



**COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT**  
10124 OLD GROVE ROAD, SAN DIEGO, CA 92131  
(858) 586-2600 FAX (858) 586-2601  
[www.sdapcd.org](http://www.sdapcd.org)

**Sectors: 2, E**  
**Site Record ID: APCD2019-SITE-03221**

**Application Record ID**  
**APCD2019-APP-006111**



SANCO Services

224 S Las Posas Rd  
San Marcos, CA 92078

**EQUIPMENT ADDRESS**

SANCO Services  
NULL  
1044 W Washington Ave  
Escondido, CA 92078

**AUTHORITY TO CONSTRUCT**

**EXPIRES: June 17, 2021**

After examination of your Application for an Air Pollution Control District (**hereinafter referred to as "the District"**) Authority to Construct and Permit to Operate for equipment located at the above location, the District has decided on the following actions:

**Authority to Construct is granted** pursuant to Rule 20 of the Air Pollution Control District Rules and Regulations for equipment to consist of:

An anaerobic digestion process consisting of: four (4) digester tanks and associated mixing and recirculation pumps, gas mixers, heat exchangers, piping, valves and fittings. Digester gas purification system consisting of packed bed tower, two activated carbon filters, a compressor, 3 stage membrane separation and associated chillers, analyzers and electrical components. A portion of the digester gas from above equipment vents to **one (1) flare with a maximum flow rate of 1500 scfm.** The flare is equipped with stack thermocouples, gas booster, flare arrestor, shut off valve, flare burner tip, control panel and other associated piping valves and fittings.

This Authority to Construct is issued with the following conditions:

1. There shall be no visible emissions from the exhaust stack of the air pollution control systems. [Rule 50 and 1200]
2. At no time shall the subject equipment cause or contribute to a nuisance as specified in District Rule 51. If compliance with Rule 51 cannot be demonstrated to the satisfaction of the District, the applicant will take whatever corrective action necessary to meet applicable requirements. If corrective action requires any physical change or modification to the subject equipment, the applicant shall apply for and obtain an Authority to Construct for all such modifications. (Rule 51)
3. The flare exhaust concentration of Sulfur compounds, calculated as Sulfur Dioxide (SO<sub>2</sub>) shall not exceed 0.05 percent, by volume, on a dry basis.
4. If requested by the District or EPA, the sulfur content of fuel shall be measured in accordance with ASTM Test Method D-3246 or an alternative approved in writing by the District. [Rule 53 and Rule 21]
5. Particulate Emissions from any combustion device shall not exceed 0.10 grains per dry standard cubic foot of gas which is standardized to 12 percent of carbon dioxide by volume (Rule 53)

6. If requested by the District or EPA, nonfugitive particulate emissions shall be measured in accordance with District Method 5. [Rule 53 and Rule 21]
7. The flare shall be equipped with optical flame detectors, stack temperature probe and transmitter, flame arrestors and automatic shut off valves. The stack temperature transmitter shall be calibrated in accordance with the manufacturer's specifications. The manufacturer's specifications and required calibration shall be maintained on-site for three years and made available to District personnel upon request. (Rule 51)
8. The temperature probe shall be functioning and maintained in good working condition and be accurate to +/-5%. The temperature transmitter shall be calibrated in accordance with the manufacturer's specifications. The Exhaust Stack temperature shall be continuously displayed and recorded during incineration. Records of the exhaust temperature and the manufacturer's calibration and maintenance specifications as well as the calibration indicating the accuracy of the temperature transmitter shall be maintained on-site for at least three years and shall be made available to District personnel upon request. (Rule 51)
9. The air pollution control system and its monitoring equipment shall be maintained in good operating condition and shall be in full operation in accordance with the facility's operations and maintenance (O&M) manual at all times when the process equipment is in use. The O&M manual shall be maintained on-site and made available to District personnel upon request. (Rule 51)
10. The gases shall be incinerated in the flare system and the flare shall have an operating temperature between 1,400 and 1,800 deg F measured at the stack's top temperature probe. except:
  - 1) during flare startup and/or shutdowns, the duration of which shall not exceed 15 minutes,
  - 2) during all other operations, the duration of which shall not exceed five minutes per day.

Logs of the date, duration (in minutes) and purpose of all activities that result in flare exhaust temperature deviation shall be maintained onsite for three years and made available to the District personnel upon request. (Rule 51)
11. When combusting anaerobic digester gas, oxides of nitrogen (NOx) emissions from the flare stack shall not exceed 0.060 lbs/MMBtu, as determined by a source test. (Rule 20.2)
12. When combusting natural gas, oxides of nitrogen (NOx) emissions from the flare stack shall not exceed 0.080 lbs/MMBtu, as determined by a source test. For purposes of this condition, natural gas includes any gas in the fuel from the digester gas cleanup system used to produce pipeline quality natural gas. (Rule 20.2)
13. When combusting a mixture of digester gas and natural gas, oxides of nitrogen (NOx) from the flare stack shall not exceed the an emission limit expressed in lb/MMBTU and calculated as  $[Hdg(0.060) + Hng(0.080)]/H_{tot}$  where: Hdg is the heat input from digester gas, Hng is the heat input from natural gas, and Htot is the total heat input. All heat inputs shall be calculated using the higher heating value (HHV) of the applicable fuel. For purposes of this condition, natural gas includes any gas in the fuel from the digester gas cleanup system used to produce pipeline quality natural gas. (Rule 20.2)
14. The concentration of total reduced sulfur (TRS) compounds in any fuel entering the flare shall not exceed 29.0 ppmv to be determined by source test. (Rule 20.2)
15. Fuel flow to the flare shall not exceed 90,000 standard cubic feet per hour (scfh). The permittee shall maintain hourly records of the flow of digester gas, natural gas, and gas from the digester gas cleanup system used to produce pipeline quality natural gas.
16. All source test or other tests required by this permit shall be performed by the District or an independent contractor approved by the District. Unless otherwise specified in this permit or authorized in writing by

the District, if testing will be performed by an independent contractor and witnessed by the District, a proposed test protocol shall be submitted to the District for written approval at least 60 days prior to source testing. Additionally, the District shall be notified a minimum of 30 days prior to the test so that observers may be present unless otherwise authorized in writing by the District. The applicant should contact the Source Test Section at 858-586-2775 with any questions regarding the submission or approval of a test protocol.

17. Unless otherwise specified in this permit or authorized in writing by the District, within 45 days after completion of a source test performed by an independent contractor, a final test report shall be submitted to the District for review and approval.
18. Not later than 60 calendar days after completion of the construction of the flare unless a later date is authorized in writing by the District, an Initial Emissions Source Test shall be conducted on the flare to demonstrate compliance with the NO<sub>x</sub> emission standards of this permit. The source test protocol shall comply with all of the following requirements:
  - a. Measurements of NO<sub>x</sub> and CO concentrations and emissions and oxygen (O<sub>2</sub>) concentration shall be conducted in accordance with U.S. Environmental Protection Agency (EPA) methods 7E, 10, and 3A, respectively, and District source test Method 100, or alternative methods approved by the District and EPA;
  - b. Source testing shall be performed both using 100% anaerobic digester gas fuel and using 100% natural gas without any gas in the fuel from the digester gas cleanup system used to produce pipeline quality natural gas. unless otherwise authorized in writing by the District.
  - c. The higher heating value of the fuel shall be measured by a method approved by the District, in British thermal units per standard cubic foot (Btu/scf).
  - d. The sulfur content of the flare fuel shall be measured by a method approved by the District.
  - e. Stack exhaust temperature.
  - f. Source testing shall be performed at 80% or more of the flare's rated heat input rate unless otherwise approved in writing by the District. The District may specify additional testing at different heat input levels or operational conditions to ensure compliance with the emission and concentration limits of this permit and District Rules and Regulations.
19. The flare exhaust(s) shall be equipped with a circular exhaust stack(s) with test ports and provisions for personnel access (e.g., scaffolding, platforms) for source testing. The source test protocol and stack design, with the locations of test ports, access provisions, platforms, etc., shall be submitted to and approved by the District's Monitoring and Technical Services Division (Source Test Section, 858-586-2775) prior to issuance of the Startup Authorization for this equipment.
20. Where equipped, process covers or enclosures shall be used at all times except during periods of equipment maintenance
21. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.
22. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
23. 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.)

This Authority to Construct does not authorize operation of the above-specified equipment until written notification has been provided to the District indicating that construction (or modification) has been completed in accordance with this Authority to Construct. Upon submission of this notification, temporary Permit to Operate shall take effect and will remain in effect, unless withdrawn or modified by the District, until the equipment is inspected by the District and a revised temporary permit (Startup Authorization) is issued or a Permit to Operate is granted or denied.

This Authority to Construct shall be posted on or within 25 feet of the above described equipment or maintained readily available at all times on the operating premises.

Upon completion of construction (or modification) in accordance with this Authority to Construct, and prior to commencing operation, the applicant must complete and mail, deliver or email to [APCDPermits@sdcounty.ca.gov](mailto:APCDPermits@sdcounty.ca.gov) the enclosed Construction Completion Notice to the District. After mailing, delivering or emailing the notice, the applicant may commence operation of the equipment. Operation must be in compliance with all the conditions of this Authority to Construct and applicable District Rules.

This Authority to Construct does not relieve the holder from obtaining permits or authorizations, which may be required by other governmental agencies. This Authority to Construct is not authority to exceed any applicable emission standard established by this District or any other governmental agency. This authorization is subject to cancellation if any emission standard or condition is violated.

Within 30 days after receipt of this Authority to Construct, the applicant may petition the Hearing Board for a hearing on any conditions imposed herein in accordance with Rule 25.

This Authority to Construct will expire on 06/17/2021 unless an extension is granted in writing.

This is not a Permit to Operate. Please be advised that installation or operation of this process or equipment without written authorization may be a misdemeanor subject to fines and penalties.

If you have any questions regarding this action, please contact me at (858) 586-2719 or via email at [Russell.Yanagihara@sdcounty.ca.gov](mailto:Russell.Yanagihara@sdcounty.ca.gov).

Russell Yanagihara  
Associate Engineer

CC: Compliance Division



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Site Record ID: APCD2019-SITE-03221

Application Record ID  
APCD2019-APP-006112



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Authority to Construct is granted pursuant to Rule 20 of the Air Pollution Control District Rules and Regulations for equipment to consist of:

An organic waste processing facility receiving green and food waste consisting of a waste receiving area, star screen, digestate press room which is vented to a biofilter odor control system with dimensions of 66' W x 45' L and 9' D using organic material as media. along with any conveyors, holding tanks, electric de-packaging machines, electric feed hopper(s), electric shredder(s) and any other associated equipment.

This Authority to Construct is issued with the following conditions:

1. There shall be no visible emissions from the exhaust stack of the air pollution control systems. [Rule 50 and 1200]
2. At no time shall the subject equipment cause or contribute to a nuisance as specified in District Rule 51. If compliance with Rule 51 cannot be demonstrated to the satisfaction of the District, the applicant will take whatever corrective action necessary to meet applicable requirements. If corrective action requires any physical change or modification to the subject equipment, the applicant shall apply for and obtain an Authority to Construct for all such modifications. (Rule 51)
3. Pressroom area should be enclosed and Air Pollution Control Equipment shall be in operation at all times except when vehicles are entering or exiting the building or during equipment maintenance.
4. The Air Pollution Control system and its monitoring equipment shall be maintained in good operating condition and shall be in full operation in accordance with the facility's operations and maintenance (O&M) manual at all times when the process equipment is in use. The O&M manual shall be maintained on-site and made available to District personnel upon request. (Rule 51)
5. The outlet ammonia within 6 inches of the surface of the biofilter bed shall not exceed six (6) parts per million by volume (ppmv). The ammonia exhaust concentration shall be monitored between 3 and 6 inches of the surface of the biofilter and within 3 feet of the geometric center of the surface of the biofilter and recorded at least once per day during operations and as may be requested by the District during

inspections. ammonia concentration records shall be maintained on site for at least three years and made available to District personnel upon request. (Rule 51)

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7. The outlet hydrogen sulfide concentration within 6 inches of the surface of the biofilter bed shall not exceed 0.2 part per million by volume (ppmv). The hydrogen sulfide exhaust concentration shall be monitored between 3 and 6 inches of the surface of the biofilter and within 3 feet of the geometric center of the surface of the biofilter and recorded at least once per day during operations and as may be requested by the District during inspections. ammonia Hydrogen sulfide concentration records shall be maintained on site for at least three years and made available to District personnel upon request. (Rule 51)
8. Hydrogen Sulfide concentrations shall be measured with a properly calibrated Portable Hydrogen Sulfide Analyzer (such as an Industrial Scientific ATX-612 H<sub>2</sub>S, Jerome Meter Model 631-X, Acrolog H<sub>2</sub>S Parts Per Billions Monitor, or OdaLog Low Range H<sub>2</sub>S Logger (0.01 to 2.00 ppm)), an appropriate Dräger tube #8101991) or any equivalent method approved in writing by the District. The above monitoring equipment shall be maintained and calibrated in accordance with manufacturer's specifications. The manufacturer's specifications shall be made available to District personnel upon request.
9. Where equipped, process covers or enclosures shall be used at all times except during periods of equipment maintenance
10. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.
11. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
12. 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.)

This Authority to Construct does not authorize operation of the above-specified equipment until written notification has been provided to the District indicating that construction (or modification) has been completed in accordance with this Authority to Construct. Upon submission of this notification, temporary Permit to Operate shall take effect and will remain in effect, unless withdrawn or modified by the District, until the equipment is inspected by the District and a revised temporary permit (Startup Authorization) is issued or a Permit to Operate is granted or denied.

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Within 30 days after receipt of this Authority to Construct, the applicant may petition the Hearing Board for a hearing on any conditions imposed herein in accordance with Rule 25.

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Russell Yanagihara  
Associate Engineer

CC: Compliance Division