



February 15, 2024

Mr. Keith Macias  
Manager, Compliance Division  
Ventura County Air Pollution Control District  
4567 Telephone Road, 2<sup>nd</sup> Floor  
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, 2023 to December 31, 2023;
2. Annual Title V Compliance Certification for January 1, 2023 to December 31, 2023

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, Annual Deviation Summary Form, and Flare Source Test Summary Form.

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.

Mr. Keith Macias  
August 15, 2024  
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Sincerely,

A handwritten signature in blue ink, appearing to read 'RJ', is positioned below the word 'Sincerely,'.

Richard Jones  
Director of Operations

Attachments

1. Semi-Annual NSPS/NESHAP/Title V Report for July 1, 2023 to December 31, 2023
2. Annual Title V Compliance Certification for January 1, 2023 to December 31, 2023

Copy: United States Environmental Protection Agency, Region IX

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

**Second Semi-Annual 2023 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**  
4567 Telephone Road, 2<sup>nd</sup> Floor  
Ventura, California 93003  
(805) 303-4005

February 15, 2024

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**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: 2/15/24
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Time Period Covered by the Semi-Annual Report of Required Monitoring:  07/01/2023 to 12/31/2023
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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. TRL has continued to comply with the California EG rule since June 2021.

### 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, TRL is subject to the landfill NESHAP under 40 CFR Part 63, Subpart AAAA. Landfills subject to Subpart AAAA can choose to comply with Subpart AAAA in lieu of the major compliance provisions of Subpart WWW and OOO, as of September 27, 2021. The new NESHAP rule also removed the Startup, Shutdown, Malfunction (SSM) Plan requirements that were in the previous rule. Note that the facility is complying with the relevant major compliance provisions of Subpart OOO by choosing to comply with the equivalent sections under Subpart AAAA as allowed. 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. In the past, it was interpreted that the landfills subject to Subpart AAAA can choose to comply with Subpart AAAA in lieu of the major compliance provisions of Subparts WWW and OOO, as of September 27, 2021. Please note, in accordance with the California Air Pollution Control Officers Association’s (CAPCOA) October 2023 meeting and the EPA

Region IX's updated guidance, the Site will also be complying with the portions of Subpart OOO that are applicable to the CA State Plan for EG sites, which includes 40 CFR Part 62.16716(c), wellhead temperature of 55 degrees Celsius (°C) (131 Fahrenheit (°F)) moving forward in the next reporting period.

For the reporting period from July 1 through December 31, 2023, 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**

<b>Updated NESHAP Subpart AAAA</b>
<b>40 CFR 63.1981(h), (i), (j), (k), (l)</b>
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

<b>Updated NESHAP Subpart AAAA</b>
<b>40 CFR 63.1961(a), (b), (f)</b>
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) during all monitoring events. As noted previously, due to the change in interpretation for wellhead compliance for EG landfills, starting the next reporting period, TRL will meet the Subpart OOO temperature limit of 131 °F or seek a higher operating value for wells above this limit.

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 from July 1 through August 28, 2023, the minimum temperature at which the flare should operate was 1,631 °F (1,681 °F – 50 °F).

The 2023 source test for biennial emission compliance and methane destruction for the flare was performed on July 13, 2023, and the source test report was submitted on August 29, 2023 with a temperature at 1,686 °F. During the reporting period from August 29 through December 31, 2023, the minimum temperature at which the flare should operate was 1,636 °F (1,686 °F – 50 °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. The NESHAP minimum temperature is no more than 82 degrees F below the more recent source test but is 50 degrees F per the LMR.

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, 2023 due to some, but not limited to, the following reasons:

- Low flow
- 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 3. 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 3. Summary of Flare Downtime from July 1 through December 31, 2023**

<b>Control System Periods of Downtime</b>		
<b>Date</b>	<b>Duration (Hrs:Min)</b>	<b>Reason for Shutdown</b>
7/17/23	1:03	Flare shutdown due to low flow
7/27/23	1:15	Flare shutdown due to low flow
7/31/23	0:46	Flare shutdown due to blower vibration
8/2/23	0:45	Flare shutdown due to low flow
8/24/23	0:58	Flare shutdown due to low flow
9/4/23	4:10	Flare shutdown due to low temperature
9/4/23	0:32	Flare shutdown due to low temperature
9/6/23	5:38	Flare manual shutdown for maintenance
9/6/23	0:12	Flare manual shutdown for maintenance
9/6/23	0:14	Flare manual shutdown for maintenance
9/7/23	30:41	Flare manual shutdown for maintenance
9/8/23	0:41	Flare manual shutdown for maintenance
9/8/23	1:08	Flare manual shutdown for maintenance
9/8/23	0:56	Flare manual shutdown for maintenance
9/8/23	0:11	Flare manual shutdown for maintenance
9/11/23	3:47	Flare manual shutdown for maintenance
9/11/23	0:11	Flare manual shutdown for maintenance
9/12/23	5:14	Flare manual shutdown for new flare installation
9/12/23	17:48	Flare manual shutdown for new flare installation
9/26/23	15:21	Flare shutdown due to low flow
9/27/23	0:17	Flare shutdown due to low flow
10/3/23	15:31	Flare shutdown due to low flow
10/4/23	0:11	Flare shutdown due to low temperature
10/4/23	1:18	Flare shutdown due to low temperature
10/4/23	0:09	Flare shutdown due to low temperature

<b>Control System Periods of Downtime</b>		
<b>Date</b>	<b>Duration</b>	<b>Reason for Shutdown</b>
	<b>(Hrs:Min)</b>	
10/4/23	1:21	Flare shutdown due to low temperature
10/18/23	0:38	Flare shutdown due to low temperature
11/1/23	2:36	Flare shutdown due to low flow
11/1/23	0:13	Flare shutdown due to low flow
11/14/23	0:07	Flare shutdown due to low flow
11/14/23	6:01	Flare shutdown due to low flow
11/14/23	12:31	Flare shutdown due to low flow
12/4/23	0:22	Flare shutdown due to low flow
12/5/23	3:54	Flare shutdown due to low flow
12/5/23	0:11	Flare shutdown due to low temperature
12/5/23	0:09	Flare shutdown due to low temperature
12/18/23	15:00	Flare shutdown due to low flow
12/19/23	0:19	Flare shutdown due to low flow
12/30/23	5:32	Flare shutdown due to 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 2023 instantaneous surface emissions monitoring event was performed on August 15, 2023 by RES Environmental, Inc. (RES). The event resulted in twelve (12) areas of the landfill having TOC concentrations above 500 ppmv, measured as methane. Remediation activities were performed, including adding water and compacting soil, and a 10-day re-monitoring event performed August 25, 2023, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed September 15, 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.

### 3.2.2 Fourth Quarter Monitoring

The fourth quarter 2023 instantaneous surface emissions monitoring event was performed on December 5, 2023 by RES. The event resulted in three (3) areas of the landfill having TOC concentrations above 500 ppmv, measured as methane. Remediation activities were performed, including adding water and compacting soil, and a 10-day re-monitoring event performed on December 15, 2023, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed January 5, 2024, 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/or abandonments are noted in Table 4 below. Note that the landfill had sufficient well density with the abandonment of wells.

**Table 4. GCCS Installations, Upgrades, and Abandonments**

<b>DATE</b>	<b>DESCRIPTION</b>
11/8/23	Well 323EDGE abandoned
11/9/23	Well 308L abandoned
11/19/23	Well 37RR abandoned



## 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 July 13, 2023.

Performance test summary information on the NMOCs, NOx, SOx, and CO emissions for the flare is provided in Table 5 below.

**Table 5. Summary of Source Test Results**

Test Date	Parameter	Flare Result	Emission Limit
Flare 7/13/23	NOx Emission Rate (lb/MMBtu)	0.032	0.06 lb/MMBtu
	CO Emission Rate (lb/MMBtu)	0.0014	0.20 lb/MMBtu
	SOx Emission Rate (lb/MMBtu)	0.0084	0.02 lb/MMBtu
	NMOC Emission Rate (ppmv, as hexane @ 3% O <sub>2</sub> )	0.1	20 ppmv
	NMOC Destruction Efficiency (%)	99%	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 July 13, 2023. The methane destruction efficiency was 99.98%, which is in compliance with 17 CCR requirements. The next methane destruction testing is required by 2026 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.

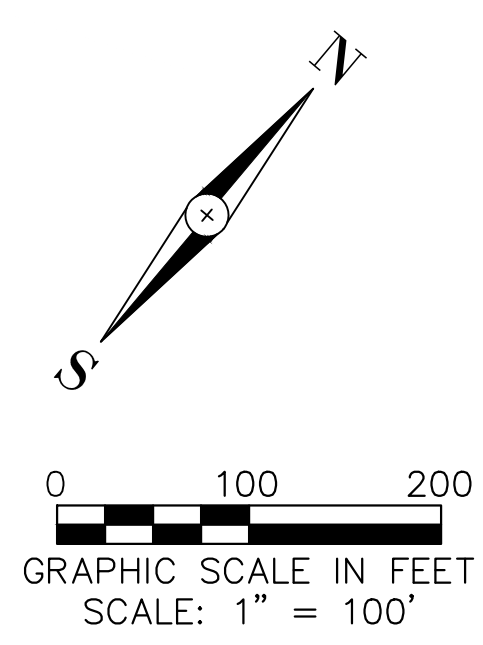
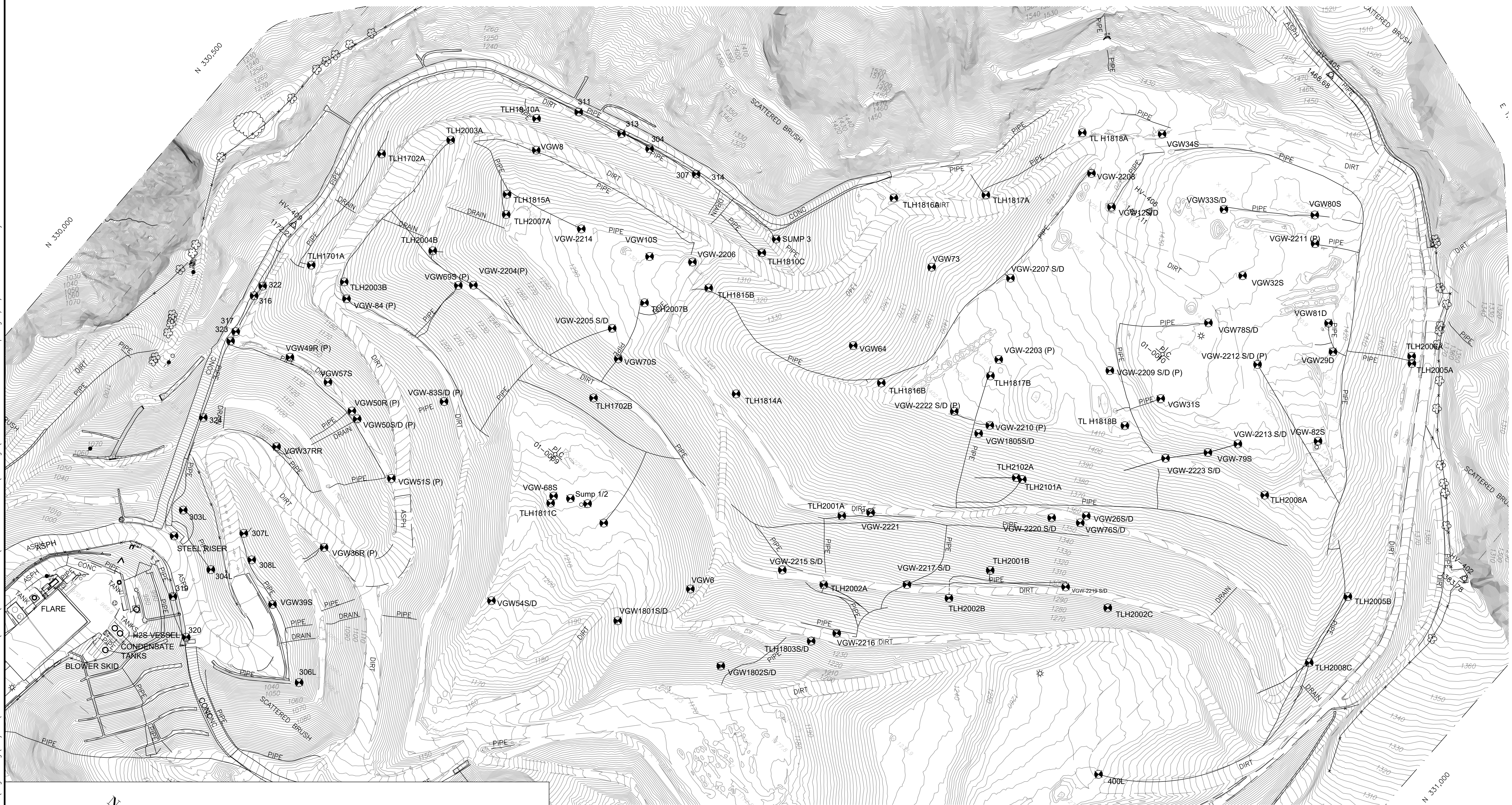
## 7.0 TITLE V COMPLIANCE

During the reporting period, the Landfill performed all required monitoring and maintained the appropriate records.

**APPENDIX A**  
**LANDFILL SITE PLAN**



C:\Users\AliciaKamany\Blogs\Engineering\Projects\USGH1701.100 - VRSD Toland\TRIF LFG Wells\Vertical Well Install Drawings\Toland GCCS Master Site Map.dwg 7/17/2023 AliciaKamany




LEGEND	
	EXISTING HDPE PIPE
	EXISTING LFG EXTRACTION WELL LOCATION
	ISOLATION VALVE INSTALLED
	VRSD PROPERTY BOUNDARY

TOPOGRAPHY NOTE:  
 1. BASED ON SURVEY INFORMATION RECEIVED FROM VENTURA REGIONAL SANITATION DISTRICT DATE: 12-08-2022

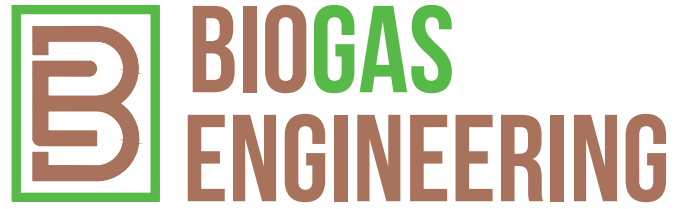
REV	DATE	DESCRIPTION	DRN BY	CHK BY	APRV BY
1.0	05.10.23	GCCS MAP	AK	GA	GA

OWNER:



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

ENGINEER:



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

LFG GCCS MAP - APRIL 2023	DRAWING NO.
TOLAND ROAD LANDFILL MASTER LFG SITE PLAN	-



**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, 2023.

- 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 (7/1/2023 – 12/31/2023) the GCCS operated a total of 4,260 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.

- 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 °F from July 1 through August 28, 2023 and less than 1,604 °F from August 29 through December 31, 2023 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: 2/15/24</p>
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<p>Time Period Covered by Compliance Certification</p> <p><u>01</u> / <u>01</u> / <u>2023</u> (MM/DD/YY) to <u>12</u> / <u>31</u> / <u>2023</u> (MM/DD/YY)</p>
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# ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 23 (MM/DD/YY) to 12 / 31 / 23 (MM/DD/YY)

A. Attachment # or Permit Condition #:  None	B. Equipment description:	C. Deviation Period: Date & Time Begin:  End: When Discovered: Date & Time
D. Parameters monitored:	E. Limit:	F. Actual:
G. Probable Cause of Deviation:		H. Corrective actions taken:

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

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



# ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 23 (MM/DD/YY) to 12 / 31 / 23 (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>N</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>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



# ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 23 (MM/DD/YY) to 12 / 31 / 23 (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>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Monthly records of throughput and consumption.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

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

<p>A. Attachment # or Permit Condition #: P07340PC2</p>	<p>D. Frequency of monitoring:</p>
<p>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>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Landfill gas flow is recorded by a totalizer.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



# ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 23 (MM/DD/YY) to 12 / 31 / 23 (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 / 23 (MM/DD/YY) to 12 / 31 / 23 (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 / 23 (MM/DD/YY) to 12 / 31 / 23 (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></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

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

<p>A. Attachment # or Permit Condition #: P07340PC2</p>	<p>D. Frequency of monitoring: 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 H<sub>2</sub>S 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></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



# ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 23 (MM/DD/YY) to 12 / 31 / 23 (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 2023.</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 &amp; 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 2023.</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: 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 2023.</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 / 23 (MM/DD/YY) to 12 / 31 / 23 (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
	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. The micro-turbines did not operate in 2023.	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 / 23 (MM/DD/YY) to 12 / 31 / 23 (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 0.27 lb/hr in 2023.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



# ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 23 (MM/DD/YY) to 12 / 31 / 23 (MM/DD/YY)

<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> *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> *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> *If yes, attach Deviation Summary Form</p>



# ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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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:</p> <p>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:</p> <p>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:</p> <p>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:</p> <p>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:</p> <p>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:</p> <p>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 2023.</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 2023.</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 2023.</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 2023.</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 2023.</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 2023.</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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Period covered by Compliance Certification: 01 / 01 / 23 (MM/DD/YY) to 12 / 31 / 23 (MM/DD/YY)

<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"> <li>• Monitoring of wells (pressure)</li> <li>• Instantaneous Surface Emissions and Integrated Surface Sampling</li> <li>• Positive Pressure Monitoring</li> <li>• Source Testing for Methane Destruction</li> <li>• Control Device temperature and flow rate</li> </ul>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p>Annual (or every 3 yrs) for CH<sub>4</sub> DE</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 #: 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>



# ANNUAL COMPLIANCE CERTIFICATION

## SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 23 (MM/DD/YY) to 12 / 31 / 23 (MM/DD/YY)

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: NMOC
C. Measured Emission Rate: 0.1 ppm 0.041 lb/hr	D. Limited Emission Rate: 20 ppm 1.00 lb/hr	E. Specific Source Test or Monitoring Record Citation: Modified EPA Method 25	F. Test Date: July 13, 2023

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: NO <sub>x</sub>
C. Measured Emission Rate: 1.19 lb/hr 0.032 lb/MMBtu	D. Limited Emission Rate: 5.15 lb/hr 0.06 lb/MMBtu	E. Specific Source Test or Monitoring Record Citation: EPA Method 7E	F. Test Date: July 13, 2023

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: CO
C. Measured Emission Rate: 0.054 lbs/hr 0.0014 lb/MMBtu	D. Limited Emission Rate: 17.16 lbs/hr 0.2 lb/MMBtu	E. Specific Source Test or Monitoring Record Citation: EPA Method 10	F. Test Date: July 13, 2023

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: SO <sub>x</sub>
C. Measured Emission Rate: 0.27 lb/hr (as SO <sub>2</sub> ) 0.0084 lb/MMBtu (as SO <sub>2</sub> )	D. Limited Emission Rate: 1.72 lb/hr (as SO <sub>2</sub> ) 0.02 lb/MMBtu (as SO <sub>4</sub> )	E. Specific Source Test or Monitoring Record Citation: Modified SCAQMD 307-91	F. Test Date: July 13, 2023

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: Destruction Eff.%
C. Measured Emission Rate: NMOC: 99%, or 0.1 ppm MDE: 99.998%	D. Limited Emission Rate: NMOC: 98%, or 20 ppm MDE: 99%	E. Specific Source Test or Monitoring Record Citation: Modified EPA Method 25	F. Test Date: July 13, 2023