# PETITION FOR VARIANCE BEFORE THE HEARING BOARD OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

IV 11/22/22 RV 12/27/22

PETITI	ONER:	Sunshine Canyor	Landfill	CASE NO:	3448-16	<u>-</u>
(Brown	ing-Ferris Ind	ustries of Californi	a, Inc. (BFIC)	FACI	LITY ID: <u>049111</u>	
[locati	TY ADDRES on of equipm tate, Zip <u>: See</u>		ando Rd., Sylmar, on; specify busin	CA 91342 ress/corporate addre	ss, if different, unde	r item 2, below]
1.	TYPE OF V. selecting)  NTERIN		STED (more than	one box may be chec	ked; see Attachment A	1
2.	Kate Downe	o receive notices r	egarding this Petiti	on (no more than two	ess, and phone numb authorized persons).	er of persons
	Sylmar, CA		Zip 91342		Zip	· · · · · · · · · · · · · · · · · · ·
	<b>2</b> (818) 36	2-2154	Ext.	<b>8</b> ()	<i>_E</i> xt	<b>t</b>
	Fax <u>* (</u>	)		Fax_()		
	E-mail_kdov	vney@republicser	vices.com	E-mail	<del></del>	<del></del>
3.	RECLAIM P		⊠ No	Title V Permit		No
If	ie Clerk of i Syou requir	the Board at 90 e disability-rela	9-396-2500 ör i sted accommode	by e-mail at <u>clerko</u> utions to facilitate	ernative format by fboard@aqmd.gov participating in the prior to the prior to the hearing	e hearing,

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]

4. GOOD CAUSE: Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

Sunshine Canyon Landfill (SCL) is requesting an interim variance to cover the time until a hearing for the regular variance can be held.

The Flare No. 9 source test was initially performed on March 2, 2022 by Alliance Source Testing, LLC (Alliance) but it was discovered during the initial review process that the chain of custody record (COC), sample analysis date, and the quality assurance/quality control (QA/QC) date were inconsistent and not conducted in the correct order. Under normal circumstances, the chain of custody record shows the date the laboratory receives the collected samples, followed by the date of the laboratory analysis, and the QA/QC is conducted throughout the laboratory analysis. However, for the Flare 9 source test, the COC date and the Sample Receiving Data Sheet date were inconsistent. The Sample Receiving Data Sheet also had purge dates that were inconsistent with the sample receiving date. In addition, the Laboratory Analysis Report was dated March 8-9, 2022 but the QA/QC had the date analyzed as March 8, 2022, which infers it may have been done prior to the analysis. Because of the inconsistencies found in the COC and QA/QC, this initial Flare 9 source test was considered unreliable and was not used for compliance purposes. A new source test was scheduled for June 20, 2022, which was the next available source test date available for Alliance. Flare 9 continued to follow the last valid source test from March 21, 2019 until the new source test was conducted and reported. This initial source test and the reason for rejection of the source test was provided to the SCAQMD in April 2022.

The Flare No. 9 re-test was performed on June 20, 2022 by Alliance. The source test results for this test which were reported on August 19, 2022, indicated the flare did not pass the allowable permitted emission limits of pounds per million British Thermal Units (ib/MMBtu) for the Nitrogen Oxides (NOx) and Reactive Organic Compounds (ROC).

Actions were taken immediately by SCL to identify potential equipment issues affecting the flare's ability to meet the NOx and ROC permitted emission limits. SCL is currently working closely with the manufacturer, John Zink Company LLC, who has provided recommendations for optimizing the operation and efficiency of the flare, and SCL is currently pursuing these recommendations. Please note, Flare No. 9 was shut down again immediately after performing the source re-test and was not planned for operation unless necessary for odor control. SCL believed the operation of the Sunshine Gas Producers (SGP) LFG-to-energy (LFGTE) Plant and the operation of Flare No. 1, Flare No. 3, Flare No. 10, and Flare No. 11 would be sufficient for controlling odors. However, due to maintenance and unexpected downtime of the SGP LFGTE Plant and the other control devices, this necessitated the operation of Flare No. 9 for odor controls on a limited basis. This is why there is not sufficient time to wait for regular variance hearing as non-compliance has already started. Flare No. 9 will be scheduled for another re-test as soon as the possible equipment issues are addressed and the SCAQMD will be notified appropriately.

Please note, despite SCL's best efforts of following the recommendations from the flare manufacturer, the site is concerned about the possibility of another failed source test. Therefore, SCL is requesting a regular variance until the issues can be fully resolved. The interim variance is requested because the Flare No. 9 will need to operate on limited occasions to control odors until the regular variance hearing can be held.

5. Briefly describe the type of business and processes at your facility.

The SCL is an active, municipal solid waste (MSW) landfill with a landfill gas (LFG) collection and control (GCCS) system. The SCL is comprised of two areas, the City Side Landfill and the County Side Landfill. The GCCS consists of vertical LFG collection wells, and horizontal collectors, and gas transmission header and lateral piping system as needed. Horizontal collectors can also include, but are not limited to, collectors located under membrane-covered area (closure turf), leachate system connections, trench collectors, and liner collectors.

There are five operating flares at SCL (Flare No. 1, Flare No. 3, Flare No. 9, Flare No. 10, and Flare No. 11). Flare No. 3 operates as a back-up flare to Flares No. 1, No. 9, No. 10, No. 11 and the SGP LFGTE Plant. The SGP Plant initiated operations in September 2014 and is not under common control with SCL. The SGP Plant operates under its own Title V permit. The landfill site is permitted under its Title V Permit (Facility ID No. 049111). Flares No. 9, No. 10, and No. 11 operates as supplemental control devices to the SGP Plant.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment, For RECLAIM or Title V facilities, attach only the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing. Equipment/Activity/ /Application// RECLAIM Date RemitiNo. Device Application/Plan No. Denled (if relevant) Landfill Gas Flare No. 9 A/N: 526972, Permit No. G45944 \*Attach copy of denial letter 7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text. Flare No. 9 is a LFG control device necessary for the combustion of collected LFG in order to prevent odor issues. 8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes 🖂 Nol If yes, how often: Various, see below Date of last maintenance and/or inspection: Various, see below Describe the maintenance and/or inspection that was performed. Flare No. 9's maintenance and its frequency are listed below (The last two months of maintenance records are attached): Test control panel inputs, outputs and shutdowns (monthly) Download digital chart recorder data (weekly) Indicate operational status (1 week) Inspect flare refractory (3 months) Inspect and clean dampers, lubricate pivot points with oil (2 months) Inspect flare pilot assembly (3 months) Inspect and clean UV sensor bulb (3 months) Inspect flare burners for blockage and corrosion (3 months) Inspect backpressure reading at flare stack inlet <5" H2O (weekly) Inspect gas leak via odor observation (twice per month) Inspect (replace as necessary) thermocouple assemblies (6 months) Flame arrestor differential pressure < 2" W.C (twice per month) Outside shell temperature location 1-4 (monthly) Combustion Air Blower's preventative maintenance and Inspections and their frequency are listed below: Inspect shaft alignment (3 months) Check tightness of all bolts and set screws (3 months) Inspect blower inlet and outlet for obstructions (3 months) Check bearing temperature (3 months) inspect and clean blower fan (3 months)

Inspect pressure switch set point (3 months)
Clean combustion air blower filter (monthly)

under which this permit is issued unless otherwise noted below."  Flare No. 9 is not meeting Condition No. 1 because the annual source test demonstrated it did not meet the NOx and ROG limits under Condition No. Condition No. 27 (Rule 1303)  "This equipment is subject to the applicable requirements of the following rand regulations:  NMOC: 20 ppmv or 98% weight reduction, Rule 1150.1, 40 CFR 6 Subpart WWW, 40 CFR 63 Subpart AAAA  CO: 2000 ppmv, Rule 407  NOx: 0.025 lb/MMBtu, Rule 1303 - BACT/LAER  SOx as H2S: 150 ppmv in inlet (Rule 431.1)  PM10: 5 lbs/MMscf, Rule 1303 - BACT/LAER  PM: 0.1 gr/dscf, Rule 409  PM: Rule 404, See Appendix B for emission limits  VOC: 0.006 lb/MMBtu, Rule 1303 - BACT/LAER  CO: 0.06 lb/MMBtu, Rule 1303 - BACT/LAER  Flare No. 9 is not meeting Condition No. 27 because the annual source test demonstrated it did not meet the NOx (test result 0.029 lb/MMBtu) and RO (test result 0.0078 lb/MMBtu) limits listed in Condition No. 27.	"Construction and another	Explanation		
accordance with all data and specifications submitted with the applic under which this permit is issued unless otherwise noted below."  Flare No. 9 is not meeting Condition No. 1 because the annual source test demonstrated it did not meet the Nox and ROG limits under Condition No.  Condition No. 27 (Rule 1303)  "This equipment is subject to the applicable requirements of the following of and regulations:  NMOC: 20 ppmv or 98% weight reduction, Rule 1150.1, 40 CFR 65 Subpart WWW, 40 CFR 63 Subpart AAAA  CO: 2000 ppmv, Rule 407  NOX: 0.025 Ib/MMBtu, Rule 1303 - BACT/LAER  SOX as H2S: 150 ppmv in inlet (Rule 431.1)  PM10: 5 Ibs/MMscf, Rule 1303 - BACT/LAER  PM: 0.1 gr/dscf, Rule 409  PM: Rule 404, See Appendix B for emission limits  VOC: 0.006 Ib/MMBtu, Rule 1303 - BACT/LAER  CO: 0.06 Ib/MMBtu, Rule 1303 - BACT/LAER  Flare No. 9 is not meeting Condition No. 27 because the annual source test demonstrated it did not meet the NOx (test result 0.029 Ib/MMBtu) and RO (test result 0.0078 Ib/MMBtu) limits listed in Condition No. 27.  Are the equipment or activities subject to this request currently under variance coverage? Yes Note that the subject is the subject to this request currently under variance coverage?	"Condition and			
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Date	Subpart WWW, 40 CFR 63 Su CO: 2000 ppmv, R NOx: 0.025 lb/MMB SOx as H2S: 150 ppmv in in PM10: 5 lbs/MMscf, F PM: 0.1 gr/dscf, Ru PM: Rule 404, See VOC: 0.006 lb/MMB CO: 0.06 lb/MMB CO: 0.06 lb/MMB tu Flare No. 9 is not meeting Cordemonstrated it did not meet it (test result 0.0078 lb/MMBtu) I subject to this request currently	abpart AAAA ule 407 itu, Rule 1303 - BACT/LAER let (Rule 431.1) Rule 1303 - BACT/LAER ale 409 Appendix B for emission limits itu, Rule 1303 - BACT/LAER a, Rule 1303 - BACT/LAER addition No. 27 because the annual source tes the NOx (test result 0.029 lb/MMBtu) and RO imits listed in Condition No. 27.		
		or within the last six months) under variance		
are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes \(\Boxed{\omega}\) No \(\Boxed{\omega}\)		1Explanation		
overage? Yes No 🗵	Date			
overage? Yes No No Case(No. Date(of/Action)   Final(Compliance)   Explanation				
overage? Yes No No Case(No. Date(of/Action)   Final(Compliance)   Explanation	1 - F1 F-1-11 11 11 - 4 14 - 6			
CaselNo Date of Action Final Compliance Explanation		by concerning this equipment or activity with		
overage? Yes No No Case(No. Date(of/Action)   Final(Compliance)   Explanation				
Case No. Date of Action Final Compliance Explanation  Date of Action Date  Vere you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity with	of each notice.			
		Flare No. 9 is not meeting Cordemonstrated it did not meet to "This equipment is subject to trand regulations:  NMOC: 20 ppmv or 98 Subpart WWW, 40 CFR 63 Succession of Violation or Notice(s) to Compare the Cordemonstrated it did not meet to the Cordem		

Inspect motor bearings (1 year)

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

Under Permit to Operate/Construct (PTO/C) No. G45944 (A/N 526972), SCL is required to conduct a source test on landfill gas Flare No. 9 located at the Sunshine Canyon Landfill in Sylmar, CA. Alliance conducted the initial source test on March 2, 2022, but because of inconsistencies found in the chain of custody (COC) and the quality assurance/quality control (QA/QC), the initial test was considered unreliable and Flare No. 9 was immediately shutdown until a re-test could be performed.

This re-test was performed on June 20, 2022 by Alliance. The source test results for this re-test which was reported on August 19, 2022 indicated the flare did not pass the allowable permitted emission limits of lb/MMBtu for the NOx and the ROC.

Actions were taken immediately by SCL to identify potential equipment issues affecting the flare's ability to meet the NOx and ROC permitted emission limits. SCL is currently working closely with the manufacturer, John Zink Company LLC, who has provided recommendations for optimizing the operation and efficiency of the flare, and we are currently pursuing these recommendations. Please note, Flare No. 9 was shut down again immediately after performing the re-test and has not been in operation since unless necessary to control odors in the future, prior to a re-test. SCL believed the operation of the Sunshine Gas Producers (SGP) LFG-to-energy (LFGTE) Plant and the operations of Flare No. 1, Flare No. 3, Flare No. 10, and Flare No. 11 would be sufficient for controlling odors. However, due to maintenance and unexpected downtime of the SGP LFGTE Plant and the other control devices, it necessitated the operation of Flare No. 9 for odor controls on a limited basis. Flare No. 9 will be scheduled for another re-test as soon as the possible equipment issues are addressed and the SCAQMD will be notified appropriately.

Addressing the issue for proper operation of Flare No. 9 is dependent on the ability to obtain the necessary parts and equipment as soon as they are available, and the timeframe for implementing and installing the necessary parts and equipment. The ability to address the emissions limits of Flare No. 9 are dependent on the earliest availability of a source test company, requirement to provide to the SCAQMD written notice of the test thirty days prior to the testing, and the availability of the final source test results by the source test company. Non-compliance is beyond SCL's reasonable control because the flare is necessary to ensure compliance with landfill gas emissions and odor requirements.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

The Flare No. 9 source test results was reported on August 19, 2022, which indicated the flare did not pass the allowable permitted emission limits of 0.025 pounds per million British Thermal Units (Ib/MMBtu) for the Nitrogen Oxides (NOx) (0.029 lb/MMBtu result) and 0.006 lb/MMBtu for the Reactive Organic Compounds (ROC) (0.0078 lb/MMBtu result).

16: List date(s) and action(s) you have taken since that time to achieve compliance.

Flare No. 9 was shut down again immediately after performing the source re-test and has not been in operation since unless necessary to control odors in the future, prior to a re-test. The site team is working closely with the manufacturer and implementing all recommendations, including the installation of a new static mixing chamber to the upgraded design, which will reportedly facilitate better mixing of air to gas to meet the current emission limits. The site team is currently working to identify and secure a contractor to perform the installation and expects the installation to be complete by the end of November, pending contractor availability.

17.	What would be the harm to your business during and/or after the period of the variance if the variance were not granted?				
	Economic losses: Potential surface emission and odor issues if Flare No. 9 is not allowed to operate for the combustion of LFG, which would result in complaints and consequently Notices of Violation (NOV) with monetary penalties. Potential NOVs issued for each day Flare No. 9 is operating and associated monetary fines.  Number of employees laid off (if any):				
	Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contra hardship on customers, layoffs, and/or similar impacts).				
	If the variance is not granted, the facility would have difficulty operating in accordance with District rules and regulations, increasing the likelihood and magnitude of potential enforcement action and fines for each day Flare No. 9 operates for odor control. This would result in financial harm from potential fines as well as				

If the variance is not granted, the facility would have difficulty operating in accordance with District rules and regulations, increasing the likelihood and magnitude of potential enforcement action and fines for each day Flare No. 9 operates for odor control. This would result in financial harm from potential fines as well as additional stigma damages associated with being considered a long-term violator of District regulations. LFG is continuously generated due to microbial degradation of refuse. The landfill cannot prevent LFG from being generated within the landfill. In order to prevent potential odor issues, which are considered a priority, there are limited occasions when Flare No. 9 needs to be operated. These limited occasions includes downtime and maintenance periods for the SGP LFGTE Plant and the other flare control devices.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

SCL took direct action and Flare No. 9 was shutdown immediately after performing the source re-test and has not been in operation. However, due to required maintenance and unexpected downtime of the SGP LFGTE Plant and the other control devices has necessitated the operation of Flare No. 9 for odor control on a limited basis.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

The state of the s	(A)	(B)	(C)*
	Total Estimated	Reduction Due to	Net Emissions After
Pollutant	Excess Emissions	Mitigation	Mitigation((lbs/day)
the state of the s	:(IDS/Oay):	(IDS/day)	
Reactive Organic Gases (ROGs)	1,81	ا م	4.04
Neactive Organic Gases (NOGS)	1.01	U	1.81
Nitronia Guida - (NGC)			<u> </u>
Nitrogen Oxides (NOx)	6:74	<u>                                      </u>	6.74

<sup>\*</sup> Column A minus Column B = Column C

Excess Opacity: N/A %

20. Show calculations used to estimate quantities in No. 19, or explain why there will be no excess emissions.

See attached calculations. The excess emission estimates is based on an upper end estimate of the days and hours for the overall length of time for which the variance is requested. Please note, actual excess emissions and days of excess emissions will be based on how often the flare is needed for odor control and will almost certainly be lower than the upper end estimate.

21.	Explain how you plan to reduce (mitigate) excess emissions during the variant féasible, or why reductions are not feasible.	ce period to the maximum extent:
	In order to reduce excess emissions, Flare No. 9 has shut down and is no local continuous basis. However, the flare will need to operate on a limited basis of during maintenance and downtime of the SGP LFGTE Plant and the other considered a priority.	when necessary to control odors,
<b>2</b> 2.	How do you plan to monitor or quantify emission levels from the equipment or period, and to make such records available to the District? Any proposed money records are period, and facilities from applicable missing data requirements.	activity(s) during the variance onitoring does not relieve
	The facility will continue to monitor the flow and temperature of the flare and demonstrated in question No. 20 above to determine the amount of excess e the amount of excess emissions will be made available to the District.	conduct the same calculations as missions. The calculations and
23.	How do you intend to achieve compliance with the rule(s) and/or permit condit description of any equipment to be installed, modifications or process changes to be amended, etc., dates by which the actions will be completed, and an est	s to be made, permit conditions
	The site team is working closely with the manufacturer and implementing all installation of a new static mixing chamber to the upgraded design, which will mixing of air to gas to meet the current emission limits. The site team is curre secure a contractor to perform the installation and expects the installation to November 2022, pending contractor availability. The cost of the loaner installation	I reportedly facilitate better ently working to identify and be complete by the end of
24.	State the date you are requesting the variance to begin:Date of filing/, date by which you expect to achieve final compliance:December 2022	1/4/22 ; and the
	If the regular variance is to extend beyond one year, you must include a Sche specifying dates or time increments for steps needed to achieve compliance, of increments of Progress (see Attachment A, Item 24, Example #3).	edule of Increments of Progress, See District Rule 102 for definition
	List Increments of Progress here:	· · · · · · · · · · · · · · · · · · ·
	No applicable.	·
ľyóu m	AY ATTACH ADDITIONAL PAGES IF NECESSARY.]	PAGE 7 OF 10

	variance petition or any rela						
			Ext Ext.	_			
	•		EXI	<del>-</del>			
	If the petition was completed by someone other than the petitioner, please provide their name and title below.						
	Name	Company	Title				
	The undersigned, under pe therein set forth, is true and	nalty of perjury, states the	at the above petition, including a	ttachments and the items			
	Executed on 11111	<u> </u>	Sylman	, California			
	Signature		Kate Downey Print Name				
	Title: Environmental Mana	ger					
individu followir	uals, or entities meeting sma	Il business gross receipts	ES: To be eligible for reduced criterion [see District Rule 303()	n)], you must complete the			
	1. The petitioner is						
	<ul> <li>a) an individual, or</li> <li>b) an officer, partner or owner of the petitioner herein, or a duly authorized agent of the petitioner authorized to make the representations set forth herein.</li> </ul>						
	If you selected 1a, abo		torm nerein.				
	2. The petitioner is	•					
		eets the following definition	on of Small Business as set forth	in District Rule 102			
	SMALL BUSINESS	means a business which	is independently owned and op concern, the combined activities	erated and meets the			
		mber of employees is 10 o	or less; AND	*			
		al gross annual receipts a	•				
	(iii) the fac	ility is a not-for-profit train	•				
	b) ☐ an entity with tota	o- I gross annual receipts of	R- \$500,000 or less.				
		petitioner qualifies for red ordance with Rule 303(h).	uced fees for purpose of filing fe	es and excess emission			
	I declare under penalty of p	erjury that the foregoing i	s true and correct.				
Executi	ed on	, at		, California			
Signatu	ire	-	Print Name	<del></del>			
• –							
ue			<del></del>				
YOU MA	AY ATTACH ADDITIONAL PAGES	IF NECESSARY]		PAGE 8 OF 10			

#### ATTACHMENT A

#### ITEM 1

Type of Variance Requested:

- (a) SHORT: If compliance with District rule(s) can be achieved in <u>90 days or less</u>, request a short variance. (Hearing will be held approximately 21 days from date of filling—10-day posted notice required.)
- (b) REGULAR: If compliance with District rule(s) will take <u>more than 90 days</u>, request a regular variance. If the variance request will extend beyond one year, you <u>must</u> include a specific detailed schedule of increments of progress [see Page 8, No. 24] under which you will achieve final compliance. (Hearing will be held approximately 45 days from date of filing—30-day published notice required.)
- (c) EMERGENCY: If non-compliance is the result of an unforeseen emergency, such as a sudden equipment breakdown, power failure, or accidental fire, you may request an emergency variance. You may request an ex parte emergency variance in addition to an emergency variance. An emergency variance cannot be granted for more than 30 days. (Hearing will be held within 2 working days from the date of filing, whenever possible, excluding Mondays, weekends, and holidays.) If you request an emergency variance, you must answer No. 4 on page 1.
- (d) **EX PARTE EMERGENCY:** If variance coverage is required on a weekend or when the Board is not in session, and you cannot wait until an emergency variance hearing can be held, you may request an ex parte emergency variance will be granted or denied solely on the information contained in the petition and the District's response to the petition. Under most circumstances, an ex parte emergency variance will remain in effect only until a hearing can be held. If you request an ex parte variance, you must answer No. 4 on page 1.
- (e) INTERIM: If you require immediate relief (other than for emergencies) to cover the time until a short or regular variance hearing can be held, request an interim variance. If you request an interim variance, you must also request a short or a regular variance on the same petition. (Hearing will be held approximately 2 working days from date of filing, whenever possible, excluding Mondays, weekends and holidays.) If you request an interim variance, you must answer No. 4 on page 1.

#### ITEM 4

GOOD CAUSE: The Hearing Board is required to provide public notice of variance hearings, as the public has a right to attend and testify at such hearings. In order for the Hearing Board to hold an Interim, Ex Parte Emergency or Emergency Variance hearing without the required public notice, a petitioner must present facts which will support a determination by the Board that "good cause" exists to hear a variance without notifying the public about the variance and providing the public with an opportunity to present evidence concerning the variance.

#### ITEM 6

# Example #1:

Equipment/Activity	Remit No.	RECLIAIM Device No.	Date) (Application/Plan) (Denied)
		<u> </u>	(if relevant)
Tenter frame		D32	
Chrome-plating tank	M99999		
Bake oven	123456		
Create special effects (fog)	N/A	N/A	N/A
Mfg., sale, distribution, use of non-compliant coating	N/A	N/A	12/10/95

## ITEM 9

- a) If you are requesting relief from Rule 401 and the excess opacity during the variance period will reach or exceed 40%, you should also request relief from California Health and Safety Code Section 41701.
- b) If you are requesting relief from a permit condition(s), you should also request relief from the rule requiring compliance with conditions of the permit: 202(a), (b) or (c) Temporary Permit to Operate; 203(b) Permit to Operate; 2004(f)(1) RECLAIM Permit; 3002(c) Title V Permit.

## Example #2:

Rule	Explanation
404(a)	tenter frame is vented to damaged air pollution control equipment
2004 (f)(1) [Condition No. 28-2 of Facility P/O No. 099999]	source test cannot be conducted as required until new ESP is installed
1113(c)(2)	petitioner manufactures and sells clear wood finishes with VOCs in excess of 350 grams per liter
401(a) & California H&S Code Section 41701	Opacity will exceed 45%.

#### **ITEM 24**

# Example #3:

# Sample Schedule of Increments of Progress

- Permit application(s) will be submitted to the District by [date].
- Contracts for the purchase of emission control systems will be awarded by [date].
- On-site construction will be completed by [date].

(Petition for Variance: Revised February 22, 2011)

English	"If you require a language interpreter in order to participate in the hearing, contact the
	Clerk of the Board at least five (5) calendar days before your hearing at 909-396-2500 or
	by e-mail at clerkofboard@aqmd.gov. Specify the case name and number, hearing date,
<del></del>	and the language for which you are requesting an interpreter."
Farsi	"اگر برای شرکت در جلمه استماع به مترجم نیاز دارید, حد اقل پنج (5) روز تقویمی قبل از جلیمه استماع ، با منظی هیئت توسط شعاره تلفن 2500-396-909 یا یومیله نامه الکترونیکی با نشاتی Clerkofboard@agmd.gov تعلق بگیرد. نام پرونده و شعاره آن, تاریخ
	خلمیه استماع و ژبانی را که برای آن مترجم درخواست کرده اید مشخص گلید"
Arabic	"إذًا كنت في حاجة لمترجم من أجل المشاركة في جلمنة الامشماع، اتصل بكاتب المحكمة قبل موحد جلمنة الامتماع بحممية (5) أيام على خاتف 2500-
	. حلد اسم وزقم القضية و تاريخ الاستثماع واللغة التي تزيد في 396 <u>clerkofboard@aqmd.gov 3</u> 960-909 أو بالبريد الإلكتروني على مترجم لها."
Armenian	"Ունկնդրաթյան մասնակցելու համար, եթե թարգմանչի կարիրն անենար, նախրան ձեր
	անկնորաբյունը, ամենարիչն մինգ (5) օրացույցային օրից առաջ կապվեր մանձնախմբի բարտողարի նետ, 909–390–2600 մեռախոսանամարով կամ ելեկո՝ նամակով մետևրալ
	ինասցնով <u>Clerkofboard@aqmd.gov</u> լ Նչեր գործի անունն և ռամարը, ունկնդրության
Vietnames	թվականը, և լեզուն, որի համար թարգմանիչ եր ցանկանում" "Nếu quý vị cần Thông Dịch Viên cho buổi điều trần, xin vụi lòng điện-thoại cho Thư Ký Hội Đồng
	tại số 909-396-2500 trễ nhất là năm [5] ngày, không tính hai ngày Thứ Bảy và Chủ Nhật, trước buổi
·e	điều trần hoặc gửi điện thư đến <u>clerkofboard@aqmd.gov</u> . Nhớ ghi rõ tên và số hổ sơ, ngày điều trần, và ngôn ngữ quý vị cần có người để thông dịch."
Chinese	如果你要求翻譯來協助你參加聽證會,請在你的聽證會前至少提前五天(5個日曆日)打電
	話到909-396-2500或發電子郵件到 <u>clerkofboard@agmd.gov</u>
	與局裏的辦事人員聯絡。並且明確説明你的案子的名稱和號碼,聽證日期,以及你要求的
	翻譯的語種。
Japanese	公聴会(ヒアリング)に参加するために通訳が必要な場合、少なくとも5日前まで
	に事務局 (Clerk of the Board) にご連絡ください。電話でのご連絡は
	909-396-2500、ε-メールでのご連絡は <u>clerkofboard@agmd.gov</u> .
	までお願いします。その際、案件名 (case name) と案件番号 (case number)、
	ヒアリングの日付、通訳が必要な言語を特定して下さい。
Korean	"만약 귀하나 귀하의 증인들이 심리에 참여하기 위해 통역사가 필요하시면,
	심리일 5일 전까지 기관부서의 서기에게 909-396-2500으로 연락하시거나,
	<u>clerkofboard@aqmd.gov</u> 로 연락 하십시오.
	통역이 필요하신 사건의 이름, 심리날짜, 그리고 언어를 정확하게 말씀해
	주십시오."
Spanish	Si usted requiere un intérprete para poder participar en la audiencia, favor de comunicarse
	con el Secretario de la Junta cuando menos cinco (5) días hábiles antes de su audiencia al
i.	teléfono (909) 396-2500 ó por correo electrónico al clerkofboard@aqmd.gov. Especifique
	el nombre y el número de su causa, la fecha de la audiencia y el idioma del cual está
Tapalan	solicitando el intérprete. "Kung kailangan ninyo nang interpreter sa Pilipino para makasali kayo sa pagdinig sa kaso, tumawag lang
Tagalog	po kayo sa Clerk of the Board sa numero 909-396-2500 or kung hindi mag-email kayo sa
	email <u>clerkofboard@aqmd.gov</u> . Kailangan na tumawag kayo sa loob nang limang araw (5 days) bago ang
	inyong hearing date at ibigay and inyong pangalan at case number, araw nang inyong pagdinig sa kaso at inyong gusto na may lenguahe na interpreter".
Thai	หากคุณต้องการสามในการขึ้นตาล ให้ติดต่อเจ้าหน้าที่ ล่วงหน้าอย่างน้อย 5 วันก่อนวันขึ้นตาล โดยติดต่อที่เบอร์โทร 909-396-2500 หรือโดย@mailที่

 clerkofboard@aqmd.gov างบอก	ชื่อและหมายเลกของคดี พร้อมทั้งวันเวลาในการขึ้นศาล	และระบุภาษาที่คุณต้องการล่าม	1	-
		-		

# **Clerk of Board**

From: Koster, Paul < PKoster@republicservices.com>

Sent: Monday, November 14, 2022 7:03 AM

To: Clerk of Board

Cc: Downey, Kate; Wade, Benjamin

Subject: RE: Sunshine Canyon Landfill Request for Variance on Flare 9

Attachments: Flare 9 Vairance.pdf

To whom it may concern,

Please find attached the Petition for Variance requested for Flare 9 located at Sunshine Canyon Landfill in Sylmar. Feel free to reach out to me if you have any questions or concerns regarding this petition.

Thank you,

# Paul D. Koster II

**Environmental Manager** 

14747 San Fernando Road Slymar, CA. 91342

e pkoster@republicservices.com

o 818-362-2258

c 818-200-3016

w RepublicServices.com



Sustainability in Action