



February 15, 2023

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

SUBJECT: TITLE V COMPLIANCE REPORTS FOR THE TOLAND ROAD LANDFILL

Mr. Macias:

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. Semi-Annual New Source Performance Standards (NSPS)/National Emission Standards for Hazardous Air Pollutants (NESHAP) and Title V Report for July 1, 2022 to December 31, 2022;
2. Supplemental information historically submitted with Title V Reports.

Attachment 1 includes the Semi-Annual NSPS/NESHAP report/Title V report.

Attachment 2 includes the Annual Title V Compliance Certification. Attachment 2 also includes the Permit Attachment Form and Annual Deviation Summary Form.

Attachment 3 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 Semi-Annual Monitoring Report. This attachment includes the monthly landfill throughputs and volume of gasoline used at VRSD. The opacity compliance forms were previously submitted as part of the first semi-annual report.

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, the approved California state plan for the Emission Guidelines (EG), which includes compliance with the AB 32 Landfill Methane Rule (LMR) and specific portions of 40 CFR Part 62 Subpart OOO, and the NESHAP for municipal solid waste landfills (40 CFR Part 63, Subpart AAAA).

If you have any questions or require additional information, please contact me at (805) 658-4679 or Edward Pettit at (805) 207-2218.

Sincerely,

A handwritten signature in blue ink, appearing to read 'RJ', is positioned above the typed name of the sender.

Richard Jones
Director of Operations
Ventura Regional Sanitation District

Attachments

1. Semi-Annual NSPS/NESHAP/Title V Report for July 1, 2022 to December 31, 2022
2. Annual Title V Compliance Certification for January 1, 2022 to December 31, 2022
3. Supplemental Information Historically Submitted with Title V Reports

Copy: United States Environmental Protection Agency, Region IX

ATTACHMENT 1
SEMI-ANNUAL NSPS/NESHAP/TITLE V REPORT

**Second Semi-Annual 2022 Title V Report
and Emissions Guidelines (EG)/ National Emission
Standards for Hazardous Air Pollutants (NESHAP)
Report
Toland Road Landfill
Santa Paula, California**



From:
Ventura Regional Sanitation District
4105 W. Gonzales Road
Oxnard, California 93036

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

February 15, 2023

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:

Ed Swede
Air Quality Engineer
Ventura County Air Pollution Control District
4567 Telephone Road
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: Title: Richard Jones Director of Operations	Date: 2/15/23
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Time Period Covered by the Semi-Annual Report of Required Monitoring: 07/01/2022 to 12/31/2022

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1.0 INTRODUCTION

This semi-annual Title V and New Source Performance Standards (NSPS)/Emissions Guidelines (EG), National Emission Standards for Hazardous Air Pollutants (NESHAP) 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:

- Portions of 40 Code of Federal Regulations (CFR) Part 62, Subpart OOO (“Federal Plan”) as of June 21, 2021
- In compliance with 40 CFR 63, Subpart AAAA (NESHAP) for Landfills), the annual report is submitted semi-annually
- Revised 40 CFR 63, Subpart AAAA (NESHAP) as of September 27, 2021
- To fulfill the semi-annual reporting requirement under the facility’s Title V permit (No. 07340)

1.1 EMISSION GUIDELINE CF RULE

TRL is considered a “new” landfill under the original landfill NSPS, and as such was subject to 40 CFR Part 60, Subpart WWW, and is considered an “existing” landfill under the new EG rule, promulgated under 40 CFR Part 60, Subpart Cf in August 2016. The California Air Resources Board (CARB) submitted a State Plan, dated May 25, 2017, to implement the United States Environmental Protection Agency’s (EPA’s) EG rule. CARB’s State Plan claimed that the California AB 32 Landfill Methane Rule (LMR), which TRL is already subject to, is already more stringent than the EG rule, and that compliance with the LMR should be sufficient to comply with the EG rule. The EPA partially approved and partially disapproved CARB’s State Plan on January 9, 2020 because CARB’s State Plan did not fully meet certain provisions of the EG rule. EPA published its Federal Plan for the EG under 40 CFR Part 62, Subpart OOO in May 2021, and it became effective on June 21, 2021. At that time, the approved EG Cf rule in California became the LMR plus specific sections of Subpart OOO related to wellhead temperature.

1.2 UPDATED NESHAP 40 CFR 63, SUBPART AAAA

Due to the site’s permitted design capacity being over the 2.5 million Megagram/2.5 million cubic meter limits and having an uncontrolled non-methane organic compound (NMOC) content exceeding 50 Megagrams per year, the major compliance provisions of Subpart OOO were replaced as of September 27, 2021 by the NESHAP 40 CFR 63, Subpart AAAA requirements, which essentially implement and enhance provisions of 40 CFR 60, Subparts XXX (which were updated NSPS for Municipal Solid Waste (MSW) landfills promulgated in 2016) as well as removing the Startup, Shutdown, Malfunction (SSM) Plan requirements. Note that per a June 24, 2021 email from the VCAPCD, it is the District’s policy to enforce the current regulations. Therefore, although the Title V Permit references Subpart WWW, the facility does not have to comply with the outdated regulations. This includes VCAPCD Rule 74.17.1, which references the NSPS Subpart WWW.

As mentioned above, the major compliance provisions of Subpart OOO were replaced as of September 27, 2021 by the NESHAP 40 CFR 63, Subpart AAAA requirements. As such, TRL is complying with Subpart OOO through compliance with the major provisions of NESHAP AAAA for the sections that apply to the site, which is allowed by the regulations.

For the reporting period from July 1, 2022 through December 31, 2022, this Semi-Annual Report complies with the sections specified in Subpart AAAA, 40 CFR 63.1981(h), which describes the items to be submitted in an annual report for landfills using an active collection system. In accordance with NESHAP 40 CFR 63, Subpart AAAA, this report is submitted semi-annually.

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. In April 2019, the microturbines were permanently shut down.

2.2 DESCRIPTION OF LANDFILL GAS COLLECTION AND CONTROL SYSTEM

The GCCS installed at 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.
- An 85.8 MMBtu/hr LFG Specialties flare
- Leachate collection and storage
- Condensate collection, storage, and injection system

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/NESHAP

The following information in Table 1 is required to be reported in a semi-annual report:

Table 1. Reporting Requirements, Corresponding Regulatory References

Updated NESHAP Subpart AAAA
40 CFR 63.1981(h), (i), (j), (k), (l)
Number of times that applicable parameters monitored under 40 CFR 63.1958(b), (c), and (d) were exceeded and when the gas collection and control system was not operating under 40 CFR 63.1958(e), including periods of SSM.
Description and duration of all periods when the gas stream was diverted from the control device or treatment system through a bypass line or the indication of bypass flow as specified under 40 CFR 63.1961.
Description and duration of all periods when the control device or treatment system was not operating and length of time the control device or treatment system was not operating.
All periods when the collection system was not operating.
The location of each exceedance of the 500-ppm methane concentration as provided in 40 CFR 63.1958(d) 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 pursuant to 40 CFR 63.1960(a)(3) and (4), (b), and (c)(4).
Required information of the initial performance source test report pursuant to 40 CFR 63.1981(i).
For any corrective action analysis for which corrective actions are required in 40 CFR 63.1960(a)(3)(i) or (a)(5) and that take more than 60 days to correct the exceedance, the root cause analysis conducted.
Each owner or operator required to conduct enhanced monitoring in 40 CFR 63.1961(a)(5) and (6) must include the results of all monitoring activities conducted during the period.
Where an owner or operator subject to the provisions of subpart 40 CFR 63.1981(k) seeks to demonstrate compliance with the operational standard for temperature in § 63.1958(c)(1) and a landfill gas temperature measured at either the wellhead or at any point in the well is greater than or equal to 76.7 degrees Celsius (170 degrees Fahrenheit) and the carbon monoxide concentration measured is greater than or equal to 1,000 ppmv, then you must report the date, time, well identifier, temperature and carbon monoxide reading via email to the Administrator within 24 hours of the measurement.
Beginning no later than September 27, 2021, the owner or operator must submit reports electronically according to paragraphs 40 CFR 63.1981(l)(1) and (2) of this section.
--
Submit semi-annual CMS summary reports including required items listed in 40 CFR 63.10(e)(3)(vi)

The following information required to be submitted in the NSPS/NESHAP semi-annual report is organized as follows:

- 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 and 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
- 24-Hour High Temperature
- CMS Summary Report
- Title V Compliance

3.1 MONITORED PARAMETERS

The following information in Table 2 is required to be monitored:

Table 2. Monitored Parameters, Corresponding Regulatory References

Updated NESHAP Subpart AAAA
40 CFR 63.1961(a), (b), (f)
Vacuum applied to the extraction wells via the gas collection header is monitored on a monthly basis. A vacuum must be maintained at each wellhead to be in compliance with 40 CFR 63.1961 (a)(1).
Nitrogen or oxygen content of LFG at the wellheads is monitored on a monthly basis.
Temperature of the LFG at the wellheads is monitored on a monthly basis. Temperature must be maintained below 62.8 degrees C (145 degrees F) to comply with 40 CFR 63.1961(a)(3).
A temperature or flame presence monitoring device with a continuous recorder, and a gas flow rate measuring device, which records flow at least once every 15 minutes, must be installed at the flare station. The temperature/flame presence and LFG flow rate monitoring data are used to determine the amount of time the LFG collection and control systems are on-line and to ensure compliance with the minimum temperature

Updated NESHAP Subpart AAAA
40 CFR 63.1961(a), (b), (f)
requirement for enclosed flares. The flare monitoring devices must be operating continuously to comply with 40 CFR 63.1961(b) and to show that the flare is on-line at any time that the collection system is operating (in compliance with 40 CFR 63.1958 (e) and (f)).
Landfill surface emissions monitoring was performed on a quarterly basis to measure concentrations of TOC as methane. A portable FID organic vapor analyzer, which meets NSPS specifications, was used to measure concentrations of TOC as methane (in compliance with 40 CFR 63.1961(f)).
The landfill surface was inspected at least monthly for evidence of cracks or other surface integrity issues, in accordance with 40 CFR 63.1960(c)(5).
Per 40 CFR 63.1983(c)(1)(i), the average temperature of the flare for a 3-hour time period cannot fall below 28°C (82°F) less than the average operation temperature based on the most recent source test. Please note, continuous monitoring of temperature monitoring is required at all times except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (in compliance with 40 CFR 63.1961(h)).

3.1.1 Wellhead Monitoring Data

Wellhead monitoring data from the monthly monitoring events during the reporting period included wellhead vacuum and the temperature of LFG at the wellheads. Please note that wellhead oxygen was monitored on a monthly basis; however, under the revised NESHAP Subpart AAAA regulations, there is no longer a well oxygen limit. These data provide the following information regarding compliance with 40 CFR 63.1961:

- During the reporting period, all operational extraction wells had negative pressure during all monitoring events.
- During the reporting period, all of the operational extraction wells were operated with LFG less than 62.8 °C (145 °F) except for one (1) well. Corrective action (through valve adjustments) was initiated within 5 days and re-monitoring was performed, and the well was corrected within 15 days. The summary of the well above 145 °F is provided in Table 3. Please note that enhanced monitoring of the well was not initiated within 7 calendar days of the initial exceedance above 145 F. The deviation is summarized in Section 7.0.

Table 3. Summary of Wells Above 145 °F

Well	Initial Date	Initial Temperature	Re-Monitoring Date(s)	Compliant Temperature	Duration (Days)
		(°F)		(°F)	
2209D	8/18/22	148.7	8/18/22 8/29/22	144.6	11

- During the reporting period, all operational extraction wells were monitored monthly for oxygen content.

Wellhead readings for wells that were off-line due to maintenance, active filling or on-site construction activities; and/or shut-off to control increased well temperature to prevent a subsurface fire, were excluded from the above review. 40 CFR 63.1981(j) requires notifications for corrective action that will exceed 60 days to implement. Such corrective actions also require a “root cause analysis” to determine the reason for the exceedance if exceedances cannot be corrected in 15 days. For corrective actions that require more than 60 days to complete, an additional “corrective action analysis” is also required. There were no exceedances during the reporting period and therefore no corrective actions or root cause analyses to report.

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 control or treatment system at all times when the collected gas is routed to the system (40 CFR 63.19586(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.

3.1.3 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. Thus, collected LFG was at no time diverted from combustion at the control device during the reporting period.

3.1.4 Minimum Flare Temperature

The 2021 source test for biennial emission compliance and methane destruction for the flare was performed on August 2, 2021, and the source test report was submitted on September 10, 2021 with a temperature at 1,681 °F. During the reporting period, the minimum temperature at which the flare should operate was 1,599 °F (1,681 °F – 82 °F).

The average temperature for the flare for a three (3)-hour time period cannot fall below the established minimum temperatures. Note that the permitted minimum temperature for the flare is 1,500 °F, which is below the minimum under the NSPS/NESHAP.

During the reporting period, the average temperature for the flare did not drop below the minimum temperature while operational. Missing or invalid data can potentially be a deviation for the temperature monitoring requirement for the flare if one or more hours of data in a 3-hour block is missing or invalid as defined by having more than 15 minutes of invalid or missing data in an hour. There were zero (0) missing data events for the flare during the reporting period, except for periods excluded per 40 CFR 63.1961.

3.1.5 Control System and Collection System Downtime

Due to the control system setup at the site, it would be a unique instance when the flare went off-line for an extended period, which could result in a condition whereby adequate LFG control capacity was not available. Collection system shutdown occurs when the blower/flare station is shut down. If this occurs, all exit valves automatically shut and LFG would not be vented to the atmosphere.

Blower/flare station shutdowns occurred at various times during the reporting period of July 1 through December 31, 2022 due to some, but not limited to, the following reasons:

- High oxygen
- Low temperature
- Scheduled or unscheduled flare or collection system maintenance/repair

Collected LFG was at no time diverted from the flare because the blower automatically shuts down whenever the flare shuts down. Therefore, at no time was the collected LFG emitted without combustion during the reporting period. Also in no instances did free venting of LFG occur during the reporting period. Individual flare station shutdowns during the reporting period are included in Table 4. Per 40 CFR 63.1955(c), the equipment was operated in a manner consistent with safety and good air pollution control practices for minimizing emissions, and the work practice standard was met.

Table 4. Summary of Flare Downtime from July 1 through December 31, 2022

Control System Periods of Downtime		
Date	Duration	Reason for Shutdown
	(Hrs:Min)	
7/5/22	0:18	Flare shutdown due to low temperature
7/5/22	1:13	Flare shutdown due to low temperature
7/6/22	2:23	Flare shutdown due to high oxygen/low flow
7/6/22	1:08	Flare shutdown due to low temperature
7/6/22	1:11	Flare shutdown due to low temperature/low flow
7/7/22	0:17	Flare shutdown due to low temperature/low flow
7/11/22	3:25	Flare shutdown due to high oxygen/low temperature
7/17/22	0:32	Flare shutdown due to low temperature
7/17/22	15:24	Flare shutdown due to low temperature
7/31/22	7:40	Flare shutdown due to low temperature
9/1/22	1:42	Flare shutdown due to low temperature
9/1/22	0:49	Flare shutdown due to low temperature
9/12/22	1:22	Flare shutdown due to low temperature
9/14/22	0:58	Flare shutdown due to low temperature
9/26/22	4:54	Flare shutdown due to Southern California Edison (SCE) power glitch
10/20/22	2:27	Flare shutdown due to high oxygen caused by operations hitting header line in field
10/26/22	2:55	Flare shutdown due to low temperature
10/31/22	0:44	Flare shutdown due to low temperature

Control System Periods of Downtime		
Date	Duration	Reason for Shutdown
	(Hrs:Min)	
10/31/22	2:48	Flare shutdown due to low temperature
10/31/22	14:23	Flare shutdown due to SCE power outage
11/1/22	0:20	Flare shutdown due to low temperature
11/1/22	2:00	Flare shutdown due to high oxygen
11/1/22	2:12	Flare shutdown due to low temperature
11/1/22	0:37	Flare shutdown due to oxygen leak
11/1/22	0:11	Flare shutdown due to oxygen leak
11/2/22	5:00	Flare shutdown due to low temperature; oxygen leak
11/17/22	1:36	Flare manual shutdown for flow meter calibration
12/20/22	3:32	Flare shutdown due to oxygen leak/wellfield work
12/22/22	2:30	Flare shutdown due to low temperature/ low flow
12/26/22	6:38	Flare shutdown due to low temperature/ low flow

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/NESHAP 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 2022 instantaneous surface emissions monitoring event was performed on August 23, 2022 by RES Environmental, Inc. (RES). The event resulted in seven (7) areas of the landfill having TOC concentrations above 500 ppmv, measured as methane. Remediation activities were performed, including adding soil/water, and a 10-day re-monitoring event performed September 1, 2022, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed September 22, 2022, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. There were no areas which triggered the NESHAP 120-day timeline to implement a system expansion.

3.2.2 Fourth Quarter Monitoring

The fourth quarter 2022 instantaneous surface emissions monitoring event was performed on December 7 and 8, 2022 by RES. The event resulted in one (1) area of the landfill having TOC concentrations above 500 ppmv, measured as methane. Remediation activities were performed, including adding soil/water, and a 10-day re-monitoring event performed on December 16, 2022, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed January 12, 2023, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. There were no areas which triggered the NESHAP 120-day timeline to implement a system expansion.

3.3 COVER INTEGRITY MONITORING

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 monthly basis during the reporting period. Cover integrity monitoring results are located in Appendix B.

3.4 GAS COLLECTION SYSTEM INSTALLATIONS AND UPGRADES

During the reporting period, the following gas collection system installations, upgrades and abandonments are noted in Table 5 below. Note that the landfill had sufficient well density with the abandonment of wells as additional new wells were added during the reporting period.

Table 5. GCCS Installations, Upgrades, and Abandonments

DATE	DESCRIPTION
2/11/22	New well TH2001BR online (not previously reported)
7/7/22	New wells VGW-2203S, VGW-2206S, VGW-2210S, VGW-2211S, and VGW-2212S installed and online
7/12/22	New well VGW-2204S installed and online
7/14/22	New wells VGW-2205S, VGW-2205D, VGW-2207S, VGW-2207D, VGW-2209S, VGW-2209D, VGW-2212D, VGW-2213S, VGW-2213D, VGW-2214S, VGW-2220S, VGW-2221S, VGW-2222S, VGW-2222D, VGW-2223S, and VGW-2223D installed and online
7/19/22	Well TLH-1814R abandoned
8/18/22	New well VGW-2208S installed and online
8/24/22	New well VGW-2216S installed and online
8/25/22	New wells VGW-2215S, VGW-2217D, VGW-2217S, VGW-2219D, and VGW-2219S installed and online
9/28/22	Wells VGW-76S and VGW-76D abandoned
10/19/22	Well TLH-2005B abandoned
11/17/22	New well VGW-2221D installed and online

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 compliance test for Non-Methane Organic Compounds (NMOC), Nitrogen Oxides (NOx), Sulfur Oxides (SOx), Carbon Monoxide (CO), and toxics for the flare was performed on August 2, 2021.

Performance test summary information on the NMOCs, NOx, SOx, and CO emissions for the flare is provided in Table 6 below.

Table 6. Summary of Source Test Results

Test Date	Parameter	Flare Result	Emission Limit
Flare 8/2/21	NOx Emission Rate (lb/MMBtu)	0.0378	0.06 lb/MMBtu
	CO Emission Rate (lb/MMBtu)	0.0445	0.20 lb/MMBtu
	SOx Emission Rate (lb/MMBtu)	0.00446	0.02 lb/MMBtu
	NMOC Emission Rate (ppmv, as hexane @ 3% O ₂)	0.387	20 ppmv
	NMOC Destruction Efficiency (%)	99.43	98%

Note: Compliance with NMOCs is met with 98% destruction efficiency or less than 20 ppmv outlet as hexane@3% oxygen, so compliance was achieved.

Please note that methane destruction efficiency testing under Condition No. 3 from the Title 17 California Code of Regulations (CCR) section in the PTO was also conducted on August 2, 2021. The methane destruction efficiency was 99.996%, which is in compliance with 17 CCR requirements. The next methane destruction testing is required by 2024 since TRL qualifies for testing every three years under the LMR.

5.0 24-HOUR HIGH TEMPERATURE

40 CFR 63.1981(k) requires the reporting of any landfill gas temperature measurements greater than or equal to 170°F. During the reporting period, there were no readings greater or equal to 170°F.

6.0 CMS SUMMARY REPORT

The additional reporting requirements for continuous monitoring systems (CMS) per 40 CFR 63.10(e)(3)(vi) is included in Appendix C.

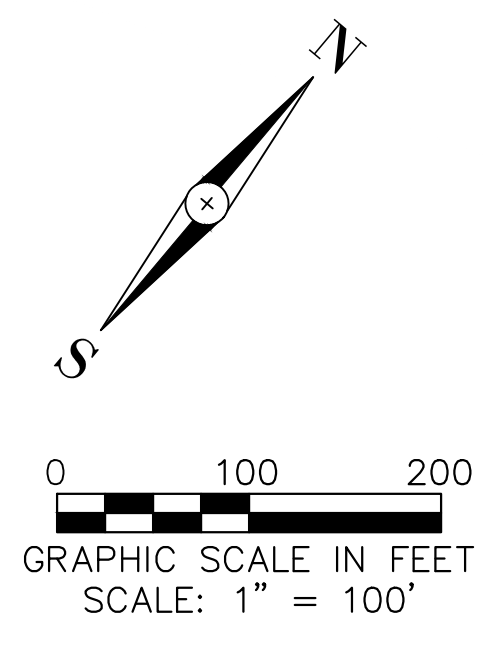
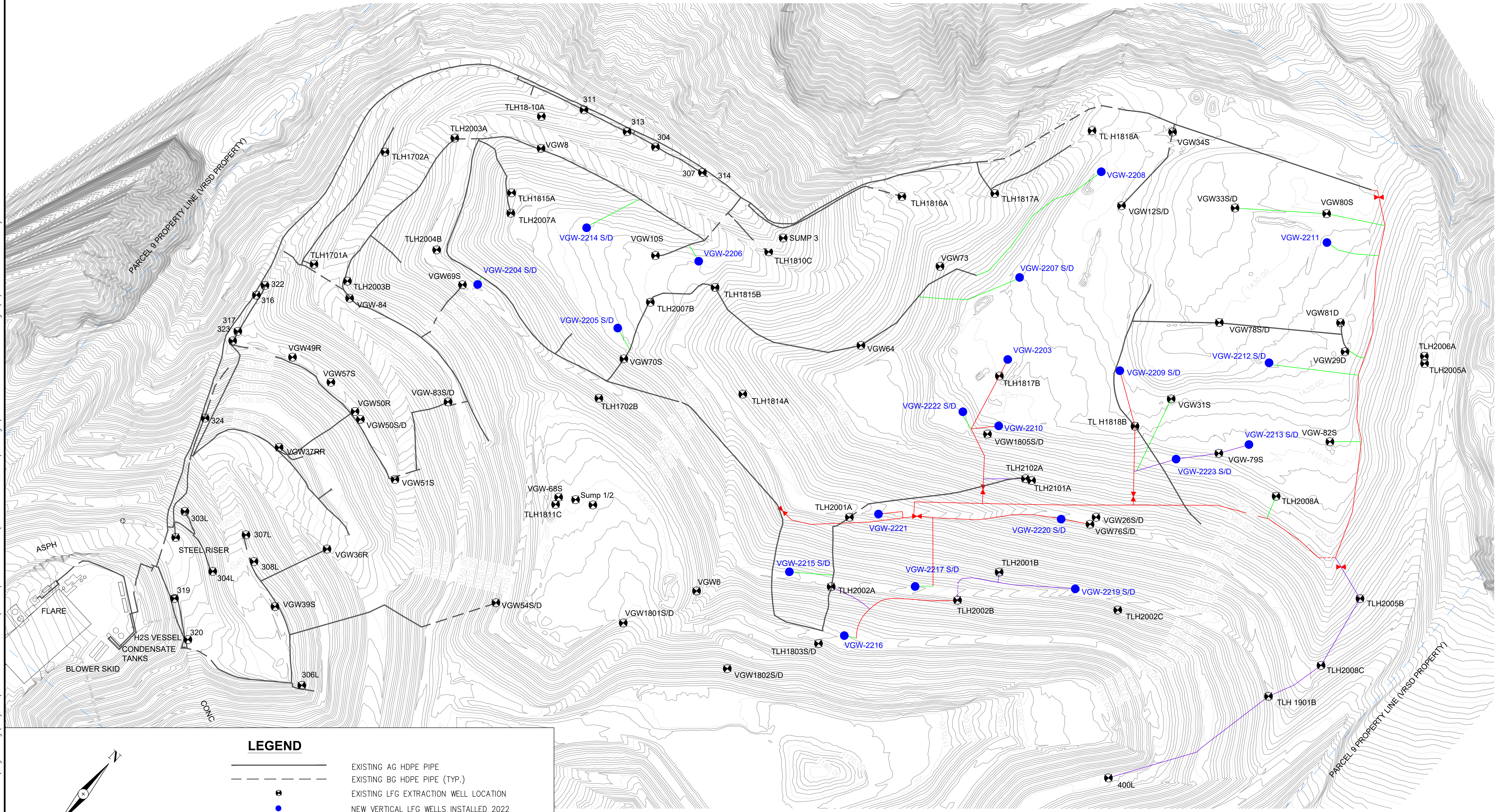
7.0 TITLE V COMPLIANCE

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

- During an inspection by the VCAPCD on October 18, 2022, the inspector discovered a leak at a component under positive pressure (test port in main 24-inch diameter line) greater than 500 ppmv, as methane (greater than 99,000 ppmv). A Notice of Violation (NOV) #24526 was issued. The leak was repaired on the same day and the re-test on October 18, 2022 resulted in emissions below 500 ppmv, as methane (approximately 3.4 ppmv).
- During the reporting period, LFG well 2209D had a temperature greater than 145 degrees Fahrenheit on August 18, 2022. Per 40 CFR 63.1961(a)(5), wells with temperatures greater than 145 degrees Fahrenheit must perform enhanced monitoring procedures within 7 days of the well temperature exceedance. Although the well was corrected within 15 days (on the 11th day), VRSD personnel did not conduct the enhanced monitoring procedures within 7 days.

APPENDIX A
LANDFILL SITE PLAN

C:\Users\AliciaKeamany\Documents\Engineering\Blogseng - Documents\Engineering\Projects\US\H1701.100 - VRSD\Toland\TRLF LFG Wells\Vertical Well Install Drawings\Toland GCCS Master Site.dwg 8/4/2022 AliciaKeamany




LEGEND	
	EXISTING AG HDPE PIPE
	EXISTING BG HDPE PIPE (TYP.)
	EXISTING LFG EXTRACTION WELL LOCATION
	NEW VERTICAL LFG WELLS INSTALLED 2022
	NEW ISOLATION VALVE INSTALLED
	NEW 12 IN. LFG HEADER - AG INSTALLED
	NEW 12 IN. LFG HEADER - BG INSTALLED
	NEW 4 IN. LFG HEADER - AG INSTALLED
	NEW 6 IN. LFG HEADER - AG INSTALLED
	NEW 6 IN. LFG HEADER - BG INSTALLED
	VRSD PROPERTY BOUNDARY

TOPOGRAPHY NOTE:
 1. BASED ON SURVEY INFORMATION RECEIVED FROM VENTURA REGIONAL SANITATION DISTRICT DATE: 12-17-21
 2. THE PROPOSED VERTICAL WELL LOCATIONS WERE RECEIVED FROM VERTEX SURVEY INC DATE 04-29-22.
 3. NEW VERTICAL WELLS AND HEADERS INSTALLATION COMPLETED JULY 2022.

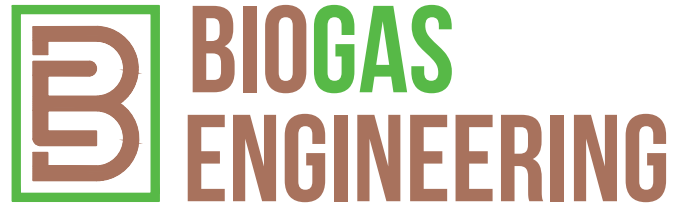
REV	DATE	DESCRIPTION	DRN BY	CHK BY	APRV BY

OWNER:



TOLAND ROAD LANDFILL
 3500 TOLAND RD.
 SANTA PAULA, CA
 PH: 805-658-4675

ENGINEER:



SIGNAL HILL, CA 90755
 PH: (562) 726-3565
 EMAIL: INFO@BIOGASENG.COM

LFG GCCS MAP - AUGUST 2022

TOLAND ROAD LANDFILL
 MASTER LFG SITE PLAN

DRAWING NO. -

APPENDIX B
COVER INTEGRITY MONITORING

APPENDIX C
NESHAP/CMS SUMMARY REPORT

SUMMARY REPORT – GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

The National Emission Standards for Hazardous Air Pollutants (NESHAP) Maximum Achievable Control Technology (MACT) Rule for Landfills (40 CFR 63 Subpart AAAA) was amended in March 2020. These amendments became effective September 27, 2021 and include additional reporting requirements for continuous monitoring systems (CMS) per §63.10(e)(3)(vi).

- A. The company name and address of the affected source:

Toland Road Landfill
3500 Toland Road
Santa Paula, California 93060

- B. An identification of each hazardous air pollutant monitored at the affected source.

N/A. Subpart AAAA establishes a relevant emission standard for total non-methane organic compounds (NMOCs) and does not require hazardous air pollutant monitoring.

- C. The beginning and ending dates of the reporting period.

The reporting period covers the period of July 1 – December 31, 2022.

- D. A brief description of the process units.

The landfill gas collection and control system (GCCS) CMS components which are subject to the QC program and additional reporting requirements are:

- Enclosed flare(s) with thermocouples to measure combustion temperature
- Associated data recorder(s)

- E. The emission and operating parameter limitations specified in the relevant standard(s).

Subpart AAAA establishes a relevant emission standard for non-methane organic compound (NMOC) emissions from enclosed flares of 98 percent weight-reduction or 20 parts per million by volume (ppmv) dry basis, as hexane at 3 percent oxygen. The monitoring requirement associated with this emission standard is established in §63.1983(b)(2) and requires that the landfill maintain records of monitoring of average combustion temperature measured at least every 15 minutes. Exceedances are established in §63.1983(c)(1) as all 3-hour periods of operation during which the average temperature was more than 28 degrees Celsius (82 degrees Fahrenheit) below the average combustion temperature during the most recent performance test at which compliance with the relevant emission standard of §63.1959(b)(2)(iii) was determined.

- F. The monitoring equipment manufacturer(s) and model number(s).

- Thermocouples: Tempco Model MTA01208
- Data Recorder: Yokogawa Model S5P0211

G. The date of the latest CMS certification or audit.

N/A. Per Table 1 to Subpart AAAA of Part 63, the CMS performance evaluation requirements of §63.8(e) do not apply to municipal solid waste (MSW) landfills.

H. The total operating time of the affected source during the reporting period.

During the reporting period (7/1/2022 – 12/31/2022) the GCCS operated a total of 4,284 hours.

I. An emission data summary (or similar summary if the owner or operator monitors control system parameters), including the total duration of excess emissions during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes.¹

- There were no instances during the reporting period during which the average operational combustion temperature of the flare was measured to be less than 1,599 deg F for at least 3 hours (i.e., 28 °C (82 °F)) below the average combustion temperature measured for the enclosed flare during the most recent performance test).

J. A CMS performance summary (or similar summary if the owner or operator monitors control system parameters), including the total CMS downtime during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of CMS downtime expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total CMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes.

During the reporting period, there were no instances where combustion temperature was not measured and recorded during flare operation as required.

K. A description of any changes in CMS, processes, or controls since the last reporting period.

No changes in applicable CMS, process, or controls occurred since the last reporting period.

L. The name, title, and signature of the responsible official who is certifying the accuracy of the report.

See Certification at beginning of report.

M. The date of the report.

See Cover Page.

ATTACHMENT 2
ANNUAL TITLE V COMPLIANCE CERTIFICATION



Ventura County
Air Pollution
Control District

**ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM**

TV Permit # 07340

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


Ms. Roshni Brahmbhatt
Enforcement & Compliance Enforcement Division
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Confidentiality

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

Certification by Responsible Official

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

<p>Signature and Title of Responsible Official:</p> <p>Title: Director of Operations </p>	<p>Date:</p> <p>2/15/23</p>
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<p>Time Period Covered by Compliance Certification</p> <p><u>01</u> / <u>01</u> / <u>2022</u> (MM/DD/YY) to <u>12</u> / <u>31</u> / <u>2022</u> (MM/DD/YY)</p>
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Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 22 (MM/DD/YY) to 12 / 31 / 22 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 17 CCR 95464(b)(1)(B)</p>	<p>B. Equipment description: Test port in main 24-inch diameter line</p>	<p>C. Deviation Period: Date & Time Begin: 10/18/22 End: 10/18/22 When Discovered: Date & Time 10/18/22</p>
<p>D. Parameters monitored: Leak Testing of Components under Positive Pressure</p>	<p>E. Limit: <500 ppmv as methane</p>	<p>F. Actual: >500 ppmv as methane</p>
<p>G. Probable Cause of Deviation: During inspection on 10/18/22, the inspector found one exceedance greater than 500 ppmv as methane at a component under positive pressure (test port in main 24-inch diameter line)</p>		<p>H. Corrective actions taken: The leak was repaired on the same day of discovery and re-monitoring was performed on 10/18/22, which resulted in emissions below 500 ppmv, as methane.</p>

<p>A. Attachment # or Permit Condition #: 40 CFR 63.1961(a)(5)</p>	<p>B. Equipment description: LFG Collection Well 1805D</p>	<p>C. Deviation Period: Date & Time Begin: 8/26/22 (7 days after exceedance) End: 8/29/22 When Discovered: Date & Time 1/31/23</p>
<p>D. Parameters monitored: Monthly monitoring of LFG collection wells requires re-monitoring within 15 days for wells with exceedances to confirm compliance</p>	<p>E. Limit: <145 degrees Fahrenheit</p>	<p>F. Actual: Well temperature exceeded 145 degrees Fahrenheit and enhanced monitoring was not conducted within 7 days</p>
<p>G. Probable Cause of Deviation: VRSD did not perform enhanced monitoring procedures within 7 days of the well temperature exceedance. Well was corrected within 15 days.</p>		<p>H. Corrective actions taken: VRSD personnel have been instructed on the proper monitoring, reporting, and recordkeeping requirements under this provision.</p>

<p>A. Attachment # or Permit Condition #:</p>	<p>B. Equipment description:</p>	<p>C. Deviation Period: Date & Time Begin: End: When Discovered: Date & Time</p>
<p>D. Parameters monitored:</p>	<p>E. Limit:</p>	<p>F. Actual:</p>
<p>G. Probable Cause of Deviation:</p>		<p>H. Corrective actions taken:</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 22 (MM/DD/YY) to 12 / 31 / 22 (MM/DD/YY)

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

<p>A. Attachment # or Permit Condition #: 40 CFR Part 62 Subpart OOO (Portions)</p>	<p>D. Frequency of monitoring:</p> <p>Monthly</p>
<p>B. Description:</p> <p>40 CFR Part 62 Subpart OOO (Portions associated with State Plan for EG sites) – Compliance through 40 CFR 63 Subpart AAAA</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p style="padding-left: 20px;">x Monitor wells (temperature)</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40CFR63AAAA</p>	<p>D. Frequency of monitoring:</p> <p>Recordkeeping as needed.</p>
<p>B. Description:</p> <p>40CFR Part 63, Subpart AAAA</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p style="padding-left: 20px;">x Monitor flare gas flow rate and temperature</p> <p style="padding-left: 20px;">x Monitor wells and collection header (temperature, pressure, nitrogen, oxygen – no limit).</p> <p style="padding-left: 20px;">x Monitor methane concentration at the surface of the landfill</p> <p style="padding-left: 20px;">x Maintain records control device and GCCS downtime</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>I</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u></p> <p>*If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 22 (MM/DD/YY) to 12 / 31 / 22 (MM/DD/YY)

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

<p>A. Attachment # or Permit Condition #: P07340PC1</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Condition No. 2 - Rule 29 Solvent Use</p>	<p>Annually</p>
<p>C. Method of monitoring: Maintain solvent use exemption records. No solvents were used in 2020.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: P07340PC2</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Condition No. 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.</p>	<p>Continuous</p>
<p>C. Method of monitoring: Landfill gas flow is recorded by a totalizer.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 22 (MM/DD/YY) to 12 / 31 / 22 (MM/DD/YY)

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

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

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 22 (MM/DD/YY) to 12 / 31 / 22 (MM/DD/YY)

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

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

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 22 (MM/DD/YY) to 12 / 31 / 22 (MM/DD/YY)

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

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

<p>A. Attachment # or Permit Condition #: P07340PC2</p>	<p>D. Frequency of monitoring: Not applicable.</p>
<p>B. Description: Condition No. 3 and 12 – Sulfur Treatment Recordkeeping</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Daily colorimetric H₂S content measurements and monthly lab analysis of total sulfur at exhaust of sulfur treatment system.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 22 (MM/DD/YY) to 12 / 31 / 22 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: P07340PC3</p>	<p>D. Frequency of monitoring: Not applicable.</p>
<p>B. Description: Condition Nos. 1 - CARB Executive Order DG-027</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The 250kW micro-turbines comply with ARB Executive Order DG-027 and are CARB certified. The micro-turbines did not operate in 2021.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: P07340PC3</p>	<p>D. Frequency of monitoring: Daily, Monthly and Annually.</p>
<p>B. Description: Condition Nos. 2, 3, 5 and 7 – Rule 51 Nuisance, Rule 54 Sulfur Compounds & Rule 64 Sulfur Content of Fuels, Sulfur Treatment Monitoring, 250kW Micro-Turbines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>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. The micro-turbines did not operate in 2022.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: P07340PC3</p>	<p>D. Frequency of monitoring: Not applicable.</p>
<p>B. Description: Condition No. 4 – Rule 40 CFR Part 60, Subpart WWW, 250kW Micro-Turbines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Maintain documentation of EPA compliance determination that 250kW Micro-turbines are subject to Section 60.752(b)(2)(iii)(C). The micro-turbines did not operate in 2022.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 22 (MM/DD/YY) to 12 / 31 / 22 (MM/DD/YY)

A. Attachment # or Permit Condition #: P07340PC3	D. Frequency of monitoring:
B. Description: Condition No. 6 – Rule 74.17.1 Micro-Turbine Metering Requirement	Daily, Monthly, Semi-Annually
C. Method of monitoring: Electrical power generated, landfill gas flow rate, and heating value. The micro-turbines did not operate in 2022.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 22 (MM/DD/YY) to 12 / 31 / 22 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 50</p>	<p>D. Frequency of monitoring:</p> <p>Annual formal survey</p>
<p>B. Description:</p> <p>Rule 50 - Opacity</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment in First Semi-Annual 2022 Report.</p>
<p>C. Method of monitoring:</p> <p>Routine surveillance and visual inspections of the control devices emissions. Annual formal survey of the control devices emissions.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

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

<p>A. Attachment # or Permit Condition #: 54.B.2</p>	<p>D. Frequency of monitoring:</p> <p>Bi-annually</p>
<p>B. Description:</p> <p>Rule 54.B.2 Sulfur Dioxide</p> <p>According to APCD memo from Terri Thomas, 5/23/96, subject Rule 54.B.2 compliance is an emission rate of 0.46 lb/hr would produce a 1 hour maximum concentration of 0.11 ppmv and a 24 hour maximum concentration of 0.04 ppmv, 100 meters from stack.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>Exhaust analysis and compliance demonstration. Source test exhaust value of Sulfur Dioxide of 0.15 lb/hr.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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

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

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



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

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

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



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<p>A. Attachment # or Permit Condition #: 74.1</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Rule 74.1 Abrasive Blasting</p>	<p>As needed.</p>
<p>C. Method of monitoring: No abrasive blasting was conducted in 2022.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 74.2</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Rule 74.2 Architectural Coatings</p>	<p>Annually</p>
<p>C. Method of monitoring: Maintain VOC records of coatings used. Only coatings that are in compliance with Rule 74.2 are used. No coatings were used in 2022.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 74.4.D</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Rule 74.4.D Cut Back Asphalt</p>	<p>As needed.</p>
<p>C. Method of monitoring: No road oils were applied in 2022.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: 74.28</p>	<p>D. Frequency of monitoring:</p> <p>As needed.</p>
<p>B. Description:</p> <p>Rule 74.28 Asphalt Roofing Operations</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>No asphalt roofing operations were conducted in 2022.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 74.29</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description:</p> <p>Rule 74.29 Soil Decontamination Operations</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>No soil decontamination operations were conducted in 2022.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40CFR.61.M</p>	<p>D. Frequency of monitoring:</p> <p>As needed.</p>
<p>B. Description:</p> <p>40 CFR, Part 61, Subpart M – National Emission Standard for Asbestos</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>No asbestos demolition or renovation activities were conducted in 2022.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: 17CCR</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: 17 CCR Landfill Methane Rule (Sections 95460-95476)</p>	<p>Varies</p>
<p>C. Method of monitoring:</p> <ul style="list-style-type: none"> • Monitoring of wells (pressure) • Instantaneous Surface Emissions and Integrated Surface Sampling • Positive Pressure Monitoring • Source Testing for Methane Destruction • Control Device temperature and flow rate 	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p>Annual (or every 3 yrs) for CH₄ DE</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>I</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 55</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Rule 55 – Fugitive Dust</p>	<p>Varies</p>
<p>C. Method of monitoring: EPA Method 9 (when applicable)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p>EPA Method 9 for opacity</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

ATTACHMENT 3

SUPPLEMENTAL INFORMATION HISTORICALLY SUBMITTED WITH TITLE V REPORTS

**Toland Road Landfill
2022
Monthly Throughput**

Month	LFG scf	HHV	CH4 Average
Jan	55,065,307	462	45.6
Feb	57,742,815	430	42.5
Mar	59,574,004	442	43.7
Apr	59,197,977	441	43.6
May	58,872,994	468	46.2
Jun	55,386,155	450	44.4
Jul	56,898,125	421	41.6
Aug	64,036,660	424	41.9
Sep	60,618,913	408	40.3
Oct	63,676,088	421	41.6
Nov	64,120,129	410	40.5
Dec	62,212,744	415	41.0

Blower Hours					
Blower 1			Blower 2		
804	22072	22876	9	31133	31142
379	22876	23255	156	31142	31298
728	23255	23983	1	31298	31299
469	23984	24453	189	31299	31488
60	24453	24513	657	31488	32145
167	24513	24680	490	32169	32659
688	24680	25368	0	32659	32659
737	25368	26105	0	32659	32659
565	26105	26670	134	32659	32793
728	26670	27398	0	32793	32793
708	27398	28106	0	32793	32793
724	28106	28830	0	32793	32793
6,757.00	Total		1,636.00	Total	

2022	Total LFG	Ave HHV	MMBtu
	717,401,911	433	310,364

**Toland Road Landfill
2022 SC Fuels Gasoline Volumes**

Period	Gas Type	No. of Gallons
January 1 – June 30, 2022	Unleaded Regular	3,246
July 1 – December 31, 2022	Unleaded Regular	3,170
Total 2022: 6,416 gallons		