



Ventura County
Air Pollution
Control District

669 County Square Drive
Ventura, California 93003

tel 805/645-1400
fax 805/645-1444
www.venturaapcd.org

Michael Villegas
Air Pollution Control Officer

July 26, 2011

2011 JUL 28 AM 11:35
RECEIVED
VENTURA REGIONAL
SANITATION DISTRICT

Mr. Mark Lawler
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003

Subject: Notice of Violation Number 22578

Dear: Mr. Lawler

Enclosed you will find Notice of Violation (NOV) number 22578. It has been issued to Ventura Regional Sanitation District as a result of a violation I observed during the site visit today at Toland Road Landfill, APCD Permit to Operate number 7340. The NOV has been issued to VRSD for violation of APCD Rule 29.C.1 for failure to close the wet biosolids receiving hopper cover within ten minutes of terminating wet biosolids transfer activities, in violation of Authority to Construct number 07340-130, condition B.4.

During the above-mentioned site visit, at 12:35 PM, while touring the Biosolids Plant, I observed that the cover to the wet biosolids receiving hopper had been left in a wide open position. I pointed out that the cover had been left open to my escort, Richard Baldwin, consultant to VRSD. A nearby worker apparently noticed that we were discussing the open cover and closed it shortly afterwards.

Later, I checked with VRSD personnel manning the scale house. He verified that the most recent load of wet biosolids delivered to the Biosolids Plant had arrived at the scale at 11:40 AM. According to the VRSD personnel, it takes approximately 15 minutes to offload wet biosolids. Allowing 10 minutes for the truck driver to drive the truck from the scale to the receiving hopper and untarp the wet load, the driver would have started offloading operations at approximately 11:50 AM, terminating the offloading operations at approximately 12:05 PM, 30 minutes prior to the time that I spotted the open cover.

On April 2, 2009, Ventura County APCD issued a temporary operating permit to VRSD allowing operation of the Biosolids Drying System for equipment and processes authorized by Authority to Construct (A/C) number 07340-130. The A/C includes a number of conditions regarding the operation of the Biosolids Plant. The temporary operating permit requires that VRSD comply with the conditions of A/C number 07340-130.

Authority to Construct number 07340-130, condition B.4 states in part:

".....The cover or lid shall be in the closed position except during activities necessary for the unloading of wet biosolids from the delivery truck into the receiving hopper, or maintenance activities. The receiving hopper shall be closed or sufficiently covered within ten (10) minutes of terminating transfer activities."

Item 171

During my site visit today, I observed that the wet biosolids receiving hopper cover was wide open approximately 30 minutes after the termination of the most recent wet biosolids receiving activities had terminated, in violation of the condition 11.e, and therefore in violation of APCD Rule 29.C.1, Conditions on Permits.

You should also note that during a Biosolids Plant inspection on August 23, 2010, I observed that the receiving hopper cover would not properly close and pointed that fact out to Greg Grant and Mark Potter, both VRSD employees at the time. On August 25, 2010, I issued Notice to Comply (NTC) number 11936 to VRSD for violating Rule 29.C for the same A/C condition violation as well as other condition violations I observed during that inspection. I sent the NTC to VRSD via US Mail.

I also sent a copy of the NTC, on August 25, 2010, as an attachment to an email to Greg Grant. The email detailed a number of compliance issues I found at the Biosolids Plant at that time. I have enclosed a copy of that email. Please note that the receiving hopper cover violation is the first item detailed in my email.

You will be contacted separately regarding settlement of this violation. Be advised that the District will respond to any subsequent violations of this A/C condition in a manner commensurate with the severity of the violation.

If you have any questions regarding this matter, please contact me at 805/645-1494.

Sincerely,

DAN SEARCY

Dan Searcy
Manager, Compliance Division

C: Mike Villegas, VCAPCD
Kerby Zozula, VCAPCD



Ventura County
Air Pollution
Control District

669 County Square Drive 2nd Fl.
Ventura CA 93003

Tel: 805/645-1400
Fax: 805/645-1444

NOTICE OF VIOLATION

No. 22510

Name: VENTURA REGIONAL SANITATION DIST. Date: JULY 26, 2011
Address: 1001 PARTIDGE DR. SUITE 150 City/Zip: VENTURA 93003
Inspection Address: 3500 TOLANA ROAD P.O./ID#: 07340
City/Zip: SANTA BARBARA, CA 93060 Phone: 805/658-4674

You are hereby notified that a **VIOLATION** of **RULE 29.C.1** of the Rules and Regulations of the Ventura County Air Pollution Control District, **SECTION** _____ of the California Health and Safety Code, **SECTION** _____ of the California Code of Regulations, was committed on JULY 26, 2011 by: FAILURE CLOSE WET RIOSOLIAS RECEIVING HOMER WITHIN TEN (10) MINUTES OF TERMINATING RIOSOLIAS TRANSFER ACTIVITIES, AS REQUIRED BY AUTHORITY TO CONSTRUCT NUMBER 07340-130, CONDITION B.4

Pursuant to Section 42400 of the Health and Safety Code of the State of California, 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. Every day during any portion of which such violation occurs constitutes a separate offense.

ADVISE THIS DISTRICT, IN WRITING, WITHIN TEN (10) DAYS, OF THE CORRECTIVE ACTION TAKEN TO RESOLVE THIS VIOLATION. YOUR RESPONSE DOES NOT PRECLUDE THE POSSIBILITY OF FURTHER LEGAL ACTION.

Issued by (Signature) DAN SEARCY Sector _____ Date 7-26-2011 Time 5:05 PM

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

Issued To (please print) MR MADIK LAUREL Title (please print) GENERAL MANAGER

Signature of Person Receiving Notice SENT VIA CERTIFIED MAIL Title _____ Date _____

Follow-up Action: _____

Disposition: _____

Dan Searcy

From: Dan Searcy
Sent: Wednesday, August 25, 2010 4:27 PM
To: Greg Grant
Cc: Keith Duval; Kerby Zozula; John Harader
Subject: Results of 08-23-2010 Toland Road Inspection
Attachments: VRSD NTC 11936.pdf

Hello Greg.

Below is a summary of my observations from our inspection Monday at the Toland Landfill Biosolids Drying Operations:

- The cover on the Fenton Wet Biosolids Receiving Hopper did not properly close. It appeared that the hinges were located too low, or not adjusted properly. The rear of the cover touches, not allowing the front portion of the cover to close completely and seal like it should.

Authority to Construct (A/C) number 07340-131, condition B.4 states "The receiving hopper may be equipped with a cover or lid, which shall be a motorized cover or lid. The cover or lid shall be in closed position except during activities necessary for the unloading of wet biosolids from the delivery truck into the receiving hopper, or maintenance activities."

The cover needs to be repaired or adjusted so that it closes completely and touches along all 4 sides.

- I observed that the access plates located at the exit of each dryer, where the dried solids drop out of each dryer and into the first screw auger had been removed while the equipment was in operation. According to VRSD employee, Mark Potter, the access plates had been removed due to problems they have been having with the hydraulic rams that operate the sliding panels below that open to allow dried solids to exit the dryers. Mr. Potter told me that the panels had been in place that morning and workers had removed them. The access panels were replaced prior to our leaving the facility that afternoon.

A/C condition C.1 states: "The screw augers used for unloading dried solids from the Fenton Dehydration Chambers (dryers) to the truck loading stations shall be totally enclosed."

The access covers should be in place whenever the dryers are in operation unless there are mechanical problems that necessitate the immediate removal of the panels while the dryers are operating.

- A/C condition F.2 states: "Reclaimed water from the biosolids drying process (condensate) shall be stored in totally enclosed tanks. All tanks shall be equipped with a solid roof and shall be maintained in good condition. All tanks shall be equipped with sealed hatches and pressure vacuum relief valves."

I requested clarification regarding whether this condition applies to the 1080 gallon chilled condensate tank, the 400 gallon clarifier tank and the 2500 gallon surge tank, or just the storage tanks. **The intent of the A/C condition was to require that all water/condensate collected from the biosolids be in enclosed containers.** This includes condensate storage, processing, or treatment tanks. Although the condition already applies to all tanks, I have requested that it be revised in order to further clarify that it applies to all tanks that may contain condensate, whether they are used for processing, treatment, or long term storage.

When we were inspecting the above mentioned tanks, I observed that the stainless steel 400 gallon clarifier tank had the cover unbolted and the cover was not correctly fitted. Also, the tank had what appeared to be 2 - 2" ABS pipes that connect to the vapor space that were functioning as vents, with no PV valves. During the inspection you told me that personnel had been working on re-piping the tanks with metal piping. The tanks must be completely sealed while in use and they also must be

equipped with pressure vacuum valves, as stated in condition F.2. **Any** opening in the roof of any of these 3 tanks is a violation of the condition.

I noticed that the roof panels on the 1080 gallon chilled condensate collection tank and possibly the 2500 gallon surge tank had warped to the point that they no longer sealed the opening. I can send you photos I took, if you need them. These tanks are plastic or acrylic and apparently the heat from newly condensed liquids has caused the covers to warp. The 3 tanks contain condensate, one directly from the condenser, so there is a potential for odors. The untreated condensate drops into the 1080 gallon tank first where it begins treatment.

- I also noticed that the 3 previously-mentioned tanks were connected to a "vapor recovery" of sorts. There was a 2" line connected to the vapor spaces of the 3 tanks, tying them in to the main air duct that goes from the water condenser/heat exchanger to the Biofilter. There is a 2" ball valve where the 2" line connects to the duct, apparently to isolate the 2" line from the duct if needed. I observed that the valve was in the closed position, so the "vapor recovery" was not working.

After reviewing the A/C, I couldn't find anything on the A/C that requires this 2" line to be in place and operational, venting the vapor spaces from the 3 process tanks to the Biofilter. However, I think it's a good idea, to vent these process tanks to the Biofilter for odor control, although it's not currently required. I have requested that Engineering add conditions to the final permit to make this a requirement.

- As we discussed during the inspection, the dried material has a much stronger smell than the wet material. The trailer used to store this dry material is an open trailer and is not covered. Because it takes several loads of wet material to fill one trailer with dry material, the trailer may sit partially filled and uncovered for long periods of time. The A/C does not address this. I have requested that Engineering add a condition or conditions requiring the trailer(s) be covered when not actively filling and/or that VRSD be required to empty trailers daily whether or not they are completely filled.

I believe the above-mentioned permit revisions I have requested will either further clarify current requirements, or help to reduce the potential for nuisance odors from the Biosolids Drying System.

In summary, the partially open Fenton Wet Biosolids Receiving Hopper cover, the open access panels on the 2 – Fenton Dehydration Chambers, the warped covers on the condensate tanks, and the open cover on the 400 gallon Clarifier Tank are all violations of their respective A/C conditions and APCD Rule 29.C. You also need to add PV valves to the tanks and seal the vents on the 400 gallon tank.

I'm issuing Notice to Comply (NTC) number 11936 for these violations. I have attached a pdf of the NTC. You should receive the hard copy shortly. Please be aware that if I observe any subsequent violations of these conditions, I will have no choice but to issue a Notice of Violation instead of an NTC. Please contact me to arrange for a re-inspection, once the repairs have been made. If you have any questions, please feel free to contact me.

I believe the permit revisions I have requested will help to reduce the potential for odors from the Biosolids Drying System

Thanks for your cooperation.

Regards, Dan Searcy
Supervising Air Quality Specialist, Compliance Division
Ventura County APCD

7/26/2011

17-5

NOTICE OF HEARING
BEFORE THE
VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT HEARING BOARD

THE HEARING BOARD HEREBY GIVES NOTICE that it will conduct a public hearing on MONDAY, AUGUST 29, 2011, at 5:30 p.m. The location of the hearing will be the Lower Plaza Assembly Room, Hall of Administration, Ventura County Government Center, 800 South Victoria Avenue, Ventura, California. Interested persons may appear at this hearing and give testimony.

THE HEARING BOARD WILL GIVE CONSIDERATION to the following petition for variance from the Air Pollution Control District Rules and Regulations:

Number 839: Petition of Ventura Regional Sanitation District ("VRSD") for a short variance from Air Pollution Control District Rule 29.C, Conditions on Permits - Violation of Permit Conditions, and District Rule 74.17.1.B, Municipal Solid Waste Landfills - Requirements. VRSD operates the Toland Road Landfill. The facility is equipped with a Landfill Gas Collection and Control System that includes a landfill gas flare.

District Rule 74.17.1, requires that "flares shall be source tested to demonstrate continuing compliance every two years." Title V Federal Operating Permit No. 07340 also requires that "the flare shall be source tested every two years as required by Rule 74.17.1". The source test was due on June 24, 2011, but was not conducted because the flare was not operational. The flare must be repaired before it can be tested. Repairs are expected to be complete in October 2011. VRSD is requesting a short variance and authorization to continue operating the landfill gas control system until the flare can be repaired and tested. The facility is located at 3500 Toland Road, Santa Paula, California. The facility is a major stationary source as defined by Environmental Protection Agency criteria.

Interested persons may examine the petition, which includes proposed conditions and/or increments of progress, at the office of the Clerk of the Board, Fourth Floor, Hall of Administration, Ventura County Government Center, 800 South Victoria Avenue, Ventura, California. Interested persons may also examine a copy of the Air Pollution Control District Rules and Regulations at the office of the Clerk of the Board. The office hours for the Clerk of the Board are Monday through Friday from 8:00 a.m. to 5:00 p.m.

DATED: August 12, 2011

MICHAEL POWERS,
Clerk of the Board of Supervisors
& Clerk of the APCD Hearing Board

BY: *Paolo R. Guinto*
Deputy Clerk of the Board