

VENTURA REGIONAL SANITATION DISTRICT

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



February 13, 2012

Mr. Dan Searcy
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 Annual Compliance Certification Report for the Toland Road Landfill.

Please call Andy Hovey at 805-658-4679 if you have any questions.

A handwritten signature in blue ink that reads 'Sally Coleman'. The signature is fluid and cursive.

SALLY COLEMAN – DIRECTOR OF OPERATIONS

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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:  Title: DIRECTOR OF OPERATIONS	Date: 2/13/12
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Time Period Covered by Compliance Certification <u>01</u> / <u>01</u> / <u>11</u> (MM/DD/YY) to <u>12</u> / <u>31</u> / <u>11</u> (MM/DD/YY)

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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

1.a. 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 • Quadrantial 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 Solvent use exemption records 	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"> 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, 3, 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, 3, 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, 3, 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

Ib. 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	<ul style="list-style-type: 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 	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • PM - CARB Method 5 	<ul style="list-style-type: none"> • 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 Annual compliance certification Routine surveillance Maintain VOC records of coatings used Annual compliance certification Test ROC content of oil sample being proposed for usage 	<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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Period Covered by Compliance Certification: 01 / 01 / 11 (MM/DD/YY) to 12 / 31 / 11 (MM/DD/YY)

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

<p>A. Attachment # or Permit Condition #: 74.17.1N5-07340</p>	<p>D. Frequency of monitoring: Continuous, quarterly and bi-annually</p>
<p>B. Description: Rule 74.17.1</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.</p>
<p>C. Method of monitoring:</p> <ul style="list-style-type: none"> • 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) 	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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



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Period Covered by Compliance Certification: 01 / 01 / 11 (MM/DD/YY) to 12 / 31 / 11 (MM/DD/YY)

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

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

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



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<p>A. Attachment # or Permit Condition #: P07340PC2</p>	<p>D. Frequency of monitoring: Continuous, bi-annually and quadrennially</p>
<p>B. Description: Condition No. 2 – Rule 26 Flare BACT Limits</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.</p>
<p>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.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: P07340PC2</p>	<p>D. Frequency of monitoring: Quadrennially</p>
<p>B. Description: Condition No. 3 – Rule 54 Sulfur Compounds</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.</p>
<p>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.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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



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

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

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



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A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring: Bi-annually
B. Description: Condition No. 8 – Rule 51 Flare Dimensions and Exhaust Velocity	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): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring: Every 1000 hours, but not less than 10 years and not more than every 4 years.
B. Description: Condition No. 9 & 10 – Rule 51 Toxics Testing and HRA Requirements	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): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC3	D. Frequency of monitoring: Not applicable.
B. Description: Condition Nos. 1, 3 and 4 – Rule 74.17.1 Micro-Turbine Emission Limits	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: The 70kW micro-turbine was removed from Permit (07340-132).	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form



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<p>A. Attachment # or Permit Condition #: P07340PC3</p>	<p>D. Frequency of monitoring:</p> <p>Not applicable.</p>
<p>B. Description:</p> <p>Condition Nos. 2, 3 and 4 – Rule 54 Sulfur Compounds, Micro-Turbines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>The 70kW micro-turbine was removed from Permit (07430-132).</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

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

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 11 (MM/DD/YY) to 12 / 31 / 11 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 54.B.1</p>	<p>D. Frequency of monitoring: Not applicable.</p>
<p>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.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Compliance with Rule 64 ensures compliance with this rule based on District analysis.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 54.B.2</p>	<p>D. Frequency of monitoring: Bi-annually</p>
<p>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.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment A.</p>
<p>C. Method of monitoring: Exhaust analysis and compliance demonstration. Source test exhaust value of Sulfur Dioxide of 0.21 lb/hr.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 11 (MM/DD/YY) to 12 / 31 / 11 (MM/DD/YY)

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

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

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 11 (MM/DD/YY) to 12 / 31 / 11 (MM/DD/YY)

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

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

<p>A. Attachment # or Permit Condition #: 74.1</p>	<p>D. Frequency of monitoring: As needed.</p>
<p>B. Description: Rule 74.1 Abrasive Blasting</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: No abrasive blasting was conducted in 2011.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 11 (MM/DD/YY) to 12 / 31 / 11 (MM/DD/YY)

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

<p>A. Attachment # or Permit Condition #: 74.4.D</p>	<p>D. Frequency of monitoring: As needed.</p>
<p>B. Description: Rule 74.4.D Cut Back Asphalt</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: No road oils were applied in 2011.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 74.28</p>	<p>D. Frequency of monitoring: As needed.</p>
<p>B. Description: Rule 74.28 Asphalt Roofing Operations</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: No asphalt roofing operations were conducted in 2011.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 11 (MM/DD/YY) to 12 / 31 / 11 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 74.29</p>	<p>D. Frequency of monitoring: As needed.</p>
<p>B. Description: Rule 74.29 Soil Decontamination Operations</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: No soil decontamination operations were conducted in 2011.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40CFR.61.M</p>	<p>D. Frequency of monitoring: As needed.</p>
<p>B. Description: 40 CFR, Part 61, Subpart M – National Emission Standard for Asbestos</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: No asbestos demolition or renovation activities were conducted in 2011.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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

Attachment A



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 11 (MM/DD/YY) to 12 / 31 / 11 (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: 0.09 lb/hr (as CH ₄) 0.93 ppm @ 3% O ₂ (as hexane)	D. Limited Emission Rate: 1.00 lb/hr (as CH ₄) <20 NSPS	E. Specific Source Test or Monitoring Record Citation: Modified EPA Method 25	F. Test Date: 10/19/11

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: NO _x
C. Measured Emission Rate: 1.58 lb/hr (as NO ₂) 0.048 lb/MMBtu (as NO ₂)	D. Limited Emission Rate: 5.15 lb/hr (as NO ₂) 0.06 lb/MMBtu (as NO ₂)	E. Specific Source Test or Monitoring Record Citation: EPA Method 7E	F. Test Date: 10/19/11

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: CO
C. Measured Emission Rate: 4.71 lb/hr 0.139 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: 10/19/11

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: SO _x
C. Measured Emission Rate: 0.21 lb/hr (as SO ₂) 0.007 lb/MMBtu (as SO ₂)	D. Limited Emission Rate: 1.72 lb/hr (as SO ₂) 0.02 lb/MMBtu (as SO ₄)	E. Specific Source Test or Monitoring Record Citation: Modified SCAQMD 307-91	F. Test Date: 10/19/11

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: Destruction Eff. %
C. Measured Emission Rate: 98.13%	D. Limited Emission Rate: >98%	E. Specific Source Test or Monitoring Record Citation:	F. Test Date: 10/19/11

5.0 SUMMARY OF RESULTS

TABLE 5-1
SUMMARY OF RESULTS vs PERMIT CONDITIONS
VRSD Toland
Flare
October 19, 2011

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O ₂ , %	1.21	11.85	
CO ₂ , %	39.49	8.30	
N ₂ , %	4.84	79.85	
H ₂ O, %	3.09	10.30	
Flow Rate, wscfm	1033.4	12,883	
Flow Rate, dscfm	1001.6	12,805	inlet 1,500
Temperature, °F (measured at sample ports)	93	1,481	
Temperature, °F (measured at monitoring thermocouple)		1,645	>1,500
Btu/scf	531		
MMBtu/Hr	32.92		
NO _x :			
ppm		18.3	
ppm @ 3% O ₂		35.5	
lb/hr (as NO ₂)		1.58	5.15
lb/day (as NO ₂)		37.9	
lb/MMBtu (as NO ₂)		0.048	0.06
lb/MMCF (as NO ₂)		26.28	
CO:			
ppm		68.1	
ppm @ 3% O ₂		168.1	
lb/hr		4.71	17.16
lb/day		113.13	
lb/MMBtu		0.139	0.2
lb/MMCF		78.43	
Hydrocarbons:			
CH ₄ , ppm	523,400	< 1.0	
CH ₄ , lb/hr	1,302	< 0.03	
Destruction Eff. % CH ₄	-	> 99.998	99
TGNMO, ppm (as CH ₄)	2,317	2.85	
TGNMO, ppm @ 3% O ₂ (as methane)		5.64	
TGNMO, lb/hr (as CH ₄)	5.7	0.09	1.00
TGNMO, lb/MM Btu (as CH ₄)	-	0.003	
TGNMO, lb/day (as CH ₄)	136.5	2.08	
TGNMO, ppm (as hexane)		0.48	
TGNMO, ppm @ 3% O ₂ (as hexane)		0.93	<20 NSPS
TGNMO, lb/hr (as hexane)		0.08	
Destruction Eff. %		98.13	>98%
lb/MMCF		1.29	
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	21.3		
SO ₂ Outlet, ppm		1.68	
SO _x Exhaust, lb/hr (as SO ₂)		0.21	1.72
SO _x Exhaust, lb/day (as SO ₂)		5.14	
SO _x Exhaust, lb/MMBtu (as SO ₂)		0.007	0.02
lb/MMCF		3.56	

Notes:

The results in this table are the averages of all measurements

5.0 SUMMARY OF RESULTS

TABLE 5-2
GENERAL RESULTS
VRSD Toland
Flare
October 19, 2011

Parameter	INLET				EXHAUST			
	First Run	Second Run	Third Run	Average	First Run	Second Run	Third Run	Average
O ₂ , %	1.21	1.21	1.21	1.21	13.89	10.82	10.84	11.85
CO ₂ , %	39.5	39.5	39.5	39.5	6.48	9.18	9.24	8.30
N ₂ , %	4.8	4.8	4.8	4.8	79.6	80.0	79.9	79.9
H ₂ O, %	2.6	3.2	3.5	3.1	8.31	10.94	11.65	10.30
Flow Rate, wscfm	1,071.6	1,035.1	993.5	1,033.4	12,139	12,017	14,493	12,883
Flow Rate, dscfm	1,044.0	1,002.1	958.7	1,002	16,582	11,130	10,702	12,805
Temperature, °F	85	95	99	93	1,273	1,585	1,586	1,481
Btu/scf	531	531	531	531				
MMBtu/hr	34.14	32.98	31.65	32.92				
NO_x:								
ppm					11.44	21.81	21.60	18.28
ppm @ 3% O ₂					29.2	38.7	38.4	35.5
lb/hr (as NO _x)					1.35	1.73	1.65	1.58
lb/MM Btu (as NO _x)					0.040	0.053	0.052	0.048
CO:								
ppm					181.39	2.88	< 20.00	68.09
ppm @ 3% O ₂					463.47	5.12	< 35.57	168.05
lb/hr					13.071	0.139	< 0.930	< 4.714
lb/MM Btu					0.383	0.004	< 0.029	< 0.139
Hydrocarbons:								
CH ₄ , ppm	523,400	523,400	523,400	523,400	< 1	< 1	< 1	< 1
CH ₄ , lb/hr	1356.85	1302.49	1246.06	1,302	0.01	0.03	0.03	0.03
Destruction Eff. % CH ₄					99.997	99.998	99.998	99.998
Ethane, ppm	< 10.00	< 10.00	< 10.00	< 10.00	< 1	< 1	< 1	< 1
TGNMO, ppm (as CH ₄)	1,220	2,380	3,350	2,317	1.94	3.61	3.01	2.83
TGNMO, lb/hr (as CH ₄)	3.16	5.92	7.98	5.69	0.08	0.10	0.08	0.09
TGNMO, ppm (as hexane)	203.3	396.7	558.3	386.1	0.32	0.60	0.50	0.48
TGNMO, ppm @ 3% O ₂ (as hexane)	184.8	360.6	507.6	351.0	0.83	1.07	0.89	0.93
TGNMO, lb/hr (as hexane)	2.83	5.31	7.14	5.09	0.07	0.09	0.07	0.08
Destruction Eff. %					97.47	98.32	98.59	98.13
Sulfur Compounds:								
H ₂ S, ppm	23.3	8.98	7.36	13.21				
Carbonyl Sulfide, ppm	0.34	0.39	0.38	0.37				
Methyl Mercaptan, ppm	1.7	1.58	1.38	1.55				
Ethyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Sulfide, ppm	4.92	5.18	5.34	5.15				
Carbon Disulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
isopropyl mercaptan, ppm	0.74	0.76	0.63	0.75				
n-propyl mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Disulfide, ppm	< 0.2	0.21	0.25	0.21				
Total Sulfur Compounds:								
Total Reduced Sulfur Inlet, ppm	31.0	17.3	15.6	21.3				
SO _x Exhaust, lb/hr (as SO ₂) ¹⁷					0.321	0.172	0.149	0.214

The exhaust volume flow values are based on EPA Method 19

Attachment B

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

Survey Information:

By: Jason Siegert
Date: March 9, 2011
Time: 2:00 PM to 2:30PM
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).

A handwritten signature in blue ink, appearing to read "Jason Siegert", written in a cursive style.

JASON SIEGERT – SOURCE CONTROL INSPECTOR

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

Survey Information:

By: Jason Siegert

Date: April 15, 2011

Time: 12:30 PM to 1:00 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).

A handwritten signature in black ink, appearing to read "Jason Siegert", with a long horizontal flourish extending to the right.

JASON SIEGERT – SOURCE CONTROL INSPECTOR

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

Survey Information:

By: Jason Siegert
Date: April 15, 2011
Time: 1:15 PM to 1:45 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).



JASON SIEGERT – SOURCE CONTROL INSPECTOR

Attachment C

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

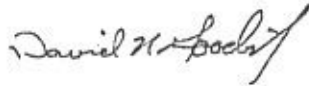
Survey Information:

By: David Gooding

Date: 1ST Quarter 2011

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

Verification: On the attached dates I observed Sensidyne tube readings (tube range 0.5-40 ppm) of hydrogen sulfide at the 24" header leading to the flare and micro-turbines.



DAVID GOODING – ENGINEERING TECHNICIAN

Colorimetric Tube Reading (ppm H2S)

Date	Weekday	Flare Header	24" Header	Vilter Outlet	Blower Outlet	Tube Used
1/3/2011	2	not monitored				
1/4/2011	3		0			0.5-40
1/5/2011	4		10			0.5-40
1/6/2011	5		19			0.5-40
1/7/2011	6		0			0.5-40
1/10/2011	2		16			0.5-40
1/11/2011	3		18			0.5-40
1/12/2011	4		0			0.5-40
1/13/2011	5		17			0.5-40
1/14/2011	6		18			0.5-40
1/17/2011	2		18			0.5-40
1/18/2011	3		10			0.5-40
1/19/2011	4		13			0.5-40
1/20/2011	5		0			0.5-40
1/21/2011	6		1			0.5-40
1/24/2011	2		3			0.5-40
1/25/2011	3		0			0.5-40
1/26/2011	4		12			0.5-40
1/27/2011	5		0			0.5-40
1/28/2011	6		8			0.5-40
1/31/2011	2		14			0.5-40
2/1/2011	3		0			0.5-40
2/2/2011	4		0			0.5-40
2/3/2011	5		16			0.5-40
2/4/2011	6		16			0.5-40
2/7/2011	2		16			0.5-40
2/8/2011	3		16			0.5-40
2/9/2011	4		16			0.5-40
2/10/2011	5		0			0.5-40
2/11/2011	6		14			0.5-40
2/14/2011	2		0			0.5-40
2/15/2011	3		8			0.5-40
2/16/2011	4		14			0.5-40
2/17/2011	5		15			0.5-40
2/18/2011	6		19			0.5-40
2/21/2011	2		holiday			
2/22/2011	3		16			0.5-40
2/23/2011	4		18			0.5-40
2/24/2011	5		24	ND		0.5-40
2/25/2011	6		28		2	0.5-40
2/28/2011	2		24	ND		0.5-40
3/1/2011	3		24	ND	ND	0.5-40
3/2/2011	4		24	ND		0.5-40
3/3/2011	5		8	ND		0.5-40
3/4/2011	6		12	ND		0.5-40
3/7/2011	2		12			0.5-40
3/8/2011	3		14			0.5-40
3/9/2011	4		7			0.5-40
3/10/2011	5		10			0.5-40
3/11/2011	6		8			0.5-40
3/14/2011	2		NR			
3/15/2011	3		NR			
3/16/2011	4		10			0.5-40
3/17/2011	5		NR			
3/18/2011	6		11			0.5-40
3/21/2011	2		NR			
3/22/2011	3		15			0.5-40
3/23/2011	4		12			0.5-40
3/24/2011	5		14			0.5-40
3/25/2011	6		10			0.5-40
3/28/2011	2		5			0.5-40
3/29/2011	3		11			0.5-40
3/30/2011	4		6			0.5-40
3/31/2011	5		9			0.5-40

Attachment D

THIS MEMORANDUM

is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading. The property described below in appropriate cases except as noted hereon and conditions of carriage of bill of lading, marked, consigned, and destined as indicated below, which said carrier and destination, if in its route, otherwise to deliver to another carrier on the route to said destination, if by mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time, intended in all or any of said property, that every service to be performed hereunder shall be subject to (a) the terms and conditions of the Uniform Domestic Freight Bill of Lading set forth in the Uniform Freight Classification in effect on the date hereof, if this is a rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for forward and his assigns.



OFFICE LOCATED AT
15401 Van Allen Avenue, Van Nuys, CA 91411
PO Box 1000, Van Nuys, California 91411
(818) 255-0118 • FAX (818) 255-0121

CARRIER

2



1920 LUGGER WAY • LONG BEACH, CA 90801-2554 • 562-405-0264

CAUTION: SEE REVERSE SIDE FOR HAZARD WARNING

CONSIGNOR/SELLER:

Mercury Air Group Inc.
5456 McConnell Avenue
Los Angeles, CA 90066

CONSIGNEE/BUYER:

Mercury Air Group
5456 McConnell Avenue
Los Angeles, CA 90066

DATE SHIPPED 2/08/12	TIME IN 16:20	TIME OUT 18:35	SHIPPED FROM 1920 LUGGER WAY • LONG BEACH CA		CUSTOMER NO 00012480444	B/L NO. 411056
CARRIER CODE FAUX	CARRIER NAME ARC West	DRIVER NO. 8145	VEHICLE NO. 1077-0	CUSTOMER EMERGENCY PHONE 310/627-2737		

PRODUCT DESCRIPTION	ADD*	TEMP	GRAV	GROSS GAL	NET GAL	*ADDITIVE INJECTED (OUNCES)
						TOTAL
7 Uni Reg Gasoline with ETQH his product meets CARB Phase 3 Reformulated gasoline with ethanol standards and is intended for sale in California only.	110	53.8	59.0	67003	6984	
1 Uni Reg Gasoline with ETQH his product meets CARB Phase 3 Reformulated gasoline with ethanol standards and is intended for sale in California only.	29	54.4	52.4	1801	1795	
						3804 Gross

O.T. HAZARDOUS MATERIAL DESCRIPTION
gasoline, 3, UN 1203, PG II

MESSAGES
Petro-Diamond Incorporated EPA registration # 4060.
gasoline and diesel fuel meet all CARB & EPA requirements.

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

X

Carrier certifies that the cargo tank supplied for this shipment is a proper container for the transportation of this commodity. If this shipment moves, in other than shipper's vehicle, the terms will be those (a) of the contract between shipper and carrier or (b) the terms of the lawfully applicable tariffs if the carrier is common carrier.

TRANSPORTATION EMERGENCY
Call CHEMTEL
1-800-255-3924
24 hours a day, 7 days a week

Michael Estrada