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

A Public Waste Management Agency

February 10, 2011

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

SALLY COLEMAN – DIRECTOR OF OPERATIONS

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM

A copy of each Annual Compliance Certification shall be submitted to EPA, Region 9, at the following address:

Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region 9
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:	Date: 2/10/11
Sally Bremer Title: DIRECTOR OF OPERATIONS	

Time Period Covered by Compliance Certification

01 / 01 / 10 (MM/DD/YY) to 12 / 31 / 10 (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	•Annual compliance certification •Annual static pressure testing •Quadrennial dynamic pressure testing •Log of maintenance on vapor recovery system	•Records of maintenance •Records of vapor recovery system tests	None	•Static Test (ARB TP-201.3b) •Dynamic Test (ARB TP-201.4)	
74.17.1NS-07340	Rule 74.17.1	•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)	•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	•Reports of exceedances •Reports of new wells	•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 AAAA	•Annual compliance certification •Comply with 40 CFR Part 60, Subpart Cc •Develop a startup, shutdown, malfunction (SSM) plan	•Records of SSM plan	•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	•Annual compliance certification •Monthly records of throughput and consumption	•Monthly records of throughput and consumption	None	None	
PO7340PC1 - Condition No. 2	Rule 29 Solvent Use	•Annual compliance certification	•Solvent use exemption records	None	None	District enforceable only
PO7340PC2 - Condition No. 1	Rule 26 Annual Flare Combustion Limit	•Annual compliance certification •Landfill gas flow rate and heating value	•Landfill gas flow rate and heating value	None	None	
PO7340PC2 - Condition No. 2	Rule 26 Flare BACT Limits	•Annual compliance certification •Flare temperature •Testing every 2 years (ROC,NOx) •Testing every 4 years (SOx)	•Records of flare temperature •Records of source tests	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. 3	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	
PO7340PC2 - Condition No. 4	Rule 57.1	•Annual compliance certification	•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	•Routine surveillance •Visual inspections •Annual compliance certification, including a formal survey •Opacity readings upon request •Notification required for uncorrectable visible emissions	•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	•Annual compliance certification •Follow monitoring requirements under Rule 64 •Upon request, source test for sulfur compounds at point of discharge	None	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	•Annual compliance certification •Determine ground or sea level concentrations of SO_2, upon request	•Representative fuel analysis or exhaust analysis and compliance demonstration	None	•SO_2 - BAAQMD Manual of Procedures, Vol.VI, Section 1, Ground Level Monitoring for H_2S and SO_2	
57.1	Rule 57.1	•Annual compliance certification	None	None	•PM – CARB Method 5	•Compliance based on District EPA emission factor analysis
64.B.1	Rule 64.B.1	•Annual compliance certification •Quarterly micro-turbine fuel sulfur analysis	•Quarterly fuel sulfur analyses	None	•SCAQMD Method 307-94 or ASTM D1072-90 or other alternatives per Rule 64.E.1	
64.B.2	Rule 64.B.2	•Annual compliance certification •Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)	•Fuel supplier's certification, or fuel test per each delivery	None	•ASTM Method D4294-83 or D2622-87	
74.6	Rule 74.6	•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)	•Records of current solvent information	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	•Annual compliance certification •Maintain identification records of large water heaters and small boilers	•Records of current information of large water heaters and small boilers	None	None	•Rule only applies to future installation of large water heaters and small boilers
74.22	Rule 74.22	•Annual compliance certification •Maintain furnace identification records	•Records of current furnace information	None	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	•Annual compliance certification •Routine surveillance and visual inspections of abrasive blasting operation •Abrasive blasting records	•Abrasive blasting records	None	•Visible emission evaluation- Section 92400 of CCR	
74.2	Rule 74.2	•Annual compliance certification •Routine surveillance •Maintain VOC records of coatings used	•Maintain VOC records of coatings used	None	•Rule 74.2.G	
74.4.D	Rule 74.4.D	•Annual compliance certification •Test ROC content of oil sample being proposed for usage	•Records of oil analyses	None	•ASTM D402	
74.28	Rule 74.28	•Annual compliance certification •Visual inspection to ensure proper vapor control during roofing kettle operation	None	None	None	
74.29	Rule 74.29	•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	•Weekly measurements of soil decontamination operation vapor concentration •Date and quantity of soil aerated	None	•Vapor concentration- EPA Method 21 •Wt. % of contaminant in soil-EPA Method 8015B	
40CFR.61.M	40 CFR Part 61, Subpart M	•Annual compliance certification •See 40 CFR Part 61.145 for inspection procedures	•See 40 CFR Part 61.145 for recordkeeping procedures	•See 40 CFR Part 61.145 for notification procedures	•See 40 CFR Part 61.145 for test methods	

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Period Covered by Compliance Certification: 01 / 01 / 10 (MM/DD/YY) to 12 / 31 / 10 (MM/DD/YY)

A. Attachment # or Permit Condition #: 70N3	D. Frequency of monitoring: Annually
B. Description: Rule 70	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain records of maintenance and vapor recovery system tests (Static and Dynamic).	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.17.1N5-07340	D. Frequency of monitoring: Continuous, quarterly and bi-annually
B. Description: Rule 74.17.1	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.
C. Method of monitoring: • Monitor flare gas flow rate and temperature. • Monitor wells (temperature, pressure, nitrogen, oxygen) • Monitor methane concentration at surface of landfill • Source test flare every 2 years (NMOC, NOx and CO)	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 40CFR63AAAA	D. Frequency of monitoring: Recordkeeping as needed.
B. Description: 40CFR Part 63, Subpart AAAA	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Develop and implement a Startup, Shutdown, Malfunction Plan (SSMP).	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 01 / 01 / 10 (MM/DD/YY) to 12 / 31 / 10 (MM/DD/YY)

A. Attachment # or Permit Condition #: P07340PC1	D. Frequency of monitoring:
B. Description: Condition No. 1 – Rule 26 General Recordkeeping	Monthly
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Monthly records of throughput and consumption.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC1	D. Frequency of monitoring:
B. Description: Condition No. 2 - Rule 29 Solvent Use	Annually
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain solvent use exemption records.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 1 – Rule 26 Annual Flare Combustion Limit The annual amount of landfill gas combusted in the destruction devices shall not exceed 450,000 MMBtU per year.	Continuous
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Landfill gas flow is recorded by a totalizer.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 2 – Rule 26 Flare BACT Limits	Continuous, bi-annually and quadrennially
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.
C. Method of monitoring: The flare is equipped with a continuous temperature recording device and landfill gas flow totalizer. Source testing every 2 years (ROC, NOx) using EPA test method 25 or 18, 7 and every 4 years (SOx) using modified SCAQMD method 307-94.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 3 – Rule 54 Sulfur Compounds	Quadrennially
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.
C. Method of monitoring: Source test flare every 4 years for sulfur compounds using EPA test method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD method 307-94, as appropriate.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 4 – Rule 57.1 Particulate Matter Emissions from Fuel Burning Equipment	Not applicable.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Not required based on District EPA emission factor analysis.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 5 – Rule 26 Flare Equipment Requirements	Monthly
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Monthly function checks of the flare equipment.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 6 – Rule 26 Flare Condensate Knockout / Filter Requirements	Not applicable.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: The flare is operated with a condensate knockout / filter vessel.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 7 – Rule 26 Collection Vessel Emission Requirements	Monthly
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Monthly inspections of collection vessel.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 8 – Rule 51 Flare Dimensions and Exhaust Velocity	Bi-annually
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.
C. Method of monitoring: Source Testing of the flare stack exit velocity using APCD approved testing protocol.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 9 & 10 – Rule 51 Toxics Testing and HRA Requirements	Every 1000 hours, but not less than 10 years and not more than every 4 years.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.
C. Method of monitoring: Source Testing of the flare for Toxics using APCD approved testing protocol.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC3	D. Frequency of monitoring:
B. Description: Condition Nos. 1, 3 and 4 – Rule 74.17.1 Micro-Turbine Emission Limits	Exempt.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment B.
C. Method of monitoring: The micro-turbines are exempt from the bi-annual source testing (NMOC).	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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A. Attachment # or Permit Condition #: P07340PC3	D. Frequency of monitoring:
B. Description: Condition Nos. 2, 3 and 4 – Rule 54 Sulfur Compounds, Micro-Turbines	Exempt.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment B.
C. Method of monitoring: The micro-turbines are exempt from the quadrennial source testing.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC3	D. Frequency of monitoring:
B. Description: Condition No. 5 – Rule 74.17.1 Micro-Turbine Metering Requirements	Continuous
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Meter electrical power generation, landfill gas flow rate and heating value.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 50	D. Frequency of monitoring:
B. Description: Rule 50 - Opacity	Annual formal surveys.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment C.
C. Method of monitoring: Routine surveillance and visual inspections of the control devices emissions. Annual formal surveys of the control devices emissions.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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A. Attachment # or Permit Condition #: 54.B.1	D. Frequency of monitoring:
B. Description: Rule 54.B.1 Sulfur Compounds APCD memos Rule 54, Sulfur Compounds 12/9/97 and SOx Rule Comparison for Combustion of Gaseous Fuel 12/2/97.	Not applicable. E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Compliance with Rule 64 ensures compliance with this rule based on District analysis.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 54.B.2	D. Frequency of monitoring:
B. Description: Rule 54.B.2 Sulfur Dioxide According to APCD memo from Terri Thomas, 5/23/96, subject Rule 54.B.2 compliance is an emission rate of 0.46 lb/hr would produce a 1 hour maximum concentration of 0.11 ppmv and a 24 hour maximum concentration of 0.04 ppmv, 100 meters from stack.	Bi-annually E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.
C. Method of monitoring: Exhaust analysis and compliance demonstration. Source test exhaust value of Sulfur Dioxide of 0.32 lb/hr.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 57.1	D. Frequency of monitoring:
B. Description: Rule 57.1 Particulate Matter Emissions from Fuel Burning Equipment	Not applicable. E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Compliance based on District analysis of EPA emission factor dated 12/3/1997.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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A. Attachment # or Permit Condition #: 64.B.1	D. Frequency of monitoring: Annually
B. Description: Rule 64.B.1	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: See Attachment D.
C. Method of monitoring: Annual fuel gas analysis of hydrogen sulfide.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 64.B.2	D. Frequency of monitoring: Annually
B. Description: Rule 64.B.2 Fuel Supplier's Certification	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Fuel supplier's certification is supplied by the fuel manufacturer.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.6	D. Frequency of monitoring: Annually
B. Description: Rule 74.6 Surface Cleaning and Degreasing	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain records of current solvent information.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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A. Attachment # or Permit Condition #: 74.11.1	D. Frequency of monitoring:
B. Description: Rule 74.11.1 Large Water Heaters and Small Boilers	Not applicable.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: There are no large water heaters or small boilers at this location that fall under this rule.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.22	D. Frequency of monitoring:
B. Description: Rule 74.22 Natural Gas-Fired Fan-Type Furnaces	Not applicable.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: There are no natural gas-fired fan-type furnaces at this location that fall under this rule.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.1	D. Frequency of monitoring:
B. Description: Rule 74.1 Abrasive Blasting	As needed.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No abrasive blasting was conducted in 2010.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 10 (MM/DD/YY) to 12 / 31 / 10 (MM/DD/YY)

A. Attachment # or Permit Condition #: 74.2	D. Frequency of monitoring: Annually
B. Description: Rule 74.2 Architectural Coatings	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain VOC records of coatings used. Only coatings that are in compliance with rule 74.2 are used.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.4.D	D. Frequency of monitoring: As needed.
B. Description: Rule 74.4.D Cut Back Asphalt	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No road oils were applied in 2010.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.28	D. Frequency of monitoring: As needed.
B. Description: Rule 74.28 Asphalt Roofing Operations	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No asphalt roofing operations were conducted in 2010.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 10 (MM/DD/YY) to 12 / 31 / 10 (MM/DD/YY)

A. Attachment # or Permit Condition #: 74.29	D. Frequency of monitoring:
B. Description: Rule 74.29 Soil Decontamination Operations	As needed. E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No soil decontamination operations were conducted in 2010.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 40CFR.61.M	D. Frequency of monitoring:
B. Description: 40 CFR, Part 61, Subpart M – National Emission Standard for Asbestos	As needed. E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No asbestos demolition or renovation activities were conducted in 2010.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.29	D. Frequency of monitoring:
B. Description:	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring:	F. Currently in Compliance? (Y or N): ____ G. Compliance Status? (C or I): ____ H. *Excursions, exceedances, or other non-compliance? (Y or N): ____ *If yes, attach Deviation Summary Form

Attachment A

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 10 (MM/DD/YY) to 12 / 31 / 10 (MM/DD/YY)

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: NMOC
C. Measured Emission Rate: 0.14 lb/hr (as CH4) 2.28 ppm @ 3% O2 (as hexane)	D. Limited Emission Rate: 1.00 lb/hr (as CH4) <20 NSPS	E. Specific Source Test or Monitoring Record Citation: Modified EPA Method 25	F. Test Date: 06/24/09

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: NOx
C. Measured Emission Rate: 0.99 lb/hr (as NO2) 0.046 lb/MMBtu (as NO2)	D. Limited Emission Rate: 5.15 lb/hr (as NO2) 0.05 lb/MMBtu (as NO2)	E. Specific Source Test or Monitoring Record Citation: EPA Method 7E	F. Test Date: 06/24/09

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: CO
C. Measured Emission Rate: 3.57 lb/hr 0.166 lb/hr	D. Limited Emission Rate: 17.16 lb/hr 0.2 lb/hr	E. Specific Source Test or Monitoring Record Citation: EPA Method 10	F. Test Date: 06/24/09

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: SOx
C. Measured Emission Rate: 0.32 lb/hr (as SO2) 0.015 lb/MMBtu (as SO2)	D. Limited Emission Rate: 1.72 lb/hr (as SO2) 0.02 lb/MMBtu (as SO4)	E. Specific Source Test or Monitoring Record Citation: Modified SCAQMD 307-91	F. Test Date: 06/24/09

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: Destruction Eff.%
C. Measured Emission Rate: 99.01%	D. Limited Emission Rate: >98%	E. Specific Source Test or Monitoring Record Citation:	F. Test Date: 06/22/10

3.0 TEST SUMMARY (Continued)

3.3 Flare Performance

During the source test the flare was operated with a landfill gas flow rate of 723 SCFM. The landfill gas BTU/scf values were 499. The flare combustion temperature controllers were set and maintained at 1650 °F as controlled by the bottom thermocouple. Compliance testing occurred on June 23 and 24, 2009. During Run #2 the monitoring thermocouple failed and the flare went down. The thermocouple was replaced and the test program was completed.

3.4 Toxics Pollutant Results

The results of the criteria and toxic pollutant testing are provided in Tables 3-2 through 3-4 and contained in Appendix A through F of this report.

TABLE 3-3
VRSD FLARE EXHAUST
TOXIC RESULTS

PARAMETER	AVERAGE (3 Tests)
Hydrochloric Acid (HCl):	
ppm	1.13
lb/hr	0.068
Hydrofluoric Acid (HF):	
ppm	1.37
lb/hr	0.046
Hexavalent Chromium (Cr^{6}+)	
lb/hr	4.32E-06
Formaldehyde:	
ppb	546
lb/hr	0.027
Acetaldehyde:	
ppb	<21.0
lb/hr	<0.002

TABLE 3-4

VOC Emissions
(Three-Run Averages)
VRSD Toland Exhaust

	RUN 1	RUN 2	RUN 3	AVERAGE
	Emissions (lbs/hr)	Emissions (lbs/hr)	Emissions (lbs/hr)	Emissions (lbs/hr)
Freon-12	< 5.51E-04	< 5.49E-04	< 5.30E-04	< **5.43E-04**
Methyl chloride	4.53E-03	< 3.59E-04	< 3.47E-04	< **1.74E-03**
Freon-114	< 9.16E-04	< 9.11E-04	< 8.80E-04	< **9.02E-04**
Vinyl chloride	< 3.35E-04	< 3.33E-04	< 3.22E-04	< **3.30E-04**
Methyl bromide	< 6.78E-04	< 6.75E-04	< 6.52E-04	< **6.68E-04**
Ethyl chloride	9.54E-04	< 4.01E-04	< 3.87E-04	< **5.81E-04**
Freon-11	< 6.83E-04	< 6.80E-04	< 6.56E-04	< **6.73E-04**
1,1-dichloroethylene	< 6.86E-04	< 6.82E-04	< 6.59E-04	< **6.76E-04**
Dichloromethane	7.88E-04	< 6.97E-04	< 6.73E-04	< **7.19E-04**
Freon-113	< 1.00E-03	< 9.99E-04	< 9.65E-04	< **9.89E-04**
1,1-dicloroethane	< 7.00E-04	< 6.97E-04	< 6.73E-04	< **6.90E-04**
c-1,2-dichloroethene	< 6.86E-04	< 6.82E-04	< 6.59E-04	< **6.76E-04**
Chloroform	< 6.40E-04	< 6.37E-04	< 6.15E-04	< **6.31E-04**
1,2-dichloroethane	< 7.00E-04	< 6.97E-04	< 6.73E-04	< **6.90E-04**
1,1,1-trichloroethane	< 7.15E-04	< 7.12E-04	< 6.87E-04	< **7.05E-04**
Benzene	3.12E-03	< 4.16E-04	< 4.02E-04	< **1.31E-03**
Carbon tetrachloride	< 8.25E-04	< 8.21E-04	< 7.93E-04	< **8.13E-04**
1,2 dichloropropane	< 9.08E-04	< 9.04E-04	< 8.73E-04	< **8.95E-04**
Trichloroethene	< 7.02E-04	< 6.99E-04	< 6.75E-04	< **6.92E-04**
1,1,2-trichloroethane	< 9.50E-04	< 9.46E-04	< 9.13E-04	< **9.36E-04**
Toluene	1.20E-03	< 6.54E-04	< 6.32E-04	< **8.29E-04**
1,2-dibromoethane	< 1.16E-03	< 1.15E-03	< 1.11E-03	< **1.14E-03**
Perchloroethene	< 8.89E-04	< 8.85E-04	< 8.55E-04	< **8.76E-04**
Chlorobenzene	1.47E-03	< 7.00E-04	< 6.76E-04	< **9.49E-04**
Ethylbenzene	< 6.63E-04	< 6.59E-04	< 6.37E-04	< **6.53E-04**
m + p-xylenes	< 6.63E-04	< 6.59E-04	< 6.37E-04	< **6.53E-04**
Styrene	< 6.51E-04	< 6.48E-04	< 6.25E-04	< **6.42E-04**
1,1,2,2,-tetrachloroethane	< 9.00E-04	< 8.96E-04	< 8.65E-04	< **8.87E-04**
o-xylene	< 6.63E-04	< 6.59E-04	< 6.37E-04	< **6.53E-04**
1,3,5-trimethylbenzene	< 7.50E-04	< 7.47E-04	< 7.21E-04	< **7.39E-04**
m-dichlorobenzene	< 7.88E-04	< 7.84E-04	< 7.57E-04	< **7.76E-04**
p-dichlorobenzene	1.48E-04	< 7.84E-04	< 7.57E-04	< **5.63E-04**
Benzylchloride	< 6.78E-04	< 6.75E-04	< 6.52E-04	< **6.68E-04**
o-dichlorobenzene	< 7.88E-04	< 7.84E-04	< 7.57E-04	< **7.76E-04**
1,2,4-trichlorobenzene	< 1.30E-03	< 1.29E-03	< 1.25E-03	< **1.28E-03**
Hexachlorobutadiene	< 1.63E-03	< 1.62E-03	< 1.57E-03	< **1.61E-03**

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 10 (MM/DD/YY) to 12 / 31 / 10 (MM/DD/YY)

A. Emission Unit Description: 70 Kilowatt Ingersoll-Rand PowerWorks Micro-Turbine			B. Pollutant: NMOC
C. Measured Emission Rate: 4.26 ppm @ 3% O2 (as hexane)	D. Limited Emission Rate: 20 ppm @ 3% O2 (as hexane)	E. Specific Source Test or Monitoring Record Citation: EPA Method 25C	F. Test Date: 07/31/08

A. Emission Unit Description: 70 Kilowatt Ingersoll-Rand PowerWorks Micro-Turbine			B. Pollutant: SOx
C. Measured Emission Rate: 0.04 lb/hr (as SO2)	D. Limited Emission Rate: 0.25 lb/hr (as SO2)	E. Specific Source Test or Monitoring Record Citation: EPA Method 25C	F. Test Date: 07/31/08

A. Emission Unit Description: 70 Kilowatt Ingersoll-Rand PowerWorks Micro-Turbine			B. Pollutant: Destruction Eff.%
C. Measured Emission Rate: 98.28%	D. Limited Emission Rate: >98%	E. Specific Source Test or Monitoring Record Citation: EPA Method 25C	F. Test Date: 07/31/08

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:

Attachment B

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

AUG 07 2008

CERTIFIED MAIL NO.: 7007 1490 0000 4710 1553
RETURN RECEIPT REQUESTED

Suparna Chakladar
SCS Energy
3900 Kilroy Airport Way Suite 100
Long Beach, CA 90806-6816

Re: NSPS WWW / MACT AAAA Compliance Demonstration for LFG-Fired Microturbine at the Toland Road Landfill, Santa Paula, California

Dear Mr. Suparna Chakladar:

This is in response to your April 24, 2008 letter to the US Environmental Protection Agency ("U.S. EPA") asking for a determination whether landfill gas ("LFG")-to-energy ("LFGTE") treatment system at the Toland Road Landfill, located in Santa Paula, California , satisfies the requirements of 40 C.F.R. Part 60.752(b)(2)(iii)(C) when LFG is routed through the representative facility's gas treatment system. U.S. EPA interprets your letter to be a request for an applicability determination and not a compliance determination.

The treatment at Toland Road Landfill is accomplished with the following:

The treatment system filters the gas at: the Conlser Sags 1-micron coalescing filter.

The treatment system compresses the gas to 90 psig in a gas compressor (the Davey compressor).

The treatment system de-waters the gas by using a moisture knockout, and compressing and cooling the gas.

The LFG treatment system consists of the following treatment processes in the order in which they treat the incoming LFG:

1. The LFG passes through a 55 gallon granular activated carbon vessel.

2. The LFG enters the facility through a moisture knock-out (**DEWATERING**).

3. The LFG is then compressed to 90 pounds per square inch (psi) via a compressor (**COMPRESSION**).

3. The LFG is then compressed to 90 pounds per square inch (psi) via a compressor **(COMPRESSION).**

4. The compressed LFG flows through an internal radiator (**COOLING**).

5. The cooled, compressed LFG flows through an Elanco gas-to-gas heat cxchanger, then through an Elanco gas-to-liquid heat exchanger. The LFG is now chilled to approximately 45 degrees Fahrenheit using a Schreiber Engineering 6050 watt chiller (**DEWATERING**).

6. The chilled LFG enters a Conlser Sags 1-micron coalescing filter (**DEWATERING**).

7. It then passes back through the gas-to-gas heat exchanger for reheating to lower the relative humidity. This dry warm (at approximately 80 degrees Fahrenheit), filtered LFG is then piped to the 70 kW Ingersoll Rand microturbine for combustion.

Therefore, U.S. EPA determines that the landfill gas (LFG) treatment system at Toland Road Landfill as detailed in this letter, is in accordance with the requirements of 40 C.F.R. 60.752(b)(2)(iii)(C). Furthermore, the 70 kW Ingersoll Rand microturbine at Olinda Landfill using the respective treated gas stream are not subject to the control requirements of 40 C.F.R. 60.752(b)(2)(iii) (B) and the associated monitoring, record keeping, and reporting for such control devices.

However, emissions from any atmospheric vent from the gas treatment system, including any compressor, are still subject to the requirements of 40 C.F.R. 60.752(b)(2)(iii)(A) and (B).

This determination was based on previous determinations from U.S. EPA Region 3 dated February 12, 2002, and October 3, 2002, which were presented to OAQPS and OECA for comment. The Federal Register Proposed Rule Amendments from 2002 are meant to be a clarification of the existing NSPS, not changes to the rule.

If you have any questions, feel free to contact Matt Salazar of my staff at (415) 972-3982.

Sincerely,

Mark A. Sims

for Douglas K. McDaniel
Chief, Enforcement Office
Air Division

cc: Michael Villegas, VCAPCD

Attachment C

VCAPCD Rule 50, Opacity
Annual Compliance Survey

Survey Information:

By: Greg Grant, P.E.
Date: December 30, 2010
Time: 2:00 PM to 2:30 PM
Emissions Unit: Toland Landfill Micro-Turbines

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).

GREG GRANT – SOLID WASTE DIVISION MANAGER

VCAPCD Rule 50, Opacity
Annual Compliance Survey

Survey Information:
By: Greg Grant, P.E.
Date: December 30, 2010
Time: 2:45 PM to 3:15 PM
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).

GREG GRANT – SOLID WASTE DIVISION MANAGER

VCAPCD Rule 50, Opacity
Annual Compliance Survey

Survey Information:
By: Greg Grant, P.E.
Date: November 16, 2010
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).

GREG GRANT – SOLID WASTE DIVISION MANAGER

Attachment D

Ventura County
Air Pollution
Control District

669 County Square Drive
Ventura, California 93003

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

Michael Villegas
Air Pollution Control Officer

March 23, 2010

Sally Coleman, Director Operations
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003

Subject: Reduction in Hydrogen Sulfide Monitoring Frequency – Toland Road Landfill

Dear Ms. Coleman:

The Ventura County Air Pollution Control District (APCD) has reviewed VRSD's letter regarding the monitoring frequency for hydrogen sulfide in the gaseous fuel at the Toland Road Landfill, as specified by Attachment 64 (Sulfur Content of Fuels), Condition 4.a. Condition 4.a requires quarterly monitoring if the stationary source began operation after April 13, 1999. However, Condition 4.b allows a reduction to annual monitoring if documentation is submitted that shows that each of four consecutive calendar quarter's sulfur content did not exceed 394 ppmv, calculated as hydrogen sulfide at the standard conditions. The APCD grants your request to reduce the monitoring frequency from quarterly to annually as allowed by Attachment 64. Condition 4.b. The reduction in the frequency of monitoring is effective immediately.

Thank you for your cooperation in this matter. If you have any questions, please contact air quality engineer Lyle Olson at 805/645-1413.

Sincerely,

Keith Duval
Deputy Air Pollution Control Officer

c. Jason Siegart, VRSD

H2SMONITORING

Atmospheric Analysis & Consulting, Inc.

CLIENT : Ventura Regional Sanitation District
PROJECT NAME : Toland Landfill Biosolids/Microturbines
AAC PROJECT NO. : 100094
REPORT DATE : 02/19/2010

On February 17, 2009, Atmospheric Analysis & Consulting, Inc. received three (3) Tedlar Bags for Total TRS analysis by SCAQMD 307.91. Upon receipt the samples were assigned unique Laboratory ID numbers as follows:

Client ID	Lab No.
Vilter Outlet	100094-43104
Blower Outlet	100094-43105
24" Test Port	100094-43106

SCAQMD 307.91 – Up to a 1mL aliquot of sample is injected into the GC/SCD for analysis following SCAQMD 307.91 as specified in the SOW.

No problems were encountered during receiving, preparation, and/ or analysis of this sample. The test results included in this report meet all requirements of the NELAC Standards and/or AAC SOP# AACI- SCAQMD 307.91.

I certify that this data is technically accurate, complete, and in compliance with the terms and conditions of the contract. Release of the data contained in this hardcopy data package and its electronic data deliverable submitted on diskette has been authorized by the Laboratory Director or his designee, as verified by the following signature.

If you have any questions or require further explanation of data results, please contact the undersigned.

Sucha Parmar, PhD
Technical Director

ACCREDITED IN ACCORDANCE WITH nelac Certificate #E87837

This report consists of 4 pages.

1534 Eastman Ave., Ste. A • Ventura, • CA 93003 (805) 650-1642 • FAX (805) 650-1644 • www.aaclab.com

Atmospheric Analysis & Consulting, Inc.

LABORATORY ANALYSIS REPORT

CLIENT	**Ventura Regional Sanitation District**	**SAMPLING DATE**	**02/17/2010**
PROJECT NO.	**100094**	**RECEIVING DAT**	**02/17/2010**
MATRIX	**AIR**	**ANALYSIS DATE**	**02/18/2010**
		REPORT DATE	**02/19/2010**

Total Reduced Sulfur Compounds Analysis by ASTM D-5504

Client ID	Vilter Outlet	Blower Outlet	24" Test Port
AAC ID	100094-43104	100094-43105	100094-43106
Analyte	Result	Result	Result
Hydrogen Sulfide	**1.584 ppmv**	< 0.100 ppmv	**8.747 ppmv**
Carbonyl Sulfide	**0.388 ppmv**	**0.129 ppmv**	**0.629 ppmv**
Sulfur Dioxide	< 0.100 ppmv	< 0.100 ppmv	< 0.100 ppmv
Methyl Mercaptan	**0.388 ppmv**	< 0.100 ppmv	**1.240 ppmv**
Ethyl Mercaptan	< 0.100 ppmv	< 0.100 ppmv	< 0.100 ppmv
Dimethyl Sulfide	**14.338 ppmv**	**39.664 ppmv**	**12.443 ppmv**
Carbon Disulfide	**0.351 ppmv**	**0.706 ppmv**	**0.145 ppmv**
Isopropyl Mercaptan	< 0.100 ppmv	< 0.100 ppmv	**0.208 ppmv**
tert-Butyl Mercaptan	< 0.100 ppmv	< 0.100 ppmv	**0.121 ppmv**
n-Propyl Mercaptan	< 0.100 ppmv	< 0.100 ppmv	< 0.100 ppmv
Methylethylsulfide	< 0.100 ppmv	**0.163 ppmv**	< 0.100 ppmv
sec-Butyl Mercaptan	**0.300 ppmv**	< 0.100 ppmv	**0.339 ppmv**
Thiophene	**0.182 ppmv**	< 0.100 ppmv	< 0.100 ppmv
iso-Butyl Mercaptan	< 0.100 ppmv	< 0.100 ppmv	< 0.100 ppmv
Diethyl Sulfide	< 0.100 ppmv	< 0.100 ppmv	< 0.100 ppmv
n-Butyl Mercaptan	< 0.100 ppmv	< 0.100 ppmv	< 0.100 ppmv
Dimethyl Disulfide	**1.969 ppmv**	**0.110 ppmv**	**2.091 ppmv**
2-Methylthiophene	**0.158 ppmv**	< 0.100 ppmv	**0.161 ppmv**
3-Methylthiophene	< 0.100 ppmv	< 0.100 ppmv	< 0.100 ppmv
Tetrahydrothiophene	< 0.100 ppmv	< 0.100 ppmv	< 0.100 ppmv
Bromothiophene	< 0.100 ppmv	< 0.100 ppmv	< 0.100 ppmv
Thiophenol	< 0.100 ppmv	< 0.100 ppmv	< 0.100 ppmv
Diethyl disulfide	< 0.100 ppmv	< 0.100 ppmv	< 0.100 ppmv
Total Unidentified Sulfur	**2.564 ppmv**	< 0.100 ppmv	**2.248 ppmv**
Total Reduced Sulfurs as H_2S	**21.834 ppmv**	**40.643 ppmv**	**27.743 ppmv**

All compound's concentrations expressed in terms of H_2S (TRS does not include COS and SO_2)
Sample Reporting Limit (SRL) is equal to Reporting Limit x Canister Dil. Fac. x Analysis Dil. Fac.

Sucha S. Parmar, Ph.D
Technical Director

1534 Eastman Ave., Ste. A • Ventura, • CA 93003 (805) 650-1642 • FAX (805) 650-1644 • www.aaclab.com

Quality Control/Quality Assurance Report
SCAQMD 307.91

Date Analyzed: 02/18/2010
Analyst: TT

Instrument ID: SCD#10
Int. Calibration Date: 11/18/2009

Opening Calibration Verification Standard

Verification Standard Concentration: 50 ppbV

	Resp. (area)	Result (ppbV)	% Rec *	% RPD ****
Initial	1975	53.9	107.7	NA
Duplicate	1933	52.7	105.4	2.1
Triplicate	1896	51.7	103.4	4.1

Method Blank

Analyte	Result
H2S	ND

Laboratory Control Spike & Duplicate

Analyte	Spike Added	LCS Result	LCSD Result	LCS % Rec *	LCSD % Rec *	% RPD ***
H2S	50.00	48.18	48.46	96.4	96.9	0.6

Matrix Spike & Duplicate **Sample ID** **Lab Air**

Analyte	Sample Conc.	Spike Added	MS Result	MSD Result	MS % Rec *	MSD % Rec *	% RPD ***
H2S	0.0	50.00	53.96	49.87	107.9	99.7	7.9

Duplicate Analysis **Sample ID** **100095-43107**

Analyte	Sample Result	Duplicate Result	Mean	% RPD ***
H2S	70282.8	67885.4	69084.1	3.5

Closing Calibration Verification Standard

Verification Standard Concentration: 50 ppbV

Analyte	Std. Conc.	Result	%Recovery *
H2S	50.00	47.23	94.5

** Must be 90-110%*

**** Must be < 10%*

***** must be < 5% RPD from Initial result.*

Sucha Parmar, Ph.D.
Technical Director

1534 Eastman Ave., Ste. A • Ventura, • CA 93003 (805) 650-1642 • FAX (805) 650-1644 • www.aaclab.com

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AAC Project No. 100094 Page 1 of 1

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client Name	Project Name	Analysis Requested	Send Report:
URSD	Toland Landfill Biosolids/Microturbines		
Project Mgr (Print Name)	Project Number		Attn:
Frank Kiesler			Phone #:
Sampler's Name (Print Name)	Sampler's Signature		Fax #:
David Gooding	David N. Gooding		

AAC Sample No.	Date Sampled	Time Sampled	Sample Type	Client Sample ID/Description	Type/No. of containers	307.91						
43104	2/17/10	15:15	Bag	Vilter Outlet	TB 1	X						
43105	2/17/10	15:25	Bag	Blower Outlet	TB 1	X						
43106	2/17/10	15:45	Bag	24" test Port	TB 1	X						

Send Invoice to: Same

Attn:

P.O. #

Turn Around Time
24-Hr ____ 48-Hr ____
5 day ____ Normal X
Other (Specify)

Special Intructions / remarks:

Relinquished by (Signature)	Print name:	Date/Time	Received by (Signature)	Print Name
David N. Gooding	David N Gooding	2/17/10 16:50		Marcus Hueppe
Relinquished by (Signature)	Print name:	Date/Time	Received by (Signature)	Print Name