a screening acute HI greater than 1.0 and explain why the refined acute analysis was not performed for these receptors (i.e., the receptors will be inside the new property boundary). Alternatively, perform the refined acute analysis for all receptors with a calculated screening acute HI greater than 1.0 and present the results in the AQ Technical Memorandum.
  - b. It appears that the refined acute analysis for receptor no. 4341 was performed incorrectly. The HRA shows that receptor no. 4341 is located at UTME 764197.15 m, UTMN 3819243.46 m. However, there is no receptor with those coordinates included in the refined acute analysis. Based on the submitted refined acute analysis modeling files, the refined H<sub>2</sub>S concentration of 40.79 µg/m<sup>3</sup> listed for receptor no. 4341 is actually for a receptor located at UTME 764198.36 m, UTMN 3819201.11 m. Correct the refined acute analysis for this receptor accordingly. Alternatively, remove the discussion of the refined acute analysis and include an explanation in the AQ Technical Memorandum that no receptors within the new property boundary have a calculated screening acute HI greater than 1.0, per comment no. 11.a above.
  - c. The refined acute HIs in cells H36 and Q36 of *ProjectAcuteRefinedRisk.xlsx* were summed incorrectly; the sums do not include the HQs for methyl bromide, 1,1,1-TCA

and vinyl chloride. Because these HQs are so low, they do not affect the results out to three significant figures. Nevertheless, for completeness, please ensure the HIs are summed correctly in any revised refined acute analyses.

12. **HRA Results Table 3-22:** The following comments refer to errors in the facility-wide HRA results presented in Table 3-22 of the AQ Technical Memorandum. As the HRA results may change based on responses to other comments in this letter, Table 3-22 will likely need to be updated. Ensure that the results presented in the revised AQ Technical Memorandum are correct.
- a. The chronic HI at the MEIR is presented as 0.08 at receptor no. 4117. However, according to the submitted HRA output file, *FWRChNCChronicRiskSumByRec.csv*, the chronic HI at this receptor is 0.07.
  - b. The chronic HI at the MEIW is presented as 0.01 at receptor no. 346. However, according to the submitted HRA output file, *FWWChrNCChronicRiskSumByRec.csv*, the chronic HI at this receptor is 0.05.
13. **Property Boundary:** The ROC modeling includes a new property boundary, which has not yet been approved. The District is awaiting a formal proposal for a combination of measures that will support the exclusion of certain areas from “ambient air” in the modeling. As described via email to Kevin Brown on December 20, 2022, the proposal should include the following:
- Written confirmation from County Public Works’ legal counsel that Tajiguas Landfill has the legal authority to control the proposed area;
  - A map defining the new property boundary as the extent of the area that the landfill personnel can control with the proposed measures (note that if future iterations of the modeling show exceedances beyond the property boundary, another formal proposal will be required to change the modeled property boundary further); and
  - Confirmation that security personnel from the landfill can access the rugged terrain to escort trespassers off-site.

Furthermore, please note that in any future application modifications, all AQIA and HRA modeling scenarios should be updated with the same property boundary.

#### **Informational Items (No Response Required):**

14. **Project Only Modeling:** Please note that the District did not review modeling files or sections of the AQ Technical Memorandum associated with the “project only” scenario. Emission calculations, modeling files, and sections of the Memo related to facility-wide impacts were reviewed and applicable comments are detailed in this letter.
15. **AD Flare Stack Height:** The District notes that a stack height of 14.349 m was entered for the AD flare for long-term averaging periods, while the *AD Flare Stack Parameters* tab of Attachment A shows a stack height of 14.359 m. The stack height is not required to be updated at this time. In any future application modifications for this project, ensure that the correct stack height is entered.
16. **Windrows Source Testing:** The District reviewed the information provided in the latest incompleteness response regarding changes to the source testing of the windrows. The District accepts the proposal to source test the windrows once per seven days when the windrows are only maintained on-site for 21 days. However, please note that the District may require additional testing if windrows are maintained on-site for a longer duration.



17. **AQ Technical Memorandum:** Upon finalization of project emission estimates and completion of required air modeling, including AQIA and HRA, the AQ Technical Memorandum should be revised with final emission estimates and AQIA and HRA results. The Memo should be provided to County Public Works for review and consideration, and to the District for peer-review.
  
18. **Land Use Approval and CEQA Lead Agency Documentation:** When available, documentation that the proposed project modifications have been reviewed and approved by County Public Works should be provided to the District, along with documentation of the CEQA determination for the proposed project modifications.

March 14, 2023

Kevin Brown  
County of Santa Barbara - Public Works Dpt  
130 E. Victoria Street, Suite 100  
Santa Barbara, CA 93101

FID: 11480  
Permit: AM 14500 10  
SSID: 03707

Re: Incomplete Authority to Construct Application 14500 10

Dear Kevin Brown:

On July 5, 2022, the Santa Barbara County Air Pollution Control District (District) received your application for Authority to Construct (ATC Mod) No. 14500 10 for modifications to the anaerobic digestion project at the Tajiguas Landfill. This letter is to inform you that the application is incomplete. Additional information and/or clarification of information already submitted is required. In order to complete the application, please respond to each of the items listed in the attachment. After we receive the requested information, we will inform you within 30 days if the application is complete.

According to Rule 208.D.4, the application will be denied 120 days after the date of filing if sufficient information needed to deem the application complete has not been submitted, unless the District has, in writing, extended the time.

Please be advised that construction of your facility without a **final** ATC Mod is a violation of District rules and the California Health and Safety Code.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please contact me at (805) 979-8314 or [MountainC@sbcapcd.org](mailto:MountainC@sbcapcd.org). Thank you for your cooperation.

Sincerely,



Charlotte Mountain, Air Quality Engineer III  
Engineering Division

Attachment: Incompleteness Items

cc: County of Santa Barbara - Tajiguas Anaerobic Digestion 11480 Project File  
Engr Chron File  
Joddi Leipner  
John Dewey  
Trevor Leiphardt  
Carly Barham

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ATTACHMENT

**ATC MOD NO. 14500 10 INCOMPLETENESS ITEM LIST**

1. **Cobalt in Fugitive Dust:** Comment no. 7 of the District’s December 21, 2022 incompleteness letter requested that Attachments A and B be updated to reflect that cobalt has health risk data. Attachment B was not submitted, and the *Fugitive PM Toxics* tab Attachment A was not updated to remove the red coloring that indicates no health risk data from the cobalt line items. This comment is a reminder to include all calculated cobalt emissions in fugitive dust in the revised HRA.

2. **Variable Emissions:** The following comments refer to the variable emissions scenarios in the modeling files submitted to the District on November 30, 2022.

a. The following variable emissions scenarios were included for Source IDs CM036 and CM060, which represent diesel combustion emissions from mobile sources routed through the baghouses:

<i>EMISFACT CM036</i>	<i>HROFDY 5*0.07 16*1.465 3*0.07</i>
<i>EMISFACT CM060</i>	<i>HROFDY 5*0.80 16*1.1 3*0.80</i>

The multiplier of 0.07 for CM036 matches the AQIA PM<sub>2.5</sub> multiplier for the hours between 9:00 PM and 5:00 AM. The multiplier of 0.80 for CM060 matches the AQIA PM<sub>10</sub> and PM<sub>2.5</sub> multipliers for the hours between 9:00 PM and 5:00 AM. **In the revised modeling, the ratio of the multiplier for the hours between 9:00 PM and 5:00 AM to the multiplier for the hours between 5:00 AM and 9:00 PM for these sources should be equal to the AQIA PM<sub>10</sub> multiplier.** For example, if the AQIA PM<sub>10</sub> multiplier is 0.80 for the hours between 9:00 PM and 5:00 AM, then the HRA multiplier should be 0.8572 for 5:00 AM to 9:00 PM and 1.0715 for 9:00 PM to 5:00 AM. Ensure the correct multipliers are used in the revised modeling submittal.

b. The following variable emissions scenario was included for Source ID CM036TAC, which represents toxic emissions from the CM036 baghouse. It is unclear why these multipliers were used. **In the revised modeling submittal, include justification of all variable emissions scenarios.**

<i>EMISFACT CM036TAC</i>	<i>HROFDY 5*0.96 16*1.02 3*0.96</i>
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3. **Property Boundary Monitoring Plan:** The following comments refer to the *Property Boundary Monitoring Plan* dated March 6, 2023.

a. After ATC Mod 14500-10 is issued and the security camera has been installed, Public Works will be required to submit an image showing the full view of the camera. Based on this image, the District may determine that the camera must be moved and/or additional cameras must be installed. Please confirm that Public Works will comply with these requirements.

b. Section 2.2.2 of the Plan states that the camera is equipped with a sensor that notifies RR&WMD staff and contractors when motion is detected. Please revise this section to clarify specifically how staff will be notified, the response time between activation of the motion sensor and staff approaching the trespasser, and during which days of the week and hours of the day staff are onsite to respond.

4. **AQ Technical Memorandum:** Upon finalization of project emission estimates and completion of required air modeling, including AQIA and HRA, the AQ Technical Memorandum should be revised with final emission estimates and AQIA and HRA results. The Memo should be provided to County Public Works for review and consideration, and to the District for peer-review.
  
5. **Land Use Approval and CEQA Lead Agency Documentation:** When available, documentation that the proposed project modifications have been reviewed and approved by County Public Works should be provided to the District, along with documentation of the CEQA determination for the proposed project modifications.

April 26, 2023  
Certified Mail  
Return Receipt Requested 9171 9690 0935 0307 0534 23

Kevin Brown  
County of Santa Barbara - Public Works Dpt  
130 E. Victoria Street, Suite 100  
Santa Barbara, CA 93101

FID: 11480  
Permit: AM 14500 10  
SSID: 03707

Re: Incomplete Authority to Construct Application 14500 10

Dear Kevin Brown:

On July 5, 2022, the Santa Barbara County Air Pollution Control District (District) received your application for Authority to Construct (ATC Mod) No. 14500 10 for modifications to the anaerobic digestion project at the Tajiguas Landfill. This letter is to inform you that the application is incomplete. Additional information and/or clarification of information already submitted is required. In order to complete the application, please respond to each of the items listed in the attachment. After we receive the requested information, we will inform you within 30 days if the application is complete.

According to Rule 208.D.4, the application will be denied 120 days after the date of filing if sufficient information needed to deem the application complete has not been submitted, unless the District has, in writing, extended the time.

Please be advised that construction of your facility without a **final** ATC Mod is a violation of District rules and the California Health and Safety Code.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please contact me at (805) 979-8314 or [MountainC@sbcapcd.org](mailto:MountainC@sbcapcd.org). Thank you for your cooperation.

Sincerely,



Charlotte Mountain, Air Quality Engineer III  
Engineering Division

Attachment: Incompleteness Items

cc: County of Santa Barbara - Tajiguas Anaerobic Digestion 11480 Project File  
Engr Chron File  
Joddi Leipner  
John Dewey  
Trevor Leiphardt  
Carly Barham

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ATTACHMENT

**ATC MOD NO. 14500 10 INCOMPLETENESS ITEM LIST**

1. **Variable Emissions:** Following up on comment no. 2 of the District's March 14, 2023 incompleteness letter and discussions with Mary Kaplan at AECOM, the following variable emissions multipliers should be used in the HRA when modeling the period averaging plotfiles:  
*EMISFACT CM036 HROFDY 5\*0.01492 16\*1.492 3\*0.01492*  
*EMISFACT CM060 HROFDY 5\*0.8572 16\*1.0715 3\*0.8572*  
Please note that these values are based on the submitted emission calculations and may change if revisions are made.
2. **Property Boundary Monitoring Plan:** The response to comment no. 3 of the District's March 14, 2023 incompleteness letter indicated that this item will be addressed separately. Please note that the *Property Boundary Monitoring Plan* is still outstanding, unless the final AQIA modeling does not show exceedances at the current property boundary.
3. **AQ Technical Memorandum:** Upon finalization of project emission estimates and completion of required air modeling, including AQIA and HRA, the AQ Technical Memorandum should be revised with final emission estimates and AQIA and HRA results. The Memo should be provided to County Public Works for review and consideration, and to the District for peer-review. This comment is informational only and does not require a response at this time.
4. **Land Use Approval and CEQA Lead Agency Documentation:** When available, documentation that the proposed project modifications have been reviewed and approved by County Public Works should be provided to the District, along with documentation of the CEQA determination for the proposed project modifications. This comment is informational only and does not require a response at this time.

May 31, 2023

Kevin Brown 9171 9690 0935 0247 1096 86  
County of Santa Barbara - Public Works Dpt  
130 E. Victoria Street, Suite 100  
Santa Barbara, CA 93101

FID: 11480  
Permit: AM 14500 10  
SSID: 03707

Re: Incomplete Authority to Construct Application 14500 10

Dear Kevin Brown:

On July 5, 2022, the Santa Barbara County Air Pollution Control District (District) received your application for Authority to Construct (ATC Mod) No. 14500-10 for modifications to the anaerobic digestion project at the Tajiguas Landfill. This letter is to inform you that the application is incomplete. Additional information and/or clarification of information already submitted is required. In order to complete the application, please respond to each of the items listed in the attachment. After we receive the requested information, we will inform you within 30 days if the application is complete.

According to Rule 208.D.4, the application will be denied 120 days after the date of filing if sufficient information needed to deem the application complete has not been submitted, unless the District has, in writing, extended the time.

Please be advised that construction of your facility without a **final** ATC Mod is a violation of District rules and the California Health and Safety Code.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please contact me at (805) 979-8314 or [MountainC@sbcapcd.org](mailto:MountainC@sbcapcd.org). Thank you for your cooperation.

Sincerely,



Charlotte Mountain, Air Quality Engineer III  
Engineering Division

Attachment: Incompleteness Items

cc: County of Santa Barbara - Tajiguas Anaerobic Digestion 11480 Project File  
Engr Chron File  
Joddi Leipner  
John Dewey  
Trevor Leiphardt  
Carly Barham

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ATTACHMENT

**ATC MOD NO. 14500 10 INCOMPLETENESS ITEM LIST**

1. **ROC Increment Modeling:** The submitted ROC increment modeling files use a different property boundary than the other modeling files, as described in Section 3.1.3 of the *Revised Air Quality Technical Memorandum For ATC 14500 10 Application: Tajiguas ReSource Center Santa Barbara County, California* (AQTR) dated May 2023. However, the District's approved approach for the ROC modeling is to exclude only the receptors with an ROC concentration exceeding the maximum increment, as described via email to Kevin Brown on May 8, 2023. Submit revised ROC modeling files using the same receptors as the other modeling runs. In the revised AQTR, identify the receptor with the highest ROC result below the maximum increment of 160  $\mu\text{g}/\text{m}^3$ , and provide a brief explanation of why this receptor was chosen.
2. **AQIA Background Concentrations:** Update the background concentrations to be based on the most recent three years of data (2019-2022).
3. **PM<sub>10</sub> Background Concentration:** Note 2 under Table 3-11 of the AQTR states that the ambient background 24-hour PM<sub>10</sub> concentration is equal to the CAAQS; however, the background concentration used in the report is greater than the CAAQS. Once the background concentrations are updated per item no. 2 of this letter, ensure that note 2 under Table 3-11 is updated accordingly.
4. **HRA Emissions:** The following comments refer to the toxic emissions included in the HRA. No revisions are required, but you may choose to update the HRA based on the comments below.
  - a. The diesel PM emissions entered in the *FACWIDE\_042623\_IMPORTEMS.CSV* file for Source ID CM036 are an order of magnitude higher than the calculated emissions: 0.207 lb/yr compared to 0.0207 lb/yr. This is a conservative error and is not required to be updated.
  - b. The zinc emissions entered in the *FACWIDE\_042623\_IMPORTEMS.CSV* file for Source ID BFADFTAC do not match the calculated emissions. However, this does not affect the HRA because zinc does not have any health risk values.
  - c. Hexavalent chromium emissions from the windrows and biofilter were quantified using the total chromium concentration from Attachment B of the District's November 4, 2021 letter regarding *ATC Mod 14500-05 Source Testing of HAPs on CHP Engines, ADF Flare and ADF Biofilter*. This methodology is conservative and is not required to be changed. However, at your option, you may use 2% of the total chromium concentration to quantify the hexavalent chromium emissions from the windrows and biofilter, per Section 3 of OEHHA's [AB 1900 Biogas Recommendations: Biogas Constituents of Concern and Health-Protective Levels for Biomethane 2020 Update](#).
5. **AQ Technical Memorandum:** Upon finalization of project emission estimates and completion of required air modeling, including AQIA and HRA, the AQ Technical Memorandum should be revised with final emission estimates and AQIA and HRA results. The Memo should be provided to County Public Works for review and consideration, and to the District for peer-review. This comment is informational only and does not require a response at this time.



6. **Land Use Approval and CEQA Lead Agency Documentation:** When available, documentation that the proposed project modifications have been reviewed and approved by County Public Works should be provided to the District, along with documentation of the CEQA determination for the proposed project modifications. This comment is informational only and does not require a response at this time.



air pollution control district  
SANTA BARBARA COUNTY

June 22, 2023

Kevin Brown  
County of Santa Barbara - Public Works Dpt  
130 E. Victoria Street, Suite 100  
Santa Barbara, CA 93101

FID: 11480  
Permit: AM 14500 10  
SSID: 03707

Re: Authority to Construct Application 14500 10

Dear Kevin Brown:

On June 22, 2023, the Santa Barbara County Air Pollution Control District (District) determined that your application for Authority to Construct (ATC Mod) No. 14500-10 for modifications to the anaerobic digestion project at the Tajiguas Landfill was complete. The District will make a decision to either issue or deny a permit for the application within 180 days from the completeness date or 180 days after lead agency approval of the project, whichever time period is longer.

Please be advised that proceeding with the construction of your project without an ATC Mod permit violates District Rule 201 and may result in penalties.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please contact me at (805) 979-8314 or [MountainC@sbcapcd.org](mailto:MountainC@sbcapcd.org).

Sincerely,

Charlotte Mountain, Air Quality Engineer III  
Engineering Division

cc: County of Santa Barbara - Tajiguas Anaerobic Digestion 11480 Project File  
Engr Chron File  
Joddi Leipner  
John Dewey  
Trevor Leiphardt  
Carly Barham

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Aeron Arlin Genet, Air Pollution Control Officer