

VENTURA REGIONAL SANITATION DISTRICT

1001 PARTRIDGE DRIVE, SUITE 150 • VENTURA, CA 93003-0704



February 11, 2010

Mr. Keith Duvall
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

**PART 70 ANNUAL COMPLIANCE CERTIFICATION REPORT
VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT PERMIT
NO. 07340 – TOLAND ROAD LANDFILL**

Enclosed is the Part 70 Compliance Certification Report for the Toland Road Landfill.

Please call Jason Siegert at 805-658-4617 if you have any questions.

SALLY COLEMAN – DIRECTOR OF OPERATIONS

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Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM

Cover Sheet

Form TVPF45/07-21-03 Page 2 of 2

A copy of each compliance certification shall be submitted to EPA Region IX at the following address:


Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

Confidentiality

All information in a Part 70 permit compliance certification is public information. The Part 70 permit is also public information.

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this compliance certification are true, accurate, and complete.

Signature and Title of Responsible Official:  Title: <i>Director of operations</i>	Date: <i>2-10-10</i>
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Time Period Covered by Compliance Certification:

01 / 01 / 09 (MM/DD/YY) to 12 / 31 / 09 (MM/DD/YY)

1. PERIODIC MONITORING SUMMARY

This periodic monitoring summary is intended to aid the permittee in quickly identifying key monitoring, recordkeeping, and reporting requirements. It is not intended to be used as a "stand alone" monitoring guidance document that completely satisfies the requirements specifically applicable to this facility. The following tables are included in the periodic monitoring summary:

- Table 1.a - Specific Applicable Requirements
- Table 1.b - Permit-Specific Conditions
- Table 1.c - General Applicable Requirements
- Table 1.d - General Requirements for Short-Term Activities

1a. Specific Applicable Requirements

The Specific Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 6 of this permit.

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
70N3	Rule 70	<ul style="list-style-type: none"> • Annual compliance certification • Annual static pressure testing • Quadrennial dynamic pressure testing • Log of maintenance on vapor recovery system 	<ul style="list-style-type: none"> • Records of maintenance • Records of vapor recovery system tests 	None	<ul style="list-style-type: none"> • Static Test (ARB TP-201.3b) • Dynamic Test (ARB TP-201.4) 	
74.17.1N5-07340	Rule 74.17.1	<ul style="list-style-type: none"> • Annual compliance certification • Monitor flare and turbine gas flow rate and flare temperature • Monitor wells and collection header (temperature, pressure, nitrogen, oxygen) • Monitor methane concentration at the surface of the landfill • Source test flare every 24 months (NMOC, NOx, and CO) • Source test micro-turbine every 24 months (NMOC) 	<ul style="list-style-type: none"> • Records of waste in place and annual waste acceptance rate • Records of flare and turbine testing • Records of flare temperature and landfill gas flow to the flare • Records of existing wells, newly installed wells, and planned wells • Records of methane concentration at the landfill surface • Records of asbestos-containing or non-degradable waste • Records of exceedances 	<ul style="list-style-type: none"> • Reports of exceedances • Reports of new wells 	<ul style="list-style-type: none"> • NMOC-EPA Test Method 25, 25C or 18 • NOx - EPA Method 7 (flare) • CO - EPA Method 10 (flare) • Calorific value - ASTM Method D1826-77 • O₂ - EPA Method 3A • Exhaust Flow - F Factor EPA Method 19 • Surface Methane - EPA Method 21 	
40CFR63AAAA	40 CFR Part 63, Subpart AAAAA	<ul style="list-style-type: none"> • Annual compliance certification • Comply with 40 CFR Part 60, Subpart Cc • Develop a startup, shutdown, malfunction (SSM) plan 	<ul style="list-style-type: none"> • Records of SSM plan 	<ul style="list-style-type: none"> • SSM plan reports 		

1b. Permit-Specific Conditions

The Permit-Specific Conditions Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 7 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO7340PC1 - Condition No. 1	Rule 26 General Recordkeeping	<ul style="list-style-type: none"> Annual compliance certification Monthly records of throughput and consumption Annual compliance certification 	<ul style="list-style-type: none"> Monthly records of throughput and consumption 	None	None	
PO7340PC1 - Condition No. 2	Rule 29 Solvent Use	<ul style="list-style-type: none"> Annual compliance certification Landfill gas flow rate and heating value 	<ul style="list-style-type: none"> Solvent use exemption records Landfill gas flow rate and heating value 	None	None	District enforceable only
PO7340PC2 - Condition No. 1	Rule 26 Annual Flare Combustion Limit	<ul style="list-style-type: none"> Annual compliance certification Flare temperature Testing every 2 years (ROC, NOx) Testing every 4 years (SOx) 	<ul style="list-style-type: none"> Records of flare temperature Records of source tests 	None	<ul style="list-style-type: none"> ROC-EPA Test Method 25 or 18 NOx - EPA Method 7 Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate 	
PO7340PC2 - Condition No. 2	Rule 26 Flare BACT Limits	<ul style="list-style-type: none"> Annual compliance certification Source test every 4 years Modeling upon request 	<ul style="list-style-type: none"> Records of source tests 	None	<ul style="list-style-type: none"> Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate 	
PO7340PC2 - Condition No. 3	Rule 54	<ul style="list-style-type: none"> Annual compliance certification Source test every 4 years Modeling upon request 	<ul style="list-style-type: none"> Records of source tests 	None	<ul style="list-style-type: none"> Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate 	
PO7340PC2 - Condition No. 4	Rule 57.1	<ul style="list-style-type: none"> Annual compliance certification 	<ul style="list-style-type: none"> None 	None	None	Not required based on District EPA emission factor analysis

1b. Permit-Specific Conditions (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO7340PC2 - Condition No. 5	Rule 26 Flare Equipment Requirements	•Annual compliance certification	•None	None	None	
PO7340PC2 - Condition No. 6	Rule 26 Flare Condensate Knockout / Filter Requirements	•Annual compliance certification	•None	None	None	
PO7340PC2 - Condition No. 7	Rule 26 Collection Vessel Emission Requirements	•Annual compliance certification	•None	None	None	
PO7340PC2 - Condition No. 8	Rule 51 Flare Dimensions and Exhaust Velocity	•Source testing	•Records of source tests	None	APCD approved test protocol	District enforceable only
PO7340PC2 - Condition Nos. 9 and 10	Rule 51 Toxics Testing and HRA Requirements	•Source testing	•Records of source tests	None	APCD approved test protocol	District enforceable only
PO7340PC3 - Condition Nos. 1, 3, and 4	Rule 74.17.1 Micro-Turbine Emission Limits	•Annual compliance certification •Testing every 24 months (NMOC)	•Records of source tests	None	•NMOC - EPA Methods 18, 25, or 25C	
PO7340PC3 - Condition No. 2, 3, and 4	Rule 54	•Annual compliance certification •Source test every 4 years •Modeling upon request	•Records of source tests	None	•Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate	
PO7340PC3 - Condition No. 5	Rule 74.17.1 Micro-Turbine Metering Requirement	•Annual compliance certification •Electrical power generated, landfill gas flow rate, and heating value	•Electrical power generated, landfill gas flow rate, and heating value	None	None	

1c. General Applicable Requirements

The General Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 8 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	<ul style="list-style-type: none"> • Routine surveillance • Visual inspections • Annual compliance certification, including a formal survey • Opacity readings upon request • Notification required for uncorrectable visible emissions 	<ul style="list-style-type: none"> • All occurrences of visible emissions for periods > 3min in any one hour • Annual formal survey of all emissions units 	None	• Opacity - EPA Method 9	
54.B.1	Rule 54.B.1	<ul style="list-style-type: none"> • Annual compliance certification • Follow monitoring requirements under Rule 64 • Upon request, source test for sulfur compounds at point of discharge 	None	None	<ul style="list-style-type: none"> • Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate 	• Compliance with Rule 64 ensures compliance with this rule based on District analysis
54.B.2	Rule 54.B.2	<ul style="list-style-type: none"> • Annual compliance certification • Determine ground or sea level concentrations of SO₂, upon request 	<ul style="list-style-type: none"> • Representative fuel analysis or exhaust analysis and compliance demonstration 	None	<ul style="list-style-type: none"> • SO₂ - BAAQMD Manual of Procedures, Vol. VI, Section 1, Ground Level Monitoring for H₂S and SO₂ 	
57.1	Rule 57.1	<ul style="list-style-type: none"> • Annual compliance certification 	None	None	• PM - CARB Method 5	• Compliance based on District EPA emission factor analysis
64.B.1	Rule 64.B.1	<ul style="list-style-type: none"> • Annual compliance certification • Quarterly micro-turbine fuel sulfur analysis 	<ul style="list-style-type: none"> • Quarterly fuel sulfur analyses 	None	<ul style="list-style-type: none"> • SCAQMD Method 307-94 or ASTM D1072-90 or other alternatives per Rule 64.E.1 	
64.B.2	Rule 64.B.2	<ul style="list-style-type: none"> • Annual compliance certification • Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification) 	<ul style="list-style-type: none"> • Fuel supplier's certification, or fuel test per each delivery 	None	<ul style="list-style-type: none"> • ASTM Method D4294-83 or D2622-87 	
74.6	Rule 74.6	<ul style="list-style-type: none"> • Annual compliance certification • Maintain current solvent information • Routine surveillance of solvent cleaning activities • Upon request, solvent testing • Measurement of freeboard height and drain hole area for cold cleaners (as applicable) 	<ul style="list-style-type: none"> • Records of current solvent information 	None	<ul style="list-style-type: none"> • ROC content-EPA Test Method 24 • Identity of solvent components- ASTM E168-67, ASTM E169-87, or ASTM E260-85 • True vapor pressure or composite partial pressure -ASTM D2879-86 • Initial boiling point-ASTM 1078-78 or published source • Spray gun active/passive solvent losses-SCAQMD Method (10-3-89) 	

1c. General Applicable Requirements (continued)

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.11.1	Rule 74.11.1	<ul style="list-style-type: none"> • Annual compliance certification • Maintain identification records of large water heaters and small boilers 	<ul style="list-style-type: none"> • Records of current information of large water heaters and small boilers 	None	None	<ul style="list-style-type: none"> • Rule only applies to future installation of large water heaters and small boilers
74.22	Rule 74.22	<ul style="list-style-type: none"> • Annual compliance certification • Maintain furnace identification records 	<ul style="list-style-type: none"> • Records of current furnace information 	None	None	<ul style="list-style-type: none"> • Rule only applies to future installation of natural gas-fired, fan-type furnaces

1d. General Requirements for Short-Term Activities

The General Requirements for Short-term Activities Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 9 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.1	Rule 74.1	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance and visual inspections of abrasive blasting operation Abrasive blasting records 	<ul style="list-style-type: none"> Abrasive blasting records 	None	<ul style="list-style-type: none"> Visible emission evaluation- Section 92400 of CCR 	
74.2	Rule 74.2	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance Maintain VOC records of coatings used 	<ul style="list-style-type: none"> Maintain VOC records of coatings used 	None	<ul style="list-style-type: none"> Rule 74.2.G 	
74.4.D	Rule 74.4.D	<ul style="list-style-type: none"> Annual compliance certification Test ROC content of oil sample being proposed for usage 	<ul style="list-style-type: none"> Records of oil analyses 	None	<ul style="list-style-type: none"> ASTM D402 	
74.28	Rule 74.28	<ul style="list-style-type: none"> Annual compliance certification Visual inspection to ensure proper vapor control during roofing kettle operation 	None	None	None	
74.29	Rule 74.29	<ul style="list-style-type: none"> Annual compliance certification Weekly measurements of in-situ soil bioventing or bioremediation Weekly measurements of soil aeration Date and quantity of soil aerated Routine surveillance Notification required for excavation 	<ul style="list-style-type: none"> Weekly measurements of soil decontamination operation vapor concentration Date and quantity of soil aerated 	None	<ul style="list-style-type: none"> Vapor concentration- EPA Method 21 Wt. % of contaminant in soil-EPA Method 8015B 	
40CFR.61.M	40 CFR Part 61, Subpart M	<ul style="list-style-type: none"> Annual compliance certification See 40 CFR Part 61.145 for inspection procedures 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for recordkeeping procedures 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for notification procedures 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for test methods 	

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 Applicable Requirement or Part 70 Permit Condition Attachment
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 70N3	Description: Rule 70 – Storage and Transfer of Gasoline.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual visual inspection and initial commissioning testing was performed. 5,821 gallons of gasoline was dispensed in 2009.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

Ventura County Air Pollution Control District
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 Applicable Requirement or Part 70 Permit Condition Attachment
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 74.17.1N5-07340	Description: Rule 74.17.1 – Municipal Solid Waste Landfills.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Gas at wellhead, Temperature, Gas Pressure, Oxygen Concentration- Monthly
 Flare Testing and Turbine Testing – Bi-annual
 Flare Temperature and Flow – Continuous
 Micro-Turbine gas flow rate is continuously recorded by continuously recording the micro-turbine power output and back calculating the gas flow rate based on a heat rate of 14,500 BTU (LHV)/KW-hr. (40CFR60.756(b)(2))
 Existing wells, newly installed wells, planned wells – as needed
 Methane testing at well surface – Quarterly – Portable Organic Vapor Analyzer
 Perimeter gas probes- Monthly – portable combustible gas detector
 System bypass- not installed
 No periods when gas system was not operating in excess of five days.
 Report of installation and location of new wells or collection system expansion - no new wells were installed in 2009. (See Semi-Annual Reports for 01/01/09 – 6/30/09 and 7/1/09-12/31/09 at APCD)

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

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5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”
6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description: 40CFR Part 63, Subpart AAAA.
Condition No. 40CFR63AAAA	

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

A Start-up, Shutdown, Malfunction Plan has been developed and was implemented during 2009. Compliance with 40CFR Part 60, Subpart Cc was maintained during 2009. (See Semi-Annual SSMP Reports 1/1/09-6/30/09 and 7/1/09-12/31/09 at APCD)

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description: The annual amount of landfill gas combusted in the flare shall not exceed 450,000 million BTUs (MMBTU) per year.
PO7340PC1 – Condition No. 1 Rule 26	

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

The annual amount of landfill gas combusted in the flare for the year 2009 was 562,114,208 scf, or 286,923 MMBTU. The 70kW Micro-Turbine combusted 1,138 MMBTU in 2009. The nine 250kW Micro-Turbines combusted 40,438 MMBTU in 2009. The Biosolids Thermal Oil Heaters combusted 2,443 MMBTU in 2009. This totals 330,942 MMBTU consumed at the landfill for 2009. This is less than the limit of 450,000 MMBTU in the permit. See attached flow sheets.

5,821 gallons of gasoline was dispensed at the Toland Landfill during 2009. The permit limit is 12,000 gallons of gasoline.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the

applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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2009 Flare Throughput

month	total scf	avg ch4	MMBTUs
Jan-09	68,343,840	47.44%	34,172
Feb-09	62,858,880	49.75%	31,429
Mar-09	67,317,120	51.38%	33,659
Apr-09	69,292,800	46.72%	34,646
May-09	64,951,200	47.00%	32,476
Jun-09	61,128,000	50.09%	30,564
Jul-09	42,274,080	52.70%	22,532
Aug-09	47,764,800	48.80%	23,596
Sep-09	12,818,816	49.30%	6,397
Oct-09	13,432,576	55.10%	7,495
Nov-09	23,177,280	56.30%	13,211
Dec-09	28,754,816	56.60%	16,746
	562,114,208		286,923

2009 Toland 70kW Micro-Turbine Summary

2009	Turbine Hours		Power		LFG		Total (cf LFG)	Total (MMBtu)
	Start (hrs)	Stop (hrs)	Difference (hrs)	Avg (Kw)	Total (kWh)	CH4 Avg (%)		
Jan-09	23,224	23,968	744	65	48,360	47.4%	55.4	2,473,011
Feb-09	23,968	24,431	463	65	30,095	49.8%	63.9	1,774,899
Mar-09	24,431	24,431	0	0	0	51.4%	0.0	0
Apr-09	24,431	24,431	0	0	0	46.7%	0.0	0
May-09	24,431	24,431	0	0	0	47.0%	0.0	0
Jun-09	24,431	24,431	0	0	0	50.1%	0.0	0
Jul-09	24,431	24,431	0	0	0	50.1%	0.0	0
Aug-09	24,431	24,431	0	0	0	50.1%	0.0	0
Sep-09	24,431	24,431	0	0	0	50.1%	0.0	0
Oct-09	24,431	24,431	0	0	0	50.1%	0.0	0
Nov-09	24,431	24,431	0	0	0	50.1%	0.0	0
Dec-09	24,431	24,431	0	0	0	50.1%	0.0	0
Total hrs:			1,207					
Hrs/Yr:			8760					
Uptime:			14%					

Note: 70 KW microturbine fuel compressor failed and is no longer operational.

2009 Toland 250kW Micro-Turbines Throughput

MONTH	HOURS	MMBTU (3.2/HR)
JAN.	0	0
FEB.	0	0
MAR.	0	0
APR.	0	0
MAY	0	0
JUN.	0	0
JULY	0	0
AUG.	0	0
SEP.	3329	10,653
OCT.	3543	11,338
NOV.	3735	11,952
DEC.	2030	6,496

40,438

2009 Biosolids Thermal Oil Heaters Throughput

month	total scf	avg ch4	MMBTUs
Jan-09	0	0.00%	0
Feb-09	0	0.00%	0
Mar-09	0	0.00%	0
Apr-09	0	0.00%	0
May-09	0	0.00%	0
Jun-09	0	0.00%	0
Jul-09	0	0.00%	0
Aug-09	0	0.00%	0
Sep-09	1,592,157	49.30%	794
Oct-09	1,423,511	55.10%	794
Nov-09	529,090	56.30%	302
Dec-09	964,862	56.60%	553
	4,509,620		2,443

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO7340PC1 – Condition No. 2 Rule 29	Description: Solvent Record keeping.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Solvents are used in small quantities for maintenance of the facility and its equipment. All of the solvents are used in 16-ounce disposable aerosol cans; approximately 60 lbs of solvents were used during 2009. The solvents consist of brake cleaner, starting fluid, electric motor cleaner, penetrating oil, and touch up paint. Additionally 10 gallons of Voltx safety solvent is used and recycled every quarter.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO7340PC2 – Condition No. 1 Rule 26	Description: Rule 26 – Annual Flare Combustion Limits.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

The annual amount of landfill gas combusted in the flare for the year 2009 was 562,114,208 scf, for a total of 286,923 MMBTU. This is less than the limit of 450,000 MMBTU in the permit. See attached flow sheet.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

Toland Landfill Flare Throughput

Month	total scf	avg ch4	BTU	MMBTU
Jul-09	42,274,080	52.70%	533	22,532
Aug-09	47,764,800	48.80%	494	23,596
Sep-09	12,818,816	49.30%	499	6,397
Oct-09	13,432,576	55.10%	558	7,495
Nov-09	23,177,280	56.30%	570	13,211
Dec-09	28,754,816	56.60%	573	16,746

168,222,368

89,977

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Applicable Requirement or Part 70 Permit Condition

Citation, including Attachment Number and/or Permit Condition Number: PO7340PC2 – Condition No. 2 Rule 26	Description: Rule 26 – Flare BACT Limits.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.
 - a. The landfill gas flare is maintained at a minimum temperature of 1500 degrees F as indicated by the flare temperature recorder. See attached source test, June 24, 2009. The flare temperature is monitored at a thermocouple located within the flare stack, which assures that the temperature will be maintained at 1500 deg. F. The source test monitors the flare temperature at the top of the stack, after the gas has traveled up the stack and partially cooled, (temperatures will always be cooler up the stack after the combustion zone) and will always be cooler than the control thermocouple. The set temperature for the system is 1650 deg. F, which used the thermocouple in the combustion zone, and the system maintains temperatures within 10 degrees of this. The toxics and source test results confirm the system design and operating temperatures reach the desired destruction efficiency and criteria pollutant goals.
 - b. ROC Emissions of, as defined in Rule 2, do not exceed 1.00 pounds per hour. See attached source test, 6/24/09.
 - c. Emissions of oxides of nitrogen (NO_x measured as NO₂) from the landfill gas flare shall not exceed 5.15 pounds per hour. See attached source test, 6/24/09.
 - d. Emissions of oxides of sulfur (SO_x) from the landfill gas flare shall not exceed 1.72 pounds per hour and 0.02 pounds per million BTU's. See attached source test, 6/24/09.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:
 - Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 - Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

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4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”
6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

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Emission Unit Description: 85.8 MMBTU/Hr LFG Specialties Inc. enclosed landfill gas flare.			Pollutant: NMOC, NOx, SOx and CO.
Measured Emission Rate: TGNMO, lb/hr (as CH4) = 0.14 NOx, lb/hr (as NO2) = 0.99 SOx, lb/hr (as SO2) = 0.32 CO, lb/hr = 3.57	Limited Emission Rate: TGNMO, lb/hr (as CH4) = 1.00 NOx, lb/hr (as NO2) = 5.15 SOx, lb/hr (as SO2) = 1.72 CO, lb/hr = 17.16	Specific Source Test or Monitoring Record Citation: PO7340PC2, Condition 2 Test Date: June 24, 2009	
Emission Unit Description: 70 Kilowatt Ingersoll-Rand PowerWorks micro-turbine.			Pollutant: NMOC
Measured Emission Rate: TGNMO, ppm @ 3% O2 (as hexane) = 4.26 Destruction Eff.% = 98.28 SOx, lb/hr (as SO2) = 0.04	Limited Emission Rate: TGNMO, ppm @ 3% O2 (as hexane) = 20 Destruction Eff.% = 98+ SOx, lb/hr (as SO2) = 0.25	Specific Source Test or Monitoring Record Citation: PO7340PC3, Condition 2, 3, & 4 Test Date: July 31, 2008	
Emission Unit Description:			Pollutant:
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation: Test Date:	
Emission Unit Description:			Pollutant:
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation: Test Date:	
Emission Unit Description:			Pollutant:
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation: Test Date:	

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO7340PC2 Condition No. 3	Description: Rule 54, Sulfur Compounds.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

From the source test conducted June 24, 2009 the SO₂ is 0.32 lb/hr at exhaust, significantly below Rule 54.B.1 requirement of 300 ppm. The inlet concentration of Total Reduced Sulfur was 45.9 ppm.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

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3.0 TEST SUMMARY (Continued)

TABLE 3-2
SUMMARY OF RESULTS vs PERMIT CONDITIONS
VRSD Toland
Flare
June 24, 2009

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O ₂ , %	1.45	13.17	
CO ₂ , %	39.56	7.11	
N ₂ , %	8.49	79.73	
H ₂ O, %	1.80	8.44	
Flow Rate, wscfm	722.8	10,205	
Flow Rate, dscfm	709.8	9,508	inlet 1,500
Temperature, °F (measured at sample ports)	91	1,371	
Temperature, °F (measured at monitoring thermocouple)		1,651	>1,500
Btu/scf	499		
MMBtu/Hr	21.64		
NO_x:			
ppm		14.6	
ppm @ 3% O ₂		33.7	
lb/hr (as NO ₂)		0.99	5.15
lb/day (as NO ₂)		23.8	
lb/MMBtu (as NO ₂)		0.046	0.05
lb/MMCF (as NO ₂)		23.28	
CO:			
ppm		85.8	
ppm @ 3% O ₂		200.3	
lb/hr		3.57	17.16
lb/day		85.69	
lb/MMBtu		0.166	0.2
lb/MMCF		83.84	
Hydrocarbons:			
CH ₄ , ppm	491,667	< 75.5	
TGNMO, ppm (as CH ₄)	7,820	5.87	
TGNMO, ppm @ 3% O ₂ (as methane)		13.58	
TGNMO, lb/hr (as CH ₄)	13.8	0.14	1.00
TGNMO, lb/MM Btu (as CH ₄)	-	0.006	
TGNMO, lb/day (as CH ₄)	331.8	3.37	
TGNMO, ppm (as hexane)		0.98	
TGNMO, ppm @ 3% O ₂ (as hexane)		2.28	<20 NSPS
TGNMO, lb/hr (as hexane)		0.13	
Destruction Eff. %		99.01	>98%
lb/MMCF		2.95	
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	45.9		
SO _x Exhaust, lb/hr (as SO ₂)		0.32	1.72
SO _x Exhaust, lb/day (as SO ₂)		7.79	
SO _x Exhaust, lb/MMBtu (as SO ₂)		0.015	0.02
lb/MMCF		7.62	

Notes:

The results in this table are the averages of all measurements.

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO7340PC2 – Condition No. 4 Rule 57.1	Description: Rule 57.1, Particulate Matter Emissions from Fuel Burning Equipment.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Periodic monitoring is not necessary to certify compliance with Rule 57.1. EPA particulate matter emission factors for landfill gas flares indicate that this flare will comply with Rule 57.1. To certify compliance, a reference to EPA emission factors is sufficient. (Rule 57.1)

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO7340PC2 – Condition No. 5 Rule 26	Description: Rule 26, Flare Equipment Requirements.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

The flare is equipped with a UV flame scanner to ensure that the flare is operating. The flare is equipped with site ports, sampling ports, a safety system to shut off the burner (flame failure alarm, gas shut off valve), inlet flow recorders, a burner assembly, and gas pilot light or electronic igniter. All devices are maintained, operated, and calibrated according to manufacturer’s specifications.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO7340PC2 – Condition No. 6 Rule 26	Description: Rule 26 – Flare Condensate Knockout / Filter Requirements.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

The flare is operated with a condensate knockout/ filter vessel.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO7340PC2 – Condition No. 7 Rule 26	Description: Rule 26 – Collection Vessel Emission Requirements.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

The emissions from the condensate and leachate collection vessels are routed to the flare for incineration on a continuous basis. This system is visually inspected on a routine basis to ensure proper operation.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

Ventura County Air Pollution Control District
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO7340PC2 – Condition No. 7 Rule 26	Description: Rule 26 – Collection Vessel Emission Requirements.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

The emissions from the condensate and leachate collection vessels are routed to the flare for incineration on a continuous basis. This system is visually inspected on a routine basis to ensure proper operation.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description: Rule 51 – Flare Dimensions and Exhaust Velocity.
PO7340PC2 – Condition No. 8	
Rule 51	

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

The height of the flare shall be no less than 45 feet. The stack diameter shall not exceed 9 feet. The stack gas exit velocity from the flare shall be no less than 4.4 feet per second and no more than 38.0 feet per second. In order to comply with this condition, the permittee shall conduct testing as required by this attachment to determine the flare stack exit velocity. (Rule 51)

The stack by design is rated at 260-2600 SCFM or 4.4 – 38 feet per second. Routine operation ranges from 500 – 1000 SCFM, which is well within design parameters.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

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5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”
6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO7340PC2 – Condition No. 9 & 10 Rule 51	Description: Rule 51 - Toxics testing and HRA Requirements.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Bi-Annual source testing for Flare was conducted June 24, 2009. The complete report is on file with the VCAPCD. Flare was source tested for Toxics in June 24, 2009. Next required Toxics testing for Flare is June 2013.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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Applicable Requirement or Part 70 Permit Condition Attachment
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

3.0 TEST SUMMARY (Continued)

TABLE 3-2
SUMMARY OF RESULTS vs PERMIT CONDITIONS
VRSD Toland
Flare
June 24, 2009

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O ₂ , %	1.45	13.17	
CO ₂ , %	39.56	7.11	
N ₂ , %	8.49	79.73	
H ₂ O, %	1.80	8.44	
Flow Rate, wscfm	722.8	10,205	
Flow Rate, dscfm	709.8	9,508	inlet 1,500
Temperature, °F (measured at sample ports)	91	1,371	
Temperature, °F (measured at monitoring thermocouple)		1,651	>1,500
Btu/scf	499		
MMBtu/Hr	21.64		
NOx:			
ppm		14.6	
ppm @ 3% O ₂		33.7	
lb/hr (as NO ₂)		0.99	5.15
lb/day (as NO ₂)		23.8	
lb/MMBtu (as NO ₂)		0.046	0.05
lb/MMCF (as NO ₂)		23.28	
CO:			
ppm		85.8	
ppm @ 3% O ₂		200.3	
lb/hr		3.57	17.16
lb/day		85.69	
lb/MMBtu		0.166	0.2
lb/MMCF		83.84	
Hydrocarbons:			
CH ₄ , ppm	491,667	< 75.5	
TGNMO, ppm (as CH ₄)	7,820	5.87	
TGNMO, ppm @ 3% O ₂ (as methane)		13.58	
TGNMO, lb/hr (as CH ₄)	13.8	0.14	1.00
TGNMO, lb/MM Btu (as CH ₄)	-	0.006	
TGNMO, lb/day (as CH ₄)	331.8	3.37	
TGNMO, ppm (as hexane)		0.98	
TGNMO, ppm @ 3% O ₂ (as hexane)		2.28	<20 NSPS
TGNMO, lb/hr (as hexane)		0.13	
Destruction Eff. %		99.01	>98%
lb/MMCF		2.95	
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	45.9		
SO _x Exhaust, lb/hr (as SO ₂)		0.32	1.72
SO _x Exhaust, lb/day (as SO ₂)		7.79	
SO _x Exhaust, lb/MMBtu (as SO ₂)		0.015	0.02
lb/MMCF		7.62	

Notes:

The results in this table are the averages of all measurements.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO7340PC2 - Condition Nos. 1, 3 & 4 Rule 74.17.1	Description: Rule 74.17.1 – Micro-Turbine Emission Limits.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Source tests conducted every 2 years, last source test was July 31, 2008. All parameters were below the permit limits. The source test is attached.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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Applicable Requirement or Part 70 Permit Condition Attachment

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

5.0 SUMMARY OF RESULTS

TABLE 5-1
SUMMARY OF TEST RESULTS
VRSD - Toland Landfill
Microturbine
July 31, 2008

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O ₂ , %	2.12	18.20	
CO ₂ , %	39.43	2.37	
N ₂ , %	11.27	79.43	
H ₂ O, %	-	3.78	
Flow Rate, wscfm	-	1,134	
Flow Rate, dscfm	30.0	1,087	
Temperature, °F	89	456.9	
Btu/scf	475		
MMBtu/Hr	0.86		
Hydrocarbons:			
CH ₄ , ppm	469,333	<	1.00
TGNMO, ppm (as CH ₄)	8,173		3.80
TGNMO, lb/hr (as CH ₄)	0.61		0.01
TGNMO, lb/MM Btu (as CH ₄)	-	0.012	
TGNMO, lb/day (as CH ₄)	14.6	0.25	
TGNMO, ppm (as hexane)		0.63	
TGNMO, ppm @ 3% O ₂ (as hexane)		4.26	20
TGNMO, lb/hr (as hexane)		0.01	
Destruction Eff. %		98.28	98+
lb/MMCF		5.11	
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	139.3		
SO _x Exhaust, lb/hr (as SO ₂)		0.04	0.25
SO _x Exhaust, lb/day (as SO ₂)		1.00	
SO _x Exhaust, lb/MMBtu (as SO ₂)		0.049	

Notes:

The results in this table are the averages of all measurements.

5.0 SUMMARY OF RESULTS (Continued)

TABLE 5-2
GENERAL RESULTS
VRSD - Toland Landfill
Microturbine
July 31, 2008

Parameter	INLET				EXHAUST			
	First Run	Second Run	Third Run	Average	First Run	Second Run	Third Run	Average
O ₂ , %	3.00	1.73	1.62	2.12	18.50	17.90	18.20	18.20
CO ₂ , %	37.7	40.3	40.3	39.4	2.23	2.44	2.43	2.37
CH ₄ , %	44.8	48.0	48.0	46.9	-	-	-	-
N ₂ , %	14.2	9.7	9.9	11.3	79.3	79.7	79.4	79.4
H ₂ O, %	-	-	-	-	3.71	3.50	4.14	3.78
Flow Rate, wscfm	-	-	-	-	1,155	1,112	1,134	1,134
Flow Rate, dscfm	30	30	30	30	1,076	1,112	1,073	1,087
Temperature, °F	77.8	89.6	101.0	89.5	457	460	454	457
Btu/scf	467	479	479	475	-	-	-	-
MMBtu/Hr	0.84	0.86	0.86	0.86	-	-	-	-
Hydrocarbons:								
CH ₄ , ppm	448,000	480,000	480,000	469,333	< 1	< 1	< 1	< 1
TGNMO, ppm (as CH ₄)	7,080	9,180	8,260	8,173	4.81	4.22	2.36	3.80
TGNMO, lb/hr (as CH ₄)	0.53	0.68	0.62	0.61	0.01	0.01	0.01	0.01
TGNMO, ppm (as hexane)	1,180.0	1,530.0	1,376.7	1,362.2	0.80	0.70	0.39	0.63
TGNMO, ppm @ 3% O ₂ (as hexane)	1,180.0	1,428.6	1,278.1	1,295.6	5.98	4.20	2.61	4.26
TGNMO, lb/hr (as hexane)	0.47	0.61	0.55	0.55	0.01	0.01	0.01	0.01
Destruction Eff. %					97.56	98.30	98.98	98.28
Sulfur Compounds:								
H ₂ S, ppm	122	126	128	125.3				
Carbonyl Sulfide, ppm	0.34	0.34	0.37	0.35				
Methyl Mercaptan, ppm	4.16	4.37	4.44	4.32				
Ethyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Sulfide, ppm	8.24	8.61	8.73	8.53				
Carbon Disulfide, ppm	0.22	0.23	0.23	0.23				
isopropyl mercaptan, ppm	0.66	0.69	0.71	0.69				
n-propyl mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Disulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Total Sulfur Compounds,								
Total Reduced Sulfur Inlet, ppm	136	140	142	139.3				
SO _x Exhaust, lb/hr (as SO ₂)					0.04	0.04	0.04	0.04

The exhaust volume flow values are based on EPA Method 1-4.

Ventura County Air Pollution Control District
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO7340PC3 Condition Nos. 2, 3 & 4	Description: Rule 54, Sulfur Compounds – Micro-Turbine.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Source test is conducted every four years. The last source test was July 31, 2008. All parameters were below the permit limits. The source test is attached.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Quantifiable Applicable Requirement or Part 70 Permit Condition Attachment
 Form TVPF47/12-21-98

Emission Unit Description: 85.8 MMBTU/Hr LFG Specialties Inc. enclosed landfill gas flare.			Pollutant: NMOC, NOx, SOx and CO.
Measured Emission Rate: TGNMO, lb/hr (as CH4) = 0.14 NOx, lb/hr (as NO2) = 0.99 SOx, lb/hr (as SO2) = 0.32 CO, lb/hr = 3.57	Limited Emission Rate: TGNMO, lb/hr (as CH4) = 1.00 NOx, lb/hr (as NO2) = 5.15 SOx, lb/hr (as SO2) = 1.72 CO, lb/hr = 17.16	Specific Source Test or Monitoring Record Citation: PO7340PC2, Condition 2 Test Date: June 24, 2009	
Emission Unit Description: 70 Kilowatt Ingersoll-Rand PowerWorks micro-turbine.			Pollutant: NMOC
Measured Emission Rate: TGNMO, ppm @ 3% O2 (as hexane) = 4.26 Destruction Eff.% = 98.28 SOx, lb/hr (as SO2) = 0.04	Limited Emission Rate: TGNMO, ppm @ 3% O2 (as hexane) = 20 Destruction Eff.% = 98+ SOx, lb/hr (as SO2) = 0.25	Specific Source Test or Monitoring Record Citation: PO7340PC3, Condition 2, 3, & 4 Test Date: July 31, 2008	
Emission Unit Description:			Pollutant:
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation: Test Date:	
Emission Unit Description:			Pollutant:
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation: Test Date:	
Emission Unit Description:			Pollutant:
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation: Test Date:	

5.0 SUMMARY OF RESULTS

TABLE 5-1
SUMMARY OF TEST RESULTS
VRSD - Toland Landfill
Microturbine
July 31, 2008

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O ₂ , %	2.12	18.20	
CO ₂ , %	39.43	2.37	
N ₂ , %	11.27	79.43	
H ₂ O, %	-	3.78	
Flow Rate, wscfm	-	1,134	
Flow Rate, dscfm	30.0	1,087	
Temperature, °F	89	456.9	
Btu/scf	475		
MMBtu/Hr	0.86		
Hydrocarbons:			
CH ₄ , ppm	469,333	< 1.00	
TGNMO, ppm (as CH ₄)	8,173	3.80	
TGNMO, lb/hr (as CH ₄)	0.61	0.01	
TGNMO, lb/MM Btu (as CH ₄)	-	0.012	
TGNMO, lb/day (as CH ₄)	14.6	0.25	
TGNMO, ppm (as hexane)		0.63	
TGNMO, ppm @ 3% O ₂ (as hexane)		4.26	20
TGNMO, lb/hr (as hexane)		0.01	
Destruction Eff. %		98.28	98+
lb/MMCF		5.11	
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	139.3		
SO _x Exhaust, lb/hr (as SO ₂)		0.04	0.25
SO _x Exhaust, lb/day (as SO ₂)		1.00	
SO _x Exhaust, lb/MMBtu (as SO ₂)		0.049	

Notes:

The results in this table are the averages of all measurements.

5.0 SUMMARY OF RESULTS (Continued)

TABLE 5-2
GENERAL RESULTS
VRSD - Toland Landfill
Microturbine
July 31, 2008

Parameter	INLET				EXHAUST			
	First Run	Second Run	Third Run	Average	First Run	Second Run	Third Run	Average
O ₂ , %	3.00	1.73	1.62	2.12	18.50	17.90	18.20	18.20
CO ₂ , %	37.7	40.3	40.3	39.4	2.23	2.44	2.43	2.37
CH ₄ , %	44.8	48.0	48.0	46.9	-	-	-	-
N ₂ , %	14.2	9.7	9.9	11.3	79.3	79.7	79.4	79.4
H ₂ O, %	-	-	-	-	3.71	3.50	4.14	3.78
Flow Rate, wscfm	-	-	-	-	1,155	1,112	1,134	1,134
Flow Rate, dscfm	30	30	30	30	1,076	1,112	1,073	1,087
Temperature, °F	77.8	89.6	101.0	89.5	457	460	454	457
Btu/scf	467	479	479	475	-	-	-	-
MMBtu/Hr	0.84	0.86	0.86	0.86	-	-	-	-
Hydrocarbons:								
CH ₄ , ppm	448,000	480,000	480,000	469,333	< 1	< 1	< 1	< 1
TGNMO, ppm (as CH ₄)	7,080	9,180	8,260	8,173	4.81	4.22	2.36	3.80
TGNMO, lb/hr (as CH ₄)	0.53	0.68	0.62	0.61	0.01	0.01	0.01	0.01
TGNMO, ppm (as hexane)	1,180.0	1,530.0	1,376.7	1,362.2	0.80	0.70	0.39	0.63
TGNMO, ppm @ 3% O ₂ (as hexane)	1,180.0	1,428.6	1,278.1	1,295.6	5.98	4.20	2.61	4.26
TGNMO, lb/hr (as hexane)	0.47	0.61	0.55	0.55	0.01	0.01	0.01	0.01
Destruction Eff. %					97.56	98.30	98.98	98.28
Sulfur Compounds:								
H ₂ S, ppm	122	126	128	125.3				
Carbonyl Sulfide, ppm	0.34	0.34	0.37	0.35				
Methyl Mercaptan, ppm	4.16	4.37	4.44	4.32				
Ethyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Sulfide, ppm	8.24	8.61	8.73	8.53				
Carbon Disulfide, ppm	0.22	0.23	0.23	0.23				
isopropyl mercaptan, ppm	0.66	0.69	0.71	0.69				
n-propyl mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Disulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Total Sulfur Compounds,								
Total Reduced Sulfur Inlet, ppm	136	140	142	139.3				
SO _x Exhaust, lb/hr (as SO ₂)					0.04	0.04	0.04	0.04

The exhaust volume flow values are based on EPA Method 1-4.

Ventura County Air Pollution Control District
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO7340PC3 - Condition Nos. 5 Rule 74.17.1	Description: Rule 74.17.1 – Micro-Turbine Metering Requirements.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

The 70kW Micro-Turbine combusted 1138 MMBTU in 2009. Micro-Turbine gas flow rate is continuously recorded by continuously recording the micro-turbine power output and back calculating the gas flow rate based on a heat rate of 14,500 BTU (LHV)/KW-hr. (40CFR60.756(b)(2)).

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

Ventura County Air Pollution Control District
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 50	Description: Rule 50, Opacity.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Visual inspection of flare and routine inspections. See attached survey.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

**VCAPCD Rule 50, Opacity
Annual Compliance Survey**

Survey Information:

By: Jason Siegert

Date: September 15, 2009

Time: 1:30 PM to 2:00PM

Emissions Unit: Toland Landfill Flare

Verification: On the above date I observed no visible emissions (including uncombined water) greater than zero percent for a period or periods aggregating more than three (3) minutes during the time observed (0.5 hour).



JASON SIEGERT – SOURCE CONTROL INSPECTOR

Ventura County Air Pollution Control District
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 54.B.1	Description: Rule 54.B.1, Sulfur Compounds.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Compliance with Rule 64 ensures compliance with this rule based on District analysis.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

Ventura County Air Pollution Control District
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 54.B.2	Description: Rule 54.B.2, Sulfur Dioxide.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Compliance with rule 64 ensures compliance with this rule based on District analysis. See attached Source Tests June 24, 2009.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

3.0 TEST SUMMARY (Continued)

TABLE 3-2
SUMMARY OF RESULTS vs PERMIT CONDITIONS
VRSD Toland
Flare
June 24, 2009

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O ₂ , %	1.45	13.17	
CO ₂ , %	39.56	7.11	
N ₂ , %	8.49	79.73	
H ₂ O, %	1.80	8.44	
Flow Rate, wscfm	722.8	10,205	
Flow Rate, dscfm	709.8	9,508	inlet 1,500
Temperature, °F (measured at sample ports)	91	1,371	
Temperature, °F (measured at monitoring thermocouple)		1,651	>1,500
Btu/scf	499		
MMBtu/Hr	21.64		
NO_x:			
ppm		14.6	
ppm @ 3% O ₂		33.7	
lb/hr (as NO ₂)		0.99	5.15
lb/day (as NO ₂)		23.8	
lb/MMBtu (as NO ₂)		0.046	0.05
lb/MMCF (as NO ₂)		23.28	
CO:			
ppm		85.8	
ppm @ 3% O ₂		200.3	
lb/hr		3.57	17.16
lb/day		85.69	
lb/MMBtu		0.166	0.2
lb/MMCF		83.84	
Hydrocarbons:			
CH ₄ , ppm	491,667	< 75.5	
TGNMO, ppm (as CH ₄)	7,820	5.87	
TGNMO, ppm @ 3% O ₂ (as methane)		13.58	
TGNMO, lb/hr (as CH ₄)	13.8	0.14	1.00
TGNMO, lb/MM Btu (as CH ₄)	-	0.006	
TGNMO, lb/day (as CH ₄)	331.8	3.37	
TGNMO, ppm (as hexane)		0.98	
TGNMO, ppm @ 3% O ₂ (as hexane)		2.28	<20 NSPS
TGNMO, lb/hr (as hexane)		0.13	
Destruction Eff. %		99.01	>98%
lb/MMCF		2.95	
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	45.9		
SO _x Exhaust, lb/hr (as SO ₂)		0.32	1.72
SO _x Exhaust, lb/day (as SO ₂)		7.79	
SO _x Exhaust, lb/MMBtu (as SO ₂)		0.015	0.02
lb/MMCF		7.62	

Notes:

The results in this table are the averages of all measurements.

Ventura County Air Pollution Control District
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 57.1	Description: Rule 57.1, Particulate Matter Emissions From Fuel Burning Equipment.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Periodic Monitoring is not necessary to certify compliance with Rule 57.1. To certify compliance, a reference to the District analysis based on EPA emission factors and a representative source test is sufficient. See attached Source Tests July 31, 2008 and June 24, 2009.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

5.0 SUMMARY OF RESULTS

TABLE 5-1
SUMMARY OF TEST RESULTS
VRSD - Toland Landfill
Microturbine
July 31, 2008

PARAMETER	INLET	EXHAUST	PERMIT LIMIT	
O ₂ , %	2.12	18.20		
CO ₂ , %	39.43	2.37		
N ₂ , %	11.27	79.43		
H ₂ O, %	-	3.78		
Flow Rate, wscfm	-	1,134		
Flow Rate, dscfm	30.0	1,087		
Temperature, °F	89	456.9		
Btu/scf	475			
MMBtu/Hr	0.86			
Hydrocarbons:				
CH ₄ , ppm	469,333	<	1.00	
TGNMO, ppm (as CH ₄)	8,173		3.80	
TGNMO, lb/hr (as CH ₄)	0.61		0.01	
TGNMO, lb/MM Btu (as CH ₄)	-		0.012	
TGNMO, lb/day (as CH ₄)	14.6		0.25	
TGNMO, ppm (as hexane)			0.63	
TGNMO, ppm @ 3% O ₂ (as hexane)			4.26	20
TGNMO, lb/hr (as hexane)			0.01	
Destruction Eff. %		98.28	98+	
lb/MMCF		5.11		
Total Sulfur Compounds,				
Total Reduced Sulfur Inlet, ppm	139.3			
SOx Exhaust, lb/hr (as SO ₂)		0.04	0.25	
SOx Exhaust, lb/day (as SO ₂)		1.00		
SOx Exhaust, lb/MMBtu (as SO ₂)		0.049		

Notes:

The results in this table are the averages of all measurements.

5.0 SUMMARY OF RESULTS (Continued)

TABLE 5-2
GENERAL RESULTS
VRSD - Toland Landfill
Microturbine
July 31, 2008

Parameter	INLET				EXHAUST			
	First Run	Second Run	Third Run	Average	First Run	Second Run	Third Run	Average
O ₂ , %	3.00	1.73	1.62	2.12	18.50	17.90	18.20	18.20
CO ₂ , %	37.7	40.3	40.3	39.4	2.23	2.44	2.43	2.37
CH ₄ , %	44.8	48.0	48.0	46.9	-	-	-	-
N ₂ , %	14.2	9.7	9.9	11.3	79.3	79.7	79.4	79.4
H ₂ O, %	-	-	-	-	3.71	3.50	4.14	3.78
Flow Rate, wscfm	-	-	-	-	1,155	1,112	1,134	1,134
Flow Rate, dscfm	30	30	30	30	1,076	1,112	1,073	1,087
Temperature, °F	77.8	89.6	101.0	89.5	457	460	454	457
Btu/scf	467	479	479	475	-	-	-	-
MMBtu/Hr	0.84	0.86	0.86	0.86	-	-	-	-
Hydrocarbons:								
CH ₄ , ppm	448,000	480,000	480,000	469,333	< 1	< 1	< 1	< 1
TGNMO, ppm (as CH ₄)	7,080	9,180	8,260	8,173	4.81	4.22	2.36	3.80
TGNMO, lb/hr (as CH ₄)	0.53	0.68	0.62	0.61	0.01	0.01	0.01	0.01
TGNMO, ppm (as hexane)	1,180.0	1,530.0	1,376.7	1,362.2	0.80	0.70	0.39	0.63
TGNMO, ppm @ 3% O ₂ (as hexane)	1,180.0	1,428.6	1,278.1	1,295.6	5.98	4.20	2.61	4.26
TGNMO, lb/hr (as hexane)	0.47	0.61	0.55	0.55	0.01	0.01	0.01	0.01
Destruction Eff. %					97.56	98.30	98.98	98.28
Sulfur Compounds:								
H ₂ S, ppm	122	126	128	125.3				
Carbonyl Sulfide, ppm	0.34	0.34	0.37	0.35				
Methyl Mercaptan, ppm	4.16	4.37	4.44	4.32				
Ethyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Sulfide, ppm	8.24	8.61	8.73	8.53				
Carbon Disulfide, ppm	0.22	0.23	0.23	0.23				
isopropyl mercaptan, ppm	0.66	0.69	0.71	0.69				
n-propyl mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Disulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Total Sulfur Compounds,								
Total Reduced Sulfur Inlet, ppm	136	140	142	139.3				
SO _x Exhaust, lb/hr (as SO ₂)					0.04	0.04	0.04	0.04

The exhaust volume flow values are based on EPA Method 1-4.

3.0 TEST SUMMARY (Continued)

TABLE 3-2
SUMMARY OF RESULTS vs PERMIT CONDITIONS
VRSD Toland
Flare
June 24, 2009

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O ₂ , %	1.45	13.17	
CO ₂ , %	39.56	7.11	
N ₂ , %	8.49	79.73	
H ₂ O, %	1.80	8.44	
Flow Rate, wscfm	722.8	10,205	
Flow Rate, dscfm	709.8	9,508	inlet 1,500
Temperature, °F (measured at sample ports)	91	1,371	
Temperature, °F (measured at monitoring thermocouple)		1,651	>1,500
Btu/scf	499		
MMBtu/Hr	21.64		
NO_x:			
ppm		14.6	
ppm @ 3% O ₂		33.7	
lb/hr (as NO ₂)		0.99	5.15
lb/day (as NO ₂)		23.8	
lb/MMBtu (as NO ₂)		0.046	0.05
lb/MMCF (as NO ₂)		23.28	
CO:			
ppm		85.8	
ppm @ 3% O ₂		200.3	
lb/hr		3.57	17.16
lb/day		85.69	
lb/MMBtu		0.166	0.2
lb/MMCF		83.84	
Hydrocarbons:			
CH ₄ , ppm	491,667	< 75.5	
TGNMO, ppm (as CH ₄)	7,820	5.87	
TGNMO, ppm @ 3% O ₂ (as methane)		13.58	
TGNMO, lb/hr (as CH ₄)	13.8	0.14	1.00
TGNMO, lb/MM Btu (as CH ₄)	-	0.006	
TGNMO, lb/day (as CH ₄)	331.8	3.37	
TGNMO, ppm (as hexane)		0.98	
TGNMO, ppm @ 3% O ₂ (as hexane)		2.28	<20 NSPS
TGNMO, lb/hr (as hexane)		0.13	
Destruction Eff. %		99.01	>98%
lb/MMCF		2.95	
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	45.9		
SO _x Exhaust, lb/hr (as SO ₂)		0.32	1.72
SO _x Exhaust, lb/day (as SO ₂)		7.79	
SO _x Exhaust, lb/MMBtu (as SO ₂)		0.015	0.02
lb/MMCF		7.62	

Notes:

The results in this table are the averages of all measurements.

Ventura County Air Pollution Control District
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 64.B.1	Description: Rule 64.B.1 – Quarterly Micro-Turbine Fuel Sulfur Analysis.
---	--

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

The landfill gas contains less than 50 grains of sulfur compounds per 100 cubic feet of gaseous fuel (788 ppmv). See attached Source Tests: 2/28/09 (1st Quarter; 92 ppmv), 6/4/09 (2nd Quarter; 99.6 ppmv), 9/14/09 (3rd Quarter; 58.1 ppmv), and 11/24/09 (4th Quarter; 134 ppmv).

Attached is the most recent fuel Analysis of the Toland Landfill gas.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

**VCAPCD Rule 64.B.1, Sulfur Content
Annual Compliance Survey**

Survey Information:

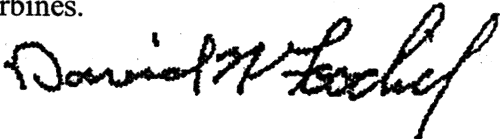
By: David Gooding

Date: February 28, 2009 (1ST Quarter)

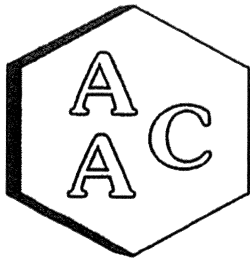
Time: 10:30 AM

Emissions Unit: Prior to Toland Landfill Flare & Micro-Turbines

Verification: On the above date I observed a Sensidyne tube reading of 92 ppm (tube range 0.75-300 ppm) of hydrogen sulfide at the 12" header leading to the flare and micro-turbines.

A handwritten signature in black ink, appearing to read "David Gooding". The signature is written in a cursive style with a large, stylized initial 'D'.

DAVID GOODING – ENGINEERING TECHNICIAN



Atmospheric Analysis & Consulting, Inc.

LABORATORY ANALYSIS REPORT

CLIENT
PROJECT NO.
MATRIX
UNITS

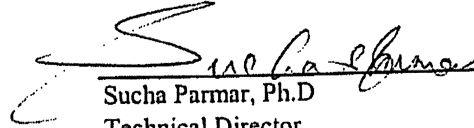
Ventura Regional Sanitation District
090364
AIR
PPMV

RECEIVING DATE 06/04/2009
ANALYSIS DATE 06/05/2009
REPORT DATE 06/08/2009

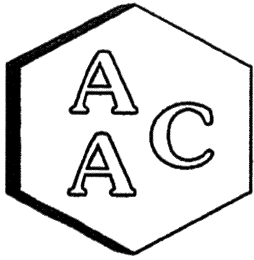
Total Reduced Sulfur Compounds Analysis by SCAQMD 307.91

Client ID	1 of 2		PQL (RLxDF's)	Reporting Limit
AAC ID	090364-38682			
Analyte	Result	Analysis Dil. Fac.		
Carbonyl Sulfide	<PQL	100	1.00	0.01
Hydrogen Sulfide	99.6	1000	10.0	0.01
Carbon Disulfide	<PQL	100	1.00	0.01
Sulfur Dioxide	<PQL	100	1.00	0.01
Methyl Mercaptan	6.4	100	1.00	0.01
Ethyl Mercaptan	18.4	400	4.00	0.01
Thiophene	<PQL	100	1.00	0.01
Dimethyl Sulfide	<PQL	100	1.00	0.01
Isopropyl Mercaptan	<PQL	100	1.00	0.01
n-Propyl Mercaptan	<PQL	100	1.00	0.01
tert-Butyl Mercaptan	<PQL	100	1.00	0.01
iso-Butyl Mercaptan	<PQL	100	1.00	0.01
sec-Butyl Mercaptan	<PQL	100	1.00	0.01
n-Butyl Mercaptan	<PQL	100	1.00	0.01
3-Methylthiophene	<PQL	100	1.00	0.01
Dimethyl Disulfide	<PQL	100	1.00	0.01
Diethyl Sulfide	<PQL	100	1.00	0.01
2-Ethylthiophene	<PQL	100	1.00	0.01
2,5-Dimethylthiophene	<PQL	100	1.00	0.01
Tetrahydrothiophene	<PQL	100	1.00	0.01
Diethyl disulfide	<PQL	100	1.00	0.01
Benzothiophene	<PQL	100	1.00	0.01
Total Unidentified Sulfurs as H ₂ S	<PQL		1.00	0.01
Total Reduced Sulfurs as H ₂ S		124.5		0.01

All compound's concentrations expressed in terms of H₂S.


 Sucha Parmar, Ph.D
 Technical Director





Atmospheric Analysis & Consulting, Inc.

LABORATORY ANALYSIS REPORT

CLIENT
PROJECT NO.
MATRIX
UNITS

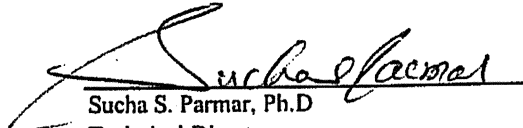
Ventura Regional Sanitation District
 090707
 AIR
 ppmv

SAMPLING DATE 09/14/2009
RECEIVING DATE 09/14/2009
ANALYSIS DATE 09/14/2009
REPORT DATE 09/14/2009

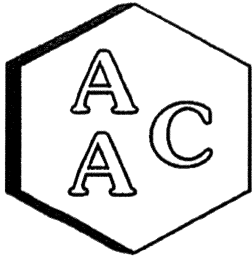
Total Reduced Sulfur Compounds Analysis by SCAQMD 307.91

Client ID AAC ID	24" Test port 090707-40755		SRL (RLxDF's)	12" Test port 090707-40756		SRL (RLxDF's)	Reporting Limit
	Result	Analysis Dil. Fac.		Result	Analysis Dil. Fac.		
Carbonyl Sulfide	0.44	10.0	0.43	<SRL	10.0	0.68	0.01
Hydrogen Sulfide	14.10	100.0	4.28	58.10	100.0	6.84	0.01
Carbon Disulfide	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
Sulfur Dioxide	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
Methyl Mercaptan	1.13	10.0	0.43	2.75	10.0	0.68	0.01
Ethyl Mercaptan	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
Thiophene	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
Dimethyl Sulfide	7.29	100.0	4.28	7.97	100.0	6.84	0.01
Isopropyl Mercaptan	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
n-Propyl Mercaptan	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
tert-Butyl Mercaptan	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
iso-Butyl Mercaptan	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
sec-Butyl Mercaptan	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
n-Butyl Mercaptan	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
3-Methylthiophene	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
Dimethyl Disulfide	0.98	10.0	0.43	<SRL	10.0	0.68	0.01
Diethyl Sulfide	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
2-Ethylthiophene	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
2,5-Dimethylthiophene	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
Tetrahydrothiophene	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
Diethyl disulfide	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
Benzothiophene	<SRL	10.0	0.43	<SRL	10.0	0.68	0.01
Total Unidentified Sulfurs as H ₂ S	<SRL			<SRL			0.01
Total Reduced Sulfurs as H ₂ S	23.5			68.8			0.01

All compound's concentrations expressed in terms of H₂S (TRS does not include COS and SO₂)
 Sample Reporting Limit (SRL) is equal to Reporting Limit x Canister Dil. Fac. x Analysis Dil. Fac.


 Sucha S. Parmar, Ph.D
 Technical Director





Atmospheric Analysis & Consulting, Inc.

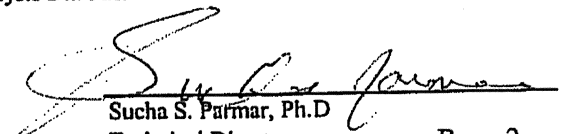
LABORATORY ANALYSIS REPORT

CLIENT	Ventura Regional Sanitation District	SAMPLING DATE	11/24/2009
PROJECT NO.	090954	RECEIVING DATE	11/24/2009
MATRIX	AIR	ANALYSIS DATE	11/25/2009
UNITS	ppmV	REPORT DATE	11/30/2009

H₂S - ppm Via *Total Reduced Sulfur Compounds Analysis by SCAQMD 307.91*
 Tube Reading *85 ppm (1-300 tube) 35 ppm (0.5-40)*

Client ID AAC ID	Raw Gas 090954-42224		SRL (RLxDF's)	24" Pipe - Sulfa Treat Out 090954-42225		SRL (RLxDF's)	Reporting Limit
	Analyte	Result		Analysis Dil. Fac.	Result		
Hydrogen Sulfide	134	1000	10.000	42.2	500	5.000	0.01
Carbonyl Sulfide	<SRL	500	5.000	<SRL	100	1.000	0.01
Sulfur Dioxide	<SRL	500	5.000	<SRL	100	1.000	0.01
Methyl Mercaptan	7.25	500	5.000	4.35	100	1.000	0.01
Ethyl Mercaptan	<SRL	500	5.000	<SRL	100	1.000	0.01
Dimethyl Sulfide	19.4	500	5.000	20.8	100	1.000	0.01
Carbon Disulfide	<SRL	500	5.000	<SRL	100	1.000	0.01
Isopropyl Mercaptan	<SRL	500	5.000	<SRL	100	1.000	0.01
tert-Butyl Mercaptan	<SRL	500	5.000	<SRL	100	1.000	0.01
n-Propyl Mercaptan	<SRL	500	5.000	<SRL	100	1.000	0.01
Methylethylsulfide	<SRL	500	5.000	<SRL	100	1.000	0.01
sec-Butyl Mercaptan	<SRL	500	5.000	<SRL	100	1.000	0.01
Thiophene	<SRL	500	5.000	<SRL	100	1.000	0.01
iso-Butyl Mercaptan	<SRL	500	5.000	<SRL	100	1.000	0.01
Diethyl Sulfide	<SRL	500	5.000	<SRL	100	1.000	0.01
n-Butyl Mercaptan	<SRL	500	5.000	<SRL	100	1.000	0.01
Dimethyl Disulfide	<SRL	500	5.000	<SRL	100	1.000	0.01
2-Methylthiophene	<SRL	500	5.000	<SRL	100	1.000	0.01
3-Methylthiophene	<SRL	500	5.000	<SRL	100	1.000	0.01
Tetrahydrothiophene	<SRL	500	5.000	<SRL	100	1.000	0.01
2,5-Dimethylthiophene	<SRL	500	5.000	<SRL	100	1.000	0.01
2-Ethylthiophene	<SRL	500	5.000	<SRL	100	1.000	0.01
Bromothiophene	<SRL	500	5.000	<SRL	100	1.000	0.01
Thiophenol	<SRL	500	5.000	<SRL	100	1.000	0.01
Diethyl disulfide	<SRL	500	5.000	<SRL	100	1.000	0.01
Benzothiophene	<SRL	500	5.000	<SRL	100	1.000	0.01
Phenyl Sulfide	<SRL	500	5.000	<SRL	100	1.000	0.01
Total Unidentified Sulfur	<SRL			7.3			0.01
Total Reduced Sulfurs as H ₂ S	160			74.6			0.01

All compound's concentrations expressed in terms of H₂S (TRS does not include COS and SO₂)
 Sample Reporting Limit (SRL) is equal to Reporting Limit x Canister Dil. Fac. x Analysis Dil. Fac.


 Sucha S. Parmar, Ph.D
 Technical Director



Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 64.B.2	Description: Rule 64.B.2, Fuel Supplier's Certification.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Only California ARB certified fuels, gasoline and Diesel, with a sulfur content of less than 0.5% are consumed. Fuel supplier's certification is supplied by the fuel manufacturer.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

02/05/2010 17:48 FAX 1 310 615 3478 CHEVRON E5 QCD LAB + CPL HOUSTON @001/001



CHEVRON PRODUCTS COMPANY
EL SEGUNDO

DFZUSNSUW-10

Chevron Special ULSD2 (S10) (Winter)

Certificate of Analysis

Sampled: 2/5/2010 07:00:00

Batch Finished: 2/5/2010 17:36:30

Report Generated: 2/5/2010 17:36:44

Predictive Model Number: N/A

Batch No: DSLCAKE_2010_00797

Vessel: TANK352

Sample: 1076231

D4052	UPPER	API	Degrees API	35.9	MIN 30.0
D4052	LOWER	API	Degrees API	35.9	MIN 30.0
D1500	UPPER	ASTM Color		<+0.5	REPORT
D1500	LOWER	ASTM Color		<+0.5	REPORT
D4176	UPPER	Appearance/Condition		PASS	PASS,B/C
D4176	LOWER	Appearance/Condition		PASS	PASS,B/C
D7039	UPPER	Sulfur by XOS	ppm	10	MAX 10.0
D7039	MIDDLE	Sulfur by XOS	ppm	9	MAX 10.0
D7039	LOWER	Sulfur by XOS	ppm	8	MAX 10.0
D86	AVERAGE	Initial Boiling Point	°F	160	REPORT
D86	AVERAGE	10%	°F	420	REPORT
D86	AVERAGE	50%	°F	530	REPORT
D86	AVERAGE	90%	°F	618	540 - 640
D86	AVERAGE	Final Boiling Point	°F	646	REPORT
D86	AVERAGE	Recovery	vol %	98.1	REPORT
D86	AVERAGE	Residue	vol %	1.4	REPORT
D86	AVERAGE	Loss	vol %	0.5	REPORT
D93	AVERAGE	Pensky-Martens Flash	°F	160	MIN 131
D130	AVERAGE	Cu Strip Rating @ 122F @ 3hr		1B	1A, 1B, 2A, 2B, 2C, 2D, 2E, 3A, 3B
D445	AVERAGE	Kinematic Viscosity @ 40C (Auto)	cSt	3.095	1.90 - 4.10
D5949	AVERAGE	Pour Point	°F	+0	MAX +20
D5773	AVERAGE	Cloud Point, Automatic	°F	+3	MAX +24
D6850	AVERAGE	Derived Cetane Number		50.10	MIN 49.6
D5186	AVERAGE	Total Aromatics	weight %	22.6	MAX 23.6
D6186	AVERAGE	Polynuclear Aromatics	weight %	2.8	MAX 4.7
D4629	AVERAGE	Nitrogen	weight %	0.0008	MAX 0.0715

I certify that above material meets prescribed requirements.

Anthony Sopys

2/8/2010 17:36:59

Company Representative

Date/Time

Comments

JMJ 2/5/2010 80-975 3-8", 80-161 21-8"
DAV 2/8 80-162 21-8", 84-162 BNSF

ATTENTION JASON S.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 74.6	Description: Rule 74.6 – Surface Cleaning and Degreasing.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Solvents are used in small quantities for maintenance of the facility and its equipment. All of the solvents are used in 16-ounce disposable aerosol cans; approximately 60 lbs of solvents were used during 2009. The solvents consist of brake cleaner, starting fluid, electric motor cleaner, penetrating oil, and touch up paint. Additionally 10 gallons of Voltx safety solvent (water-based) is used and recycled every quarter.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

Ventura County Air Pollution Control District
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 74.11.1	Description: Rule 74.11.1, Large Water Heaters and Small Boilers.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

At this time there are no Large Water Heaters or Small Boilers at this location that fall under this rule.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 - Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 - Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 74.22	Description: Rule 74.22, Natural Gas-Fired Fan -Type Furnaces.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

At this time there are no Natural Gas-Fired Fan-Type Furnaces at this location that fall under this rule.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 - Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 - Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 74.1	Description: Rule 74.1 – Abrasive Blasting.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

No abrasive blasting was performed in 2009.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

Ventura County Air Pollution Control District
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 74.2	Description: Rule 74.2 – Architectural Coatings.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Only coatings that are in compliance with rule 74.2 are used at this site.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 - Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 - Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 74.4.D	Description: Rule 74.4.D – Cut Back Asphalt.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Road oils were not applied during 2009.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 - Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 - Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 74.28	Description: Rule 74.28 – Asphalt Roofing Operations.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Asphalt roofing operations were not conducted during 2009.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 - Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition No. 74.29	Description: Rule 74.29 – Soil Decontamination Operations.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Soil decontamination operations were not conducted during 2009.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 - Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 - Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: 40CFR Part 61, Subpart M	Description: 40CFR.61.M - Part 61.145 National Emission Standard for Asbestos
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Renovation or demolition of asbestos containing materials was not conducted during 2009.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
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