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

A Public Waste Management Agency

March 15, 2017

Mr. Dan Searcy
Manager, Compliance Division
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

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SUBJECT: TITLE V COMPLIANCE REPORTS FOR THE TOLAND ROAD LANDFILL

Dear Mr. Searcy:

The Ventura Regional Sanitation District (VRSD) submits the attached Title V compliance reports for the Toland Road Landfill, Title V Permit Number 07340. A copy of this letter has also been submitted to the Air Quality Division of the United States Environmental Protection Agency, Region IX.

This submittal includes the following attachments:

1. Annual Compliance Certification Report for Calendar Year 2016;
2. Semi-Annual New Source Performance Standards (NSPS) and Title V Report for July 1, 2016 to December 31, 2016;
3. Semi-Annual Startup, Shutdown and Malfunction (SSM) Plan Report for July 1, 2016 to December 31, 2016;
4. Supplemental information historically submitted with Title V Compliance Certification.

Attachment 1 includes the Title V Annual Compliance Certification Signature Cover Form which provides the certification requirement for the Annual Compliance Certification Report. Attachment 1 also includes the Periodic Monitoring Summary Tables, the Annual Deviation Summary Form, the Permit Attachment Form, the Flare Source Test Summary Form with the summary of results from the most recent source test, and the annual flare exceedances.

Attachment 2 includes the semi-annual NSPS report/TV reports

A separate Responsible Official's Certification Form is included in Attachment 3 for the SSM Plan Report. Attachment 3 also includes a summary table of all malfunction events and the individual SSM Plan Forms.

Attachment 4 includes supplemental information that has been historically provided to the Ventura County Air Pollution Control District (VCAPCD), but is not specifically required as part of the Annual Compliance

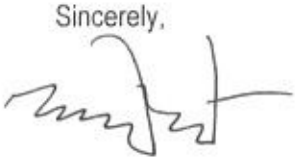
Certification Report or the Semi-Annual Monitoring Report. This attachment includes the surface monitoring logs with grid, monthly landfill throughputs, the annual volume of gasoline used at VRSD, opacity readings, and the times when the control devices were off for more than one hour.

This submittal is made in accordance with Title 40 Code of Federal Regulations (CFR) Part 70.5, State Operating Permit Programs. The attached reports satisfy the requirements under the Toland Road Landfill's Title V Permit, VCAPCD Rule 74.17.1, the NSPS for municipal solid waste landfills (40 CFR Part 60, Subpart WWW), and the National Emission Standards for Hazardous Air Pollutants for municipal solid waste landfills (40 CFR Part 63, Subpart AAAA).

The SSM Plan Report also satisfies the requirements under the 40 CFR 63.10(d)(5). For this reporting period, the actions taken during all SSM events were consistent with the procedures in the SSM Plan at the facility. There were no instances where the SSM Plan was not adequate for the situation.

If you have any questions or require additional information, please contact me at (805) 658-4675 or Edward Pettit at (805) 207-2218.

Sincerely,



Matt Baumgardner
Interim Director of Operations

Attachments

1. Annual Compliance Certification Report for Calendar Year 2016
2. Semi-Annual NSPS/Title V Report for July 1, 2016 to December 31, 2016
3. Semi-Annual Startup, Shutdown and Malfunction Plan Report for July 1, 2016 to December 31, 2016
4. Supplemental Information Historically Submitted with Title V Compliance Certification

Copy: United States Environmental Protection Agency, Region IX

ATTACHMENT 1

ANNUAL COMPLIANCE CERTIFICATION REPORT FOR CALENDAR YEAR 2016

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM

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

Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Confidentiality

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Title: INTERIM DIRECTOR OF OPERATIONS	3/15/2017

Time Period Covered by Compliance Certification

01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

1. PERIODIC MONITORING SUMMARY

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

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

1a. Specific Applicable Requirements

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

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

1b. Permit-Specific Conditions

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

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

1b. Permit-Specific Conditions (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO7340PC2 - Condition No. 5	Rule 26 Flare Equipment Requirements	•Annual compliance certification	•None	None	None	
PO7340PC2 - Condition No. 6	Rule 26 Flare Condensate Knockout / Filter Requirements	•Annual compliance certification	•None	None	None	
PO7340PC2 - Condition No. 7	Rule 26 Collection Vessel Emission Requirements	•Annual compliance certification	•None	None	None	
PO7340PC2 - Condition No. 8	Rule 51 Flare Dimensions and Exhaust Velocity	•Source testing	•Records of source tests	None	APCD approved test protocol	District enforceable only
PO7340PC2 - Condition Nos. 9 and 10	Rule 51 Toxics Testing and HRA Requirements	•Source testing	•Records of source tests	None	APCD approved test protocol	District enforceable only
PO7340PC4 - Condition No. 1	CARB Executive Order DG-027	•Annual compliance certification	•Records that micro-turbines are certified	None	None	
PO7340PC4 – Condition Nos. 2, 5	Rules 54 and 64	•Annual compliance certification •Daily LFG H2S monitoring •Monthly LFG sulfur content measurements	•Records of LFG H2S and sulfur measurements	None	•SCAQMD Method 307	
PO7340PC4 – Condition Nos. 3, 5	Rule 64	•Annual compliance certification •Annual measurement of LFG sulfur content	•Records of annual LFG sulfur content	None	Rule 64.E.1	
PO7340PC4 – Condition No. 4	40 CFR, Part 60, Subpart WWW	•Annual compliance certification •Maintain documentation of EPA determination	•Maintain records of EPA determination of LFG treatment system	None	None	
PO7340PC4 – Condition No. 6	Rule 74.17.1 Micro-Turbine Metering Requirement	•Annual compliance certification •Electrical power generated, landfill gas flow rate, and heating value	•Electrical power generated, landfill gas flow rate, and heating value	None	None	

1c. General Applicable Requirements

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	•Routine surveillance •Visual inspections •Annual compliance certification, including a formal survey •Opacity readings upon request •Notification required for uncorrectable visible emissions	•All occurrences of visible emissions for periods>3min in any one hour •Annual formal survey of all emissions units	None	•Opacity - EPA Method 9	
54.B.1	Rule 54.B.1	•Annual compliance certification •Follow monitoring requirements under Rule 64 •Upon request, source test for sulfur compounds at point of discharge	None	None	•Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A,16B, or SCAQMD Method 307-94, as appropriate	•Compliance with Rule 64 ensures compliance with this rule based on District analysis
54.B.2	Rule 54.B.2	•Annual compliance certification •Determine ground or sea level concentrations of SO_2, upon request	•Representative fuel analysis or exhaust analysis and compliance demonstration	None	•SO_2 - BAAQMD Manual of Procedures, Vol.VI, Section 1, Ground Level Monitoring for H_2S and SO_2	
57.1	Rule 57.1	•Annual compliance certification	None	None	•PM – CARB Method 5	•Compliance based on District EPA emission factor analysis
64.B.1	Rule 64.B.1	•Annual compliance certification •Quarterly micro-turbine fuel sulfur analysis	•Quarterly fuel sulfur analyses	None	•SCAQMD Method 307-94 or ASTM D1072-90 or other alternatives per Rule 64.E.1	
64.B.2	Rule 64.B.2	•Annual compliance certification •Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)	•Fuel supplier's certification, or fuel test per each delivery	None	•ASTM Method D4294-83 or D2622-87	
74.6	Rule 74.6	•Annual compliance certification •Maintain current solvent information •Routine surveillance of solvent cleaning activities •Upon request, solvent testing •Measurement of freeboard height and drain hole area for cold cleaners (as applicable)	•Records of current solvent information	None	•ROC content-EPA Test Method 24 •Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85 •True vapor pressure or composite partial pressure -ASTM D2879-86 •Initial boiling point-ASTM 1078-78 or published source •Spray gun active/passive solvent losses-SCAQMD Method (10-3-89)	

1c. General Applicable Requirements (continued)

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

Id. General Requirements for Short-Term Activities

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

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

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Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

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

A. Attachment # or Permit Condition #: 74.17.1N5-07340	D. Frequency of monitoring:
B. Description: 40 CFR Part 60 Subpart WWW	Continuous, quarterly and bi-annually
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attached Source Test Summary.
C. Method of monitoring: • Monitor flare gas flow rate and temperature. • Monitor wells (temperature, pressure, nitrogen, oxygen) • Monitor methane concentration at surface of landfill • Source test flare every 2 years (NMOC, NOx and CO)	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): I H. *Excursions, exceedances, or other non-compliance? (Y or N): Y *If yes, attach Deviation Summary Form

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

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Period Covered by Compliance Certification: 01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

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

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

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION

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Period Covered by Compliance Certification: 01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

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

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

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

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Period Covered by Compliance Certification: 01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

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

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

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

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Period Covered by Compliance Certification: 01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

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

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

A. Attachment # or Permit Condition #: P07340PC4	D. Frequency of monitoring:
B. Description: Condition Nos. 1 - CARB Executive Order DG-027	Not applicable.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: The 250kW micro-turbines comply with ARB Executive Order DG-027 and are CARB certified.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
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Period Covered by Compliance Certification: 01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

A. Attachment # or Permit Condition #: P07340PC4	D. Frequency of monitoring:
B. Description: Condition Nos. 2, 3 and 5 – Rule 51 Nuisance, Rule 54 Sulfur Compounds & Rule 64 Sulfur Content of Fuels, 250kW Micro-Turbines	Daily, Monthly and Annually. E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attached Source Test Summary
C. Method of monitoring: The treated landfill gas is monitored prior to combustion in the 250kW Micro-turbines. Daily hydrogen sulfide is measured using colorimetric method. Monthly and Annually total sulfur content is measured using SCAQMD Method 307. Maintain these records.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC4	D. Frequency of monitoring:
B. Description: Condition No. 4 – Rule 40 CFR Part 60, Subpart WWW, 250kW Micro-Turbines	Not applicable. E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain documentation of EPA compliance determination that 250kW Micro-turbines are subject to Section 60.752(b)(2)(iii)(C).	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC4	D. Frequency of monitoring:
B. Description: Condition No. 6 – Rule 74.17.1 Micro-Turbine Metering Requirement	Daily, Monthly, Semi-Annually E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Electrical power generated, landfill gas flow rate, and heating value	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

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

A. Attachment # or Permit Condition #: 54.B.2	D. Frequency of monitoring:
B. Description: Rule 54.B.2 Sulfur Dioxide	Bi-annually
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.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Exhaust analysis and compliance demonstration. Source test exhaust value of Sulfur Dioxide of 0.45 lb/hr.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

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

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

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

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

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

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

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Period Covered by Compliance Certification: 01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

A. Attachment # or Permit Condition #: 74.1	D. Frequency of monitoring:
B. Description: Rule 74.1 Abrasive Blasting	As needed.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No abrasive blasting was conducted in 2016.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

A. Attachment # or Permit Condition #: 74.4.D	D. Frequency of monitoring:
B. Description: Rule 74.4.D Cut Back Asphalt	As needed.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No road oils were applied in 2016.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

A. Attachment # or Permit Condition #: 74.28	D. Frequency of monitoring:
B. Description: Rule 74.28 Asphalt Roofing Operations	As needed.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No asphalt roofing operations were conducted in 2016.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.29	D. Frequency of monitoring:
B. Description: Rule 74.29 Soil Decontamination Operations	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No soil decontamination operations were conducted in 2016.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 40CFR.61.M	D. Frequency of monitoring:
B. Description: 40 CFR, Part 61, Subpart M – National Emission Standard for Asbestos	As needed.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No asbestos demolition or renovation activities were conducted in 2016.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
Title 17, Section 95464(b)(1)(B) (Note: This regulation is not federally enforceable. Deviation Is reported for completeness only. The Facility is in compliance with federally enforceable requirements related to surface methane emissions, as specified in 40 CFR Part 60 Subpart WWW And Rule 74.17.1.)	Components associated with Wells 218 and 219. *Refer to the January 1, 2016 through June 30, 2016 Semi-Annual Report for additional details.*	Begin: 01/28/16 End: 01/28/16 When Discovered: Date & Time 02/04/16
D. Parameters monitored: Monitor methane concentrations from the gas collection and control system so that there is no landfill gas leak that exceeds 500 ppmv at any component under positive pressure.	E. Limit: ≤ 500 ppm	F. Actual: *Refer to the January 1, 2016 through June 30, 2016 Semi-Annual Report for additional details.*
G. Probable Cause of Deviation: VRSD has an established quarterly leak detection and repair program in place for components under positive pressure. The probable cause of the deviation occurred when leaking components were discovered during a VCAPCD inspection. These were promptly repaired after discovery.	H. Corrective actions taken: The identified leaks were repaired by VRSD staff and measured ≤ 500 ppm emissions limit on 02/04/16 during the APCD re-test inspection.	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
Title 17, Section 95465(a)(1) (Note: This regulation is not federally enforceable. Deviation Is reported for completeness only. The Facility is in compliance with federally enforceable requirements related to surface methane emissions, as specified in 40 CFR Part 60 Subpart WWW And Rule 74.17.1.)	Failure to maintain surface emissions at ≤ 500 ppm methane on the MSW landfill surface near Wells 218 and 219. *Refer to the January 1, 2016 through June 30, 2016 Semi-Annual Report for additional details.*	Begin: 01/28/16 End: 01/28/16 When Discovered: Date & Time 02/04/16
D. Parameters monitored: Monitor methane concentration at surface of landfill	E. Limit: ≤ 500 ppm	F. Actual: *Refer to the January 1, 2016 through June 30, 2016 Semi-Annual Report for additional details.*
G. Probable Cause of Deviation: VRSD has an established quarterly leak detection and repair program in place. The probable cause of the deviation occurred when surface leaks were discovered during a VCAPCD inspection. These were promptly repaired after discovery.	H. Corrective actions taken: The identified leaks were repaired by VRSD staff and measured ≤ 500 ppm emissions limit on 02/04/16 during the APCD re-test inspection.	

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Period Covered by Compliance Certification: 01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
Title 17, Section 95469(b)1(B) (Note: This regulation is not federally enforceable. Deviation is reported for completeness only. The Facility is in compliance with federally enforceable requirements related to surface methane emissions, as specified in 40 CFR Part 60 Subpart WWW And Rule 74.17.1.)	Components associated with Wells PH219, 51L, 52L, Turbine engines 3 and 5. *Refer to the January 1, 2016 through June 30, 2016 Semi-Annual Report for additional details.*	Begin: 03/24/16 End: 03/24/16 When Discovered: Date & Time 03/24/16
D. Parameters monitored: Monitor methane concentrations from the gas collection and control system so that there is no landfill gas leak that exceeds 500 ppmv at any component under positive pressure.	E. Limit: ≤ 500 ppm	F. Actual: *Refer to the January 1, 2016 through June 30, 2016 Semi-Annual Report for additional details.*
G. Probable Cause of Deviation: VRSD has an established quarterly leak detection and repair program in place for components under positive pressure. The probable cause of the deviation occurred when leaking components were discovered during a VCAPCD inspection. These were promptly repaired after discovery.	H. Corrective actions taken: Leak repaired by VRSD staff was below the ≤500 ppm emissions limit on 03/24/16 during the APCD initial inspection.	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
Title 17, Section 95465(a)(1) (Note: This regulation is not federally enforceable. Deviation is reported for completeness only. The Facility is in compliance with federally enforceable requirements related to surface methane emissions, as specified in 40 CFR Part 60 Subpart WWW And Rule 74.17.1.)	Failure to maintain surface emissions at ≤ 500 ppm methane on the MSW landfill surface near Well VGW-24S. *Refer to the January 1, 2016 through June 30, 2016 Semi-Annual Report for additional details.*	Begin: 03/24/16 End: 03/24/16 When Discovered: Date & Time 03/24/16
D. Parameters monitored: Monitor methane concentration at surface of landfill	E. Limit: ≤ 500 ppm	F. Actual: *Refer to the January 1, 2016 through June 30, 2016 Semi-Annual Report for additional details.*
G. Probable Cause of Deviation: VRSD has an established quarterly leak detection and repair program in place. The probable cause of the deviation occurred when surface leaks were discovered during a VCAPCD inspection. These were promptly repaired after discovery.	H. Corrective actions taken: The identified leaks were repaired by VRSD staff and are below the ≤ 500 ppm emissions limit on 02/04/16 during the APCD re-test inspection.	

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Period Covered by Compliance Certification: 01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
40 CFR 60.755(a)(3) and (5)	LFG Collection Wells	Begin: 01/01/16 End: 12/31/16 When Discovered: Date & Time 02/15/17
D. Parameters monitored:	**E. Limit:**	**F. Actual:**
Monthly monitoring of LFG collection wells require initiation of corrective action within 5 days and re-monitoring within 15 days for wells with exceedances	< 5% oxygen <131 degrees Fahrenheit Negative pressure on wellhead required	Initiation of corrective action within 5 days and re-monitoring within 15 days was not conducted for exceedances in all cases
G. Probable Cause of Deviation:	**H. Corrective actions taken:**	
VRSD did not recognize that exceedances of the pressure, oxygen, and temperature limits required 5-day and 15-day corrective action.	VRSD personnel have been instructed on the proper monitoring, reporting, and recordkeeping requirements under this provision.	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
Title 17, Section 95469(c	LFG Collection Wells	Begin: 01/01/16 End: 12/31/16 When Discovered: Date & Time 02/15/17
D. Parameters monitored:	**E. Limit:**	**F. Actual:**
Monthly monitoring of LFG collection wells require initiation of corrective action within 5 days and re-monitoring within 15 days for wells with exceedances	Negative pressure on wellhead required	Initiation of corrective action within 5 days and re-monitoring within 15 days was not conducted for exceedances in all cases
G. Probable Cause of Deviation:	**H. Corrective actions taken:**	
VRSD did not recognize that exceedances of the pressure limit required 5-day and 15-day corrective action.	VRSD personnel have been instructed on the proper monitoring, reporting, and recordkeeping requirements under this provision.	

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Period Covered by Compliance Certification: 01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
40 CFR Part 63, Subpart AAAA	LFG Collection Wells	Begin: 01/01/16 End: 12/31/16 When Discovered: Date & Time 02/15/17
D. Parameters monitored:	E. Limit:	F. Actual:
Well Startup, Shutdown, and Malfunction Events	Recordkeeping and Reporting of Well Startup, Shutdown, and Malfunction Events	VRSD did not maintain Startup, Shutdown, and Malfunction records for individual wells
G. Probable Cause of Deviation:	H. Corrective actions taken:	
VRSD did not recognize that the provisions of SSM include individual wells as they are part of the collection system.	VRSD personnel have been instructed on the proper reporting and recordkeeping requirements under this provision.	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
40 CFR 60.757(f) and 40 CFR 63 Subpart AAAA	GCCS	Begin: 01/01/12 End: 12/31/16 When Discovered: Date & Time 02/15/17
D. Parameters monitored:	E. Limit:	F. Actual:
Submittal of Semi-Annual NSPS Reports	Semi-Annual (established under 40 CFR 63 Subpart AAAA)	VRSD did not submit semi-annual NSPS reports
G. Probable Cause of Deviation:	H. Corrective actions taken:	
VRSD did not recognize that semi-annual NSPS reports are required.	VRSD personnel have been instructed on the proper monitoring, reporting, and recordkeeping requirements under this provision.	

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Period Covered by Compliance Certification: 01 / 01 / 16 (MM/DD/YY) to 12 / 31 / 16 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
40 CFR 60.758(c)(1)(i)	Flare	Begin: Various (See list of deviations table attached) End: Various When Discovered: Date & Time Various
D. Parameters monitored:	E. Limit:	F. Actual:
Minimum Flare Combustion Temperature	Minimum combustion temperature greater than 50 degrees less than temperature operated during source test over a 3-hour average	See list of minimum 3-hour temperature deviations table attached
G. Probable Cause of Deviation:	H. Corrective actions taken:	
Low temperature shutdown settings not accurate for minimum temperatures established from source test.	VRSD personnel have been instructed on the proper auto settings for the flare so that the flare will shutdown before minimum temperature is exceeded.	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
40 CFR 60.755(c)(5)	Landfill Cover	Begin: 1/1/2016 End: 12/31/16 When Discovered: Date & Time
D. Parameters monitored:	E. Limit:	F. Actual:
Landfill Cover Integrity	Monitor cover integrity and implement repairs on a monthly basis	Cover integrity monitoring was conducted on a quarterly basis
G. Probable Cause of Deviation:	H. Corrective actions taken:	
VRSD did not recognize that cover integrity monitoring is required monthly.	VRSD personnel have been instructed on the proper monitoring, reporting, and recordkeeping requirements under this provision.	

Table 2-1
Summary of Results
VRSD - Toland Landfill
Landfill Gas Flare
October 17, 2016

	LANDFILL GAS	FLARE EXHAUST				PERMIT LIMIT
Run Number	1	1	2	3	Average	
Stack Gas Characteristics						
Temperature, degrees F	98.0	1,782	1,778	1,778	1,779	
Flow Rate, scfm	914.4	-	-	-	-	
Flow Rate, dscfm*	-	14,421	14,421	14,421	14,421	
Fixed Gases						
Oxygen, %	0.70	13.60	13.70	13.80	13.7	
Carbon Dioxide, %	37.76	6.40	6.30	6.20	6.30	
Methane, %	58.60	0.00237	0.00421	0.00350	0.00336	
BTU Value, Btu/scf	593	-	-	-	-	
Methane						
ppm, as Methane	586,000	23.69	42.08	35.03	33.60	
lb/hr, as Methane	1335	0.851	1.512	1.258	1.207	
Destruction Efficiency, %		99.94	99.89	99.91	99.91	99

* Flow Rate calculated using EPA Method 19

Toland Road Landfill - Flare
Permit No. 07340
3-Hour Periods Below 28°C of the Most Recent Performance Test Operating Temperature

Table 1 presents the flare temperature data from the most recent performance test. Table 2 presents a summary of the annual exceedances as required by Condition 8.d.

Table 1. Flare Temperature Data

Source Test	*Temperature (°F)*	*Temperature (°C)*	*Note*
Horizon Test No.: V03-031-FR	1,775	968.33	Average temperature during source test
Date Tested: 10/20/2015 Date Reported:11/11/2015	1,725	940.33	- 28°C
Horizon Test No.: V03-037-FR	1,779	970.56	Average temperature during source test
Date Tested: 10/17/2016 Date Reported:11/14/2016	1,729	942.78	- 28°C

Table 2. Toland Landfill
3-Hour Periods Operating 28°C Below the Source Tested Average Temperature

#	Date	Start	End	Duration (Hours)	Average Temperature (°F)
1	April 4, 2016	12:00	15:00	3	1,722
2	May 5, 2016	12:00	15:00	3	1,702
3	May 24, 2016	18:00	21:00	3	1,717
4	June 1, 2016	21:00	24:00	3	1,715
5	June 2, 2016	3:00	6:00	3	1,721
6	June 2, 2016	21:00	24:00	3	1,720
7	June 3, 2016	3:00	6:00	3	1,723
8	June 4, 2016	21:00	24:00	3	1,716
9	June 5, 2016	0:00	9:00	9	1,714
10	June 5, 2016	18:00	24:00	6	1,714
11	June 6, 2016	0:00	9:00	9	1,697
12	June 6, 2016	21:00	24:00	3	1,715
13	June 7, 2016	0:00	9:00	9	1,710
14	June 8, 2016	6:00	9:00	3	1,721
15	June 9, 2016	3:00	6:00	3	1,714
16	June 18, 2016	15:00	18:00	3	1,631
17	July 2, 2016	21:00	24:00	3	1,703
18	July 3, 2016	0:00	9:00	9	1,717
19	July 7, 2016	15:00	24:00	9	1,711
20	July 8, 2016	0:00	6:00	6	1,711
21	July 12, 2016	9:00	15:00	6	1,707

ATTACHMENT 2

SEMI-ANNUAL NEW SOURCE PERFORMANCE STANDARDS/TITLE V REPORT FOR JULY 1, 2016 TO DECEMBER 31, 2016

SCS ENGINEERS

Semi-Annual Title V Report and New Source Performance Standards (NSPS) Report
Toland Road Landfill
Santa Paula, California

Presented to:

Ventura Regional Sanitation District

1001 Partridge Drive, Suite 150
Ventura, California 93003

For Submittal to:

Ventura County Air Pollution Control District
669 County Square Drive
Ventura, California 93003
(805) 645-1421

Presented by:

SCS ENGINEERS
3900 Kilroy Airport Way, Suite 100
Long Beach, California 90806
(562) 426-9544

March 2017

Offices Nationwide
www.scsengineers.com

This Semi-Annual Title V and New Source Performance Standard (NSPS) Semi-Annual Report for July 1 through December 31, 2016 was developed to comply with Ventura County Air Pollution Control District (VCAPCD) and NSPS requirements for the Toland Road Landfill, California. The document is dated March 2017 and was prepared and reviewed by the following:

Gabrielle F. Stephens
Project Manager

Patrick S. Sullivan, REPA, CPP, BCES
Senior Vice President
SCS ENGINEERS

SEMI-ANNUAL TITLE V REPORT OF REQUIRED MONITORING

Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and submitted with all such reports, including, but not limited to semi-annual reports, deviation and emergency reports and any periodic reports required by a Part 70 permit. However, when submitting your Annual Compliance Certifications, please use the form titled Annual Compliance Certification Signature Cover Form. Semi-annual reports, deviations and emergency reports and any periodic reports required by your Part 70 permit should be submitted to:

Daniel Cho
Air Quality Engineer
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Title: Matt Baumgardner Interim Director of Operations	3/15/2017

Time Period Covered by the Semi-Annual Report of Required Monitoring:

07/01/2016 to 12/31/2016

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Appendices

1.0 INTRODUCTION

This semi-annual Title V and New Source Performance Standards (NSPS) Report for the Toland Road Landfill (TRL or Landfill) is being submitted by the Ventura Regional Sanitation District (VRSD) to the Ventura County Air Pollution Control District (VCAPCD) in compliance with the following:

- VCAPCD Rule 74.17.1
- Sections within 40 Code of Federal Regulations (CFR) Part 60, Subpart WWW ("NSPS"), including 40 CFR 60.757(f), which describe the items to be submitted in a semi-annual report for landfills seeking to comply with NSPS using an active collection system
- In compliance with 40 CFR 63, Subpart AAAA (National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Landfills), the NSPS annual report is submitted semi-annually
- To fulfill the semi-annual reporting requirement under the facility's Title V permit (No. 07340)

The semi-annual report includes the following information, as required by VCAPCD Rule 74.17.1 and 40 CFR 60.757(f), for the reporting period from July 1 through December 31, 2016:

- Value and length of time for exceedance of applicable parameters monitored under 40 CFR 60.756(a), (b), (c), and (d).
- Description and duration of all periods when the gas stream is diverted from the control device.
- Description and duration of all periods when the control device was not operating for more than 1 hour.
- All periods when the collection system was not operating in excess of 5 days.
- The location of each of the 500 parts per million by volume (ppmv) methane exceedances, and the concentration recorded at each location for which an exceedance was recorded in the previous month.
- The date of installation and the location of each well or collection system expansion added to the existing system pursuant to 40 CFR 60.755 paragraphs (a)(3), (b), and (c)(4).

2.0 BACKGROUND INFORMATION

2.1 OWNER AND OPERATOR INFORMATION

TRL is owned and operated by VRSD. The facility is a municipal solid waste (MSW) disposal site located in Santa Paula, California at the following address: Toland Road Landfill, 3500 Toland Road, Santa Paula, California 93060.

TRL is located in eastern Ventura County between the cities of Santa Paula and Fillmore, north of Highway 126. The landfill has been in operation since 1962. In 2000, a landfill gas (LFG) collection system and control system (GCCS) was installed at the Landfill, which included an 85.8 million British Thermal Units per hour (MMBtu/hr) LFG-fired enclosed flare. In 2009, nine (9) 3.2 MMBtu/hr microturbines were installed.

2.2 DESCRIPTION OF LANDFILL GAS COLLECTION AND CONTROL SYSTEM

The GCCS installed at the TRL is shown in the site plan provided in Appendix A, and consists of the following components:

- Vertical extraction wells and horizontal trench collectors.
- A system of lateral piping which connects the vertical wells and trench collectors to a main header system.
- A main collection header, which transports LFG to the control devices.
- A 85.8 MMBtu/hr LFG Specialties flare
- Nine Flex Energy 3.2 MMBtu/hr microturbines.
- Condensate and leachate collection and storage

The purpose of the GCCS is to minimize potential environmental impacts associated with LFG, including the following:

- LFG emissions at the landfill surface.
- LFG emissions out of the control devices.
- LFG migration through the vadose zone.

The GCCS removes LFG under a vacuum from the landfill mass. The system collects and controls migrating surface and subsurface gases from the disposal area.

3.0 MONITORING AND RECORDS REQUIRED UNDER NSPS

The following information required to be submitted in the NSPS semi-annual report as referenced in Section 1 is organized in Section 3 as follows:

- Continuously Monitored Parameters
    - Wellhead Monitoring Data
    - Flare Station Monitoring Data
    - Description and Duration of Periods when Gas was Diverted from the Control System
    - Minimum Flare Temperature
    - Control System Downtime
    - Collection System Downtime
- Surface Emissions Monitoring Data
    - Third Quarter Monitoring
    - Fourth Quarter Monitoring
- Cover Integrity Monitoring
- Gas Collection System Installations and Upgrades
- Performance Testing
    - Source Test Results
- Title V Compliance

3.1 CONTINUOUSLY MONITORED PARAMETERS

Applicable parameters continuously monitored under 40 CFR 60.756(a), (b), (c), and (d), include the following which should be monitored:

- Pressure applied to the extraction wells via the gas collection header should be monitored on a monthly basis. A vacuum must be maintained at each wellhead to be in compliance with 40 CFR 60.753 (b).
- Nitrogen or oxygen content of LFG at the wellheads should be monitored on a monthly basis. Nitrogen must be less than 20% or oxygen less than 5% to be in compliance with 40 CFR 60.753 (c).

- Temperature of the LFG at the wellheads should be monitored on a monthly basis. Temperature must be maintained below 55 degrees C (131 degrees F) to be in compliance with 40 CFR 60.753 (c).

- A temperature monitoring device with a continuous recorder shall be installed at the flare station. The temperature monitoring data are used to demonstrate when the flare is on or off-line and that flare is meeting minimum temperature requirement. The flare monitoring device must be operating continuously to be in compliance with 40 CFR 60.756 (b) or (c).

- A gas flow rate measuring device, which records flow at least once every 15 minutes, must be installed at the flare station. The flow rate monitoring data are used to determine amount of time the LFG collection and control systems are on-line. The flare monitoring device must be operating continuously to be in compliance with 40 CFR 60.756 (b) or (c) and to show that the flare and/or other control device is on-line at any time that the collection system is operating (in compliance with 40 CFR 60.753 (e) and (f)).

3.1.1 Wellhead Monitoring Data

Wellhead monitoring data from the monthly monitoring events during the reporting period included wellhead vacuum, oxygen content of LFG at the wellheads, and the temperature of LFG at the wellheads. These data provide the following information regarding compliance with 40 CFR 60.753:

- During the reporting period, wells that had positive pressure did not always meet compliance requirements per 40 CFR 60.755(a)(3). Initiation of corrective action within five days and re-monitoring within 15 days was not completed in all cases. TRL personnel have since been instructed on the proper monitoring, reporting and recordkeeping requirements under this provision.

- During the reporting period, wells that operated with LFG temperatures greater than 55 degrees Celsius (131 degrees Fahrenheit (F)) did not always meet compliance requirements per 40 CFR 60.755(a)(5). Initiation of corrective action within five days and re-monitoring within 15 days was not completed in all cases. TRL personnel have since been instructed on the proper monitoring, reporting and recordkeeping requirements under this provision.

- During the reporting period, wells that operated with oxygen contents of greater than 5% did not always meet compliance requirements per 40 CFR 60.755(a)(5). Initiation of corrective action within five days and re-monitoring within 15 days was not completed in all cases. TRL personnel have since been instructed on the proper monitoring, reporting and recordkeeping requirements under this provision.

Wellhead readings for wells that were off-line due to maintenance, active filling or on-site construction activities; taken offline for well Startup, Shutdown, and Malfunction (SSM) events;

and/or shut-off to control increased well temperature to prevent a subsurface fire as exempt under 40 CFR 60.753(b), were excluded from the above review.

3.1.2 Flare Station Monitoring Data

A temperature monitoring device with a continuous recorder and a LFG flow rate monitoring device which records flows at least every 15 minutes is installed at the flare station. The monitoring records are summarized and kept on file at the landfill. During the reporting period, the gas collection system was operated in compliance with the requirement to operate the system such that all collected gases are vented to a control system (40 CFR 60.753 (e)), and the requirement to operate the control or treatment system at all times when the collected gas is routed to the system (40 CFR 60.753 (f)). The flare station is equipped with an automatic shutdown and alarm system, which shuts down the blowers and closes a valve on the main header pipe whenever the flare shuts down. This ensures that no collected LFG is vented to the atmosphere untreated. Note that the LFG is directed to the microturbines and any remaining LFG is directed to the flare.

Missing or invalid monitoring data can potentially be a deviation for the minimum temperature requirement for the flares if one or more hours of data in a 3-hour block is missing or invalid as defined by more than 15 minutes of missing and/or invalid data in an hour. There were no occurrences during the reporting period where there was a loss of data except during SSM events.

3.1.3 Microturbines Monitoring Data

Collected LFG is directed to the microturbines at the power plant on site via a compressor. The power plant is equipped with an automatic shutdown that powers down the compressor whenever the microturbines shut down and/or the flare shuts down to ensure that no collected LFG is vented to the atmosphere. Note that the microturbines cannot operate independently of the flare station due to the blower system configuration. There were no times during the reporting period when no data were recorded by the supervisory control and data acquisition (SCADA) system that could result in a deviation. There was one (1) event on August 5, 2016 from 18:17-19:06 where the SCADA system was not recording. However, the microturbines were operating normally so we do not believe a deviation had occurred. The microturbines are covered by an NSPS treatment exemption approved by U.S. Environmental Protection Agency (EPA), Region 9.

3.1.4 Description and Duration of Periods when Gas was Diverted from Control System

As noted above, flare station blowers automatically shut down whenever the flare shuts down, and the compressor shuts down whenever the microturbines shut down. Thus, collected LFG was at no time diverted from combustion at either control device during the reporting period.

3.1.5 Minimum Flare Temperature

The 2015 annual source test for the flare was performed on October 20, 2015, and the source test report was submitted on November 11, 2015 with a temperature at 1,775 degrees F. During the

reporting period from July 1 through November 13, 2016, the minimum temperature at which the flare should operate from was 1,725 degrees F (1,775 degrees F – 50 degrees F). The 2016 annual source test for methane destruction for the flare was performed on October 17, 2016, and the source test report was submitted on November 14, 2016 with a temperature at 1,779 degrees F. During the reporting period from November 14 through December 31, 2016, the minimum temperature at which the flare should operate from was 1,729 degrees F (1,779 degrees F – 50 degrees F) since the temperature is higher than the testing conducted in 2015.

The average temperature for the flare for a three (3)-hour time period cannot fall below the established minimum temperature except during periods of SSM. Note that the permitted minimum temperature for the flare is 1,500 degrees F, which is below the minimum under the NSPS.

During the reporting period, the average temperature for the flare did not drop below the established minimum NSPS temperatures, excluding SSM events, except for the events as noted below:

- July 2, 2016 from 21:00-24:00 (average temperature 1,703 °F)
- July 3, 2016 from 0:00-9:00 (average temperature 1,717 °F)
- July 7, 2016 from 15:00-24:00 (average temperature 1,711 °F)
- July 8, 2016 from 0:00-6:00 (average temperature 1,711 °F)
- July 12, 2016 from 9:00-15:00 (average temperature 1,707 °F)

No excess emissions are believed to have occurred as the temperatures were still well above the typical recommended manufacturer and permitted temperature of 1,500 °F.

3.1.6 Control System Downtime

Due to the multiple control system setups at the site, it would be a unique instance when the flare and microturbines went off-line at the same time for an extended period, which could result in a condition whereby adequate LFG control capacity was not available.

Blower/flare station shutdowns (for more than one hour) occurred at various times during the reporting period of July 1 through December 31, 2016 due to the following reasons:

- High oxygen
- Thermocouple failure
- Scheduled or unscheduled flare or collection system maintenance/repair

The flare is the main control device and a portion of LFG is diverted to the microturbine facility on occasion. The microturbine facility cannot operate independent of the flare station. Collected LFG was at no time diverted from both the microturbine facility and the flare because the blowers and compressors automatically shut down whenever the control device shuts down. Therefore, at no time was the collected LFG emitted without destruction during the reporting period. Also in no instances did free venting of LFG occur during the reporting period. Individual control devices shutdowns exceeding 1 hour in duration are included in Table 1.

3.1.7 Collection System Downtime

At no time in the reporting period was the collection system shut down for more than 5 consecutive days.

3.2 SURFACE EMISSION MONITORING DATA

Landfill surface emissions monitoring ("instantaneous surface sweeps") were performed on a quarterly basis to measure concentrations of total organic carbon (TOC) as methane using a portable flame ionization detector organic vapor analyzer, which meets NSPS specifications. Quarterly reports summarizing the monitoring dates, survey pathways, calibration records and results will be kept on file and made available upon request. The results of the monitoring are summarized below.

3.2.1 Third Quarter Monitoring

The third quarter 2016 instantaneous surface emissions monitoring event was performed on September 28, 2016 by RES Environmental, Inc. (RES). The event resulted in thirty-six (36) areas of the landfill having TOC concentrations above 500 ppmv, measured as methane. Remediation activities were performed, including adding soil, and a 10-day re-monitoring event performed October 10, 2016 (delayed due to high winds, which did not allow valid testing to occur), resulted in four (4) areas with TOC concentrations above 500 ppmv, measured as methane. Additional mitigation measures were performed, which included application of additional soil. The second 10-day re-monitoring event, performed on October 24, 2016 (delayed due to high winds, which did not allow valid testing to occur), resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed on October 27, 2016 resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. There were no areas which triggered the NSPS 120-day timeline to implement a system expansion.

3.2.2 Fourth Quarter Monitoring

The fourth quarter 2016 instantaneous surface emissions monitoring event was performed on December 20, 2016 by RES. The event resulted in zero (0) areas of the landfill having TOC concentrations above 500 ppmv, measured as methane. There were no areas which triggered the NSPS 120-day timeline to implement a system expansion.

3.3 COVER INTEGRITY MONITORING

Per 40 CFR 60.755(c)(5), the site must implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis. TRL monitored for cover integrity on a quarterly basis during the reporting period. TRL personnel have been provided direction on the monthly program requirement.

3.4 GAS COLLECTION SYSTEM INSTALLATIONS AND UPGRADES

There were no new installations or upgrades during the reporting period.

4.0 PERFORMANCE TEST

The facility is required to perform a source test on the flare once every two years as required by Rule 74.17.1 and an air toxics test once every four years as required by Condition No. 10 of the PTO. The last compliance test for Non-Methane Organic Compounds (NMOC), Nitrogen Oxides (NOx), Sulfur Oxides (SOx), and Carbon Monoxide (CO) for the flare was performed on October 20, 2015.

Performance test summary information on the NMOCs, NOx, SOx, and CO emissions for the flare is provided below.

Test Date	Parameter	Flare Result	Emission Limit
Flare 10/20/15	NOx Emission Rate (lb/MMBtu)	0.0387	0.06 lb/MMBtu
	CO Emission Rate (lb/MMBtu)	0.0384	0.20 lb/MMBtu
	SOx Emission Rate (lb/MMBtu)	0.0065	0.02 lb/MMBtu
	NMOC Emission Rate (ppmv, as hexane @ 3% O_2)	2.41	20 ppmv
	NMOC Destruction Efficiency (%)	98.32	98%

Please note that methane destruction efficiency testing under Condition No. 3 from the Title 17 California Code of Regulations section in the PTO was conducted on October 17, 2016. The methane destruction efficiency was 99.91%.

5.0 TITLE V COMPLIANCE

During the reporting period, the Landfill performed all required monitoring and maintained the appropriate records except for the following events:

- The Landfill failed to perform 5-day corrective action and 15-day re-monitoring per 40 CFR 60.753 for wellheads displaying exceedances of the pressure, temperature and oxygen limits.
- The Landfill did not maintain complete records of individual wellhead downtime per the provisions of SSM (NESHAP Subpart AAAA).
- The Landfill did not maintain the 3-hour minimum temperature requirements as detailed in Section 3.1.5.
- The Landfill did not implement a program to monitor for cover integrity on a monthly basis. Monitoring was completed quarterly.

The deviations are detailed in the Annual Title V Compliance Certification.

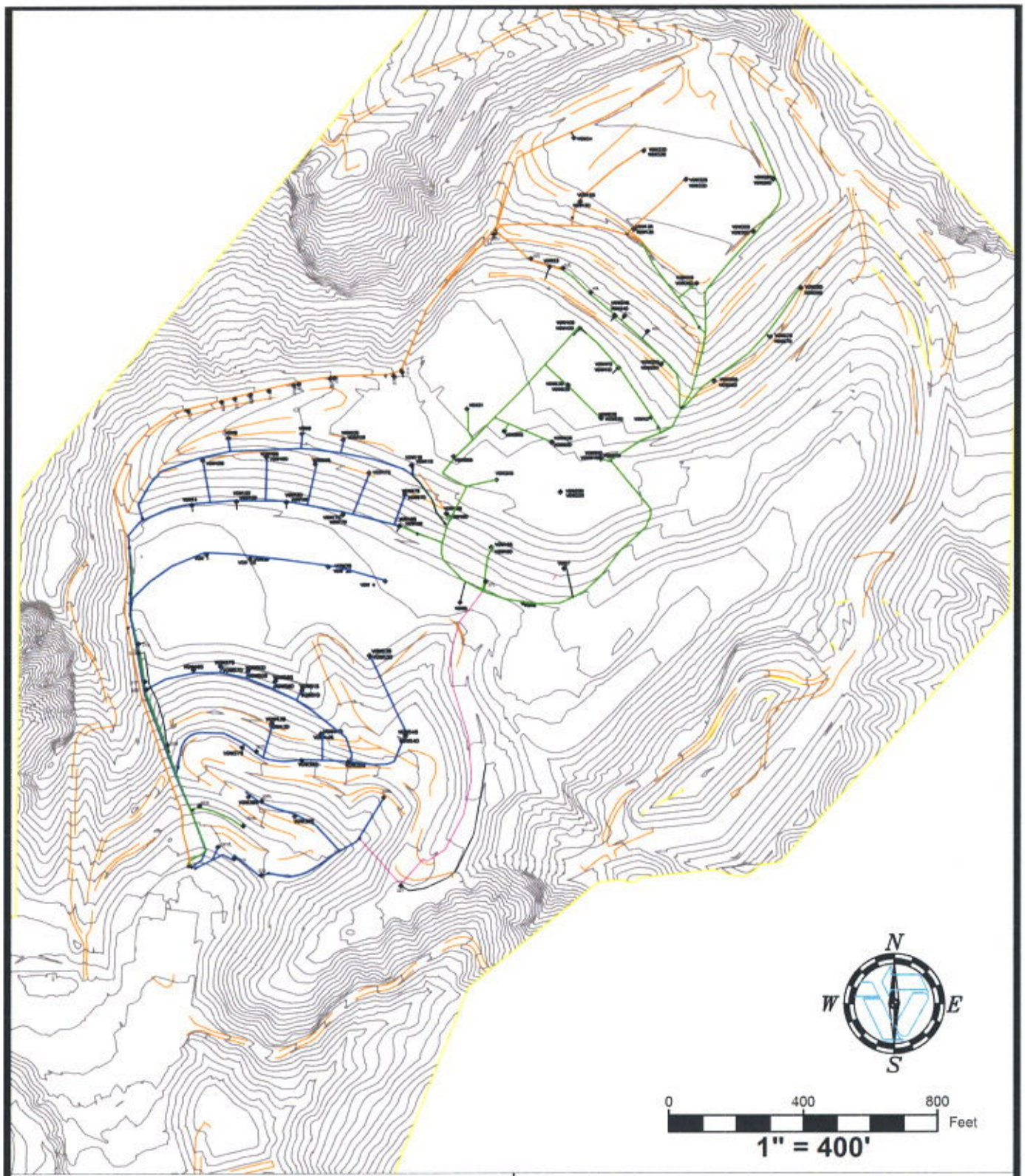
TABLES

TABLE 1. SUMMARY OF CONTROL SYSTEM DOWNTIME

July 1, 2016 to December 31, 2016

Control System Periods of Downtime Exceeding 1 Hour			
Date	Duration		Reason for Shutdown
	(Hours)	(Minutes)	
8/2/2016	2	50	Scheduled Flare Maintenance
8/10/2016	1	10	Scheduled SCE Maintenance
8/10/2016	2	37	Scheduled Flare Maintenance
8/10/2016	2	1	Scheduled Flare Maintenance
8/12/2016	1	46	Flare Shutdown - Failed Thermocouple
8/12/2016	3	53	Flare Shutdown - Failed Thermocouple
8/15/2016	6	46	Flare Shutdown - GCS Pipe Separation
8/16/2016	1	35	Scheduled Flare Maintenance
8/17/2016	1	56	Flare Shutdown - Low Combustion Temperature
8/19/2019	1	34	Flare Shutdown - Low Combustion Temperature
8/21/2016	8	1	Flare Shutdown - Failed Thermocouple
8/22/2016	3	45	Flare Shutdown - Low Combustion Temperature
8/24/2016	1	10	Scheduled Flare Maintenance
8/25/2016	1	57	Scheduled Flare Maintenance
9/13/2016	2	38	Scheduled Flare Maintenance/Troubleshooting
9/16/2016	2	13	Scheduled Flare Maintenance/Troubleshooting
9/17/2016	17	24	Flare Shutdown - Faulty Control Card
9/20/2016	2	50	Scheduled Flare Maintenance
9/27/2016	5	5	Scheduled Blower Skid Maintenance
10/4/2016	2	49	Scheduled Flare Maintenance
10/13/2016	7	37	Scheduled GCS Maintenance
10/14/2016	1	31	Scheduled GCS Maintenance
10/18/2016	8	0	Scheduled GCS Maintenance
11/2-4/2016	54	8	Scheduled GCS Maintenance
11/14/2016	1	20	Flare Shutdown - GCS Flexhose Separation
11/26/2016	1	42	Flare Shutdown - GCS Flexhose Separation
11/26/2016	1	31	Flare Shutdown - GCS Flexhose Separation
12/12/2016	7	31	Scheduled Flare Maintenance
12/13/2016	8	45	Scheduled Flare Maintenance
12/14/2016	1	44	Scheduled Flare Maintenance
12/14/2016	0	28	Scheduled Flare Maintenance
12/14/2016	1	3	Scheduled Flare Maintenance

APPENDIX A



TOLAND LANDFILL

CURRENT TOPOGRAPHY

DRAWN BY: JJW

DATE: 2/1/16

VENTURA REGIONAL SANITATION DISTRICT
1001 PARTRIDGE DRIVE SUITE 150
VENTURA CALIFORNIA 93003-5562

ATTACHMENT 3

SEMI-ANNUAL STARTUP, SHUTDOWN AND MALFUNCTION PLAN REPORT FOR JULY 1, 2016 TO DECEMBER 31, 2016

Ventura County
Air Pollution
Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

Ventura County APCD Rule 33.9 requires that "*any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official.*" Therefore, this form shall be signed by the company's Responsible Official and submitted with all such reports, including, but not limited to semi-annual reports, deviation and emergency reports and any periodic reports required by a Part 70 permit. However, when submitting your Annual Compliance Certifications, please use the form titled Annual Compliance Certification Signature Cover Form.

Semi-annual reports, deviations and emergency reports and any periodic reports required by your Part 70 permit should be submitted to:

Daniel Cho
Air Quality Engineer
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Signature: _____	3/15/2017
Title: _ INTERIM DIRECTOR OF OPERATIONS _____	

Ventura County
Air Pollution
Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

Ventura County APCD Rule 33.9 requires that "*any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official.*" Therefore, this form shall be signed by the company's Responsible Official and submitted with all such reports, including, but not limited to semi-annual reports, deviation and emergency reports and any periodic reports required by a Part 70 permit. However, when submitting your Annual Compliance Certifications, please use the form titled Annual Compliance Certification Signature Cover Form.

Semi-annual reports, deviations and emergency reports and any periodic reports required by your Part 70 permit should be submitted to:

Daniel Cho
Air Quality Engineer
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

Certification by Responsible Official

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

Signature and Title of Responsible Official: Signature: _____ Title: _ INTERIM DIRECTOR OF OPERATIONS _____	Date:

Attachment 1:

Description of all Malfunction Events

For the Reporting Period 07/01/16 to 12/31/16

Total Number of Malfunctions: 6

Date of Malfunction	Total Duration (hours)	Equipment Affected*	Description of Malfunction	Were SSM Plan Procedures Followed (Y/N)	Date of SSM Plan Revision to Address Event**
08/11/2016	1 hr 54 min	Flare	Electrical Power Fluctuations	Y	N/A
08/12/2016	1 hr 46 min	Flare	Flare Thermocouple	Y	N/A
08/12/2016	3 hr 53 min	Flare	Flare Thermocouple	Y	N/A
08/15/2016	6 hr 46 min	Flare	Flare Shutdown due to High Oxygen	Y	N/A
08/21/2016	8 hr 1 min	Flare	Flare Thermocouple	Y	N/A
09/17/2016	17 hr 24 min	Flare	Flare Faulty Control Card	Y	N/A

*Control Device, Continuous Monitoring System, or Collection System
**Not Applicable if SSM Plan Procedures were followed during the Malfunction Event

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 08-02-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 08-02-2016 Time: 7:10 AM – 10:05 AM

Duration: 2 Hours 50 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare was shut down at 07:10 AM for scheduled decommissioning of electrical service to the blower skid by ICS.

Provide description of corrective action:
The Flare was restarted and operating at temperature at 10:05 AM

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Environmental Resource Analyst

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 08-10-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 08-10-2016 Time: 8:29 AM – 9:39 AM

Duration: 1 Hours 10 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare was shut down at 08:29 AM for scheduled SCE Transformer Work on Toland Road.

Provide description of corrective action:
The Flare was restarted and operating at temperature at 9:39 AM

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Environmental Resource Analyst

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 08-11-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 08-10-2016 Time: 9:47 AM – 12:24 PM

Duration: 2 Hours 37 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare was shut down at 09:47 AM for scheduled Blower/Flare Flowmeters Calibration and program verification by contractors (DEI, Rosemount).

Provide description of corrective action:
The Flare was restarted and operating at temperature at 12:24 PM

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Environmental Resource Analyst

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 08-11-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 08-10-2016 Time: 13:33 AM – 15:34 PM

Duration: 2 Hours 1 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare was shut down at 13:33 AM for scheduled Blower/Flare Flowmeters Calibration and program verification by contractors (DEI, Rosemount).

Provide description of corrective action:
The Flare was restarted and operating at temperature at 15:34 PM

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Environmental Resource Analyst

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 08-12-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 08-11-2016 Time: 5:22 PM – 8:06 PM

Duration: 1 Hours 54 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare shut down several times due to power fluctuations between 5:22 PM and 8:06 PM. 5:22 PM – 5:54 PM 32 min., 6:05 PM – 6:44 PM 39 min., 6:57 PM – 7:15 18 min., and 7:41 PM – 8:06 PM 25 min. for a total down time of 1 hour 54 minutes.

Provide description of corrective action:
The Flare was restarted and operating at temperature at 8:06 PM

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Environmental Resource Analyst

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 08-15-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 08-12-2016 Time: 12:00 PM – 1:46 PM

Duration: 1 Hours 46 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare shut down at 12:00 PM due to a failing thermocouple.

Provide description of corrective action:
The Flare was restarted and operating at temperature at 1:46 PM

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Environmental Resource Analyst

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 08-15-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 08-12-2016 Time: 2:04 PM – 5:57 PM

Duration: 3 Hours 53 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare shut down at 2:04 PM due to a failed thermocouple.

Provide description of corrective action:
David Thomas called the APCD Breakdown Line at 5:26 PM informing of the malfuction. VRSD staff Mark P. and Joey W. replaced the bad thermocouple. Power was turned off causing (null) data during the repairs. The Flare was restarted and operating at temperature at 5:57 PM

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Environmental Resource Analyst

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 08-15-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 08-15-2016 Time: 12:59 AM – 7:45 AM

Duration: 6 Hours 46 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare shut down at 12:59 AM due to a GCS pipe separation in the well field, causing the flare to shutdown due to high oxygen.

Provide description of corrective action:
Joseph Waltz called the APCD Breakdown Line at 1:15 AM informing of the malfunction. The Flare was restarted and operating at temperature by 7:39 AM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Environmental Resource Analyst

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 08-16-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 08-16-2016 Time: 7:54 AM – 9:29 AM

Duration: 1 Hours 35 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare shut down at 7:54 AM for scheduled flare maintenance. Thermocouple No. 2 thread extraction.

Provide description of corrective action:
The Flare was restarted and operating at temperature by 9:29 AM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Environmental Resource Analyst

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 10-05-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 08-21-2016 Time: 1:44 AM – 9:45 AM

Duration: 8 Hours 1 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare shut down at 1:45 AM due to a failed thermocouple.

Provide description of corrective action:
Mark Potter called the APCD Breakdown Line at 1:54 AM informing of the malfunction. VRSD staff Mark P. and Matt B. replaced the failed thermocouple #1. Power was turned off causing (null) data during the repairs. The Flare was restarted and operating at temperature at 9:45 AM

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Environmental Resource Analyst

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 09-27-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 09-17-2016 Time: 09-17-16 3:21PM – 09-18-16 8:45 AM

Duration: 17 Hours 24 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare shut down on 09/17/16 at 3:21 PM due to a faulty control card inside the primary open/close valve.

Provide description of corrective action:
The APCD Breakdown line was call on 09-17-16 at 6:06 PM with a follow-up e-mail was sent on 9-23-16 by Mark Potter. The flare was restarted and operating at temperature on 09-18/16 at 8:45 AM after controls technician troubleshooting was completed.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Environmental Resource Analyst

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 09-27-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 09-27-2016 Time: 7:35 AM – 12:40 AM/PM

Duration: 5 Hours 5 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare was shut down at 7:35 AM for scheduled Blower Skid Maintenance (Bearings).

Provide description of corrective action:
The Flare was restarted and operating at temperature at 12:40 PM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Environmental Resource Analyst

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 10-17-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 10-13-2016 Time: 8:18 AM – 3:55 PM

Duration: 7 Hours 37 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare was shut down at 8:18 AM for Gas Collection System (GCS) Maintenance.

Provide description of corrective action:
APCD was notified by e-mail on 10-12-16 at 5:41 PM informing of the planned shutdown. The flare was restarted and operating at temperature at 3:55 PM. APCD was notified by e-mail on 10-13-16 @ 5:32 PM notifying of the flare and GCS being back in operation.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Environmental Resource Analyst

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 10-31-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 10-18-2016 Time: 7:58 AM – 3:58 PM

Duration: 8 Hours 0 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare was shut down at 7:58 AM for Gas Collection System (GCS) Maintenance.

Provide description of corrective action:
APCD Breakdown Line was notified on 10-18-16 at 11:01 AM informing of the planned shutdown. The flare was restarted and operating at temperature at 3:58 PM. APCD was notified by e-mail on 10-25-16 @ 9:53 AM notifying of the flare and GCS being back in operation.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Environmental Resource Analyst

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 11-07-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 11-02-2016 thru 11-04-2016 Time: 11-02-16 9:15 AM – 11-04-16 3:23 PM

Duration: 54 Hours 8 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare was shut down on 11-02-16 at 9:15 AM for Gas Collection System (GCS) Maintenance. The new H2S scrubbing vessel media will be transferred from the old vessels and large plumbing re-configuration completed.

Provide description of corrective action:
APCD was notified on 10-31-16 at 2:00 PM by an e-mail from Mark Potter informing of the planned shutdown. The flare was restarted and operating at temperature on 11/4/16 at 3:23 PM. APCD was notified by e-mail on 11-04-16 @ 4:18 PM by Mark Potter notifying of the flare and GCS being back in operation.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

Title: Engineering Technician

Signature: David F Thomas

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 12-19-2016

Unit ID: Flare, Microturbines (Compressor)

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 12-12-2016 thru 12-14-2016 Time: 12-12-16 8:45 AM – 4:16 PM (7 hrs. 31min), 12-13-16 8:43 AM – 5:28 PM (8 hrs. 45 min), 12/14/16 8:31 AM – 3:56 PM (7 hrs. 25 min.)

Duration: 23 Hours 41 Minutes Total

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:
The Toland Flare was shut down on 12-12-16 at 8:45 AM for the Flare Burner Assembly replacement project. The LFG Specialty crew (a division of Chicago Bridge and Iron), removed the old array and installed the new on Monday the 12th, the flare then ran overnight. Tuesday the burner assembly was partially pulled and thoroughly inspected for any sign of problems, no problems were evident and the assembly was re-seated. Finally, on Wednesday the 14th, the LFG Specialty crew trialed the controls running a diagnostic program and gave the system a clean bill of health.

Provide description of corrective action:
APCD was notified on 12-06-16 at 5:09 PM by an e-mail from Mark Potter informing of the planned shutdown. The flare was restarted and operating at temperature on 12/14/16 at 3:56 PM. APCD was notified by e-mail on 12-16-16 @ 12:31 PM by Mark Potter notifying of the flare and GCS being back in operation.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

_____

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

_____

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

☐ Yes ☑ No

Name: David F. Thomas

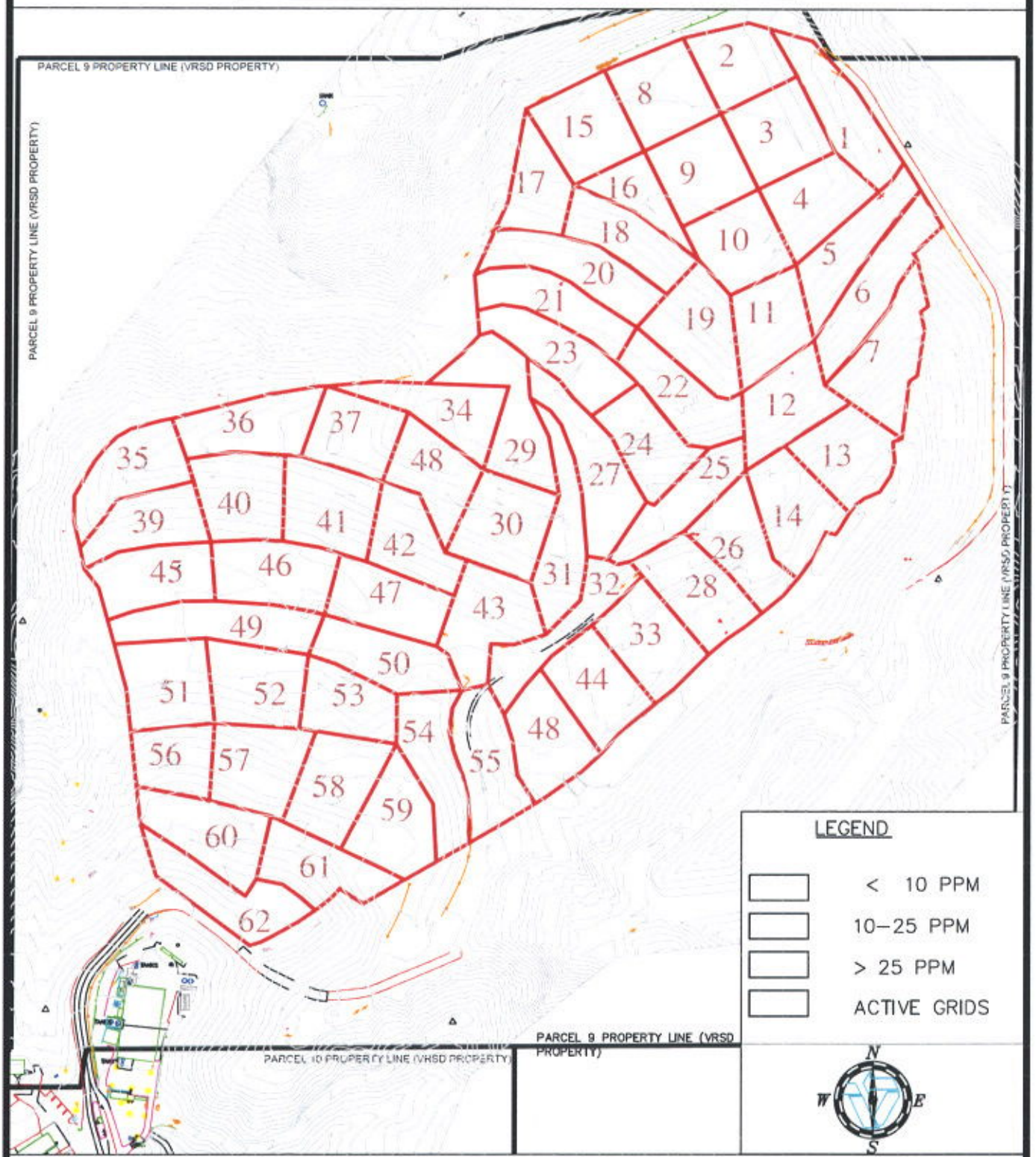
Title: Engineering Technician

Signature: David F Thomas

TOLAND ROAD LANDFILL

QUARTER SURFACE SWEEPS

OPERATIONS SUMMARY



FILE: 20160801_MONITORING GRID DRAWN BY: JJW TOPO DATE: 8/1/16

Surface Monitoring Log

Landfill: Toland Road
Quarter: 3rd QTR 2016 Instantaneous Surface Emission Monitoring

Dates:	Area Covered (See Map)	Location Well ID	Exceedences of 500 PPM methane (Instantaneous)	Monitoring Schedule
			3	
				3
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			33	
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Surface Monitoring Log

Landfill: Toland Road
Quarter: 3rd QTR 2016 Instantaneous Surface Emission Monitoring

Dates:	Area Covered (See Map)	Location Well ID	Exceedences of 500 PPM methane (Instantaneous)	Monitoring Schedule
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Surface Monitoring Log

Landfill: Toland Road

Quarter: 3rd QTR 2016 Instantaneous Surface Emission Monitoring

Dates:	Area Covered (See Map)	Location Well ID	Exceedences of 500 PPM methane (Instantaneous)	Monitoring Schedule
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Surface Monitoring Log

Landfill: Toland Road
Quarter: 3rd QTR 2016 Instantaneous Surface Emission Monitoring

Dates:	Area Covered (See Map)	Location Well ID	Exceedences of 500 PPM methane (Instantaneous)	Monitoring Schedule

Surface Monitoring Log

Landfill: **Toland Road**
Quarter: **3rd QTR 2016 Integrated Surface Emission Monitoring**

Dates:	Area Covered (See Map)	Exceedences of 25 PPM methane (Integrated)	Monitoring Schedule
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Surface Monitoring Log

Landfill: Toland Road
Quarter: 4th QTR 2016 Instantaneous Surface Emission Monitoring

Dates:	Area Covered (See Map)	Location Well ID	Exceedences of 500 PPM methane (Instantaneous)	Monitoring Schedule
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			r	d
			r	3 d

Surface Monitoring Log

Landfill: Toland Road

Quarter: 4th QTR 2016 Integrated Surface Emission Monitoring

Dates:	Area Covered (See Map)	Exceedences of 25 PPM methane (Integrated)	Monitoring Schedule
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[illegible]

Toland Road Landfill

Permit No. 07340

Control Devices (Flare, Microturbines, Burners) Off for more than 1-hour

Date(s):	Day	Time	Description	Duration	
				Hours	Minutes
	T		S d F r M		
	d	3	S d d SCE M		
	d		S d d F r M		3
	d	3 33 3	S d d F r M		
	Fr	3	F r S d F d T r		
	Fr		F r S d F d T r	3	3
	M		F r S d CS P S r		
	T		S d d F r M		3
	d	3 3 33	F r S d C T r r		
	Fr	3	F r S d C T r r		3
	S		F r S d F d T r		
	M	3 3	F r S d C T r r	3	
	d		S d d F r M		
	T	3	S d d F r M		
3	T	3	S d d F r M Tr		3
	Fr		S d d F r M Tr		3
	S		F r S d F C r C rd		
	T		S d d F r M		
	T	3	S d d r S d M		
	T	3	S d d F r M		
3	T		S d d CS M		3
	Fr	3 3 3	S d d CS M		3
	T		S d d CS M		
	d	3	S d d CS M		
	M		F r S d CS F S r		
	S	3	F r S d CS F S r		
	S		F r S d CS F S r		3
	M		S d d F r M		3
3	T	3	S d d F r M		
	d		S d d F r M		
	d	3	S d d F r M		
	d	3	S d d F r M		3
			Totals	3	

Total Hours **169.3**

Toland Road Landfill 2016 Monthly Throughputs

Date	Micro Flow (scf)	Total MMBtu	HHV
[illegible]	[illegible]	3[illegible]	[illegible]
A[illegible]	[illegible]	[illegible]	[illegible]
S[illegible]	[illegible]	[illegible]	[illegible]
O[illegible]	[illegible]	[illegible]	[illegible]
N[illegible]	[illegible]	[illegible]	[illegible]3
D[illegible]	[illegible]	[illegible]	[illegible]
Totals	**7,825,720**	**3,986**	**535**

Date	Flare (scf)	Total MMBtu	HHV
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Totals	**260,099,216**	**138,884**	**535**

SC FUELS®

January 3, 2017

RE: Ventura Regional Sanitation Account #: 01-0008716

Volume: January 1, 2016 to December 31, 2016

Product: Regular Ethanol 10% Item # 327B001

Product	ProductDesc	Gallons	Invoice #	Date	By Month
327B001	REGULAR ETHANOL 10%	250.0	0493717	2016-01-05	
327B001	REGULAR ETHANOL 10%	100.0	0507835	2016-01-26	**350.0**
327B001	REGULAR ETHANOL 10%	103.0	0512193	2016-02-02	
327B001	REGULAR ETHANOL 10%	126.0	0519329	2016-02-09	
327B001	REGULAR ETHANOL 10%	200.0	0531590	2016-02-23	**429.0**
327B001	REGULAR ETHANOL 10%	840.0	0539034	2016-03-03	**840.0**
327B001	REGULAR ETHANOL 10%	937.0	0574293	2016-04-20	**937.0**
327B001	REGULAR ETHANOL 10%	35.0	0587900	2016-05-04	
327B001	REGULAR ETHANOL 10%	745.0	0599461	2016-05-26	**780.0**
327B001	REGULAR ETHANOL 10%	1167.0	0668566	2016-08-11	**1167.0**
327B001	REGULAR ETHANOL 10%	770.0	0719800	2016-10-14	**770.0**
327B001	REGULAR ETHANOL 10%	1005.0	0747783	2016-11-18	**1005.0**
		6278.0			**6278.0**

Corporate Office
1800 W. Katella Avenue, Suite 400 Orange, CA 92867
Sales/Order Desk: (800) 659-5823

VCAPCD Rule 50, Opacity
Annual Compliance Survey

Survey Information:

By: David Thomas
Date: July 13, 2016
Time: 10:30 AM to 11:00 AM
Emissions Unit: Toland Road Landfill - Micro-Turbines (E3, E4)

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

David F Thomas

DAVID F. THOMAS – ENGINEERING TECHNICIAN

VCAPCD Rule 50, Opacity
Annual Compliance Survey

Survey Information:

By: David Thomas
Date: October 17, 2016
Time: 10:00 AM to 10:30 AM
Emissions Unit: Toland Road Landfill - Flare

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

David F Thomas

DAVID F. THOMAS – ENGINEERING TECHNICIAN