



510-430-8509
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February 13, 2015

Dan Searcy
Ventura County Air Pollution Control District
669 County Square Drive
Second Floor
Ventura, California 93003
(805) 645-1494

SUBJECT: SEMI-ANNUAL TITLE V/NSPS REPORT, SEMI-ANNUAL SSM PLAN REPORT, AND ANNUAL TITLE V COMPLIANCE CERTIFICATION, SIMI VALLEY LANDFILL AND RECYCLING CENTER, SIMI VALLEY, CALIFORNIA

Dear Mr. Searcy:

Waste Management hereby provides the Ventura County Air Pollution Control District (VCAPCD) with one copy of the Annual Title V Compliance Certification Report, the Semi-Annual New Source Performance Standards (NSPS) Report/Title V Report, and the Semi-Annual Startup, Shutdown, and Malfunction (SSM) Plan Report for the Simi Valley Landfill and Recycling Center in Simi Valley, California. Copies of these documents have also been sent to the Air Division at the U.S. Environmental Protection Agency (USEPA) Region IX.

The semi-annual Title V/NSPS and SSM reports were developed for the reporting period from July 1, 2014 through December 31, 2014. The annual Title V compliance certification was developed for the reporting period from January 1, 2014 through December 31, 2014. The reports satisfy the requirements under the site's Title V permit, the VCAPCD Rule 74.17.1, the NSPS for municipal solid waste landfills (40 Code of Federal Regulations [CFR] Part 60, Subpart WWW), and the National Emission Standard for Hazardous Air Pollutants (NESHAPs) for municipal solid waste landfills (40 CFR Part 63, Subpart AAAA).

The SSM Plan Report satisfies the requirements under the Maximum Achievable Control Technology (MACT) rule for semi-annual reporting of SSM plan implementation including 40 CFR 63.10(d)(s).

If you have any questions or need any additional information, please contact the undersigned at (510) 613-2165, or Mr. Bruce Matlock at (805) 579-7267.

Sincerely,

Collin Pavelchik
EP Air Quality Specialist
Waste Management

Mr. Dan Searcy
February 13, 2015
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Enclosures:

NSPS/Title V Semi-Annual Report; SSM Semi-Annual Report; Title V Annual Compliance Certification

cc: Administrator of Air Division; USEPA Region IX (w/enclosures)
Bruce Matlock; Waste Management (w/enclosures)
Christian Colline; Waste Management (w/enclosures)
Eddie Pettit; Waste Management (w/enclosures)
Paul Willman; Waste Management (w/enclosures)
Scott Tignac; Waste Management (w/enclosures)
Matthew Darr; Waste Management (w/enclosures)



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.

<p>Signature and Title of Responsible Official:</p> <p><i>Scott Ferguson</i></p> <p>Title: District Manager</p>	<p>Date:</p> <p>2-12-15</p>
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<p>Time Period Covered by Compliance Certification</p> <p>01/01/2014 (MM/DD/YY) to 12/31/2014 (MM/DD/YY)</p>
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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <u>74.6</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Cold cleaner - Free board ratio compliance</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The landfill used a remote reservoir cold cleaner (RRCC) and was exempt from the annual measurement and verification requirements as specified in Condition 8 of Attachment 74.6. The RRCC onsite complies with the drain hole and free board height requirements as specified in Rule 74.6.C.1. The site replaced the RRCC with a new cold cleaner that utilizes a low reactive organic compounds (ROC) content solvent with a ROC content of 25 grams per liter or less during 2004. The new cold cleaner is exempt from the new Rule 74.6.E.1. effective on 7/1/04.</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 #: <u>74.9N7</u></p>	<p>D. Frequency of monitoring: Emergency</p>
<p>B. Description: The engine shall only be operated during an emergency or during maintenance operation of not more than 50 hours per calendar year.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Emergency Standby Generator Use Log provided in Appendix B.</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above, upon reviewing of the emergency engine hours of operation log (Date, time, duration, and reason for emergency operation). The engine was operated for a total of 8.67 hours during the reporting period. Emergency Standby Generator Use Log provided in Appendix B.</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 #: <u>ATCM Engine N2</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: The District is required to implement and enforce the state Airborne Toxic Control Measure for stationary compression Ignition Engines that apply to in-use emergency standby stationary diesel-fueled IC engines according to Section 93115, Title 17.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above which states the emergency engine shall only be operated during maintenance and testing of not more than 20 hours per calendar year. Upon reviewing of the emergency engine hours of operation log (Date, time, duration, and reason for emergency operation), the engine only operated for maintenance and testing for 0.0 hrs during the reporting year.</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>



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<p>A. Attachment # or Permit Condition #: <u>74.17.1</u></p>	<p>D. Frequency of monitoring: Continuously</p>
<p>B. Description: Operate the landfill gas (LFG) collection and control system (GCCS) in accordance with the requirements of Rule 74.17.1 and the compliance provisions in 40 CFR 60.755.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The site is operating the landfill gas collection system such that gas is collected from each area, cell or group of cells and is routing all collected gas to an active collection system. The site's flare is operated in accordance with the requirements of Rule 74.17.1.B.3.b based on the source test conducted on August 28, 2013 for flare No. 3.</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 #: <u>40CFR63AAAA</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: The subpart requires all applicable landfills to meet the requirements of 40 CFR Part 60, Subpart Cc or WWW and to meet the startup, shutdown and malfunction (SSM) requirements of the general provisions of Part 63.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement of 40 CFR Part 60, subpart WWW. The site has a written startup, shutdown and malfunction plan according to the provisions in 40 CFR 63.6(e)(3).</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 #: <u>PO01395PC1-Condition No. 1</u></p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Recordkeeping on monthly records of LFG throughput and consumption to the control devices.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement by keeping monthly records of LFG throughput and consumption to the control devices on file.</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>



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<p>A. Attachment # or Permit Condition #: PO01395PC1-Condition No. 2</p>	<p>D. Frequency of monitoring: Continuously</p>
<p>B. Description: Annual amount of LFG combusted in the flare and the two IC engines shall not exceed 878,190 MMBtu/yr. Total combined amount of LFG combusted in the two engines shall not exceed 306,000 MMBtu/hr.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above, per review of the monthly LFG throughput summary records to the control devices. The records are kept on file and will be made available upon request.</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 #: PO01395PC1-Condition No. 3</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Each engine and flare shall be equipped with a totalizing fuel meter.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The flare and engines are equipped with the required components and are in compliance with the applicable requirements listed above.</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 #: PO01395PC1-Condition No. 4</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Recordkeeping on monthly records of solvent purchase and usage. (District enforceable only)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The condition is District enforceable only and needs not to be certified via the Title V annual compliance certification. However, the landfill keeps associated records on file as specified in the permit condition.</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>



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Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PO01395PC2-Cond No. 1,2,3</p> <p>B. Description: John Zink flare BACT limits: 1. Temperature 2. Source test (NOx, CO, ROC and NMOC) every two years 3. Testing of SOx every two years</p> <p>C. Method of monitoring: 1. Source test from August 28, 2013 resulted in a TSMOC/ROC emission rate of 2.83 ppm, a NOx emission rate of 0.0121 lb/MMBtu, a CO emission rate of 0.0029 lb/MMBtu, and a sulfur emission rate of 44.8 ppm. Therefore, the flare meets the emission limits as specified in the permit conditions. 2. The flare will be automatically shutdown when the temperature falls below the minimum temperature as required under the permit. Flare temperatures are monitored via a continuous recorder.</p>	<p>D. Frequency of monitoring: Biennial</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Attached</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 #: CARB CH4 from MSW</p> <p>B. Description: CARB AB32 LMR Regulations</p> <p>C. Method of monitoring: The site is in compliance with the applicable requirement by submitting the annual CARB AB32 LMR reports on March 15 of every year which contains the necessary information.</p>	<p>D. Frequency of monitoring:</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 #: PO01395PC2-Condition No. 4&5</p> <p>B. Description: Flare sulfur compounds (SO2) emission requirement.</p> <p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above, per District analysis of Rule 54 compliance based on EPA SO2 emission factor.</p>	<p>D. Frequency of monitoring:</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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<p>A. Attachment # or Permit Condition #: P001395PC2-Condition No. 7</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Flare particulate matter (PM) emission requirement. Condensate knockout/filter vessel requirement for the John Zink flare.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above, per District analysis of Rule 57.1 compliance based on EPA PM emission factor; and per the flare being equipped with the required components.</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 #: 40CFR63 ZZZN2 (LFG RICE)</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Annual compliance certification and records of maintenance</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement by submitting this compliance certification and by submitting the maintenance records semi-annually</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 #: P001395PC2-Condition No. 6</p>	<p>D. Frequency of monitoring: At least every four years</p>
<p>B. Description: Flare equipment requirements for the John Zink flare. Source test every four years on the emission of sulfur compounds.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The flare is equipped with the required components and is in compliance with the applicable requirements. The site is also in compliance with the applicable requirement listed above, per source test conducted in August 2013 for the flare.</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 #:	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

A. Attachment # or Permit Condition #: 40CFR63 ZZZN3 (Emergency RICE)	D. Frequency of monitoring:
B. Description: Annual compliance certification and records of maintenance	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: The site is in compliance with the applicable requirement by submitting this compliance certification and by maintaining the maintenance records (if operated).	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 #: PO01395PC2-Condition No. 8	D. Frequency of monitoring: Annual
B. Description: Annual function-check requirement for GCCS.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual function-check on the flare and collection system components as required under the condition are performed annually. Associated records are kept on file. The site is in compliance with the applicable requirement listed above.	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 #: PO01395PC2-Condition No. 9</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Piping system must be connected to the Landfill Gas Collection System and the collected gas must be commingled with the gas prior to being metered and incinerated.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above.</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 #: PO01395PC2-Condition No. 10</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Vacuum gauges must be maintained in accordance with manufacturers recommendations.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above.</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 #: PO01395PC2-Condition No. 11</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Gas well location requirements.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The landfill acknowledged and is in compliance with the applicable requirements as specified in condition No. 11.</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>



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A. Attachment # or Permit Condition #:	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

A. Attachment # or Permit Condition #: PO01395PC2-Condition No.12&13	D. Frequency of monitoring:
B. Description: Risk assessment requirements based on Rule 51.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: The site is in compliance and the source tests do not indicate concentrations of toxic contaminants, which would exceed any risk-based requirements.	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 #: PO01395PC3-Condition No. 1	D. Frequency of monitoring: Biennial
B. Description: Deutz IC engines emission limits: 1. BACT limits 2. Rule 74.9.B.1 limits 3. Emissions testing biennially to verify compliance	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Attached
C. Method of monitoring: The performance test for Engine No. 2 was conducted on 4/10/13 by Total Air Analysis, Inc. of Carson. The performance test for Engine No. 1 was performed on 4/10/13. Engine No. 1 source test had NOx emission rate of 27.37 ppmv at 15% O2, CO emission rate of 194.33 ppev at 15% O2, and ROC emission rate of 8.65 ppev at 15% O2. Engine No.2 source test had NOx emission rate of 20.50 ppmv at 15% O2, CO emission rate of 183.33 ppev at 15% O2, and ROC emission rate of 10.96 ppmv at 15% O2. The test result showed that both engines are in compliance with the NOx, CO, and ROC permitted emission limits.	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 #: PO01395PC3-Condition No. 2</p>	<p>D. Frequency of monitoring: Biennial</p>
<p>B. Description: Sulfur compounds requirements (SO2 and H2S).</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above, per source tests conducted in April 2013 for the IC engines.</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 #: PO01395PC3-Condition No. 3</p>	<p>D. Frequency of monitoring: Biennial</p>
<p>B. Description: Biennial source test requirement on IC engines.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above, per source tests conducted in April 2013 for the IC engines.</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 #: PO01395PC3-Condition No. 4</p>	<p>D. Frequency of monitoring: Biennial</p>
<p>B. Description: Source test report and submittal requirement.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above, per source tests reports summarizing April 2013 tests results for the IC engines. The source tests reports were submitted to the District within the required time frame.</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>



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<p>A. Attachment # or Permit Condition #: PO01395PC3-Condition No. 5</p>	<p>D. Frequency of monitoring: Quarterly.</p>
<p>B. Description: Quarterly screening analysis of NOx and CO emissions pursuant to Rule 74.9.B.5.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Annual IC engines emission inspection information are provided in Appendix B.</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above.</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 #: PO01395PC3-Condition No. 6</p>	<p>D. Frequency of monitoring: Quarterly</p>
<p>B. Description: Engine Inspection Plan pursuant to Rule 74.9C.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Annual IC engines emission inspection information are provided in Appendix B.</p>
<p>C. Method of monitoring: The LFGTE facility maintains an Engine Inspection Plan and performs quarterly (or every 2,000 hours of operation) inspections. Emission screening using a portable analyzer was performed in accordance with the Engine Inspection Plan. The screenings performed in all quarters were in compliance with BACT and District Rule 74.9. Annual IC engines emission inspection information are provided in Appendix B.</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 #: PO01395PC3-Condition No. 7</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Record keeping requirements for engine emission inspection pursuant to Rule 74.9.E.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above by keeping all the emission inspections logs and associated information on file.</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 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: P001395PC3-Condition No. 8</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Reporting requirements for engine emission inspection pursuant to Rule 74.9.F.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Engines emission inspection Appendix B</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above by providing the engines emission inspections results with the Title V annual certification. The associated information can be found in Appendix B.</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 #: 50</p>	<p>D. Frequency of monitoring: Annual</p>
<p>B. Description: Opacity requirement.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Opacity survey is provided in Appendix A</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above. Annual survey on emission units was conducted on 3/28/14, 5/29/14, 9/29/14 and 11/25/14 and no visible emissions were identified during the survey. The results of the survey is included in Appendix A.</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.1</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Sulfur compounds emission requirement.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above, per compliance with the fuel sulfur content limits of Rule 64.</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 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <u>54.B.2</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Sulfur dioxide concentration requirement at or beyond property line.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Engines emission inspection Appendix B</p>
<p>C. Method of monitoring: The landfill acknowledged the applicable requirement listed above and will perform associated testing upon District's request. Based on current information, the landfill believes it is in compliance with this limit.</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 #: <u>57.1</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Particulate matter emissions from fuel burning equipments.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Opacity survey is provided in Appendix A</p>
<p>C. Method of monitoring: The site is in compliance with the applicable requirement listed above, per District analysis of Rule 57.B compliance based on EPA PM emission factor.</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 #: <u>64.B.1</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Sulfur content of gaseous fuel requirement.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The landfill is in compliance with the applicable limit, per review of the sulfur content of LFG analysis result performed during the flare and engine source tests.</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>



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Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <u>64 . B . 2</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Sulfur content of liquid fuel requirement.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The landfill uses CARB certified diesel fuel on the emergency IC engine and is exempt from the certification and testing requirement as specified in Attachment 64.B.2. The fuel is purchased from the local distributor for Shell Oil. Shipping records on each fuel load showing a distillate certification certifying use in California under "CARB Diesel Regulations" are kept on file at the site.</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 #: <u>74 . 6</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Solvent information for surface cleaning and degreasing.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Opacity survey is provided in Appendix A</p>
<p>C. Method of monitoring: The site is exempt from the solvent requirement and cleaning devices and methods requirements as specified in Rule 74.6.B.1 and B.2, per compliance with the requirements of Rule 74.6.1. The site acknowledged the applicable requirements specified in Rule 74.6.B.3 and B.4 and is in compliance with those practices.</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 #: <u>74 . 11 . 1</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Large water heater and small boiler requirement.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The landfill does not have any regulated large water heater or small boiler installed onsite prior to the end of the reporting period. The requirements of this permit condition did not apply.</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

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<p>A. Attachment # or Permit Condition #: <u>74.22</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Natural gas-fired fan-type central furnaces requirement.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The landfill does not have any regulated furnaces installed onsite prior to the end of the reporting period. The requirements of this permit condition did not apply.</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 #: <u>74.1</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Abrasive blasting requirement.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: There were no abrasive blasting activities performed on the landfill during the reporting period. The requirements of this permit condition did not apply.</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 #: <u>74.2</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Architectural coating requirement.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: There were no regulated activities performed on the landfill during the reporting period. The requirements of this permit condition did not apply.</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 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 74.4.D</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Cutback asphalt - road oils requirement.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: There were no regulated activities performed on the landfill during the reporting period. The requirements of this permit condition did not apply.</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 #: 74.28</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: 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: There were no regulated activities performed on the landfill during the reporting period. The requirements of this permit condition did not apply.</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 #: 74.29</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: 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: There were no regulated activities performed on the landfill during the reporting period. The requirements of this permit condition did not apply.</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 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40CFR.61.M</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Asbestos demolition or renovation activities.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: There were no regulated activities performed on the landfill during the reporting period. The requirements of this permit condition did not apply.</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 #: PO1395PC4</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Rule 29 Out of Service Emissions Units</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The 44 MMBTU/Hr McGill Environmental Systems Landfill Gas Flare and the 75 MMBTU/Hr/John Zink (Model ZTOF) Landfill Gas Flare are out of service and have been removed from the site.</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>



ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 14 (MM/DD/YY) to 12 / 31 / 14 (MM/DD/YY)

A. Emission Unit Description: John Zink BACT limits: 1. Source test (NOx, ROC, CO and NMOC) every two years 2. Testing of Sulfur Oxides (SOx) every two years			B. Pollutant: NOx, CO, ROC, NMOC, Sulfur
C. Measured Emission Rate: NOx 0.0121 lb/mmbtu, CO 0.0029 lb/mmbtu TRS 44.8 ppm, NMOC/ROC 2.83 ppm	D. Limited Emission Rate: NOx 0.025 lb/mmbtu, CO 0.20 lb/mmbtu, TRS 60 ppm, NMOC/ROC 20 ppm	E. Specific Source Test or Monitoring Record Citation: ATC 01395-270 - Condition No. 7	F. Test Date: August 28, 2013

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: Deutz IC engine 1 emission limits: 1. BACT limits 2. Rule 74.9.B.1 limits			B. Pollutant: NOx, CO, ROC
C. Measured Emission Rate: ROC 8.65 ppmv, NOx 27.37 ppmv, CO 194.33 ppmv	D. Limited Emission Rate: ROC 28 ppmv, NOx 35 ppmv, CO 280 ppmv	E. Specific Source Test or Monitoring Record Citation: PO01395PC3-Condition No.1	F. Test Date: April 10, 2013

A. Emission Unit Description: Deutz IC engine 2 emission limits: 1. BACT limits 2. Rule 74.9.B.1 limits			B. Pollutant: NOx, CO, ROC
C. Measured Emission Rate: ROC 10.96 ppmv, NOx 20.50 ppmv, CO 183.33 ppmv	D. Limited Emission Rate: ROC 28 ppmv, NOx 35 ppmv, CO 280 ppmv	E. Specific Source Test or Monitoring Record Citation: PO01395PC3-Condition No.1	F. Test Date: April 10, 2013

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:

APPENDIX A

Simi Valley Landfill Annual Emission Certification - VCAPCD Rule 50: Opacity				
Q-1 Date of Inspection: 03/28/14 Time: 9:00:00 am				
Inspectors Name: Bruce Matlock				
Emission Unit				
Flare Station :	Yes	No	N/A	Comments
1. Any visible emissions at time of obvservation?		X		
Emergency Generator:	Yes	No	N/A	Comments
1. Any visible emissions at time of obvservation?			X	Backup engine not operation at time of certification
Deutz Engines:	Yes	No	N/A	Comments
1. Any visible emissions at time of obvservation?		X		
Observations/Comments:				
No visible emissions from any GCCS combustion equipment.				

Q-2 Date of Inspection: 5/29/14 Time: 2:50 pm				
Inspectors Name: Bruce Matlock				
Emission Unit				
Flare Station :	Yes	No	N/A	Comments
1. Any visible emissions at time of obvservation?		X		
Emergency Generator:	Yes	No	N/A	Comments
1. Any visible emissions at time of obvservation?				Backup engine not operation at time of certification
Deutz Engines:	Yes	No	N/A	Comments
1. Any visible emissions at time of obvservation?		X		
Observations/Comments:				

Q-3 Date of Inspection: 9/29/14 Time: 9:00 am				
Inspectors Name: Bruce Matlock				
Emission Unit				
Flare Station :	Yes	No	N/A	Comments
1. Any visible emissions at time of obvservation?		X		
Emergency Generator:	Yes	No	N/A	Comments
1. Any visible emissions at time of obvservation?				Backup engine not operation at time of certification
Deutz Engines:	Yes	No	N/A	Comments
1. Any visible emissions at time of obvservation?		X		
Observations/Comments:				

Q-4 Date of Inspection: 11/25/14 Time: 10:00 am				
Inspectors Name: Bruce Matlock				
Emission Unit				
Flare Station :	Yes	No	N/A	Comments
1. Any visible emissions at time of obvservation?		X		
Emergency Generator:	Yes	No	N/A	Comments
1. Any visible emissions at time of obvservation?				Backup engine not operation at time of certification
Deutz Engines:	Yes	No	N/A	Comments
1. Any visible emissions at time of obvservation?		X		
Observations/Comments:				

APPENDIX B

Emission Inspection Log

Simi Valley Landfill and Recycling Center

Engine ID: 1 Location: Simi Valley

Pollutant: CO

Date	Limit (ppmv)	Actual Percent Oxygen	Corrected Reading to 15% Oxygen	Reading	Scheduled Remonitoring Date	Comments
3/27/2014	280	7.4	213.3	488	none	Called APCD on 3/26/14
6/30/2014	280	7.4	233.4	534	none	Called APCD on 6/27/14
9/22/2014	280	7.8	229.7	510	none	Called APCD on 9/19/14
12/19/2014	280	7.6	226.2	510	none	Called APCD on 12/18/14

Emission Inspection Log

Simi Valley Landfill and Recycling Center

Engine ID: 2 Location: Simi Valley

Pollutant: CO

Date	Limit (ppmv)	Actual Percent Oxygen	Corrected Reading to 15% Oxygen	Reading	Scheduled Remonitoring Date	Comments
3/27/2014	280	7.3	188.3	434	none	Called APCD on 3/26/14
6/30/2014	280	6.9	222.9	529	none	Called APCD on 6/27/14
9/22/2014	280	8.8	244.8	502	none	Called APCD on 9/19/14
12/19/2014	280	9.8	214.7	404	none	Called APCD on 12/18/14

Emission Inspection Log

Simi Valley Landfill and Recycling Center

Engine ID: 1 Location: Simi Valley

Pollutant: NOx

Date	Limit (ppmv)	Actual Percent Oxygen	Corrected Reading to 15% Oxygen	Reading	Scheduled Remonitoring Date	Comments
3/27/2014	35	7.4	29.3	67	none	Called APCD on 3/26/14
6/30/2014	35	7.4	16.6	38	none	Called APCD on 6/27/14
9/22/2014	35	7.8	21.6	48	none	Called APCD on 9/19/14
12/19/2014	35	7.6	24.0	54	none	Called APCD on 12/18/14

Emission Inspection Log

Simi Valley Landfill and Recycling Center

Engine ID: 2 Location: Simi Valley

Pollutant: NOx

Date	Limit (ppmv)	Actual Percent Oxygen	Corrected Reading to 15% Oxygen	Reading	Scheduled Remonitoring Date	Comments
3/27/2014	35	7.3	28.20	65	none	Called APCD on 3/26/14
6/30/2014	35	6.9	32.03	76	none	Called APCD on 6/27/14
9/22/2014	35	8.8	20.97	43	none	Called APCD on 9/19/14
12/19/2014	35	9.8	31.36	59	none	Called APCD on 12/18/14

