'18MAY24 PM 2:30 APCD

FORTISTAR METHANE GROUP

MM San Diego – North City
5244 Convoy Street ◆ San Diego, California 92111
Tel. (858) 715-0936 ◆ Fax. (858) 715-4620

May 23, 2018

Douglas L. Erwin, PE
Senior Air Pollution Control Engineer
San Diego APCD
10124 Old Grove Road
San Diego, California 92131

Subject: MM San Diego – North City (Title V Permit No. 975482)
Title V Permit Renewal Application – Additional Fee Submittal

Dear Mr. Erwin;

Enclosed is a check for $8,233.00 related to the renewal application for Title V Permit No. 975482 that has previously been submitted. MM San Diego – North City has supplied a total sum of $8,328.00 ($95.00 check originally submitted with application) to go towards the San Diego Air Pollution Control District's application fee estimate of $8,224.00.

Please direct all questions regarding this fee submittal to Suparna Chakladar at (951) 833-4153.

Sincerely,

Anthony J. Falbo
Senior Vice President - Operations
FORTISTAR Methane Group
MM San Diego – North City

Enclosures: Application Fee Estimate
Additional Application Fee Deposit
Application Fee Correspondence

cc: Suparna Chakladar, FMG

'18MAY24 PM 2:31 APCD

We received another application for title V renewal at Minnesota Methane- N. City, similar to the one for Neo, which was also accompanied with a check for $95. Attached are estimated fees for the balance. As with Neo, we will await your submittal of the additional deposit, then proceed with the application

Douglas L. Erwin, PE
Senior Air Pollution Control Engineer
San Diego Air Pollution Control District
10124 Old Grove Rd.
San Diego, CA 92131
Phone: (858) 586-2717
Fax: (858) 586-2801
www.sdapcd.org

CONFIDENTIALITY NOTICE: This email message, including any attachments, is for the sole use of the intended recipient(s) and may contain information protected from disclosure by applicable laws and regulations. If you are not an intended recipient, you may not review, use, copy, disclose or distribute this message or any of the information contained in this message to anyone. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of this message and any attachments. Unintended transmission shall not constitute waiver of any applicable legal protection afforded to this email and any attached documents.

'18MAY24 PM 2:31 APCD

Michael Langfelder

From: Suparna Chakladar
Sent: Friday, May 18, 2018 2:35 PM
To: environmentalreporting
Subject: FW: Scan from a COSD Xerox WorkCentre
Attachments: img-517162212-0001.pdf; fee est Neo SD LLC T5 renewal 5-18-2018.xlsx

Suparna Chakladar
Vice President
FORTISTAR Methane Group
5087 Junction Road
Lockport, NY 14094
Ph: (951) 833-4153
Fax: (866) 683-9459

-----Original Message-----
From: Erwin, Douglas <Douglas.Erwin@sdcounty.ca.gov>
Sent: Friday, May 18, 2018 9:57 AM
To: Suparna Chakladar <SChakladar@fortistar.com>; Anthony Falbo <AJFalbo@Fortistar.com>
Cc: McDaniel, Carol <Carol.McDaniel@sdcounty.ca.gov>; Cain, Teresa <Teresa.Cain@sdcounty.ca.gov>; Erwin, Douglas <Douglas.Erwin@sdcounty.ca.gov>
Subject: FW: Scan from a COSD Xerox WorkCentre

Ms. Chakladar
Mr. Falbo

The District has received your attached submittal, however, to complete this submittal, additional funds in the amount of the attached estimate are required. Please note that the current permit processing fee is $104 (revised from $95 in July '17).

We will await your submittal of the additional fee deposit.

Regards,
Doug

Douglas L. Erwin, PE
Senior Air Pollution Control Engineer
San Diego Air Pollution Control District
10124 Old Grove Rd.
San Diego, CA 92131
Phone: (858) 586-2717
Fax: (858) 586-2801
www.sdapcd.org

CONFIDENTIALITY NOTICE: This email message, including any attachments, is for the sole use of the intended recipient(s) and may contain information protected from disclosure by applicable laws and regulations. If you are not an intended recipient, you may not review, use, copy, disclose or distribute this message or any of the information contained in this

'18MAY24 PM 2:30 APCD

Michael Langfelder

From: Erwin, Douglas <Douglas.Erwin@sdcounty.ca.gov>
Sent: Monday, May 21, 2018 10:54 AM
To: Suparna Chakladar
Cc: McDaniel, Carol; Cain, Teresa; Anthony Falbo; environmentalreporting
Subject: RE: Application incomplete - missing fees

Suparna,
Point taken. I will pull the most recent renewals for both MM-North City and Neo, and send you revised estimates based on your assertion that the renewal will be the same or nearly the same.
Regards,
Doug Erwin

From: Suparna Chakladar [mailto:SChakladar@fortistar.com]
Sent: Monday, May 21, 2018 5:47 AM
To: Erwin, Douglas <Douglas.Erwin@sdcounty.ca.gov>
Cc: McDaniel, Carol <Carol.McDaniel@sdcounty.ca.gov>; Cain, Teresa <Teresa.Cain@sdcounty.ca.gov>; Anthony Falbo <AJFalbo@Fortistar.com>; environmentalreporting <environmentalreporting@fortistar.com>
Subject: RE: Application incomplete - missing fees

Mr. Erwin;

The 55 hours being estimated for renewal of the MM San Diego North City Title V permit at a fee of $11,269 exceeds the prior fees charged for Title V renewal significantly. In 2011, we paid $5,108 for renewal of the Title V. Given that no change has been made in the equipment or operational practices at this site, we expect the renewal to be administrative only.

Please help us understand why the fees are more than double that of 5 years ago for an administrative change.

Thank you

Suparna Chakladar
Vice President
FORTISTAR Methane Group
5087 Junction Road
Lockport, NY 14094
Ph: (951) 833-4153
Fax: (866) 683-9459

From: Erwin, Douglas <Douglas.Erwin@sdcounty.ca.gov>
Sent: Friday, May 18, 2018 11:17 AM
To: Suparna Chakladar <SChakladar@fortistar.com>
Cc: McDaniel, Carol <Carol.McDaniel@sdcounty.ca.gov>; Cain, Teresa <Teresa.Cain@sdcounty.ca.gov>; Erwin, Douglas <Douglas.Erwin@sdcounty.ca.gov>
Subject: Application incomplete - missing fees

Suparna,

'18MAY24 PM 2:32 APCD

message to anyone. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of this message and any attachments. Unintended transmission shall not constitute waiver of any applicable legal protection afforded to this email and any attached documents.

-----Original Message-----
From: APCD Front Desk [mailto:LUEG-APCD-XeroxWC5325@sdcounty.ca.gov]
Sent: Thursday, May 17, 2018 4:22 PM
To: McDaniel, Carol <Carol.McDaniel@sdcounty.ca.gov>
Subject: Scan from a COSD Xerox WorkCentre

Please open the attached COSD document. It was scanned and sent to you using a Xerox WorkCentre.

Number of Images: 60
Attachment File Type: PDF

Device Name: APCD Front Desk
Device Location:

For more information on Xerox products and solutions, please visit http://www.xerox.com/

FORTISTAR Methane Group
MM San Diego LLC
North City Plant
4949 Eastgate Mall Road ◆ San Diego, California 92121-1208
Tel. (858) 677-9265 ◆ Fax. (858) 677-9290

May 16, 2018

Title V Permitting Team
San Diego County Air Pollution Control District
10124 Old Grove Road
San Diego, CA 92131-1649

Subject: MM San Diego – North City
Title V Permit No. 975482 - Renewal Application

To Whom It May Concern,

Enclosed is the Title V Permit Renewal application for the MM San Diego LLC – North City facility located at 4949 Eastgate Mall Road. Please refer to our April 30th, 2018 letter which discusses the facility's applicability to 40 CFR 63 Subpart ZZZZ. The conditions which are to be deleted have been listed on Form 1401-O. Please incorporate these changes in our Title V Permit. A check for the required processing fee is also included in this submittal, in the amount of $95.00. If additional permitting fees are required, please provide an estimate.

Please direct all questions regarding this application to Suparna Chakladar at (951) 833-4153.

Sincerely,

Anthony J. Falbo
Senior Vice President - Operations
FORTISTAR Methane Group
MM San Diego LLC – North City

Enclosures: Application Fee Check
Title V Renewal Application Forms
PTO Revision Request, April 30th 2018 Correspondence
Current Permit To Operate

cc: Suparna Chakladar, FMG

Internal Use Only
APP ID: APCD 2018 -APP/CER- 005414
SITE ID: APCD 1996 -SITE- 09688

GENERAL PERMIT OR REGISTRATION APPLICATION FORM

APCD AIR POLLUTION CONTROL DISTRICT COUNTY OF SAN DIEGO

Submittal of this application does not grant permission to construct or to operate equipment except as specified in Rule 24(c).

REASON FOR SUBMITTAL OF APPLICATION:

- ☐ New Installation
- ☐ Amendment to Existing Authority to Construct or Application
- ☐ Change of Permit Conditions
- ☐ Registration of Portable Equipment
- ☐ Existing Unpermitted Equipment or Rule 11 Change
- ☐ Change of Equipment Location
- ☐ Change Permit to Operate Status to Inactive
- ☒ Other (Specify) Title V Renewal Application
- ☐ Modification of Existing Permitted Equipment
- ☐ Change of Equipment Ownership *(please provide proof of ownership)*
- ☐ Banking Emissions

List affected APP/PTO Record ID(s): Title V Permit No. 975482

APPLICANT INFORMATION

Name of Business (DBA) MM San Diego LLC - North City

Does this organization own or operate any other APCD permitted equipment at this or any other adjacent locations? ☐Yes ☒No

If yes, list assigned Site Record IDs listed on your Permits

Name of Legal Owner (if different from DBA)

Equipment Owner	Authority to Construct Mailing Address
Name: MM San Diego LLC - North City	Name: same
Mailing Address: 5087 Junction Road	Mailing Address:
City: Lockport State: NY Zip: 14094	City: State: Zip:
Phone: (716) 439 - 1004	Phone: ( )
E-Mail Address: schakladar@fortistar.com	E-Mail Address:

Permit To Operate Mailing Address	Invoice Mailing Address
Name: same	Name: same
Mailing Address:	Mailing Address:
City: State: Zip:	City: State: Zip:
Phone: ( )	Phone: ( )
E-Mail Address:	E-Mail Address:

EQUIPMENT/PROCESS INFORMATION: Type of Equipment: ☒ Stationary ☐ Portable, *if portable please enter below the equipment storage address*. If portable, will operation exceed 12 consecutive months at the same location ☐ Yes ☐ No

Equipment Location Address 4949 Eastgate Mall Road City San Diego State: CA

Parcel No. Zip 92121 Phone (716) 439 1004 E-mail: schakladar@fortistar.com

Site Contact Suparna Chakladar Phone (951) 833-4153

General Description of Equipment/Process Landfill gas-to-energy facility

Application Submitted by ☒ Owner ☐ Operator ☐ Contractor ☐ Consultant Affiliation

EXPEDITED APPLICATION PROCESSING: ☐ I hereby request Expedited Application Processing and understand that:
a) Expedited processing will incur additional fees and permits will not be issued until the additional fees are paid in full (see Rule 40(d)(8)(iv) for details) b) Expedited processing is contingent on the availability of qualified staff c) Once engineering review has begun this request cannot be cancelled d) Expedited processing does not guarantee action by any specific date nor does it guarantee permit approval.

I hereby certify that all information provided on this application is true and correct.

SIGNATURE Date 5/16/2018

Print Name Anthony J. Falbo Company MM San Diego LLC - North City

Phone (716) 439-1004 E-mail Address afalbo@fortistar.com

Internal Use Only

Date 5/24/2018	Staff Initials: CM	Amt Rec'd $ 8233	Fee Schedule Title V = 8129 ETM
RNP: 0	EMF: 0	NBF: 104	TA: 8129

GEN_APP_Form_Rev Date: Aug. 2017

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Stationary Source Summary (FORM 1401-A1)

Company Name	District Use Only
_____	NEDS # _____
	SITE ID # _____

I. FACILITY IDENTIFICATION

1. Facility Name (if different than company name): MM San Diego LLC - North City
2. Four digit SIC Code: 4911
3. Parent Company (if different than Company Name): _____
4. Mailing Address: 5087 Junction Road
   City Lockport State NY Zip 14094
5. Street Address or Source Location: 4949 Eastgate Mall Road
   City San Diego State CA Zip 92121
6. UTM Coordinates: _____
7. Source Located within 50 miles of a state line: ☒ Yes ☐ No (All sources **are** within 50 miles)
8. Source Located within 1000 feet of a school: ☐ Yes ☒ No
9. Type of Organization: ☒ Corporation ☐ Sole Ownership ☐ Government ☐ Partnership ☐ Utility Company
10. Legal Owner's Name: MM San Diego LLC
11. Owner's Agent name (if any): _____
12. Responsible Official: Anthony J. Falbo
13. Plant Site Manager/Contact: Norman Doss Phone #: 408-890-1511 FAX #: 866-683-9459
14. Application Contact: Suparna Chakladar
15. Type of Facility: Landfill Gas to Energy Facility
16. General description of processes/products: Landfill gas is combusted in 4 internal combustion engines which drive 4 generators. Natural gas is combusted as a supplemental fuel.
17. Is a Federal Risk Management Plan (RMP) pursuant to Section 112(r) required? ☐ Yes ☒ No
    (If application is submitted after RMP due date, attach verification that plan is registered with the appropriate agency.)

II. TYPE OF PERMIT ACTION (check)	CURRENT PERMIT (permit number)	EXPIRATION (date)
☐ **Initial Title V Application**	N/A	N/A
☒ **Permit Renewal**	975482	January 13, 2019
☐ **Significant Permit Modification**		
☐ **Minor Permit Modification**		
☐ **Administrative Amendment**		

III. DESCRIPTION OF PERMIT ACTION

1. Does the permit action requested involve: ☐ Temporary Source ☐ Voluntary Emissions Caps
   ☐ Acid Rain Source ☐ Alternative Operating Scenarios ☐ Abatement Devices
   ☐ CEMs ☐ Permit Shield
   ☐ Outdated SIP Requirement Streamlining ☐ Multiple Applicable Requirement Streamlining
   ☐ Source Subject to MACT Requirements [Section 112]
   ☐ Source Subject to Enhanced Monitoring (40CFR64) [Compliance Assurance Monitoring]
2. Is source operating under a Compliance Schedule? ☐ Yes ☒ No ☐ Proposed
3. Is source operating under a Variance ☐ Yes ☒ No (If Yes, please attach variance information)
4. For permit modification, provide a general description of the proposed permit modification:
   _____

IV. SUPPLEMENTAL ATTACHMENTS*: _____

* Means all attachments to the complete application.

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Stationary Source Summary (FORM 1401-A2)

Company Name	District Use Only
MM San Diego LLC - North City	NEDS # _____ SITE ID # _____

I. MAJOR SOURCE APPLICABILITY

Check appropriate pollutant(s) for which you are a Major Source under Title V. Applicability is based on potential to emit.
If more space is necessary, use additional forms. Please type or print legibly.

POLLUTANT	MAJOR SOURCE THRESHOLD TOTAL EMISSIONS, TPY	(check if appropriate)
VOC	100	☐
PM_{10}	100	☐
SO_2	100	☐
NOx	100	☒
CO	100	☒
ODC	100	☐
LEAD COMPOUNDS	10	☐
HAZARDOUS AIR POLLUTANTS		
SINGLE HAP	10	☐
		☐
		☐
COMBINATION HAP	25	☐
		☐
		☐
		☐

Attach all necessary calculations to this form as applicable. NOTE: Calculations are only needed if no Emission Inventory is on file with the District

Reference Annual Emission Inventory

Inventory Year 2016

Signature of Responsible Official

05/16/2018
Date

Anthony J. Falbo
Print Name of Responsible Official

(716) 439 - 1004
Telephone No. of Responsible Official

Senior Vice President - Operations
Title of Responsible Official

II. EMISSIONS CALCULATIONS ATTACHED (as needed)

☐ Yes ☒ No

DISTRICT USE ONLY

Date Application Received: _____ **Application #** _____

Application Filing Fee: _____ **District Received Stamp:** _____

Receipt #: _____ **Fee Code:** _____

San Diego County Air Pollution Control District
10124 Old Grove Rd., San Diego, CA 92131
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Insignificant Activity List (FORM 1401-G)

Company Name	District Use Only
MM San Diego LLC – North City	NEDS # _____
Facility Address: 4949 Eastgate Mall Road, San Diego, CA 92121	SITE ID # _____

LIST OF EQUIPMENT – INSIGNIFICANT ACTIVITIES

Place a check mark in the appropriate box for equipment that is considered an insignificant activity based on throughput or equipment capacity.

Exemptions based on Size (Capacity)

	(Condensed Language of Rule)	Appendix A Citation
☐	Stationary & portable internal combustion engines with ≤ 50 bhp output rating	(d)(1)(iii)
☐	Stationary gas turbines with a power rating of < 0.3 megawatt (MW) or a maximum gross heat input rating of 1 million BTUs per hour	(d)(1)(iv)
☐	Water cooling towers & ponds with a capacity < 10,000 gal/min not used for evaporative cooling of process water or not used for evaporative cooling of water, contaminated water or industrial waste water from barometric jets or from barometric condensers.	(d)(2)
☐	Fuel-burning equipment with a maximum gross heat input rate of < 1 million Btu/hour when not part of a process, process line, line, equipment, article, machine or other contrivance for which a permit to operate is required by these Rules and Regulations	(d)(4)(i)
☐	Fuel burning equipment with a maximum gross heat input of < 20 million Btu/hour, and fired exclusively with natural gas and/or liquefied petroleum gas	(d)(4)(ii)
☐	Steam boilers, process heaters, and steam generators with a maximum gross heat input of < 5 million Btu/hour	(d)(4)(iii)
☐	Crucible-type or pot-type furnaces with a brimful capacity of < 450 in^3 of any molten metal	(d)(12)
☐	Crucible, pot or induction furnaces with a capacity of ≤ 2500 in^3, in which no sweating or distilling is conducted and from which only non-ferrous metals except yellow brass, are poured or non-ferrous metals are held in a molten state	(d)(13)
☐	Dry batch mixers with ≤ 0.5 cubic yards rated working capacity	(d)(27)
☐	Batch mixers (wet) with ≤ 1 cubic yard capacity where no organic solvents, diluents or thinners are used.	(d)(28)
☐	Roofing kettles (used to heat asphalt) with a capacity of ≤ 85 gallons	(d)(33)
☐	Abrasive blasting equipment with a manufacturer's-rated sand capacity of < 100 lbs or < 1 ft^3	(d)(34)
☐	Paper shredders and paper disintegrators that have a capacity of 600 pounds per hour or less, and the associated conveying systems and baling equipment.	(d)(41)
☐	Ovens having an internal volume of ≤ 27 ft^3 in which organic solvents or materials containing organic solvents are charged	(d)(59)
☐	Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks with a liquid surface area of ≤ 1.0 ft^2	(d)(61)(i)
☐	Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks which have a maximum capacity of ≤ 1 gallon	(d)(61)(ii)

Continued - Exemptions based on Size (Capacity)

	(Condensed Language of Rule)	Appendix A Citation
☐	Stationary organic compound storage tanks with a capacity of ≤ 250 gallons	(e)(1)
☐	Liquid surface coating application operations using hand-held brushes for application of a primer coating from containers of ≤ eight (8) ounces in size, to fasteners to be installed on aerospace parts	(h)(5)
☐	Liquid surface coating application operations using air brushes with a coating capacity of ≤ 2 ounces for the application of a stencil coating	(h)(6)
☐	Metal inspection tanks that: a) do not utilize a suspension of magnetic or fluorescent dye particles in volatile organic solvent, and b) have a liquid surface area < 5 ft^2 and c) are not equipped with spray type flow or a means of solvent agitation	(o)(5)
☐	Bakery ovens used for baking yeast leavened products where the combined rated heat input capacity is < 2 million Btu/hr	(o)(37)

Exemptions based on Production Rates (Emission Limits)

☐	Printing or graphic arts presses located at a stationary source which emits a total of <15 lbs/day of VOC's subject to Rule 67.16, on each day of operation	(d)(7)
☐	Solder levelers, hydrosqueegees, wave solder machines, and drag solder machines which use < 10 lbs/day of any material containing VOCs	(d)(23)
☐	Fire extinguishing equipment, using halons with a charge of < 50 lbs. of a Class I or Class II ozone depleting compound.	(d)(31)
☐	Coffee roasting equipment with a manufacturer's rating of ≤ 15 lbs/hr	(d)(45)
	Equipment used to manufacture bio-agricultural products for exclusive use in field testing required to obtain FDA, EPA, USDA and /or Cal-EPA approval, provided the uncontrolled emissions of VOCs from all such operations < 5 ton/yr.	(d)(49)(iii)
☐	Oil quenching tanks which use < 20 gal/yr of make-up oil	(d)(56)
☐	Equipment that is used to conduct research and develop new or improved processes/products, and is operated by technically trained personnel under the supervision of a research director, and is not used in the manufacture of products for sale or exchange for commercial profit, and all emissions are < 15 lbs/day.	(d)(48)
☐	Powder coating operations, except metalizing gun operations, where surface preparation or cleaning solvent usage is < 0.5 gal/day	(d)(62)
☐	Equipment used to transfer fuel to & from amphibious ships for maintenance purposes, provided total annual transfers < 60,000 gal/yr.	(f)(2)
☒	Stationary storage tanks (excluding tanks subject to Rule 61.9) used exclusively for the storage of liquid organic solvents used as dissolvers, viscosity reducers, reactants, extractants, cleaning agents or thinners provided that emissions < 15 lbs/day.	(e)(3)
☐	Liquid surface coating or adhesive application operations (portable or stationary) where not more than 20 gallons per year of material containing organic compounds are applied	(h)(1)
☐	Liquid surface coating application operations exclusively using materials with a VOC content of < 20 g/L where < 30 gal/day of such materials are applied.	(h)(2)
☐	Foam manufacturing or application operations which emit < 5 lbs/day of VOCs	(i)(1)
☐	Reinforced plastic fabrication operations using resins such as epoxy and/or polyester which emit < 5 lbs/day of VOCs	(i)(2)
☐	Plastics manufacturing or fabrication operations which emit < 5 lbs/day of VOCs	(i)(3)
☐	Cold solvent degreasers used for educational purpose and which emit < 5 lbs/day of VOCs	(i)(4)

☐	Golf grip application stations which exclusively use liquid materials with an initial boiling point of 450°F (232°C), or greater and which emit < 5 lbs/day of VOCs.	(i)(5)
☐	Batch-type waste-solvent recovery stills with batch capacity of ≤ 7.5 gallons for onsite recovery provided the still is equipped with a safety device & VOC emissions are < 5 lbs/day	(i)(6)
☐	Peptide and DNA synthesis operations which emit < 5 lbs/day of VOCs	(i)(7)
☐	Equipment used for washing or drying articles fabricated from metal, cloth, fabric or glass, provided that no organic solvent is employed in the process and that no oil or solid fuel is burned and none of the products being cleaned has residues of organic solvent and VOC emissions are <5 lbs/day	(i)(8)
☐	Hot wire cutting of expanded polystyrene foam which emit < 5 lbs/day of VOCs.	(i)(9)
☐	Any coating and/or ink manufacturing operations located at a stationary source, which emit < 15 lbs/day of VOCs.	(o)(9)
☐	Any operation producing materials for use in cosmetic or pharmaceutical products and/or manufacturing cosmetic or pharmaceutical products by chemical processes, which emit < 15 lbs/day of VOCs	(o)(12)
☐	Refrigeration units except those used as, or with, air pollution control equipment with a charge of < 50 lbs of a Class I or II ozone depleting compound.	(o)(18)
☐	Atmospheric organic gas sterilizer cabinets where ethylene oxide emissions are < 5 lbs/yr	(o)(28)
☐	Aerosol can puncturing/crushing operations which vents all emissions through a properly operated/maintained carbon canister, provided < 500 cans/day are processed.	(o)(29)(ii)
☒	Solvent wipe cleaning operations using a container applicator that minimizes emissions to the air where the uncontrolled emissions of VOCs < 5 ton/yr, or the total purchase of solvents < 1,500 gal/yr, or the total purchase of solvents containing a single HAP < 350 gal/yr.	(o)(32)
☐	Equipment approved for use by the EPA for recovering and/or recycling CFCs provided such equipment is charged with < 50 lbs. of a Class I or II ozone depleting compound.	(o)(33)
☐	Stationary IC engines rated at ≤ 200 bhp installed and operated before November 15, 2000, which operate < 200 hr/yr.	(o)(34)(ii)

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

Title V Application
Applicable Requirements Summary Checklist (Form 1401-H1)

Company Name	District Use Only
MM San Diego LLC - North City	NEDS # _____ SITE ID # _____

APPLICABLE REQUIREMENTS: Applicable requirements which apply to an entire facility are listed first. The applicant should check appropriate boxes on the form and attach emission unit specific permit number lists where necessary. Where streamlining is employed, note on this form. If information does not fit in the space allotted, attach documentation and reference it on this form. **Type or print legibly.**

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Engine 1	Engine 2	Engine 3	Engine 4										Future Effective Date
	Facility Applicable Requirement Description																	
10(a)	Permits Required – (a) Authority to Contruct																	
10(b)	Permits Required – (b) Permit to Operate			X	X	X	X	X										
19	Provision of Sampling & Testing Facilities			X	X	X	X	X										
19.2	Continuous Emission Monitoring Requirements																	
19.3	Emission Information			X	X	X	X	X										
NSR	New Source Review			X	X	X	X	X										
PSD	Prevention of Significant Deterioration																	
21	Permit Conditions			X	X	X	X	X										
50	Visible Emissions			X	X	X	X	X										
51	Nuisance			X	X	X	X	X										
60	Circumvention																	
67.0	Architectural Coatings	(g)																
67.17	Storage of Materials Containing VOC	(e)		X														
71	Abrasive Blasting																	
98	Breakdown Conditions: Emergency Variance			X														
101	Burning Control																	
131	Stationary Source Curtailment Plan																	
132	Traffic Abatement Plan																	

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Engine 1	Engine 2	Engine 3	Engine 4										Future Effective Date
	Equipment Specific Applicable Requirement Description																	
50	Visible Emissions				X	X	X	X										
51	Nuisance				X	X	X	X										
52	Particulate Matter	Method 5																
53	Specific Contaminants	Method 5			X	X	X	X										
53.1	Scavenger Plants																	
54	Dust and Fumes	Method 5																
58	Incinerator Burning																	
59	Control of Waste Disposal – Site Emissions	(e)	(e) & (f)	X														
60	Circumvention																	
61.1	Receiving & Storing VOCs at Bulk Plants & Terminals	(d)	(c)(7)															
61.2	Transfer of VOCs into Mobil Transport Tanks	(c)(10)																
61.3	Transfer of VOCs into Stationary Storage Tanks		(c)(2)(iii)															
61.3.1	Transfer Of Gasoline Into Stationary Underground Storage Tanks (not in the SIP)	(h)	(g)															
61.4	Transfer of VOCs into Vehicle Fuel Tanks																	
61.4.1	Transfer Of Gasoline From Stationary Underground Storage Tanks Into Vehicle Fuel Tanks (not in the SIP)	(g)	(f)															
61.5	Visible Emissions Standards for Vapor Control Equip.		VE															
61.7	Spillage & Leakage of VOCs																	
61.8	Certification Requirements for Vapor Control Equip.																	
62	Sulfur Content of Fuels			X														
64	Reduction of Animal Matter																	
66	Organic Solvents	(p)	(o)															
66.1	Misc. Surface Coating Operations & other Processes Emitting VOC (not in SIP)	(h)	(f)															
67.1	Alternative Emission Control Plans (AECP)	(c)	(d)															
67.2	Dry Cleaning - Petroleum Solvent	(f)	(e)															
67.3	Metal Parts Coating	(g)	(f)															
67.4	Can & Coil Coating	(g)	(f)															
67.5	Paper, Film and Fabric Coating	(f)	(e)															

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Engine 1	Engine 2	Engine 3	Engine 4										Future Effective Date
67.6	Solvent Cleaning Operation	(f)																
67.6.1	Cold Solvent Cleaning and Stripping Operations	(g)	(f)															
67.7	Cutback & Emulsified Asphalt	(f)	(e)															
67.9	Aerospace Coating Operations	(g)	(f)															
67.10	Kelp Processing and Bio-Polymer Mfg.	(f)	(e)															
67.11	Wood Products Coating Operations (not in SIP)																	

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Engine 1	Engine 2	Engine 3	Engine 4										Future Effective Date
67.12	Polyester Resin Operations	(g)	(f)															
67.15	Pharmaceutical & Cosmetic Manufacturing	(e)																
67.16	Graphic Arts Operations	(g)	(f)															
67.17	Open VOC Containers	(e)																
67.18	Marine Coating Operations	(g)	(f)															
67.19	Coating and Printing Inks Mfg. Operations	(g)	(f)															
67.20	Motor Vehicle & Mobile Equipment Refinishing Operations																	
67.21	Adhesive Material Application Operations																	
67.22	Expandable Polystyrene Foam Products Manufacturing Operations (not in SIP)																	
67.24	Bakery Ovens	(f)	(e)															
68	Fuel Burning Equipment - NOx				X	X	X	X										
69.2	Boilers	(f)	(e) & (g)															
69.3	Stationary Gas Turbine Engines - RACT	(f)	(e) & (g)		X	X	X	X										
69.3.1	Stationary Gas Turbine Engines – BARCT (not in SIP)	(f)	(e) & (g)															
69.4	Stationary Internal Combustion Engines - RACT	(f)	(e)		X	X	X	X										
69.4.1	Stationary Internal Combustion Engines – BARCT (not in SIP)	(f)	(e)		X	X	X	X										
70	Orchard Heaters																	

71	Abrasive Blasting																	
20.1	Applicability, Definitions, Emission Calculations, Emission Offsets and Banking, Exemptions, and Other Requirements (SIP Version 7/5/79)																	
20.1	NSR - General Provisions (Version 11/4/98) (not in SIP)																	
20.2	Standards for Authority to Construct Best Available Control Technology (SIP Version 7/5/79)																	
20.2	NSR – Non-major Stationary Sources (Version 11/4/98) (not in SIP)																	
20.3	Standards for Authority to Construct - Air Quality Analysis (SIP Version 7/5/79)																	

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Engine 1	Engine 2	Engine 3	Engine 4										Future Effective Date
20.3	NSR – Major Stationary Source and PSD Stationary Source (Version 11/4/98) (not in SIP)				X	X	X	X										
20.4	Standards for Authority to Construct - Major Sources (SIP Version 7/5/79)																	
20.4	NSR – Portable Emission Units (Version 11/4/98) (not in SIP)																	
20.5	Power Plants (SIP Version 7/5/79)																	
20.6	Standards for Permit to Operate Air Quality Analysis (SIP Version 7/5/79)																	
SUBPART	**Regulation X - Standards of Performance for New Stationary Sources (NSPS)**	**Rule #**	**Rule #**															
A	General Provisions		260.7 260.13															
D	Standards of Performance for Fossil-Fuel Fired Steam Generators	260.46	260.45															
Da	Standards of Performance for Electric Utility Steam Generating Units Constructed After September 18, 1978		260.47a 260.48a 260.49a															
Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating	260.45b 260.46b	260.47b 260.48b 260.49b															
E	Standards of Performance for Incinerators	260.54	260.53															
I	Standards of Performance for Asphalt Concrete Plants	260.93																

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Engine 1	Engine 2	Engine 3	Engine 4										Future Effective Date
K	Standards of Performance for Storage Vessels for Petroleum Liquids Constructed after June 11, 1973 and Prior to May 19, 1978		260.113															
Ka	Standards of Performance for Storage Vessels for Petroleum Liquids Constructed after May 18, 1978	260.113a	260.115a															
Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984	260.113b	260.115b 260.116b															
Subpart																		
L	Standards of Performance for Secondary Lead Smelters	260.123																
M	Standards of Performance for Secondary Brass and Bronze Ingot Production Plants	260.133																
O	Standards of Performance for Sewage Treatment Plants	260.154	260.153															
DD	Standards of Performance for Grain Elevators	260.303																
EE	Standards of Performance for Surface Coating Metal Furniture	260.313 260.316	260.314 260.315															
GG	Standards of Performance for Stationary Gas Turbines	260.335	260.334															
QQ	Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing	260.433 260.435	260.434															
RR	Standards of Performance for the Pressure Sensitive Tape and Label Surface Coating Operations	260.444 260.446	260.445 260.447															
SS	Standard of Performance for the Industrial Surface Coating Large Appliances	260.453 260.456	260.454 260.455															
TT	Standards of Performance for Metal Coil Surface Coating	260.463 260.466	260.464 260.465															
BBB	Standards of Performance for the Rubber Tire Manufacturing Industry	260.543 260.547	260.544 260.545 260.546															
FFF	Standards of Performance for Flexible Vinyl and Urethane Coating and Printing	260.583	260.584 260.585															
JJJ	Standards of Performance for Petroleum Dry Cleaners																	

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

SUBPART	New Source Performance Standards (40 CFR 60)																	
Cb, F	Portland Cement Plants																	
Dc	Small Industrial -Commercial -Institutional Steam Generators >10 MM Btu but <100 MM Btu.																	
Ea	Municipal Waste Combustors																	
G	Nitric Acid Plants																	
H & Cb	Sulfuric Acid Plants																	

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Engine 1	Engine 2	Engine 3	Engine 4										Future Effective Date
Subpart																		
N	Oxygen Process Furnaces																	
Na	Oxygen Process Steelmaking Facilities																	
P	Primary Copper Smelters																	
Q	Primary Zinc Smelters																	
R	Primary Lead Smelters																	
S	Primary Aluminum Reduction Plants																	
T & U	Phosphate Fertilizer Industry																	
V,W,X	Phosphate Fertilizer Industry																	
Y	Coal Preparation Plants																	
Z	Ferroalloy Production Facilities																	
AA, AAa	Steel Plants																	
BB	Kraft Pulp Mills																	
CC	Glass Manufacturing Plants																	
HH	Lime Manufacturing Plants																	
KK	Lead-Acid Battery Manufacturing Plants																	
LL	Metallic Mineral Processing Plants																	
MM	Automobile and Light-Duty Truck Surface Coating Operations																	
NN	Phosphate Rock Plants																	
PP	Ammonium Sulfate Manufacture																	
UU	Asphalt Processing and Asphalt Roofing Manufacture																	

VV	Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.																	
WW	Beverage Can Surface Coating Industry																	
XX	Bulk Gasoline Terminals																	
AAA	New Residential Wood Heaters																	
DDD	VOC Emissions from the Polymer Mfg. Ind.																	
GGG	Equipment Leaks of VOC in Petroleum Refineries.																	

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Engine 1	Engine 2	Engine 3	Engine 4										Future Effective Date
Subpart																		
HHH	Synthetic Fiber Production Facilities																	
KKK, LLL	Onshore Natural Gas Processing: VOC Equipment Leaks and SO_2 Emissions.																	
HHH	Synthetic Fiber Production Facilities																	
KKK, LLL	Onshore Natural Gas Processing: VOC Equipment Leaks and SO_2 Emissions.																	
NNN	VOC Emissions from Synthetic Organic Chemical Manufacturing Industry Distillation Operations.																	
OOO	Standard of Performance for Nonmetallic Mineral Processing Plants																	
PPP	Wool Fiberglass Insulation Mfg. Plants																	
QQQ	VOC Emissions from Petroleum Refinery Wastewater Systems.																	
RRR	VOC Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.																	
SSS	Magnetic Tape Coating Facilities																	
TTT	Industrial Surface Coating Surface, Surface Coating of Plastic Parts for Business Machines.																	
UUU	Calciners and Dryers in Mineral Industries.																	
VVV	Polymeric Coating of Supporting Substances Facilities.																	
WWW	Standards of Performance for Municipal Solid Waste Facilities			X														

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

IIII	Stationary Compression Ignition Internal Combustion Engines NSPS																	
JJJJ	Stationary Spark Ignition Internal Combustion Engines NSPS																	
SUBPART	REGULATION XI - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS)																	
A	General Provisions																	
C, D	Beryllium Extraction Plants; Ceramic Plants, Foundries, Incinerators, Propellant Plants, and Machine Shops that Process Beryllium Containing Material; and Rocket Motor Firing Test Sites.																	

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Engine 1	Engine 2	Engine 3	Engine 4										Future Effective Date
Subpart																		
E	Mercury Ore Processing; Manufacturing Processes Using Mercury Chloralkali Cells; and Sludge Incinerators.																	
F	Ethylene Dichloride Mfg. Via Oxygen, HCI and Ethylene; Vinyl Chloride Mfg.; and Polyvinyl Chloride Mfg.																	
M	Asbestos Mills; Roadway Surfacing with Asbestos Tailings; Manufacture of Products Containing Asbestos; Demolition; Renovation; and Spraying and Disposal of Asbestos Waste.																	
SUBPART	NESHAPS (40 CFR 61)																	
B,Q,R, T,W,	Underground Uranium Mines; Dept. of Energy Facilities; Phosphorus Fertilizer Plants; & Facilities Processing or Disposing of Uranium Ore & Tailings.																	
H,I,K	Dept. of Energy; Nuclear Regulatory Commission Licensed Facilities; Other Federal Facilities; and Elemental Phosphorus Plants. (Radionuclide)																	
J,L,Y, BB,FF	Fugitive Process, Storage, and Transfer Equipment Leaks; Coke By-Product Recovery Plants; Benzene Storage Vessels; Benzene Transfer Operations; and Benzene Waste Operations.																	

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

N,O,P	Glass Manufacturer; Primary Copper Smelter; Arsenic Trioxide and Metallic Arsenic Production Facilities.																	
V	Pumps, Compressors, Pressure Relief Devices, Connections, Valves, Lines, Flanges, Product Accumulator Vessels, etc. in VHAP Service.																	
SUBPART	**MACT Standards (40 CFR 63)**																	
F,G, H,I	Amendment: Reopening, Averaging Issue																	
L	Coke Ovens																	
O	Ethylene Oxide Sterilizers																	
Q	Industrial Process Cooling Towers																	
R	Gasoline Distribution Facilities																	
RULE	**RULE DESCRIPTION**	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Engine 1	Engine 2	Engine 3	Engine 4										Future Effective Date
Subpart																		
T	Halogenated Solvent Cleaning Degreasing																	
X	Secondary Lead Smelters																	
Y	Marine Tank Loading/Unloading																	
CC	Petroleum Refineries																	
DD	Off-Site Waste and Recovery Operations																	
EE	Magnetic Tape																	
GG	Aerospace (Coatings)																	
II	Shipbuilding for Ship Repair (Surface Coating)																	
JJ	Wood Furniture Industry (Coatings)																	
KK	Printing and Publishing																	

AAAA	Municipal Solid Waste Landfills																	
DDDDD	Industrial, Commercial and Institutional Boilers and Process Heaters																	
MMMM	Surface Coating of Miscellaneous Metal Parts and Products																	
PPPP	Surface Coating of Plastic Parts																	
ZZZZ	Reciprocating Internal Combustion Engines																	
YYYY	Stationary Combustion Turbines																	
	California Requirements Under 17 CCR Including Airborne Toxic Control Measures (ATCM)																	
§93102	Hexavalent Chromium from Chrome Plating and Chromic Acid Anodizing Operations (equivalency under CAA given at 40 CFR 63.99)																	
§93109	Perchloroethylene from Dry Cleaning Operations (equivalency under CAA given at 40 CFR 63.99)																	
§93115	Stationary Compression Ignition Engines																	
§93116	Diesel Particulate Matter from Portable Engines Rated ≥50 Horsepower																	
§§95460 – 95476 and Appx I	Methane Emissions from Municipal Solid Waste Landfills																	
	40 CFR Part 64 - Compliance Assurance Monitoring																	
	40 CFR Part 68 Chemical Accident Prevention																	
	Title IV - Acid Rain (40 CFR 72 through 78)																	
	Title VI-Ozone Depleting Compounds (40 CFR 82)																	
B	Servicing of Motor Vehicle Air Conditioners	B																
F	Servicing of Other Air Conditioners	F																

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
LIST OF PERMITS BY EQUIPMENT CATEGORY (FORM 1401-H2)

Company Name	District Use Only
MM San Diego LLC - North City	NEDS #
Facility Address: 4949 Eastgate Mall Road, San Diego, CA 92121	SITE ID #

PERMITTED EMISSION UNITS BY EQUIPMENT CATEGORY

In the emission unit (equipment) category order entered on Form 1401-H1, Applicable Requirements Summary Checklist, list emission units by permit number for the specific emission unit (equipment) category. Under the column labeled status place an "O" if operational, "N" if non-operational, or "S" if the equipment is new and currently operating under a startup authorization. **If more space is required, use additional forms. Please type or print legibly.**

Emission Unit Category	Application/ Permit No.	Status of Emission Unit
Engine 1	960022	O
Engine 2	974394	O
Engine 3	974395	O
Engine 4	974396	O

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Certification Statement (FORM 1401-I)

Company Name	District Use Only
MM San Diego - North City	NEDS #_____
Facility Address: 4949 Eastgate Mall Road, San Diego, CA	SITE ID #_____

Under penalty of perjury, identify the following: (Read each statement carefully and check each box for confirmation.)

Applicable	Not Applicable	
[x]	[ ]	*Based on information and belief formed after reasonable inquiry, the source(s) identified in this application will continue to comply with the applicable requirement with which the source is in compliance. The applicable requirement(s) with which the source(s) is/are not in compliance is/are identified in Form 1401-L, Schedule of Compliance.*
[ ]	[x]	*Based on information and belief formed after reasonable inquiry, the source(s) identified in this application will comply with the future-effective applicable requirement(s) on a timely basis.*
[ ]	[x]	*Based on information and belief formed after reasonable inquiry, the source(s) identified in the Schedule of Compliance application form that is/are not in compliance with the applicable requirement(s), will comply in accordance with the attached compliance plan schedule.*
[x]	[ ]	*Based on information and belief formed after reasonable inquiry, information on application forms, referenced documents, all accompanying reports, and other required certifications are true, accurate, and complete.*
[x]	[ ]	*All fees required by Regulation III, Rule 40 have been paid.*

Signature of Responsible Official

05/16/2018
Date

Anthony J. Falbo
Print Name of Responsible Official

(716) 439-1004
Telepone No. of Responsible Official

Senior Vice President - Operations
Title of Responsible Official

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Compliance Certification Schedule (FORM 1401-K)

Company Name	District Use Only
MM San Diego LLC - North City	NEDS # _____
Facility Address: 4949 Eastgate Mall Road, San Diego, CA 92121	SITE ID # _____

In numerical order, list all sources that have federally enforceable requirements for compliance certification on a more frequent basis than once per year. **If more space is required, use additional forms. Please type or print legibly.**

Permit No.	Emission Unit Name	Applicable Requirements	Frequency
NONE			

Page 1 of 1

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Abatement Devices (FORM 1401-M)

Company Name	District Use Only
MM San Diego LLC - North City	NEDS # _____
Facility Address: 4949 Eastgate Mall Road, San Diego, CA 92121	SITE ID # _____

LIST OF ABATEMENT DEVICES

In numerical order, list all abatement devices, the abatement device, name or description, and the emission unit or operation abated. **If more space is required, use additional forms. Please type or print legibly.**

Permit No(s)	Abatement Device Name or Description	Emission Unit(s) or Operation(s) Abated
NONE		

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Multiple Applicable Requirements Streamlining (FORM 1401-O)

Company Name	District Use Only
MM San Diego LLC - North City	NEDS #
Facility Address: 4949 Eastgate Mall Road, San Diego, CA 92121	SITE ID #

MULTIPLE APPLICABLE REQUIREMENTS STREAMLINING

If more space is required, use additional forms. Please type or print legibly.

Application No(s) Permit No(s)	Multiple Applicable Requirements	Streamlined Requirements	Attachment Number
PTO-960022	Remove conditions: 2, 3, 6, 26, 27, 28, 29, 30.		
PTO-974395	Remove conditions: 2, 3, 6, 26, 27, 28, 29, 30		

FORTISTAR Methane Group
MM San Diego LLC
North City Plant
4949 Eastgate Mall Road ◆ San Diego, California 92121-1208
Tel. (858) 677-9265 ◆ Fax. (858) 677-9290

April 30, 2018

Arthur Carbonell
San Diego County Air Pollution Control District
10124 Old Grove Road
San Diego, CA 92131-1649

Subject: MM San Diego – North City
Request for Revision of Permits to Operate 960022 & 974395

Dear Mr. Carbonell:

We have recently received updated Permits to Operate (PTO) for the four engines at the above mentioned facility. Upon review of these permits we would like to note that conditions throughout PTO's 960022 (engine #1) and 974395 (engine #3) do not accurately reflect conditions that are applicable to our facility.

The issue with the PTOs for engine 1 and engine 3 is that many conditions throughout the permit reference 40 CFR 63 Subpart ZZZZ. It was previously determined by the San Diego Air Pollution Control District (SDAPCD) that this facility is not subject to Subpart ZZZZ regulations. This determination by the SDAPCD can be seen in the enclosed documentation which shows that an issued NOV related to Subpart ZZZZ was rescinded. Furthermore, PTO's 974394 (engine #2) and 974396 (engine #4) have been more recently updated and do not reference conditions related to Subpart ZZZZ.

Maintaining PTOs that properly reflect applicable conditions at our facility is important to ensure there is no confusion related to continued compliance. Due to the above mentioned items, we are requesting the SDAPCD revise PTOs 960022 and 974395 by removing Subpart ZZZZ requirements and inputting conditions consistent with the more recently updated PTOs for the facility.

Please direct all questions regarding this letter to Suparna Chakladar at (951) 833-4153

Sincerely,

Anthony J. Falbo
Senior Vice President - Operations
FORTISTAR Methane Group
MM San Diego LLC – North City

Enclosures: Permits to Operate (expire 3-31-19)
Support Documentation on ZZZZ Applicability

cc: Suparna Chakladar, FMG

226654

AIR POLLUTION CONTROL DISTRICT

COUNTY OF SAN DIEGO
10124 OLD GROVE ROAD
SAN DIEGO CA 92131-1649
PHONE (858) 586-2650
FAX (858) 586-2651

Sector/ID	G/09688
P/O#	See Below
Fee Code	34 B
Method	AI
Entered	
(APCD use only)	

NOTICE OF VIOLATION

Date(s) of Violation 10/7/15 Date of Report 10/7/15

Name Minnesota Methane LLC North City Phone (858) 715-0936

Address 5087 Junction Rd. City Lockport N.Y. 14094 (Zip Code)

Violation Location 4949 Eastgate Mall City San Diego 92121 (Zip Code)

Specifically, the following violation(s) of the San Diego Air Pollution Control District rules and/or laws of the State of California has occurred: (abbreviations: H&S = Cal. Health & Safety Code; CCR = Cal. Code of Regulations; R = Rule)

Section	Description of Violation
	[P/O# 960022, P/O# 974394, P/O# 974395, P/O# 974396]
R-11(29)	By failing to submit a semiannual compliance report
40CFR2227636650	to the Air Pollution Control District by the end of
R-1421 Sec I-D.1	the month following each reporting period. Specifically
	by failing to submit a semiannual compliance report
	on or before 7/31/15 for reporting period Jan 1, 2015
	through June 30, 2015.

Pursuant to California Health And Safety Code section 42400 et seq., any person who violates any Order, Rule, or Regulation of the State Board or of an Air Pollution Control District is guilty of a MISDEMEANOR. Each day a violation occurs constitutes a separate offense.

YOU MUST ADVISE THE DISTRICT IN WRITING, WITHIN TEN DAYS, OF THE ACTION TAKEN TO CORRECT THE ALLEGED VIOLATION(S) OR THE REASON(S) YOU BELIEVE THE VIOLATION(S) DID NOT OCCUR. PLEASE MAIL YOUR RESPONSE TO THE AIR POLLUTION CONTROL DISTRICT, ATTENTION: COMPLIANCE DIVISION, 10124 OLD GROVE RD., SAN DIEGO, CALIFORNIA 92131-1649.

Inspector Andy Fuchs Date 10/7/15 Time 2:10

SIGNING THIS NOTICE ACKNOWLEDGES RECEIPT OF THIS NOTICE, IT IS NOT AN ADMISSION OF GUILT.

Received by x Robert Smith Jr. (Print name) Title San Diego Area Manager

Signature Robert Smith Date October 7, 2015

(See reverse side for more information)

APCD 23 (Rev. 10/11) W=Office C= Data Entry P=Site G= Field File

Air Pollution Control Board

Greg Cox	District 1
Dianne Jacob	District 2
Dave Roberts	District 3
Ron Roberts	District 4
Bill Horn	District 5

January 12, 2016

SUPARNA CHAKLADAR
MINNESOTA METHANE LLC NORTH CITY FACILITY
5087 JUNCTION RD
LOCKPORT NY 14094

RE: **NOTICE OF VIOLATION NUMBER 226654**

Date Notice of Violation Issued: October 7, 2015
Location of Violation: 494 Eastgate Mall, San Diego CA 92121

Dear Suparna Chakladar:

The Air Pollution Control District hereby dismisses the above Notice of Violation for the following reason: After further evaluation the District has determined the above reference was issued in error. Therefore, this violation will be designated Void and the penalties in the amount of $1,000 will be refunded.

We apologize for any inconvenience this may have caused.

If there are any questions about this matter, please contact me at (858) 586-2654 or Penelope.Matthews@sdcounty.ca.gov

Sincerely,

PENELOPE MATTHEWS
Civil Actions Investigator

Reference No. APCD2015-NOV-000584

10124 Old Grove Rd. – San Diego - California 92131 – (858) 586-2600
FAX (858) 586-2651 – Smoking Vehicle Hotline – 1-800-28-SMOKE

COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT
10124 OLD GROVE ROAD, SAN DIEGO, CA 92131
PHONE (858) 586-2600 FAX (858) 586-2601
www.sdapcd.org

Sectors: 3, G
Site Record ID: APCD1996-SITE-09688
Application Record ID: APCD Condition Update

PERMIT RECORD ID
APCD2006-PTO-960022

APCD2006-PTO-960022

RECEIVED
MAR 2 6 2018
By

Minnesota Methane LLC North City
Suparna Chakladar
5087 Junction Rd
Lockport NY 14094

EQUIPMENT ADDRESS
Minnesota Methane LLC North
Renato J Potosme
4949 Eastgate Mall
San Diego CA 92121

PERMIT TO OPERATE

EXPIRES: March 31, 2019

This permit is not valid until required fees have been paid.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

EQUIPMENT DESCRIPTION

COGENERATION ENGINE #1: CATERPILLAR, MODEL 35165ITA, LANDFILL AND NATURAL GAS FIRED, 1342 BHP, LEAN BURN, TURBOCHARGED, AFTERCOOLED, AIR/FUEL CONTROLLER, S/N 4EK00279, DRIVING A 950-KW GENERATOR. (960022 ALC 09/00)(971634 ALC 09/00)(976546 ALC 02/02)983083 AFS 27JUN05

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [92F] NOx and CO Source Test
1 [92M] Mass Emissions Test (T&M)
1 [92R] VOC Lab Analysis
1 [34B] Cogeneration Engine w/ Emission Controls

BEC: APCD2014-CON-000771

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

1. Permittee shall comply with all applicable Requirements of Rule 53, Rule 62, Rule 69.4 and 40 CFR Part 60 Subpart WWW.
2. Permittee must operate and maintain the stationary engine and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The periodic maintenance shall be conducted at least once per calendar year. [Rule 12, 17 CCR 93115, and 40CFR Subpart ZZZZ §63.6625(e)(6)]

3. The engine and any associated control equipment and monitoring equipment, shall be operated and maintained at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require further efforts to reduce emissions if the equipment is in compliance with all requirements of this authorization. Compliance with this requirement will be based on available information, including but not limited to operations and maintenance procedures, control systems statements, records, test results and reports and equipment inspection.
(40 CFR Subpart ZZZZ §63.6605(b))
4. The owner or operator shall conduct periodic maintenance of this engine and any add-on control equipment, as applicable, as recommended by the engine and control equipment manufacturer or as specified by any other maintenance procedure approved in writing by the District. The periodic maintenance shall be conducted at least once each calendar year. (Rule 69.4.1)
5. The owner or operator shall minimize engine operating time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.(40CFR Subpart ZZZZ §63.6625(h))
6. The permittee shall perform the following functions and replace equipment as necessary. Inspection shall be done every after 1,440 hours of operation or annually, whichever comes first.
1) Change engine oil and filter; or test the oil in accordance with 40 CFR § 63.6625(i)
2) Inspect spark plugs
3) Inspect all hoses and belts (40 CFR 63 Subpart ZZZZ §63.6603(a) and Table 2d(13)(a-c))
7. There shall be no leaks of Landfill Gas from the Collection System and along the gas transfer path in excess of 1,375 PPM (as Methane) measured at a distance of 1/2 inches from the transfer path other than non-repeatable momentary readings, except during maintenance, repair or sampling activities.
8. Natural gas usage for the facility shall not exceed 23 million cubic feet during each and every 12 consecutive month period. Records demonstrating compliance with this limit shall be maintained on site for at least five years and made available for inspection by the District upon request.
9. Emissions of Oxide of Nitrogen (NOX) in the engine exhaust shall not exceed 1 gram per brake horsepower-hour.
10. Emissions of Carbon Monoxide (CO) in the engine exhaust shall not exceed 3 grams per brake horsepower-hour.
11. Emissions of non-methane hydrocarbons (NMHC) in the engine exhaust shall not exceed 0.55 grams per brake horsepower-hour.
12. Permittee shall comply with all applicable requirements of Rule 69.4 and Rule 69.4.1. (Rule 69.4 and Rule 69.4.1)
13. Permittee shall maintain records in accordance with all applicable requirements of Rule 69.4 and 69.4.1. (Rules 69.4 and 69.4.1)
14. The Sulfur content of any gaseous fuel burned shall not exceed 0.05% by weight.
15. Particulate emissions shall not exceed 0.10 grains per dry standard cubic foot of gas which is standardized to 12 percent of Carbon Dioxide by volume.
16. Particulate Emissions shall be measured in accordance with District Method 5.
17. The Sulfur content of fuel shall be measured in accordance with ASTM Test Method D-3246.
18. In the event that the gas collection system or the engines are inoperable, all valves which vent landfill gas to atmosphere shall be closed within 1 hour. The permittee shall maintain records of these valve closures, including the time the system or engines become inoperable and the time of valve closure. Records shall be maintained for five years and made available to the District upon request. (40 CFR Part 60, Subpart WWW)

19. This equipment shall be source tested once each permit year (annual source test) to demonstrate compliance with the emission standards contained in this permit. For the purposes of this permit, a permit year is the 12-month period ending on the last day of the permit expiration month. It is the responsibility of the permittee to schedule the source test with the District. The source test shall be performed or witnessed by the District. Each annual source test shall be separated by at least 90 days from any annual source test performed in a different permit year.
20. Concentrations of NOx, CO, and O2 in the engine exhaust shall be measured in accordance with SDCAPCD Test Method 100. The averaging periods for the measurement and engine brake horsepower output during the measurement shall be in accordance with Rule 69.4. (Rule 69.4)
21. Concentrations of NMHC in the engine exhaust shall be measured in accordance with SDCAPCD Test Methods 25A and/or 18. The averaging periods for the engine brake horsepower output during the measurement shall be in accordance with Rule 69.4. (Rule 69.4)
22. The air to fuel ratio controller and the oxygen sensor shall be inspected, calibrated or replaced per Caterpillar guidelines during scheduled maintenance periods. These scheduled maintenance periods shall occur every 30 to 60 days, and shall not extend beyond 60 days between periods. Records of the dates of maintenance performance, inspection, calibration, and replacement shall be maintained for at least 5 years and made available for inspection by the District upon request. (Rules 69.4 and 69.4.1)
23. The Permittee shall submit an Application and obtain written authorization from the District before altering any portion of the System in a manner which may affect emissions from the facility, except for necessary repair, maintenance and identical replacement.
24. Emissions of Oxides of Nitrogen, calculated as Nitrogen Dioxide (NO2), shall not exceed 65 parts per million by volume on a dry basis (PPMVD) corrected to 15% Oxygen.
25. Records required by Rules 69.4 and 69.4.1 shall be maintained on site for 3 years. (Rule 69.4 and Rule 69.4.1)
26. The owner or operator of an affected source subject to the provisions of 40CFR 63 Subpart ZZZZ shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (40 CFR 63, Subpart ZZZZ §63.6660 (b))
27. The owner or operator shall submit a semiannual compliance report recording each instance in which the facility did not meet the requirements in Table 2d to 40 CFR 63, subpart ZZZZ. (40 CFR 63 Subpart ZZZZ §63.6640 (a-b)).
28. For the purposes of this authorization "deviation" shall have the same meaning as in 40 CFR 63 subpart ZZZZ. Generally, it is any time that the owner or operator failed to meet any requirement of 40 CFR 63 subpart ZZZZ contained in this authorization, including the general duty to minimize emissions at all times as required by 40 CFR 63.6(e)(1)(i). (40 CFR 63 Subpart ZZZZ and 40 CFR 63.6(e)(1)(i))
29. The owner or operator shall submit a semiannual compliance report to the District by the end of the month following each reporting period. Reporting periods are January 1 through June 30 and July 1 through December 31. The semiannual compliance report shall contain:
(a) Company name and address,
(b) Statement by a responsible official (with name, title, and signature) certifying the accuracy of the report content,
(c) Date of report and dates of reporting period,
(d) The number, duration, and a brief description for each type of deviation which occurred during the reporting period and a description of actions taken to minimize emission and corrective actions taken,
(e) If there are no deviations from requirements, a statement that there were no deviations
(f) If there are deviations during the reporting period, the following information shall be included:
1. Date and time that each malfunction started and stopped,
2. A summary of total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during the reporting period. (40 CFR 63, Subpart ZZZZ §63.6650(b-d)

30. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in 40CFR 63 Subpart ZZZZ in the semiannual monitoring report. If an affected source submits a compliance report pursuant to Table 7 of 40CFR 63 Subpart ZZZZ along with, or as part of, the Title V semiannual monitoring report, and the compliance report includes all required information concerning deviations from any emission or operating limitation in 40CFR 63 Subpart ZZZZ, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. (40CFR 63 Subpart ZZZZ §63.6650(f))
31. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.
32. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
33. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)
34. The engine(s) covered by this permit is considered a control device and the landfill gas duct leading to the engine is considered a collection device in accordance with Title 17 California Code of Regulations (CCR) Division 3, Chapter 1, Subchapter 10, Article 4, SUBARTICLE 6. METHANE EMISSIONS FROM MUNICIPAL SOLID WASTE LANDFILLS, and are therefore subject to applicable requirements from this regulation which include, but may not be limited to, the following conditions.
35. There shall be no leaks of landfill gas from the collection system and along the gas transfer path in excess of 500 ppmv (as methane) measured at a distance of 1/2 inches from the transfer path other than non-repeatable momentary readings.
[17 CCR § 95464(b)(1)(B) and the definition of component leak at § 95475(b)]
36. This engine must achieve a methane destruction efficiency of at least 99 percent by weight. Lean burn internal combustion engines must reduce the outlet methane concentration to less than 3,000 ppmv, dry basis, corrected to 15 percent oxygen.
[17 CCR 95464(b)(3)(A)]
37. Components containing landfill gas and under positive pressure must be monitored quarterly for leaks. Any component leak must be tagged and repaired within 10 calendar days, or it is a violation of this subarticle. Component leak testing at MSW landfills having landfill gas-to-energy facilities may be conducted prior to scheduled maintenance or planned outage periods.
[17 CCR § 95469(b)(3)]
38. Recordkeeping - five year retention: In addition to any other records required by this permit, the owner or operator of any gas control device must maintain the following records for at least five (5) years:
a. All gas control system downtime in excess of one hour, the reason for the downtime, and the length of time the gas control system was shutdown.
b. Results of any source tests conducted pursuant to section 95464(b)(4).
c. Records of the equipment operating parameters specified to be monitored under sections 95469(b)(1) and 95469(b)(2) as well as records for periods of operation during which the parameter boundaries established during the most recent source test are exceeded. The records must include the following information:
[17 CCR § 95470(a)(1)]
39. Recordkeeping - retention for life of control device: The owner or operator of any gas control device must maintain the following records for the life of each gas control device:
a. The control device vendor specifications.
b. The expected gas generation flow rate as calculated pursuant to section 95471(e).
c. The percent reduction of methane achieved by the control device determined pursuant to section 95471(f).
[17 CCR § 95470(a)(2)]

COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT
10124 OLD GROVE ROAD, SAN DIEGO, CA 92131
PHONE (858) 586-2600 FAX (858) 586-2601
www.sdapcd.org

PERMIT RECORD ID
APCD2006-PTO-974394

Sectors: 3, G
Site Record ID: APCD1996-SITE-09688
Application Record ID: APCD Condition Update

RECEIVED
MAR 2 6 2018
By

Minnesota Methane LLC North City
Suparna Chakladar
5087 Junction Rd
Lockport NY 14094

EQUIPMENT ADDRESS
Minnesota Methane LLC North
Renato J Potosmo
4949 Eastgate Mall
San Diego CA 92121

PERMIT TO OPERATE

EXPIRES: March 31, 2019

This permit is not valid until required fees have been paid.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

EQUIPMENT DESCRIPTION

Engine #2: Caterpillar, Model G3516SITA, landfill and natural gas fired, 1342 BHP, lean burn, turbocharged, aftercooled, air/fuel controller, S/N 4EK01052, driving a 950-kW generator.

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [92M] Mass Emissions Test (T&M)
1 [34D] Engine for Non-Emergency & Non-Cogeneration
1 [92R] VOC Lab Analysis
1 [92Z] Miscellaneous Source Test (T&M)
1 [92F] NOx and CO Source Test

BEC: APCD2015-CON-001125

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

1. All equipment shall be kept in good operating conditions and shall be properly maintained in accordance with the manual of recommended maintenance provided by the engine manufacturer. The manual shall be kept on site.
2. There shall be no leaks of landfill gas from the collection system and along the gas transfer path in excess of 500 PPM (as methane) measured at a distance of 1/2 inches from the transfer path other than non-repeatable momentary readings. (17 CCR 95475(a)(2))
3. Emissions of Oxide of Nitrogen (NOX) in the engine exhaust shall not exceed 1 gram per brake horsepower-hour.
4. Emissions of Oxides of Nitrogen, calculated as Nitrogen Dioxide (NO2), shall not exceed 65 parts per million by volume on a dry basis (PPMVD) corrected to 15% Oxygen.
5. Emissions of Carbon Monoxide (CO) in the engine exhaust shall not exceed 3 grams per brake horsepower-hour.

6. Emissions of non-methane hydrocarbons (NMHC) in the engine exhaust shall not exceed 0.55 grams per brake horsepower-hour.
7. The Sulfur content of any gaseous fuel burned shall not exceed 0.05% by weight.
8. Particulate Emissions shall not exceed 0.10 grains per dry standard cubic foot of gas which is standardized to 12 percent of Carbon Dioxide by volume.
9. Particulate Emissions shall be measured in accordance with District Method 5.
10. The Sulfur content of fuel shall be measured in accordance with ASTM Test Method D-3246.
11. In the event that the gas collection system or the engines are inoperable, all valves which vent landfill gas to atmosphere shall be closed within 1 hour. The permittee shall maintain records of these valve closures, including the time the system or engines become inoperable and the time of valve closure. Records shall be maintained for five years and made available to the District upon request. (40 CFR Part 60, Subpart WWW)
12. The owner or operator shall conduct periodic maintenance of this engine and any add-on control equipment, as applicable, as recommended by the engine and control equipment manufacturer or as specified by any other maintenance procedure approved in writing by the District. The periodic maintenance shall be conducted at least once each calendar year. (Rule 69.4.1)
13. A non-resettable totalizing fuel meter shall be installed on this engine, maintained in good working order and used for recording engine fuel consumption. If a meter is replaced when the emission unit is operating on site, the Air Pollution Control District's compliance division shall be notified in writing within in 10 calendar days. The written notifications shall include the following information:
    a. old meter's reading.
    b. replacement meter's manufacturer name, model and serial number if available and current reading on replacement meter; and
    c. copy of receipt of new meter or of installation work order.
    A copy of the meter replacement notification shall be maintained on site and made available to the Air Pollution Control District upon request. (Rule 69.4.1)
14. Natural gas usage for the facility shall not exceed 23 million standard cubic feet during each and every 12 consecutive month period. Records demonstrating compliance with this limit shall be maintained on site for at least five years and made available for inspection by the District upon request.
15. The annual heat input from the combustion of landfill gas shall be equivalent to 10% or more of the total annual gross heat input to this equipment.
16. The following records shall be recorded monthly, maintained on site for a minimum of five years and made available to District personnel upon request:
    a. monthly landfill gas usage, standard cubic feet;
    b. average monthly landfill gas heating value, Btu per cubic feet;
    c. percentage of gross heat input to this equipment from the combustion of landfill gas.
17. This equipment shall be source tested once each permit year (annual source test) to demonstrate compliance with the emission standards contained in this permit. For the purposes of this permit, a permit year is the 12-month period ending on the last day of the permit expiration month. It is the responsibility of the permittee to schedule the source test with the District. The source test shall be performed or witnessed by the District. Each annual source test shall be separated by at least 90 days from any annual source test performed in a different permit year.
18. Concentrations of NOx, CO and O2 in the exhaust shall be measured in accordance with SDC APCD Test Method 100.
19. Concentrations of NMHC in the exhaust shall be measured in accordance with SDC APCD Test Methods 25A and/or 18.

20. The air to fuel ratio controller and the oxygen sensor shall be inspected, calibrated or replaced per Caterpillar guidelines during scheduled maintenance periods. These scheduled maintenance periods shall occur every 30 to 60 days, and shall not extend beyond 60 days between periods. Records of the dates of maintenance performance, of inspection, calibration, replacement shall be maintained on site for at least 5 years and made available for inspection by the District upon request.
21. The Owner or Operator shall conduct periodic inspections of each Engine, and any add-on control equipment as applicable, to ensure that the Engine and control equipment is operated in compliance with the Provisions of this Permit to Operate. The periodic inspections shall be conducted at least once every six months.
22. The Owner or Operator shall conduct periodic maintenance of each Engine, and any add-on control equipment as applicable, as recommended by the Engine and control equipment manufacturers or as specified by any other maintenance procedure approved in writing by the District. The periodic maintenance shall be conducted at least once each calendar year.
23. The owner or operator shall keep a manual of recommended maintenance provided by the manufacturer or other maintenance procedures as approved in writing by the District.
24. The owner or operator shall maintain an operating log containing, at a minimum, the following:
    -records of periodic engine inspections
    -the dates the inspection was performed
    -records of engine maintenance
    -the dates maintenance was performed
    -the nature of the maintenance
25. The Permittee shall submit an Application and obtain written authorization from the District before altering any portion of the System in a manner which may affect emissions from the facility, except for necessary repair, maintenance and identical replacement.
26. All records required by this written permit shall be maintained on site for a minimum of five years and made available to the District upon request. (Rule 1421)
27. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.
28. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
29. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)
30. The engine(s) covered by this permit is considered a control device and the landfill gas duct leading to the engine is considered a collection device in accordance with Title 17 California Code of Regulations (CCR) Division 3, Chapter 1, Subchapter 10, Article 4, SUBARTICLE 6. METHANE EMISSIONS FROM MUNICIPAL SOLID WASTE LANDFILLS, and are therefore subject to applicable requirements from this regulation which include, but may not be limited to, the following conditions.
31. There shall be no leaks of landfill gas from the collection system and along the gas transfer path in excess of 500 ppmv (as methane) measured at a distance of 1/2 inches from the transfer path other than non-repeatable momentary readings.
    [17 CCR § 95464(b)(1)(B) and the definition of component leak at § 95475(b)]
32. This engine must achieve a methane destruction efficiency of at least 99 percent by weight. Lean burn internal combustion engines must reduce the outlet methane concentration to less than 3,000 ppmv, dry basis, corrected to 15 percent oxygen.
    [17 CCR 95464(b)(3)(A)]

33. Components containing landfill gas and under positive pressure must be monitored quarterly for leaks. Any component leak must be tagged and repaired within 10 calendar days, or it is a violation of this subarticle. Component leak testing at MSW landfills having landfill gas-to-energy facilities may be conducted prior to scheduled maintenance or planned outage periods.
[17 CCR § 95469(b)(3)]

34. Recordkeeping - five year retention: In addition to any other records required by this permit, the owner or operator of any gas control device must maintain the following records for at least five (5) years:
a. All gas control system downtime in excess of one hour, the reason for the downtime, and the length of time the gas control system was shutdown.
b. Results of any source tests conducted pursuant to section 95464(b)(4).
c. Records of the equipment operating parameters specified to be monitored under sections 95469(b)(1) and 95469(b)(2) as well as records for periods of operation during which the parameter boundaries established during the most recent source test are exceeded. The records must include the following information:
[17 CCR § 95470(a)(1)]

35. Recordkeeping - retention for life of control device: The owner or operator of any gas control device must maintain the following records for the life of each gas control device:
a. The control device vendor specifications.
b. The expected gas generation flow rate as calculated pursuant to section 95471(e).
c. The percent reduction of methane achieved by the control device determined pursuant to section 95471(f).
[17 CCR § 95470(a)(2)]

COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT
10124 OLD GROVE ROAD, SAN DIEGO, CA 92131
PHONE (858) 586-2600 FAX (858) 586-2601
www.sdapcd.org

PERMIT RECORD ID
APCD2006-PTO-974395

Sectors: 3, G
Site Record ID: APCD1996-SITE-09688
Application Record ID: APCD Condition Update

RECEIVED
MAR 2 6 2018
By

Minnesota Methane LLC North City
Suparna Chakladar
5087 Junction Rd
Lockport NY 14094

EQUIPMENT ADDRESS
Minnesota Methane LLC North
Renato J Potosme
4949 Eastgate Mall
San Diego CA 92121

PERMIT TO OPERATE

EXPIRES: March 31, 2019

This permit is not valid until required fees have been paid.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

EQUIPMENT DESCRIPTION

COGENERATION ENGINE #3: CATERPILLAR, MODEL 35165 ITA, LANDFILL AND NATURAL GAS FIRED, 1342 BHP, LEAN BURN, TURBOCHARGED, AFTERCOOLED, AIR/FUEL CONTROLLER, S/N 4EK01701, DRIVING A 950-KW GENERATOR. (974395 ALC 09/00) (976548 ALC 02/02) 983083AFS27JUN05

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [92F] NOx and CO Source Test
1 [92M] Mass Emissions Test (T&M)
1 [92R] VOC Lab Analysis
1 [34B] Cogeneration Engine w/ Emission Controls

BEC: APCD2014-CON-000771

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

1. Permittee shall comply with all applicable Requirements of Rule 53, Rule 62, Rule 69.4 and 40 CFR Part 60 Subpart WWW.
2. Permittee must operate and maintain the stationary engine and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The periodic maintenance shall be conducted at least once per calendar year. [Rule 12, 17 CCR 93115, and 40CFR Subpart ZZZZ §63.6625(e)(6)]

3. The engine and any associated control equipment and monitoring equipment, shall be operated and maintained at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require further efforts to reduce emissions if the equipment is in compliance with all requirements of this authorization. Compliance with this requirement will be based on available information, including but not limited to operations and maintenance procedures, control systems statements, records, test results and reports and equipment inspection.
(40 CFR Subpart ZZZZ §63.6605(b))

4. The owner or operator shall conduct periodic maintenance of this engine and any add-on control equipment, as applicable, as recommended by the engine and control equipment manufacturer or as specified by any other maintenance procedure approved in writing by the District. The periodic maintenance shall be conducted at least once each calendar year. (Rule 69.4.1)

5. The owner or operator shall minimize engine operating time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.(40CFR Subpart ZZZZ §63.6625(h))

6. The permittee shall perform the following functions and replace equipment as necessary. Inspection shall be done every after 1,440 hours of operation or annually, whichever comes first.
1) Change engine oil and filter; or test the oil in accordance with 40 CFR § 63.6625(i)
2) Inspect spark plugs
3) Inspect all hoses and belts (40 CFR 63 Subpart ZZZZ §63.6603(a) and Table 2d(13)(a-c))

7. There shall be no leaks of Landfill Gas from the Collection System and along the gas transfer path in excess of 1,375 PPM (as Methane) measured at a distance of 1/2 inches from the transfer path other than non-repeatable momentary readings, except during maintenance, repair or sampling activities.

8. Natural gas usage for the facility shall not exceed 23 million cubic feet during each and every 12 consecutive month period. Records demonstrating compliance with this limit shall be maintained on site for at least five years and made available for inspection by the District upon request.

9. Emissions of Oxide of Nitrogen (NOX) in the engine exhaust shall not exceed 1 gram per brake horsepower-hour.

10. Emissions of Carbon Monoxide (CO) in the engine exhaust shall not exceed 3 grams per brake horsepower-hour.

11. Emissions of non-methane hydrocarbons (NMHC) in the engine exhaust shall not exceed 0.55 grams per brake horsepower-hour.

12. Permittee shall comply with all applicable requirements of Rule 69.4 and Rule 69.4.1. (Rule 69.4 and Rule 69.4.1)

13. Permittee shall maintain records in accordance with all applicable requirements of Rule 69.4 and 69.4.1. (Rules 69.4 and 69.4.1)

14. The Sulfur content of any gaseous fuel burned shall not exceed 0.05% by weight.

15. Particulate emissions shall not exceed 0.10 grains per dry standard cubic foot of gas which is standardized to 12 percent of Carbon Dioxide by volume.

16. Particulate Emissions shall be measured in accordance with District Method 5.

17. The Sulfur content of fuel shall be measured in accordance with ASTM Test Method D-3246.

18. In the event that the gas collection system or the engines are inoperable, all valves which vent landfill gas to atmosphere shall be closed within 1 hour. The permittee shall maintain records of these valve closures, including the time the system or engines become inoperable and the time of valve closure. Records shall be maintained for five years and made available to the District upon request. (40 CFR Part 60, Subpart WWW)

19. This equipment shall be source tested once each permit year (annual source test) to demonstrate compliance with the emission standards contained in this permit. For the purposes of this permit, a permit year is the 12-month period ending on the last day of the permit expiration month. It is the responsibility of the permittee to schedule the source test with the District. The source test shall be performed or witnessed by the District. Each annual source test shall be separated by at least 90 days from any annual source test performed in a different permit year.
20. Concentrations of NOx, CO, and O2 in the engine exhaust shall be measured in accordance with SDCAPCD Test Method 100. The averaging periods for the measurement and engine brake horsepower output during the measurement shall be in accordance with Rule 69.4. (Rule 69.4)
21. Concentrations of NMHC in the engine exhaust shall be measured in accordance with SDCAPCD Test Methods 25A and/or 18. The averaging periods for the engine brake horsepower output during the measurement shall be in accordance with Rule 69.4. (Rule 69.4)
22. The air to fuel ratio controller and the oxygen sensor shall be inspected, calibrated or replaced per Caterpillar guidelines during scheduled maintenance periods. These scheduled maintenance periods shall occur every 30 to 60 days, and shall not extend beyond 60 days between periods. Records of the dates of maintenance performance, inspection, calibration, and replacement shall be maintained for at least 5 years and made available for inspection by the District upon request. (Rules 69.4 and 69.4.1)
23. The Permittee shall submit an Application and obtain written authorization from the District before altering any portion of the System in a manner which may affect emissions from the facility, except for necessary repair, maintenance and identical replacement.
24. Emissions of Oxides of Nitrogen, calculated as Nitrogen Dioxide (NO2), shall not exceed 65 parts per million by volume on a dry basis (PPMVD) corrected to 15% Oxygen.
25. Records required by Rules 69.4 and 69.4.1 shall be maintained on site for 3 years. (Rule 69.4 and Rule 69.4.1)
26. The owner or operator of an affected source subject to the provisions of 40CFR 63 Subpart ZZZZ shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (40 CFR 63, Subpart ZZZZ §63.6660 (b))
27. The owner or operator shall submit a semiannual compliance report recording each instance in which the facility did not meet the requirements in Table 2d to 40 CFR 63, subpart ZZZZ. (40 CFR 63 Subpart ZZZZ §63.6640 (a-b)).
28. For the purposes of this authorization "deviation" shall have the same meaning as in 40 CFR 63 subpart ZZZZ. Generally, it is any time that the owner or operator failed to meet any requirement of 40 CFR 63 subpart ZZZZ contained in this authorization, including the general duty to minimize emissions at all times as required by 40 CFR 63.6(e)(1)(i). (40 CFR 63 Subpart ZZZZ and 40 CFR 63.6(e)(1)(i))
29. The owner or operator shall submit a semiannual compliance report to the District by the end of the month following each reporting period. Reporting periods are January 1 through June 30 and July 1 through December 31. The semiannual compliance report shall contain:
    (a) Company name and address,
    (b) Statement by a responsible official (with name, title, and signature) certifying the accuracy of the report content,
    (c) Date of report and dates of reporting period,
    (d) The number, duration, and a brief description for each type of deviation which occurred during the reporting period and a description of actions taken to minimize emission and corrective actions taken,
    (e) If there are no deviations from requirements, a statement that there were no deviations
    (f) If there are deviations during the reporting period, the following information shall be included:
    1. Date and time that each malfunction started and stopped,
    2. A summary of total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during the reporting period. (40 CFR 63, Subpart ZZZZ §63.6650(b-d)

30. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in 40CFR 63 Subpart ZZZZ in the semiannual monitoring report. If an affected source submits a compliance report pursuant to Table 7 of 40CFR 63 Subpart ZZZZ along with, or as part of, the Title V semiannual monitoring report, and the compliance report includes all required information concerning deviations from any emission or operating limitation in 40CFR 63 Subpart ZZZZ, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. (40CFR 63 Subpart ZZZZ §63.6650(f))
31. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.
32. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
33. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)
34. The engine(s) covered by this permit is considered a control device and the landfill gas duct leading to the engine is considered a collection device in accordance with Title 17 California Code of Regulations (CCR) Division 3, Chapter 1, Subchapter 10, Article 4, SUBARTICLE 6. METHANE EMISSIONS FROM MUNICIPAL SOLID WASTE LANDFILLS, and are therefore subject to applicable requirements from this regulation which include, but may not be limited to, the following conditions.
35. There shall be no leaks of landfill gas from the collection system and along the gas transfer path in excess of 500 ppmv (as methane) measured at a distance of 1/2 inches from the transfer path other than non-repeatable momentary readings.
[17 CCR § 95464(b)(1)(B) and the definition of component leak at § 95475(b)]
36. This engine must achieve a methane destruction efficiency of at least 99 percent by weight. Lean burn internal combustion engines must reduce the outlet methane concentration to less than 3,000 ppmv, dry basis, corrected to 15 percent oxygen.
[17 CCR 95464(b)(3)(A)]
37. Components containing landfill gas and under positive pressure must be monitored quarterly for leaks. Any component leak must be tagged and repaired within 10 calendar days, or it is a violation of this subarticle. Component leak testing at MSW landfills having landfill gas-to-energy facilities may be conducted prior to scheduled maintenance or planned outage periods.
[17 CCR § 95469(b)(3)]
38. Recordkeeping - five year retention: In addition to any other records required by this permit, the owner or operator of any gas control device must maintain the following records for at least five (5) years:
a. All gas control system downtime in excess of one hour, the reason for the downtime, and the length of time the gas control system was shutdown.
b. Results of any source tests conducted pursuant to section 95464(b)(4).
c. Records of the equipment operating parameters specified to be monitored under sections 95469(b)(1) and 95469(b)(2) as well as records for periods of operation during which the parameter boundaries established during the most recent source test are exceeded. The records must include the following information:
[17 CCR § 95470(a)(1)]
39. Recordkeeping - retention for life of control device: The owner or operator of any gas control device must maintain the following records for the life of each gas control device:
a. The control device vendor specifications.
b. The expected gas generation flow rate as calculated pursuant to section 95471(e).
c. The percent reduction of methane achieved by the control device determined pursuant to section 95471(f).
[17 CCR § 95470(a)(2)]

COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT
10124 OLD GROVE ROAD, SAN DIEGO, CA 92131
PHONE (858) 586-2600 FAX (858) 586-2601
www.sdapcd.org

PERMIT RECORD ID
APCD2006-PTO-974396

Sectors: 3, G
Site Record ID: APCD1996-SITE-09688
Application Record ID: APCD2015-APP-004255

RECEIVED
MAR 2 6 2018
By _____

MM San Diego LLC-North City
Suparna Chakladar
5087 Junction Rd
Lockport NY 14094

EQUIPMENT ADDRESS
MM San Diego LLC - North City
Suparna Chakladar
4949 Eastgate Mall
San Diego CA 92121

PERMIT TO OPERATE

EXPIRES: March 31, 2019

This permit is not valid until required fees have been paid.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

MM San Diego LLC-North City Anthony Falbo 5087 Junction Road, Lockport, NY 14094

EQUIPMENT DESCRIPTION

Engine #4: Caterpillar, Model 3516SITA, landfill and natural gas fired, 1342 BHP, lean burn, turbocharged, aftercooled, S/N 4EK04530, with an air/fuel controller, and driving a 950-kW generator.

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [92F] NOx and CO Source Test
1 [92M] Mass Emissions Test (T&M)
1 [92R] VOC Lab Analysis
1 [34B] Cogeneration Engine w/ Emission Controls

BEC: APCD2015-.CON-001125

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

1. All equipment shall be kept in good operating conditions and shall be properly maintained in accordance with the manual of recommended maintenance provided by the engine manufacturer. The manual shall be kept on site.
2. There shall be no leaks of landfill gas from the collection system and along the gas transfer path in excess of 500 PPM (as methane) measured at a distance of 1/2 inches from the transfer path other than non-repeatable momentary readings. (17 CCR 95475(a)(2))
3. Emissions of Oxide of Nitrogen (NOX) in the engine exhaust shall not exceed 1 gram per brake horsepower-hour.
4. Emissions of Oxides of Nitrogen, calculated as Nitrogen Dioxide (NO2), shall not exceed 65 parts per million by volume on a dry basis (PPMVD) corrected to 15% Oxygen.
5. Emissions of Carbon Monoxide (CO) in the engine exhaust shall not exceed 3 grams per brake horsepower-hour.
6. Emissions of non-methane hydrocarbons (NMHC) in the engine exhaust shall not exceed 0.55 grams per brake horsepower-hour.

7. The Sulfur content of any gaseous fuel burned shall not exceed 0.05% by weight.

8. Particulate Emissions shall not exceed 0.10 grains per dry standard cubic foot of gas which is standardized to 12 percent of Carbon Dioxide by volume.

9. Particulate Emissions shall be measured in accordance with District Method 5.

10. The Sulfur content of fuel shall be measured in accordance with ASTM Test Method D-3246.

11. In the event that the gas collection system or the engines are inoperable, all valves which vent landfill gas to atmosphere shall be closed within 1 hour. The permittee shall maintain records of these valve closures, including the time the system or engines become inoperable and the time of valve closure. Records shall be maintained for five years and made available to the District upon request. (40 CFR Part 60, Subpart WWW)

12. The owner or operator shall conduct periodic maintenance of this engine and any add-on control equipment, as applicable, as recommended by the engine and control equipment manufacturer or as specified by any other maintenance procedure approved in writing by the District. The periodic maintenance shall be conducted at least once each calendar year. (Rule 69.4.1)

13. A non-resettable totalizing fuel meter shall be installed on this engine, maintained in good working order and used for recording engine fuel consumption. If a meter is replaced when the emission unit is operating on site, the Air Pollution Control District's compliance division shall be notified in writing within in 10 calendar days. The written notifications shall include the following information:
a. old meter's reading.
b. replacement meter's manufacturer name, model and serial number if available and current reading on replacement meter; and
c. copy of receipt of new meter or of installation work order.
A copy of the meter replacement notification shall be maintained on site and made available to the Air Pollution Control District upon request. (Rule 69.4.1)

14. Natural gas usage for the facility shall not exceed 23 million standard cubic feet during each and every 12 consecutive month period. Records demonstrating compliance with this limit shall be maintained on site for at least five years and made available for inspection by the District upon request.

15. The annual heat input from the combustion of landfill gas shall be equivalent to 10% or more of the total annual gross heat input to this equipment.

16. The following records shall be recorded monthly, maintained on site for a minimum of five years and made available to District personnel upon request:
a. monthly landfill gas usage, standard cubic feet;
b. average monthly landfill gas heating value, Btu per cubic feet;
c. percentage of gross heat input to this equipment from the combustion of landfill gas.

17. This equipment shall be source tested once each permit year (annual source test) to demonstrate compliance with the emission standards contained in this permit. For the purposes of this permit, a permit year is the 12-month period ending on the last day of the permit expiration month. It is the responsibility of the permittee to schedule the source test with the District. The source test shall be performed or witnessed by the District. Each annual source test shall be separated by at least 90 days from any annual source test performed in a different permit year.

18. Concentrations of NOx, CO and O2 in the exhaust shall be measured in accordance with SDC APCD Test Method 100.

19. Concentrations of NMHC in the exhaust shall be measured in accordance with SDC APCD Test Methods 25A and/or 18.

20. The air to fuel ratio controller and the oxygen sensor shall be inspected, calibrated or replaced per Caterpillar guidelines during scheduled maintenance periods. These scheduled maintenance periods shall occur every 30 to 60 days, and shall not extend beyond 60 days between periods. Records of the dates of maintenance performance, of inspection, calibration, replacement shall be maintained on site for at least 5 years and made available for inspection by the District upon request.

21. The Owner or Operator shall conduct periodic inspections of each Engine, and any add-on control equipment as applicable, to ensure that the Engine and control equipment is operated in compliance with the Provisions of this Permit to Operate. The periodic inspections shall be conducted at least once every six months.
22. The Owner or Operator shall conduct periodic maintenance of each Engine, and any add-on control equipment as applicable, as recommended by the Engine and control equipment manufacturers or as specified by any other maintenance procedure approved in writing by the District. The periodic maintenance shall be conducted at least once each calendar year.
23. The owner or operator shall keep a manual of recommended maintenance provided by the manufacturer or other maintenance procedures as approved in writing by the District.
24. The owner or operator shall maintain an operating log containing, at a minimum, the following:
    -records of periodic engine inspections
    -the dates the inspection was performed
    -records of engine maintenance
    -the dates maintenance was performed
    -the nature of the maintenance
25. The Permittee shall submit an Application and obtain written authorization from the District before altering any portion of the System in a manner which may affect emissions from the facility, except for necessary repair, maintenance and identical replacement.
26. All records required by this written permit shall be maintained on site for a minimum of five years and made available to the District upon request. (Rule 1421)
27. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.
28. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
29. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)
30. The engine(s) covered by this permit is considered a control device and the landfill gas duct leading to the engine is considered a collection device in accordance with Title 17 California Code of Regulations (CCR) Division 3, Chapter 1, Subchapter 10, Article 4, SUBARTICLE 6. METHANE EMISSIONS FROM MUNICIPAL SOLID WASTE LANDFILLS, and are therefore subject to applicable requirements from this regulation which include, but may not be limited to, the following conditions.
31. There shall be no leaks of landfill gas from the collection system and along the gas transfer path in excess of 500 ppmv (as methane) measured at a distance of 1/2 inches from the transfer path other than non-repeatable momentary readings.
    [17 CCR § 95464(b)(1)(B) and the definition of component leak at § 95475(b)]
32. This engine must achieve a methane destruction efficiency of at least 99 percent by weight. Lean burn internal combustion engines must reduce the outlet methane concentration to less than 3,000 ppmv, dry basis, corrected to 15 percent oxygen.
    [17 CCR 95464(b)(3)(A)]
33. Components containing landfill gas and under positive pressure must be monitored quarterly for leaks. Any component leak must be tagged and repaired within 10 calendar days, or it is a violation of this subarticle. Component leak testing at MSW landfills having landfill gas-to-energy facilities may be conducted prior to scheduled maintenance or planned outage periods.
    [17 CCR § 95469(b)(3)]

34. Recordkeeping - five year retention: In addition to any other records required by this permit, the owner or operator of any gas control device must maintain the following records for at least five (5) years:
a. All gas control system downtime in excess of one hour, the reason for the downtime, and the length of time the gas control system was shutdown.
b. Results of any source tests conducted pursuant to section 95464(b)(4).
c. Records of the equipment operating parameters specified to be monitored under sections 95469(b)(1) and 95469(b)(2) as well as records for periods of operation during which the parameter boundaries established during the most recent source test are exceeded. The records must include the following information:
[17 CCR § 95470(a)(1)]

35. Recordkeeping - retention for life of control device: The owner or operator of any gas control device must maintain the following records for the life of each gas control device:
a. The control device vendor specifications.
b. The expected gas generation flow rate as calculated pursuant to section 95471(e).
c. The percent reduction of methane achieved by the control device determined pursuant to section 95471(f).
[17 CCR § 95470(a)(2)]