VENTURA REGIONAL SANITATION DISTRICT
4105 WEST GONZALES ROAD, OXNARD, CA 93036-2748
A Public Waste Management Agency

February 14, 2025

Mr. Keith Macias
Manager, Compliance Division
Ventura County Air Pollution Control District
4567 Telephone Road, 2nd 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, 2024 to December 31, 2024;
2. Annual Title V Compliance Certification for January 1, 2024 to December 31, 2024

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.

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, volume of gasoline used at VRSD, annual opacity compliance form, and diesel fuel supplier's certification.

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,

Richard Jones
Director of Operations

Attachments

1. Semi-Annual NSPS/NESHAP/Title V Report for July 1, 2024 to December 31, 2024
2. Annual Title V Compliance Certification for January 1, 2024 to December 31, 2024
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 2024 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, 2nd Floor

Ventura, California 93003

(805) 303-4005

February 15, 2025

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: 1/14/25

Time Period Covered by the Semi-Annual Report of Required Monitoring:
07/01/2024 to 12/31/2024

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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 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS NOTES AND OBJECTIONS TO SEMI-ANNUAL REPORT SUBMITTAL

VRSD submits this semi-annual report covering the reporting period from July 1 to December 31, 2024 (the "Report") in accordance with the provisions of 40 CFR Part 63, Subpart AAAA, the Landfill NESHAP. The Report consists of the CEDRI electronic file report, using Version 2.0, and the accompanying pdf narrative report form attached thereto. VRSD's submittal of the Report, and its Certification thereof, is made subject to the notes and objections set forth herein.

The elements of semi-annual reporting required pursuant to the Landfill NESHAP are set forth at 40 CFR §63.1981(h). As required by 40 CFR §63.1981(l)(2), VRSD has utilized the electronic file reporting format established by the United States Environmental Protection Agency (EPA) and made available via its CEDRI website. However, certain aspects of the CEDRI electronic file are inconsistent with, or more expansive than, the Landfill NESHAP. Accordingly, VRSD preserves and does not waive any objection it may have to the propriety, completeness or accuracy of the CEDRI reporting format or its consistency with the requirements of the Landfill NESHAP. Specifically, VRSD objects to the CEDRI electronic file reporting format to the extent that it purports to require the submittal of information that is not required to be maintained or submitted pursuant to the Landfill NESHAP, requires information to be reported in a format in which it would not otherwise be maintained, or renders such information inaccurate or incomplete. VRSD further objects to the CEDRI electronic file reporting format to the extent that it fails to include or require the inclusion of information otherwise required to be submitted pursuant to the Landfill NESHAP.

In furtherance of its preparation of the Report using the CEDRI electronic file reporting format, VRSD identifies the following specific notes and objections:

- There is an error in the "Number of Exceedances" tab of the CEDRI electronic file report: in this tab, the spreadsheet does not correctly calculate the number of exceedances due to an error in the formula embedded in the spreadsheet.

- There is a limitation in the number of entries that may be included in each tab of the CEDRI spreadsheet because each tab is locked and limited to 476 rows. This limit may preclude the inclusion of all relevant information within the electronic file report.

- There is no place to add the concentration value as required by the rulemaking. This precludes the inclusion of all relevant information within the electronic file report.

- The CEDRI electronic file purports to incorporate several elements of the general provisions of 40 CFR Subpart 63, Subpart A, which are not applicable. For example, the electronic file refers to "CMS" in several locations. VRSD has included information about enclosed flare temperature monitoring in these sections, where appropriate, and as relevant to the operating requirements set forth at 40 CFR §63.1983(c). However, the type of temperature monitoring equipment used at municipal solid waste landfills (thermocouples) are not typically required to meet the full set of requirements for more traditional continuous monitoring systems as set forth in Subpart A, such as equipment manufacturer, model number and calibration or certification information. Further, such information is not required to be maintained under the Landfill NESHAP and therefore is neither feasible nor required to be included within the Report. See, Table 1 to the Landfill NESHAP, which indicates that "Additional recordkeeping for sources with CMS" requirements under 40 CFR §63.10(c) are not applicable to this sector. Accordingly, in completing the Report, VRSD has completed only those fields in the CEDRI electronic file where applicable and/or otherwise appropriate.

- While the CEDRI electronic file format contains operating information required to be submitted under the Landfill NESHAP as set forth at 40 CFR §63.1981(h), it is VRSD's understanding that the certification and deviation requirements, as set forth in the "Certification" and "Deviation" tabs of the CEDRI spreadsheet, are applicable only to CMS systems at the affected facility, and do not apply to the other operational and compliance information required pursuant to the Landfill NESHAP.

- In the "exceedances" tab of the CEDRI electronic file, the duration of reported exceedances auto-calculates to hours. However, the nature of the Landfill NESHAP operational requirements, and the timing requirements for corrective action of initial monitored exceedances, would instead dictate that the duration of these events should be reported in days; VRSD has submitted this information consistent with these requirements.

Submission of this Report and the information contained herein should not be construed as a waiver of any objection which VRSD may have to the legal propriety of the agency's requiring or using information submitted in the Report to assess VRSD's compliance status and any such objections are hereby reserved regardless of whether a specific objection is identified herein.

1.2 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.

1.3 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 also complies 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 (ºC) (131 Fahrenheit (ºF)).

For the reporting period from July 1 through December 31, 2024, 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. On July 13, 2022, VRSD was issued an Authority to Construct (ATC) for a new, replacement 120 MMBtu/hr LFG-fired enclosed flare. The new, replacement flare officially started up on March 6, 2024.

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 through March 6, 2024.
- A 120 MMBtu/hr Perennial Energy Inc. (PEI) flare starting March 6, 2024.
- 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	NSPS Subpart OOO
40 CFR 63.1961(a), (b), (f)	**40 CFR 62.16722(a)(3)**
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	Monitor temperature of the landfill gas on a monthly basis as provided in § 62.16720(a)(4). The temperature measuring device must be calibrated annually using the procedure in 40

Updated NESHAP Subpart AAAA	NSPS Subpart OOO
40 CFR 63.1961(a), (b), (f)	**40 CFR 62.16722(a)(3)**
63.1961(a)(3).	CFR part 60, appendix A–1, EPA Method 2, section 10.3. (Please note, 62.16720(a)(4) references 62.16716(c), which states temperature must be less than 55 degrees C (131 degrees F).
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 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, with the exception of one (1) event. Per 40 CFR 63.1960(a)(3), corrective action (through valve adjustments) and re-monitoring was performed, and the well was corrected within 15 days. Date(s) and duration when pressure at the wellhead(s) was positive are summarized in Table 3 below.

Table 3. Summary of Wells with Positive Pressure

Well	Initial Date	Initial Pressure ("H20)	Re-Monitoring Date(s)	Compliant Pressure ("H20)	Duration (Days)
VGW2205S	10/3/24	0.65	10/3/24	-0.19	0

- During the reporting period, all of the operational extraction wells were operated with LFG temperatures less than 55 °C (131 °F), with the exception of three (3) events. Per 40 CFR 62.16720(a)(4), corrective action (through valve adjustments) and re-monitoring was performed for two (2) events, and one (1) event was corrected within 15 days. Due to an oversight, two (2) events did not have re-monitoring performed within 15 days (wells VGW2205S and VGW2223S). The wells were corrected within 60 days. A summary of the deviation is provided in Section 7.0. Note that a Higher Operating Value (HOV) demonstration was submitted to the VCAPCD on February 13, 2019 for wells 29S, 33S, 76D, 76S, 78S, and 81S. The HOV up to 145 °F was subsequently approved on March 6, 2019. Date(s) and duration when temperatures at the wellhead(s) were greater than or equal to 131 °F are summarized in Table 4 below.

Table 4. Summary of Wells Above 131 °F

Well	Initial Date	Initial Temperature (°F)	Re-Monitoring Date(s)	Compliant Temperature (°F)	Duration (Days)
VGW2205S	9/9/24	132.1	10/3/24	105.0	24
VGW2214S	9/9/24	131.5	9/9/24	130.7	0
VGW2223S	9/12/24	131.0	10/2/24	129.6	20

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. Root cause analyses during the reporting period can be found in Appendix B.

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 new PEI flare was started up and began operations on March 6, 2024. During the reporting period from July 1 through August 18, 2024, the minimum temperature at which the flare should operate was 1,400 °F per manufacturer's minimum operating range as the source test was not performed until July 18, 2024 and the source test reported on August 19, 2024.

The 2024 source test for the new PEI flare was performed on July 18, 2024, and the source test report was submitted on August 19, 2024 with a temperature at 1,572 °F. During the reporting period from August 19 through December 31, 2024, the minimum temperature at which the flare should operate was 1,522 °F (1,572 °F – 50 °F).

The average temperature for the flare for a three (3)-hour time period cannot fall below the established minimum temperatures. The NSPS/NESHAP minimum temperature is no more than 82 degrees F below the more recent source test but is 50 °F per the LMR.

During the reporting period, the average temperature for the flare did not drop below the minimum temperature while operational, except for three (3) events summarized below.

- 8/9/24 18:00-21:00 (1,268 degrees F)
- 8/10/24 18:00-21:00 (926 degrees F)
- 8/11/24 18:00-21:00 (1,120 degrees F)

A summary of the deviations are reported in Section 7.0.

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, 2024 due to some, but not limited to, the following reasons:

- Burner fault
- 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 5. 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 5. Summary of Flare Downtime from July 1 through December 31, 2024

Control System Periods of Downtime		
Date	**Duration (Hrs)**	**Reason for Shutdown**
7/12/24	0.85	PEI flare shutdown due to burner fault
7/13/24	42.02	PEI flare shutdown due to power glitch
7/20/24	14.65	PEI flare shutdown due to burner fault
7/22/24	6.00	PEI flare shutdown due to burner fault
7/25/24	5.17	PEI flare shutdown due to burner fault
7/26/24	16.70	PEI flare shutdown due to burner fault
7/27/24	42.50	PEI flare shutdown due to pressure sensor failure
7/30/24	1.25	PEI flare shutdown due to burner fault
7/31/24	3.35	PEI flare shutdown due to burner fault
7/31/24	1.10	PEI flare shutdown due to burner fault
8/1/24	3.55	PEI flare shutdown due to burner fault
8/1/24	1.38	PEI flare shutdown due to burner fault
8/1/24	1.17	PEI flare shutdown due to burner fault
8/1/24	17.20	PEI flare shutdown due to burner fault
8/3/24	3.13	PEI flare shutdown due to burner fault
8/3/24	19.77	PEI flare shutdown due to low temperature
8/5/24	6.12	PEI flare shutdown due to air/fuel fault
8/5/24	0.25	PEI flare shutdown due to air/fuel fault
8/5/24	0.07	PEI flare shutdown due to air/fuel fault
8/5/24	14.80	PEI flare shutdown due to air/fuel fault
8/6/24	0.60	PEI flare shutdown due to burner fault
8/6/24	1.93	PEI flare shutdown due to air/fuel mixture
8/7/24	6.43	PEI flare shutdown due to air/fuel mixture
8/7/24	1.05	PEI flare shutdown due to air/fuel mixture
8/7/24	3.20	PEI flare shutdown due to burner fault and air/fuel fault

Control System Periods of Downtime		
Date	Duration (Hrs)	Reason for Shutdown
8/8/24	0.12	PEI flare shutdown due to low temperature/ air fuel mixture
8/9/24	3.42	PEI flare shutdown due to low temperature/ air fuel mixture
8/9/24	12.47	PEI flare shutdown due to low temperature
8/10/24	0.18	PEI flare shutdown due to low temperature
8/10/24	16.20	PEI flare shutdown due to low temperature
8/11/24	8.55	PEI flare shutdown due to low temperature
8/12/24	0.75	PEI flare shutdown due to low temperature
8/12/24	0.55	PEI flare shutdown due to low temperature
8/12/24	9.08	PEI flare shutdown due to low temperature
8/13/24	0.18	PEI flare shutdown due to low temperature
8/13/24	0.07	PEI flare shutdown due to low temperature
8/14/24	3.92	PEI flare shutdown due to low temperature
8/15/24	7.50	PEI flare shutdown due to low temperature
8/15/24	1.32	PEI flare shutdown due to low temperature
8/16/24	6.12	PEI flare shutdown due to low temperature/ air fuel mixture
8/16/24	1.00	PEI flare shutdown due to low temperature/ air fuel mixture
8/16/24	0.45	PEI flare shutdown due to low temperature/ air fuel mixture
8/16/24	0.15	PEI flare shutdown due to low temperature/ air fuel mixture
8/16/24	0.08	PEI flare shutdown due to low temperature/ air fuel mixture
8/16/24	8.82	PEI flare shutdown due to low temperature/ air fuel mixture
8/17/24	0.60	PEI flare shutdown due to low temperature/ air fuel mixture
8/17/24	14.32	PEI flare shutdown due to low temperature/ air fuel mixture
8/18/24	0.78	PEI flare shutdown due to air fuel mixture
8/19/24	29.75	PEI flare shutdown due to air fuel mixture
8/21/24	0.08	PEI flare shutdown due to air fuel mixture
8/21/24	0.08	PEI flare shutdown due to air fuel mixture
8/21/24	2.13	PEI flare shutdown due to air fuel mixture
8/21/24	6.97	PEI flare shutdown due to air fuel mixture
8/22/24	0.38	PEI flare shutdown due to air fuel mixture
8/23/24	2.57	PEI flare shutdown due to low temperature/ air fuel mixture
8/23/24	0.27	PEI flare shutdown due to low temperature/ air fuel mixture
8/24/24	2.78	PEI flare shutdown due to low temperature/ air fuel mixture
8/25/24	8.85	PEI flare shutdown due to low temperature/ air fuel mixture
8/26/24	6.53	PEI flare shutdown due to low temperature/ air fuel mixture
8/27/24	4.73	PEI flare shutdown due to low temperature/ air fuel mixture
8/27/24	16.83	PEI flare shutdown due to air fuel mixture
8/28/24	1.45	PEI flare shutdown due to air fuel mixture
8/28/24	10.98	PEI flare shutdown due to air fuel mixture
8/31/24	4.22	PEI flare shutdown due to low temperature/ air fuel mixture
9/1/24	0.25	PEI flare shutdown due to low temperature/ air fuel mixture
9/1/24	0.25	PEI flare shutdown due to air fuel mixture

Control System Periods of Downtime		
Date	Duration (Hrs)	Reason for Shutdown
9/1/24	0.70	PEI flare shutdown due to air fuel mixture
9/2/24	1.78	PEI flare shutdown due to air fuel mixture
9/3/24	0.08	PEI flare shutdown due to air fuel mixture
9/3/24	0.60	PEI flare shutdown due to air fuel mixture
9/3/24	0.48	PEI flare shutdown due to air fuel mixture
9/3/24	8.58	PEI flare shutdown due to air fuel mixture
9/5/24	0.55	PEI flare shutdown due to air fuel mixture
9/5/24	14.50	PEI flare shutdown due to air fuel mixture
9/6/24	19.00	PEI flare shutdown due to air fuel mixture
9/8/24	2.83	PEI flare shutdown due to air fuel mixture
9/8/24	13.02	PEI flare shutdown due to air fuel mixture
9/10/24	1.18	PEI flare shutdown due to air fuel mixture
9/10/24	0.78	PEI flare shutdown due to air fuel mixture
9/10/24	0.55	PEI flare shutdown due to air fuel mixture
9/11/24	4.25	PEI flare shutdown due to air fuel mixture
9/11/24	0.05	PEI flare shutdown due to air fuel mixture
9/11/24	0.12	PEI flare shutdown due to air fuel mixture
9/12/24	0.22	PEI flare shutdown due to air fuel mixture
9/12/24	0.07	PEI flare shutdown due to air fuel mixture
9/12/24	0.13	PEI flare shutdown due to air fuel mixture
9/12/24	0.08	PEI flare shutdown due to air fuel mixture
9/12/24	13.65	PEI flare shutdown due to air fuel mixture
9/14/24	7.82	PEI flare shutdown due to air fuel mixture
9/14/24	1.70	PEI flare shutdown due to air fuel mixture
9/15/24	8.15	PEI flare shutdown due to air/fuel mixture
9/16/24	2.77	PEI flare shutdown due to low temperature
9/16/24	15.23	PEI flare shutdown due to low temperature
9/18/24	0.93	PEI flare shutdown due to low temperature
9/19/24	8.27	PEI flare shutdown due to low temperature
9/20/24	1.20	PEI flare shutdown due to low temperature
9/20/24	0.13	PEI flare shutdown due to low temperature
9/20/24	0.28	PEI flare shutdown due to low temperature
9/20/24	0.18	PEI flare shutdown due to low temperature
9/20/24	0.63	PEI flare shutdown due to low temperature
9/20/24	2.65	PEI flare shutdown due to low temperature
9/21/24	2.23	PEI flare shutdown due to low temperature
9/21/24	2.47	PEI flare shutdown due to low temperature
9/21/24	12.28	PEI flare shutdown due to low temperature
9/22/24	3.65	PEI flare shutdown due to low temperature
9/23/24	3.03	PEI flare shutdown due to low temperature
9/23/24	1.10	PEI flare shutdown due to low temperature

Control System Periods of Downtime		
Date	Duration (Hrs)	Reason for Shutdown
9/23/24	9.68	PEI flare shutdown due to low temperature
9/24/24	0.10	PEI flare shutdown due to low temperature
9/24/24	1.77	PEI flare shutdown due to low temperature
9/25/24	3.07	PEI flare shutdown due to low temperature
9/25/24	2.12	PEI flare shutdown due to low temperature
9/26/24	2.33	PEI flare shutdown due to low temperature
9/26/24	1.85	PEI flare shutdown due to low temperature
9/27/24	4.73	PEI flare shutdown due to low temperature
9/28/24	14.40	PEI flare shutdown due to low temperature
9/29/24	1.52	PEI flare shutdown due to low temperature
9/29/24	3.38	PEI flare shutdown due to low temperature
9/30/24	6.13	PEI flare shutdown due to low temperature
10/1/24	1.97	PEI flare shutdown due to low temperature
10/1/24	0.88	PEI flare shutdown due to low temperature
10/1/24	2.22	PEI flare shutdown due to low temperature
10/2/24	1.80	PEI flare shutdown due to low temperature
10/2/24	0.10	PEI flare shutdown due to low temperature
10/2/24	0.23	PEI flare shutdown due to low temperature
10/2/24	0.25	PEI flare shutdown due to low temperature
10/2/24	0.92	PEI flare shutdown due to low temperature
10/2/24	13.03	PEI flare shutdown due to low temperature
10/3/24	0.07	PEI flare shutdown due to low temperature
10/3/24	1.17	PEI flare shutdown due to low temperature
10/3/24	7.18	PEI flare shutdown due to low temperature
10/4/24	2.65	PEI flare shutdown due to low temperature
10/5/24	7.72	PEI flare shutdown due to low temperature
10/5/24	3.53	PEI flare shutdown due to low temperature
10/6/24	5.08	PEI flare shutdown due to low temperature
10/6/24	0.12	PEI flare shutdown due to low temperature
10/6/24	6.03	PEI flare shutdown due to low temperature
10/7/24	2.37	PEI flare shutdown due to low temperature
10/7/24	0.10	PEI flare shutdown due to low temperature
10/7/24	4.88	PEI flare shutdown due to low temperature
10/8/24	26.15	PEI flare shutdown due to low temperature
10/9/24	0.52	PEI flare shutdown due to low temperature
10/9/24	0.97	PEI flare shutdown due to low temperature
10/9/24	1.95	PEI flare shutdown due to low temperature
10/10/24	4.45	PEI flare shutdown due to low temperature
10/10/24	0.10	PEI flare shutdown due to low temperature
10/10/24	0.15	PEI flare shutdown due to low temperature/ air fuel mixture
10/10/24	3.82	PEI flare shutdown due to low temperature/ air fuel mixture

Control System Periods of Downtime		
Date	Duration (Hrs)	Reason for Shutdown
10/11/24	3.47	PEI flare shutdown due to low temperature/ air fuel mixture
10/11/24	1.77	PEI flare shutdown due to low temperature/ air fuel mixture
10/12/24	18.75	PEI flare shutdown due to low temperature/ air fuel mixture
10/13/24	24.98	PEI flare shutdown due to low temperature/ air fuel mixture
10/15/24	3.03	PEI flare shutdown due to low temperature/ air fuel mixture
10/15/24	0.17	PEI flare shutdown due to low temperature/ air fuel mixture
10/15/24	0.10	PEI flare shutdown due to low temperature
10/15/24	0.38	PEI flare shutdown due to low temperature/ air fuel mixture
10/15/24	1.63	PEI flare shutdown due to low temperature/ air fuel mixture
10/15/24	7.17	PEI flare shutdown due to low temperature/ air fuel mixture
10/16/24	0.37	PEI flare shutdown due to low temperature/ air fuel mixture
10/16/24	1.83	PEI flare shutdown due to low temperature/ air fuel mixture
10/16/24	9.70	PEI flare shutdown due to low temperature/ air fuel mixture
10/17/24	0.22	PEI flare shutdown due to low temperature/ air fuel mixture
10/17/24	0.27	PEI flare shutdown due to low temperature/ air fuel mixture
10/17/24	23.62	PEI flare shutdown due to low temperature/ air fuel mixture
10/19/24	5.72	PEI flare shutdown due to low temperature/ air fuel mixture
10/19/24	0.32	PEI flare shutdown due to low temperature/ air fuel mixture
10/19/24	22.70	PEI flare shutdown due to low temperature/ air fuel mixture
10/20/24	11.45	PEI flare shutdown due to air/fuel mixture
10/21/24	0.08	PEI flare shutdown due to air/fuel mixture
10/21/24	0.10	PEI flare shutdown due to low temperature
10/21/24	0.10	PEI flare shutdown due to low temperature
10/21/24	0.08	PEI flare shutdown due to low temperature
10/21/24	14.00	PEI flare shutdown due to low temperature/ air fuel mixture
10/22/24	1.38	PEI flare shutdown due to low temperature/ air fuel mixture
10/22/24	0.07	PEI flare shutdown due to low temperature/ air fuel mixture
10/22/24	0.13	PEI flare shutdown due to low temperature/ air fuel mixture
10/22/24	0.25	PEI flare shutdown due to low temperature/ air fuel mixture
10/22/24	0.90	PEI flare shutdown due to low temperature/ air fuel mixture
10/22/24	1.22	PEI flare shutdown due to low temperature/ air fuel mixture
10/22/24	0.18	PEI flare shutdown due to low temperature/ air fuel mixture
10/22/24	1.33	PEI flare shutdown due to low temperature/ air fuel mixture
10/22/24	0.58	PEI flare shutdown due to low temperature/ air fuel mixture
10/22/24	0.18	PEI flare shutdown due to low temperature/ air fuel mixture
10/22/24	1.22	PEI flare shutdown due to low temperature/ air fuel mixture
10/23/24	6.42	PEI flare shutdown due to low temperature/ air fuel mixture
10/23/24	0.85	PEI flare shutdown due to low temperature/ air fuel mixture
10/23/24	0.68	PEI flare shutdown due to low temperature/ air fuel mixture
10/23/24	0.28	PEI flare shutdown due to low temperature/ air fuel mixture
10/23/24	15.42	PEI flare shutdown due to low temperature/ air fuel mixture

Control System Periods of Downtime		
Date	Duration (Hrs)	Reason for Shutdown
10/24/24	0.15	PEI flare shutdown due to low temperature/ air fuel mixture
10/24/24	0.08	PEI flare shutdown due to low temperature/ air fuel mixture
10/24/24	16.33	PEI flare shutdown due to low temperature/ air fuel mixture/ blower fault
10/26/24	41.65	PEI flare shutdown due to low temperature/ air fuel mixture/ blower fault
10/29/24	5.85	PEI flare shutdown due to low temperature/ air fuel mixture/ blower fault
10/29/24	0.20	PEI flare shutdown due to low temperature/ air fuel mixture/ blower fault
10/29/24	0.17	PEI flare shutdown due to low temperature/ air fuel mixture/ blower fault
10/29/24	0.08	PEI flare shutdown due to low temperature/ air fuel mixture
10/29/24	1.15	PEI flare shutdown due to low temperature/ air fuel mixture
10/30/24	4.30	PEI flare shutdown due to low temperature/ air fuel mixture
10/30/24	0.52	PEI flare shutdown due to low temperature/ air fuel mixture
10/30/24	0.45	PEI flare shutdown due to low temperature/ air fuel mixture
10/31/24	1.28	PEI flare shutdown due to low temperature/ air fuel mixture
10/31/24	9.87	PEI flare shutdown due to low temperature/ air fuel mixture
11/1/24	4.08	PEI flare shutdown due to low temperature/ air fuel mixture
11/2/24	1.33	PEI flare shutdown due to low temperature/ air fuel mixture
11/2/24	4.02	PEI flare shutdown due to low temperature/ air fuel mixture
11/3/24	13.92	PEI flare shutdown due to low temperature/ air fuel mixture
11/4/24	19.07	PEI flare shutdown due to low temperature/ air fuel mixture
11/5/24	0.40	PEI flare shutdown due to low temperature/ air fuel mixture
11/5/24	0.10	PEI flare shutdown due to low temperature/ air fuel mixture
11/6/24	56.45	PEI flare manual shutdown due to wind event/ Southern California Edison (SCE) fire prevention shutdown
11/12/24	0.55	PEI flare shutdown due to low temperature/ air fuel mixture
11/13/24	1.17	PEI flare shutdown due to low temperature/ air fuel mixture
12/1/24	0.10	PEI flare shutdown due to low temperature/ air fuel mixture
12/1/24	0.78	PEI flare shutdown due to low temperature/ air fuel mixture
12/2/24	7.18	PEI flare shutdown due to low temperature
12/2/24	0.43	PEI flare shutdown due to low temperature
12/2/24	13.47	PEI flare shutdown due to low temperature and low air/fuel mixture
12/3/24	1.55	PEI flare shutdown due to low temperature and low air/fuel mixture
12/3/24	19.43	PEI flare shutdown due to low temperature and low air/fuel mixture
12/5/24	2.02	PEI flare shutdown due to low temperature and low air/fuel mixture
12/5/24	0.98	PEI flare shutdown due to low temperature and low air/fuel mixture
12/5/24	9.30	PEI flare shutdown due to low temperature and low air/fuel mixture
12/6/24	0.62	PEI flare shutdown due to low temperature and low air/fuel mixture
12/7/24	18.17	PEI flare shutdown due to low temperature and low air/fuel mixture

Control System Periods of Downtime		
Date	Duration (Hrs)	Reason for Shutdown
12/8/24	12.50	PEI flare shutdown due to low temperature and low air/fuel mixture
12/9/24	4.58	PEI flare shutdown due to low temperature and low air/fuel mixture
12/10/24	11.65	PEI flare shutdown due to low temperature and low air/fuel mixture
12/11/24	10.65	PEI flare shutdown due to burner fault
12/12/24	26.23	PEI flare shutdown due to burner fault and low temperature
12/13/24	0.60	PEI flare shutdown due to burner fault and low temperature
12/14/24	6.75	PEI flare shutdown due to burner fault and low temperature
12/15/24	0.88	PEI flare shutdown due to burner fault and low temperature
12/15/24	9.50	PEI flare shutdown due to low temperature
12/16/24	12.25	PEI flare shutdown due to low temperature
12/18/24	3.57	PEI flare shutdown due to low temperature
12/20/24	0.45	PEI flare shutdown due to low temperature
12/20/24	2.22	PEI flare shutdown due to low temperature
12/20/24	0.73	PEI flare shutdown due to low temperature
12/21/24	5.82	PEI flare shutdown due to low temperature
12/22/24	16.88	PEI flare shutdown due to low temperature/ air fuel mixture
12/24/24	0.87	PEI flare shutdown due to low temperature/ air fuel mixture
12/25/24	3.92	PEI flare shutdown due to low temperature/ air fuel mixture
12/26/24	8.42	PEI flare shutdown due to low temperature/ air fuel mixture
12/28/24	11.45	PEI flare shutdown due to low temperature/ air fuel mixture
12/30/24	3.82	PEI flare shutdown due to low temperature
12/31/24	15.63	PEI flare shutdown due to low temperature/ air fuel mixture

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 2024 instantaneous surface emissions monitoring event was performed on August 27, 2024 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 water and compaction, and a 10-day re-monitoring event performed September 6, 2024, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed September 26, 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. The monitoring results showing locations of exceedances can be found in Appendix C.

3.2.2 Fourth Quarter Monitoring

The fourth quarter 2024 instantaneous surface emissions monitoring event was performed on November 5, 2024 by RES. The event resulted in zero (0) areas of the landfill having TOC concentrations above 500 ppmv, measured as methane. There were no areas which triggered the 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 D.

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 6 below. Note that the landfill had sufficient well density with the abandonment of wells as new collectors were installed during the first half of 2024.

Table 6. GCCS Installations, Upgrades, and Abandonments

DATE	DESCRIPTION
7/15/24	Well TH2001BR abandoned
9/11/24	Wells TLH2302A and TLH2303A abandoned
10/2/24	Well TLH2302B 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 per the Authority to Construct. The compliance test for Non-Methane Organic Compounds (NMOC), Nitrogen Oxides (NOx), Sulfur Oxides (SOx), Carbon Monoxide (CO), and toxics for the PEI flare was performed on July 18, 2024.

Performance test summary information on the NMOCs, NOx, SOx, and CO emissions for the PEI flare is provided in Table 7 below.

Table 7. Summary of Source Test Results

Test Date	Parameter	Flare Result	Emission Limit
Flare 7/18/24	NOx Emission Rate (lb/MMBtu)	0.014	0.025 lb/MMBtu
	CO Emission Rate (lb/MMBtu)	0.0163	0.06 lb/MMBtu
	SOx Emission Rate (lb/MMBtu)	0.0053	0.02 lb/MMBtu
	NMOC Emission Rate (ppmv, as hexane @ 3% O_2)	2.04	20 ppmv
	NMOC Destruction Efficiency (%)	--	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. Inlet Method 25C sample for Run 3 compromised.

Please note that methane destruction efficiency testing under from the Title 17 California Code of Regulations (CCR) section in the PTO was also conducted on July 18, 2024. The methane destruction efficiency was 99.4%, which is in compliance with 17 CCR requirements.

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 E.

7.0 TITLE V COMPLIANCE

During the reporting period, the Landfill performed all required monitoring and maintained the appropriate records except for the events summarized below.

- On September 12, 2024, well VGW2223S had a temperature of 131 degrees Fahrenheit. Due to an oversight, the initiation of corrective action within 5 days and the 15-day re-monitoring event was not performed. The well was corrected during the next monitoring event on October 2, 2024 (129 degrees F).

- On September 9, 2024, well VGW2205S had a temperature greater than 131 degrees Fahrenheit. Due to an oversight, the 15-day re-monitoring event was not performed. The well was corrected during the next monitoring event on October 3, 2024 (106.5 degrees F).

- During the reporting period, the average temperature for the flare dropped below the minimum temperature over a 3-hour average while operational, as summarized below:

    - 8/9/24 18:00-21:00 (1,268 degrees F)
    - 8/10/24 18:00-21:00 (926 degrees F)
    - 8/11/24 18:00-21:00 (1,120 degrees F)

    Please note that the flare is a newly replaced ultra-low emissions flare that had recently performed its initial source test (July 18, 2024) but had not received the finalized report (August 19, 2024). As such, the flare's minimum temperature was set to 1,400 degrees F. After the source test but prior to the final report, it is believed that a power outage affected the flare operation and its controls, causing the temperature to operate below the limit without shutting down. VRSD is working with the manufacturer to optimize flare operation and reduce flare downtime, while maintaining compliance with all requirements.

- During an inspection by the VCAPCD, California Air Resources Board (CARB), and EPA on October 30, 2024, a leak was discovered coming from the pressure relief valve of a treated leachate tank with a concentration of 8,000 ppmv. A Notice of Violation (NOV) (No. 25303) was issued on November 5, 2024 for failing to route emissions from the leachate storage tank to the flare for destruction per Condition No. 8 in Attachment PO07340PC. VRSD remediated the leak by replacing the gasket on the flange. A re-monitoring event on November 12, 2024 confirmed the leak had been remediated. A copy of the re-monitoring results can be found in Appendix F.

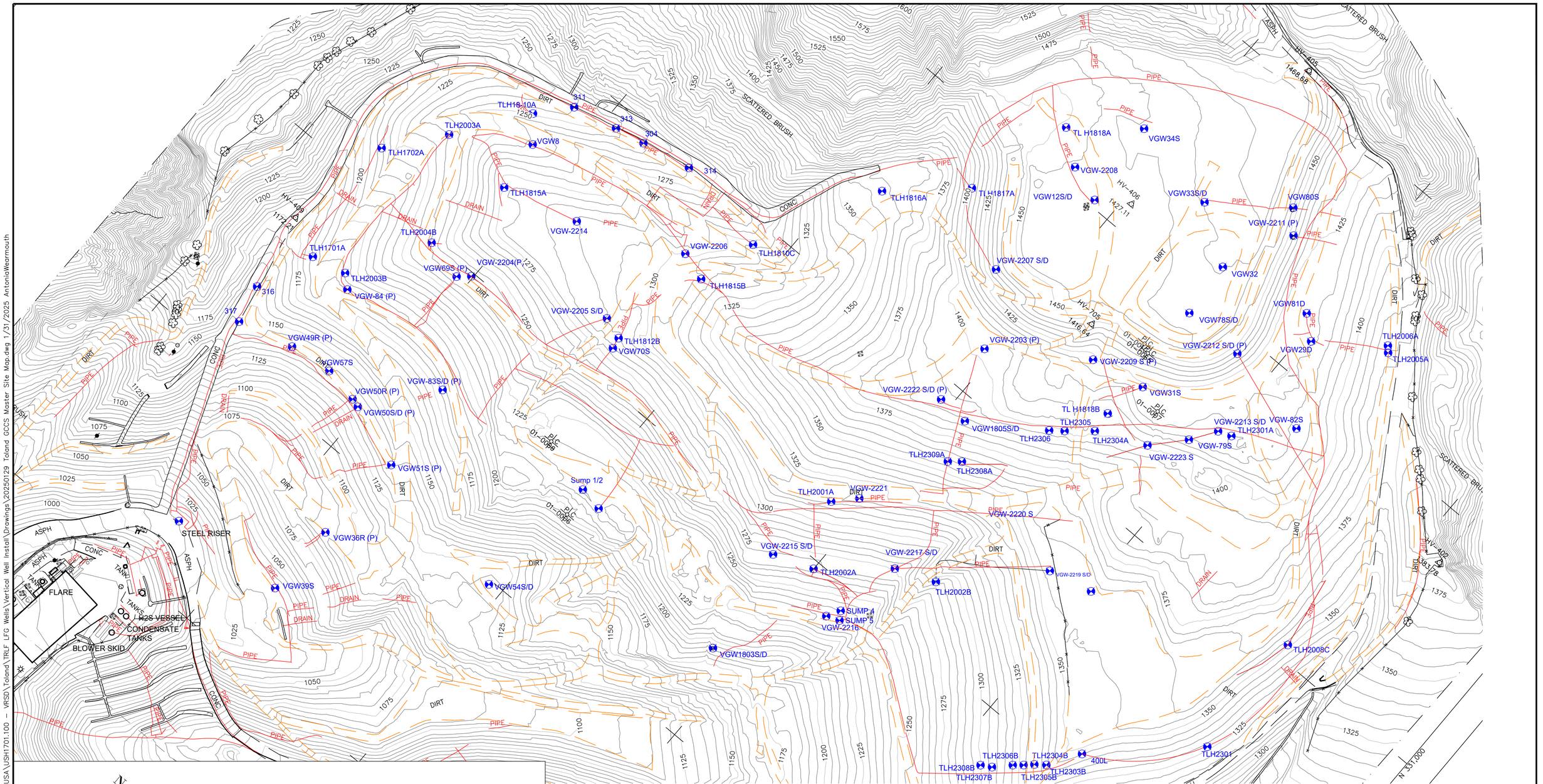
- During an inspection by the VCAPCD, CARB, and EPA on October 30, 2024, the inspector(s) discovered nine (9) areas of the landfill having TOC concentrations above 500 ppmv, measured as methane. An NOV (No. 25304) was issued for failing to maintain surface emissions at or below 500 ppmv as methane on the landfill surface per the AB 32 LMR Section 95465(a)(1). Remediation activities were performed, including adding water, compacting, track walking, and/or reconnecting wells. A 10-day re-monitoring event performed on November 8, 2024, resulted in nine (9) areas with TOC concentrations above 500 ppmv, measured as methane. Note that the re-monitoring was performed during a public safety power shutoff by SCE. A second 10-day re-monitoring event was performed on November 12, 2024. All nine (9) areas were below 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed December 6, 2024, resulted in zero (0)

areas with TOC concentrations above 500 ppmv, measured as methane. There were no areas which triggered the timeline to implement a system expansion. No further corrective action was required. A copy of the re-monitoring results can be found in Appendix F.

- During an inspection by the VCAPCD, CARB, and EPA on October 30, 2024, the inspector(s) discovered two (2) leaks at a component under positive pressure greater than 500 ppmv, as methane. An NOV was issued (No. 25305) for failing to maintain positive pressure component leaks below 500 ppmv as methane per the AB 32 LMR Section 95464(b)(1). Remediation activities were performed including re-connecting the wells that had been capped and the source of the leaks, as well as watering/compacting around the well casing. A 10-day re-monitoring event performed on November 8, 2024, resulted in both locations with TOC concentrations above 500 ppmv, measured as methane. Note that the corrections were delayed due to the wells being located in a dangerous area (active construction) which was relayed to the VCAPCD. An additional re-monitoring event was performed on November 12, 2024. Both locations showed concentrations below 500 ppmv, as methane. No further corrective action was required. A copy of the re-monitoring results can be found in Appendix F.

APPENDIX A

LANDFILL SITE PLAN



LEGEND

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

N S

0 100 200

GRAPHIC SCALE IN FEET
SCALE: 1" = 100'

TOPOGRAPHY NOTE:
1. BASED ON SURVEY INFORMATION RECEIVED FROM VENTURA REGIONAL SANITATION DISTRICT DATE:12-18-2024

REV	DATE	DESCRIPTION	DRN BY	CHK BY	APRV BY
1.0	01.30.25	GCCS MAP	AW	MC	GA

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

ENGINEER:
BIOGAS ENGINEERING
3816 STINEMAN CT., SUITE 203
LONG BEACH, CA 90808, PH: (562) 786-5656
EMAIL: INFO@BIOGASENG.COM

LFG GCCS MAP - JANUARY 2025

TOLAND ROAD LANDFILL
MASTER LFG SITE PLAN

DRAWING NO.
-

C:\Users\AntonioWearmouth\Biogas Engineering Dropbox\Projects\USA\USH1701.100 - VRSD\Toland\TRLF LFG Wells\Vertical Well Install\Drawings\20250129 Toland GCCS Master Site Map.dwg 1/31/2025 AntonioWearmouth

APPENDIX B

ROOT CAUSE ANALYSES

TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/9/2024
Collection Device ID:	VGW-2205S
Temperature Reading:	132.1

Root Cause Analysis		
Has the owner/operator received approval from the state agency to operate at a temperature higher than 55°C (131°F) for this well?	☐ Yes	☒ No
• If YES, exempt as per 40 CFR §60.763(c). • If NO, continue the form.		
Describe what was inspected.		
No abnormal conditions observed in area surrounding the well		
Describe what was determined to be the root cause of the exceedance.		
Technician failed to notice increase in temperature once adjustment to well made		
Determine the required next steps.		
Was the temperature exceedance remediated within 60 days since the initial exceedance?	☒ Yes	☐ No
• If YES, keep records of Root Cause Analysis. No reporting required. • If NO, continue with Corrective Action Analysis and Implementation Plan.		

TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/12/2024
Collection Device ID:	VGW-2223S
Temperature Reading:	131

Root Cause Analysis		
Has the owner/operator received approval from the state agency to operate at a temperature higher than 55°C (131°F) for this well?	☐ Yes	☒ No
• If YES, exempt as per 40 CFR §60.763(c). • If NO, continue the form.		
Describe what was inspected.		
No abnormal conditions observed in area surrounding the well		
Describe what was determined to be the root cause of the exceedance.		
Technician failed to notice increase in temperature once adjustment to well made		
Determine the required next steps.		
Was the temperature exceedance remediated within 60 days since the initial exceedance?	☒ Yes	☐ No
• If YES, keep records of Root Cause Analysis. No reporting required. • If NO, continue with Corrective Action Analysis and Implementation Plan.		

APPENDIX C

THIRD QUARTER 2024 INSTANTANEOUS SURFACE EMISSIONS MONITORING EXCEEDANCE RESULTS

TOLAND LANDFILL
INSTANTANEOUS LANDFILL SURFACE MONITORING

Personnel: LOGAN, ZeiT A-SAMRA
M. GRANADOS
A. SAMRA
Cal. Gas Exp. Date: 7-25

Date: 8-29-24 Instrument Used: TVA1800 Grid Spacing: 25

Temperature: 63 Precip: 0 Upwind BG: 1 Downwind BG: 2

GRID ID	STAFF INITIALS	START TIME	STOP TIME	TOC PPM	WIND INFORMATION			REMARKS
					AVG SPEED	MAX. SPEED	DIRECTION	
45	LZ	0849	0906	1392	1	2	6	
46	LZ	0911	0924	1219	1	1	8	
49	LZ	0932	0947	106	0	1	6	
52	LZ	0950	1005	11138	1	2	8	
36	MG	0855	0910	1781	1	2	6	
35	MG	0913	0928	3468	1	1	8	
39	MG	0931	0946	690	0	1	8	
51	AS	0842	0857	76.89	0	1	7	
56	AS	0859	0914	57.56	1	2	10	
57	AS	0915	0930	69.58	1	1	9	
60	AS	0932	0947	9.85	0	1	8	

Attach Calibration Sheet
Attach site map showing grid ID

Yellow Flag (over 500 ppm) Landfill Surface Emissions Monitoring
10 Day Exceedances and Monitoring Log

Site: TOLAND

Quarter / Year:	3rd QTR 2024
Technician:	Ricky Ramaker
Instrument:	TVA 1000
Calibration Standard:	500 ppm

Initial Monitoring Event					First Re-Monitoring Event – 10 Days				Second Re-Monitoring Event – 10 Days			
Grid Number	Flag Number	Location	Field Reading (ppm)	Date Monitored	Remedial Work	Date Monitored	No Excd. <500 ppm	Excd. >500 ppm	Remedial Work	Date Monitored	No Excd <500 ppm	Excd >500 ppm
45	Y21	Surface	1100	9-27-24								
46	Y22	Surface	1101									
36	Y1	Surface	606									
36	Y2	Well 3134	1781									
35	Y3	Surface	2800									
35	Y4	Surface	3468									
39	Y5	Surface	680									

8-27-24 TOLAND LANDFILL EXCEEDANCES

ID	lat	lon	time	name	cmt	GRID
1	34.40308596	-118.996737	2024-08-27T17:00:57Z	B21	249ppm surface	52
2	34.40411601	-118.998391	2024-08-27T15:55:13Z	Y01	1100PPM surface	36
3	34.40536902	-118.997068	2024-08-27T16:09:14Z	Y02	600Ppm well313u	36
4	34.40502	-118.998217	2024-08-27T16:20:13Z	Y03	2800Ppm surface	35
5	34.40468397	-118.998222	2024-08-27T16:34:31Z	Y04	3468Ppm surface	35
6	34.40442396	-118.997506	2024-08-27T16:50:29Z	Y05	690Ppm surface	39
7	34.404891	-118.997619	2024-08-27T16:03:59Z	Y21	1100 Ppm surface	45
8	34.404013	-118.996402	2024-08-27T16:19:10Z	Y22	1101ppm surface	46

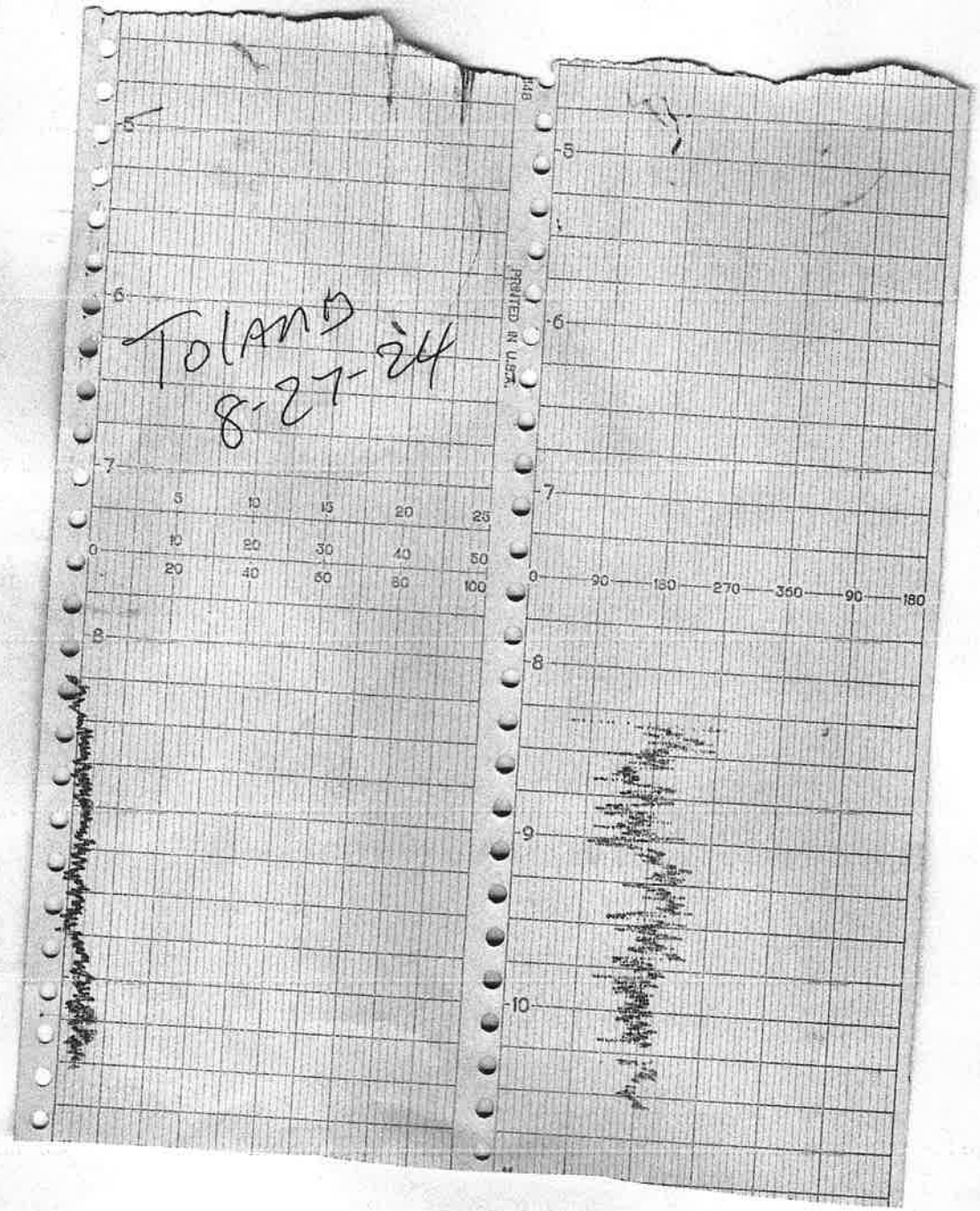
RES Environmental Inc.

TVA CALIBRATION LOG

Landfill: TOLAND

OPERATOR INITIALS	DATE	SN #	CH4 CALIBRATION GAS UNCORRECTED READINGS						CH4 CALIBRATION GAS CORRECTED READINGS					
			LOW		MED		HIGH		LOW		MED		HIGH	
			PPM	ACT	PPM	ACT	PPM	ACT	PPM	ACT	PPM	ACT	PPM	ACT
LZ	8-27-24	1030945294	—	—	—	—	500	500	—	—	—	—	500	500
MG	1	49171643	—	—	—	—	500	500	—	—	—	—	500	500
AS	1	1031445323	—	—	—	—	500	500	—	—	—	—	500	500

WIND SPEED & DIRECTION CHART ROLL



Yellow Flag (over 500 ppm) Landfill Surface Emissions Monitoring
10 Day Exceedances and Monitoring Log

Site: TOLAND

Quarter / Year:	3rd QTR 2024	3rd QTR 2024
Technician:	Ricky Ramacre	Stephen Borchers
Instrument:	TVA1000	TVA1000
Calibration Standard:	500 PPM	500

Initial Monitoring Event					First Re-Monitoring Event – 10 Days				Second Re-Monitoring Event – 10 Days			
Grid Number	Flag Number	Location	Field Reading (ppm)	Date Monitored	Remedial Work	Date Monitored	No Excd. <500 ppm	Excd. >500 ppm	Remedial Work	Date Monitored	No Excd <500 ppm	Excd >500 ppm
45	Y21	Surface	1100	8-27-24	Watered and compaction	9-6-24	18.25					
46	Y22	Surface	1101				8.78					
36	Y1	Surface	606				48.58					
34	Y2	Well 3134	1781				38.73					
35	Y3	Surface	2800				53.38					
35	Y4	Surface	3468				45.34					
39	Y5	Surface	680				11.05					

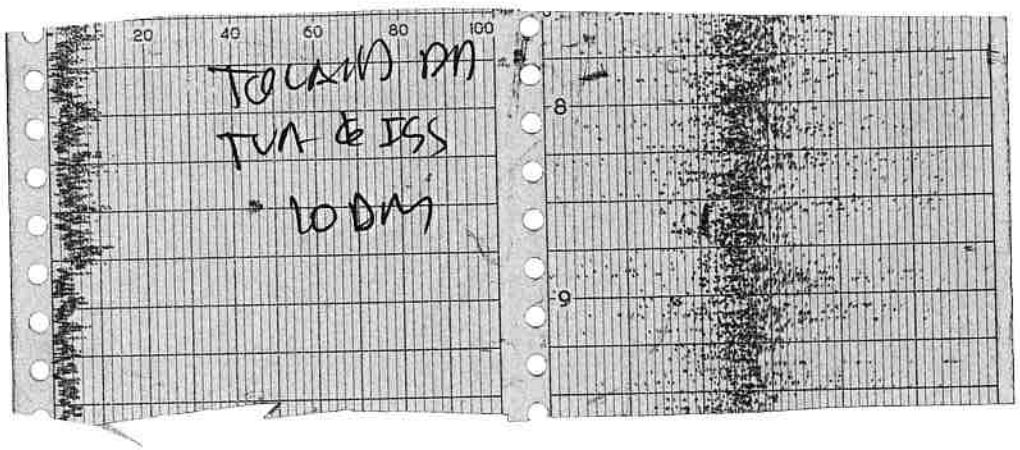
RES Environmental Inc.

TVA CALIBRATION LOG

Landfill: Toland

OPERATOR INITIALS	DATE	SN #	CH4 CALIBRATION GAS UNCORRECTED READINGS						CH4 CALIBRATION GAS CORRECTED READINGS					
			LOW		MED		HIGH		LOW		MED		HIGH	
			PPM	ACT	PPM	ACT	PPM	ACT	PPM	ACT	PPM	ACT	PPM	ACT
S.B.	9-6-24	0720723627	—	—	—	—	500	500	—	—	—	—	500	500

WIND SPEED & DIRECTION CHART ROLL



8-27-24 TOLAND LANDFILL EXCEEDANCES

ID	lat	lon	time	name	cmt	GRID
1	34.40308596	-118.996737	2024-08-27T17:00:57Z	B21	249ppm surface	52
2	34.40411601	-118.998391	2024-08-27T15:55:13Z	Y01	1100PPM surface	36
3	34.40536902	-118.997068	2024-08-27T16:09:14Z	Y02	600Ppm well313u	36
4	34.40502	-118.998217	2024-08-27T16:20:13Z	Y03	2800Ppm surface	35
5	34.40468397	-118.998222	2024-08-27T16:34:31Z	Y04	3468Ppm surface	35
6	34.40442396	-118.997506	2024-08-27T16:50:29Z	Y05	690Ppm surface	39
7	34.404891	-118.997619	2024-08-27T16:03:59Z	Y21	1100 Ppm surface	45
8	34.404013	-118.996402	2024-08-27T16:19:10Z	Y22	1101ppm surface	46

Yellow Flag (over 500 ppm) Landfill Surface Emissions Monitoring
30 Day Exceedances and Monitoring Log

Site: Toland

Quarter / Year:	3rd 2024	3rd 2024	
Technician:	Ricky Ramirez	Mike Orus	
Instrument:	TVA1000	TVA1000	
Calibration Standard:	500ppm	500 ppm	

Initial Monitoring Event					30 Day Re-Monitoring Event				First Re-Monitoring Event – 10 Days			
Grid Number	Flag Number	Location	Field Reading (ppm)	Date Monitored	Remedial Work	Date Monitored	No Excd. <500 ppm	Excd. >500 ppm	Remedial Work	Date Monitored	No Excd. <500 ppm	Excd. >500 ppm
45	Y21	Surface	1,100	8-27-24		9-26-24	56					
46	Y22	Surface	1,101				102					
36	Y1	Surface	606				80					
36	Y2	Well 3134	1,781				131					
35	Y3	Surface	2,800				255					
35	Y4	Surface	3,468				411					
34	Y5	Surface	680				39					

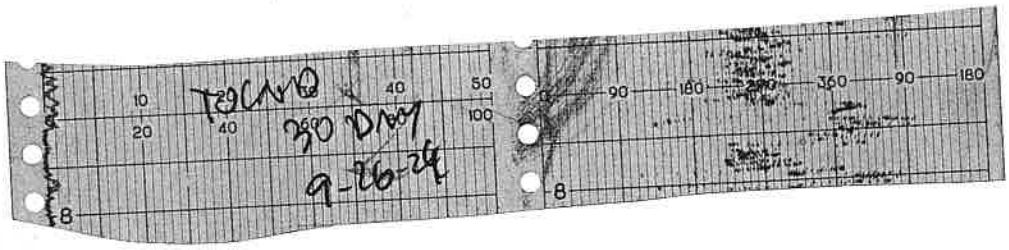
RES Environmental Inc.

TVA CALIBRATION LOG

Landfill: Toland

OPERATOR INITIALS	DATE	SN #	CH4 CALIBRATION GAS UNCORRECTED READINGS						CH4 CALIBRATION GAS CORRECTED READINGS					
			LOW		MED		HIGH		LOW		MED		HIGH	
			PPM	ACT	PPM	ACT	PPM	ACT	PPM	ACT	PPM	ACT	PPM	ACT
MO	9-26-24	1036346773	—	—	—	—	500	500	—	—	—	—	500	500

WIND SPEED & DIRECTION CHART ROLL

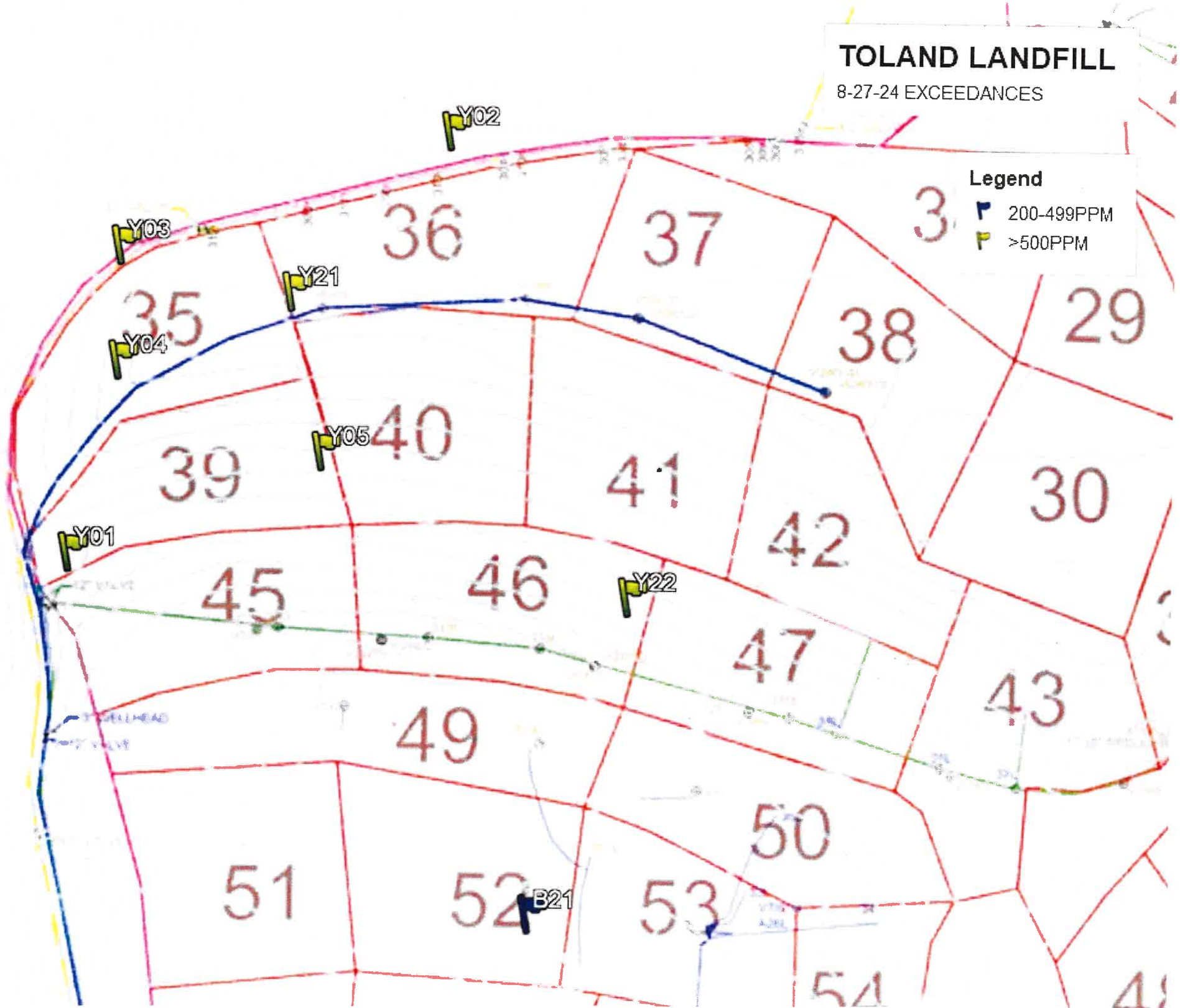


TOLAND LANDFILL

8-27-24 EXCEEDANCES

Legend

- 200-499PPM
- >500PPM



PARCEL 9 PROPERTY LINE (VRSD PROPERTY)

PARCEL 9 PROPERTY LINE (VRSD PROPERTY)

PARCEL 10 PROPERTY LINE (VRSD PROPERTY)

TUA 3RD QTR 2024

8-24-24

= MONT GRIDS

= ACTIVE TRASH

= ACTIVE CONSTRUCTION
LINER NEW CELL

PROPERTY LINE (VRSD PROPERTY)

1" = 100'

TOLAND LANDFILL
SWEEP GRID

Drawn By: Joey Weitz

VENTURA REGIONAL SANITATION DISTRICT
1001 Partridge Drive, Suite 150
Ventura, California 93003-5562

TOLAND LANDFILL

8-27-24 EXCEEDANCES

Legend

- 200-499PPM
- >500PPM

Y02
Y03
Y21
Y04
Y05
Y01
Y22
B21

36
37
3
35
38
29
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52
53
54

APPENDIX D

COVER INTEGRITY MONITORING

INSPECTOR: Alan C. DATE: 07-02-2024

Toland Road Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 08-01-2024

Toland Road Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 09-05-2024

Toland Road Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 10-01-2024

Toland Road Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 11-11-2024

Toland Road Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 12-04-2024

Toland Road Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

APPENDIX E

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 because 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, 2024.

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).

PEI Flare:

- Thermocouples: ThermX Southwest Model KM19-24-6UD-00-AX
- Data Recorder: Yokogawa Model FX1006-4-2-L

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 (7/1/2024 – 12/31/2024) the GCCS operated a total of 3,072.0 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 three (3) instances during the reporting period from July 1 through August 18, 2024 during which the average operational combustion temperature of the PEI flare was measured to be less than 1,400 °F for at least 3 hours (i.e., 28 °C (82 °F)). The operational temperature was based on manufacturer's operating range as performance test report not submitted until August 19, 2024. The exceedances are summarized below:

Start Date	End Date	Duration (Hours)	Reason
8/9/24 (18:00)	8/9/24 (21:00)	3.0	Control Equipment Problem (New Flare)
8/9/24 (18:00)	8/9/24 (21:00)	3.0	Control Equipment Problem (New Flare)
8/9/24 (18:00)	8/9/24 (21:00)	3.0	Control Equipment Problem (New Flare)
Total		**9.0**	
% of Total Source Operating Time		**0.29%**	

- There were no instances during the reporting period from August 19 through December 31, 2024 during which the average operational combustion temperature of the PEI flare

was measured to be less than 1,490 °F for at least 3 hours 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.

APPENDIX F

NOV RE-MONITORING RESULTS

APCD / CARB/EPA Site Inspection NOV#25303

Facility: Toland Landfill		**Toland Road Landfill**			
Date: Original Date 10-30-2024		**Re-Monitoring Date**	**11/8/2024**	**Second Re-Monitoring Date**	**11/12/2024**
Time Start - End: 12:20 / 4:00					
Inspector: Alan C.					
		Leak Concentration in ppmv			
Leak Location	**Original read**	**Result**	**Time**	**Result**	**Time**
Breather on top at bolted flange	8000	750	10:00 AM	23.5	1:15 AM

Flare Skid (Temp 1450 F, LFG Flow 1855 scfm)

Vilter Skid (0 scfm)

Microturbines Running: None, Vilter Maintenance Required

LFG: average CH_4 = 44.09 , CO_2 = 35.12 , O_2 = 1.97 %

Weather: 69 ° F Wind Speed average = 4 mph, Direction: N

Calibrate SiteFID @ Toland Office @ 3:50 ran '30 Mins Prior to Cal.'

Mitigation: Replaced gasket on flange

APCD /CARB/EPA Site Inspection NOV#25304

Facility: Toland Landfill		Toland Road Landfill					
Date: Original Date 10-30-2024		First 10-Day Re-Test Date:	11/8/2024	Second 10-Day Re-Test Date:	11/12/2024	1-Month Re-Monitoring Date:	11/26/2024
Time Start - End: 12:20 / 4:00							
Inspector: Alan C.		PSP Edison Power outage					
		Concentration in ppmv					
Leak Location	**Original read**	**Result**	**Time**	**Result**	**Time**	**Result**	**Time**
Side of well casing for VGW2221D	639	600	10:30 AM	38.7	2:00 PM	32.60	7:30 AM
Between 2 pipes on slope near road crossings for 2305A & 2306A	1,137	800	10:36 AM	95.3	2:07 PM	105	7:36 AM
Pipe on slope going into road crossings near VGW2221D and TLH2305A	8,357	1,000	10:38 AM	85.6	2:10 PM	61.9	7:39 AM
Surface crack between VGW 2221D TLH2305A	1,108	900	10:42 AM	60.3	2:15 PM	61.67	7:44 AM
Surface crack near TLH2304A & TLH1818B	1,000	9,000	10:46 AM	26.3	2:20 PM	48.30	7:49 AM
On side if well casing for VGW2209S	6,012	1,100	10:49 AM	98.8	2:24 PM	105	7:53 AM
On side if well casing for VGW31S	618	9,000	10:52 AM	133	2:29 PM	117	7:58 AM
On side if well casing for VGW2203S	1,476	2,000	10:58 AM	138	2:34 PM	39.10	8:05 AM
On side if well casing for VGW2207S	50,000	flame out	11:07 AM	28.6	2:40 PM	15.91	8:12 AM

Flare Skid (Temp 1450 F, LFG Flow 1855 scfm)

Vilter Skid (0 scfm)

Microturbines Running: None, Vilter Maintenance Required

LFG: average CH_4 = 44.09 , CO_2 = 35.12 , O_2 = 1.97 %

Weather: 69 ° F Wind Speed average = 4 mph, Direction: N

Calibrate SiteFID @ Toland Office @ 3:50 ran '30 Mins Prior to Cal.'

Mitigation:	#1 watered and recompacted near and around well
	#2 watered and recompacted near and around pipes
	#3 watered and recompacted near and around slope, pipe and well
	#4 watered and track walked / compacted near and around slope, pipe and well
	#5 watered and recompacted near and around pipes
	#6 reconnected well and watered / compacted near and around well
	#7 watered and recompacted near and around well
	#8 watered and recompacted near and around well
	#9 reconnected well and watered / compacted near and around well

APCD /CARB/EPA Site Inspection NOV#25305

Facility: Toland Landfill		Toland Road Landfill			
Date: Original Date 10-30-2024*		Re-Test Date:	11/8/2024	Additional Re-Test Date	11/12/2024
Time Start - End: 12:20 / 4:00		PSP Edison Power outage			
Inspector: Alan C.					
		Leak Concentration in ppmv			
Leak Location	Original read	Result	Time	Result	Time
2209S	50,000	1,150	10:49 AM	13.6	2:24 PM
2207D	1,100	1,050	11:08 AM	7.6	12:00 AM

Flare Skid (Temp 1450 F, LFG Flow 1855 scfm)

Vilter Skid (0 scfm)

Microturbines Running: None, Vilter Maintenance Required

LFG: average CH_4 = 44.09 , CO_2 = 35.12 , O_2 = 1.97 %

Weather: 69 ° F Wind Speed average = 4 mph, Direction: N

Calibrate SiteFID @ Toland Office @ 3:50 ran '30 Mins Prior to Cal.'

Mitigation: #1 Hooked up well and put online

#2 Hooked up well and put online

*Note re-monitoring delayed due to wells being in dangerous area (active construction); VRSD informed APCD delay for correcting exceedances

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.

Signature and Title of Responsible Official:	Date:
Title: Director of Operations	1/14/25

Time Period Covered by Compliance Certification

01 / 01 / 2024 (MM/DD/YY) to 12 / 31 / 2024 (MM/DD/YY)

ANNUAL COMPLIANCE CERTIFICATION
DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 24 (MM/DD/YY) to 12 / 31 / 24 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
40 CFR 62.16720(a)(4)	LFG Collection Well VGW2223S	Begin: 9/12/24 End: 10/2/24 When Discovered: Date & Time 10/2/24
D. Parameters monitored: Monthly monitoring of LFG collection wells requires initiation of corrective action within 5 days and re-monitoring within 15 days for wells with exceedances to confirm compliance	E. Limit: <131 degrees Fahrenheit	F. Actual: 5-day initiation of corrective action and 15-day re-monitoring reading confirming compliance not performed
G. Probable Cause of Deviation: VRSD did not recognize that an exceedance of the limit, so initiation of corrective action within 5 days and 15-day re-monitoring reading confirming compliance did not occur. Well was corrected in next monitoring event.	H. Corrective actions taken: VRSD personnel have been instructed on the proper monitoring, reporting, and recordkeeping requirements under this provision.	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
40 CFR 62.16720(a)(4)	LFG Collection Well VGW2205S	Begin: 9/9/24 End: 10/3/24 When Discovered: Date & Time 10/3/24
D. Parameters monitored: Monthly monitoring of LFG collection wells requires re-monitoring within 15 days for wells with exceedances to confirm compliance	E. Limit: <131 degrees Fahrenheit	F. Actual: 15-day re-monitoring reading confirming compliance not performed
G. Probable Cause of Deviation: VRSD did not perform 15-day re-monitoring reading confirming compliance within timeframe allowed. Well was corrected in next monitoring event.	H. Corrective actions taken: VRSD personnel have been instructed on the proper monitoring, reporting, and recordkeeping requirements under this provision.	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
40 CFR 63.1983(c)(1)(i)	Enclosed LFG PEI Flare	Begin: 8/9/24 (18:00) 8/10/24 (18:00) 8/11/24 (18:00) End: 8/9/24 (21:00) 8/10/24 (21:00) 8/11/24 (21:00) When Discovered: Date & Time 2/11/24
D. Parameters monitored: Minimum operating temperature for 3-hour average	E. Limit: Operate above minimum established temperature for 3-hour average (1,400 degrees F per manufacturer as initial source test had not been performed)	F. Actual: 8/9/24 (1,268 degrees F) 8/10/24 (926 degrees F) 8/11/24 (1,120 degrees F)
G. Probable Cause of Deviation: It is believed that power outage affected flare operation and its controls causing temperature to operate below limit without shutting down	H. Corrective actions taken: Working with manufacturer to optimize flare operation and reduce flare downtime, and maintain low temperature shutdown settings	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
Attachment PO07340PC Condition No. 8	Pressure relief valve of treated leachate tank	Begin: 10/30/24 End: 11/12/24 When Discovered: Date & Time 10/30/24
D. Parameters monitored: Leak Testing of Leachate Collection Vessel	E. Limit: Emissions from condensate/leachate collection vessels shall be routed to flare for incineration	F. Actual: 8,000 ppmv
G. Probable Cause of Deviation: Damaged gasket on flange of leachate tank	H. Corrective actions taken: Gasket on flange replaced and re-monitoring on 11/12/24 confirmed leak had been remediated	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
17 CCR 95464(a)(1)	Nine (9) locations identified on the landfill surface during VCAPCD, CARB, and EPA inspection; issued NOV No. 25304	Begin: 10/30/24 End: 11/12/24 When Discovered: Date & Time 10/30/24
D. Parameters monitored: Instantaneous Surface Emissions Monitoring	E. Limit: <500 ppmv as methane	F. Actual: >500 ppmv as methane
G. Probable Cause of Deviation: During inspection on 10/30/24, the inspectors found nine exceedances greater than 500 ppmv as methane on the surface of the landfill including at well casings, surface cracks, and near pipes.	H. Corrective actions taken: The surface was repaired (watered and compacted) and/or wells reconnected to increase vacuum, and re-monitoring was performed on 11/8/24, which resulted in emissions above 500 ppmv, as methane for all locations. A second 10-day re-monitoring was performed which resulted in all nine locations below 500 ppmv, as methane.	

A. Attachment # or Permit Condition #: 17 CCR 95464(b)(1)	B. Equipment description: Two (2) locations (capped well 2209S and 2207D) identified during VCAPCD, CARB, and EPA inspection; issued NOV No. 25305	C. Deviation Period: Date & Time Begin: 10/30/24 End: 11/12/24 When Discovered: Date & Time 10/30/24
D. Parameters monitored: Leak Testing of Components under Positive Pressure	E. Limit: <500 ppmv as methane	F. Actual: >500 ppmv as methane
G. Probable Cause of Deviation: During inspection on 10/30/24, the inspectors found two exceedances greater than 500 ppmv as methane at components under positive pressure (capped wells) in construction area.	H. Corrective actions taken: Both wells were connected to the GCCS and put online. A re-monitoring event on 11/12/2024 resulted in emissions below 500 ppmv, as methane for both locations.	

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

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

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

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

A. Attachment # or Permit Condition #: P07340PC1	D. Frequency of monitoring:
B. Description: Condition No. 2 - Rule 29 Solvent Use	Annually
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain solvent use exemption records. No solvents were used in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC2/ATC No. 07340-210	D. Frequency of monitoring:
B. Description: Condition No. 1 – Rule 26 Annual Flare Combustion Limit The annual amount of landfill gas combusted in the 120 MMBtu/hr shall not exceed 1,051,200 MMBtu/yr	Continuous
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Landfill gas flow is recorded by flow meter and chart recorder device.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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A. Attachment # or Permit Condition #: P07340PC2/ATC No. 07340-210	D. Frequency of monitoring:
B. Description: Condition No. 2 – Rule 26 Flare BACT Limits	Continuous, bi-annually and quadrennially
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: The flare is equipped with a continuous temperature recording device and landfill gas flow totalizer. Source testing every 2 years (ROC, NOx) using EPA test method 25 or 18, 7 and every 4 years (SOx) using modified SCAQMD method 307-94.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC2/ATC No. 07340-210	D. Frequency of monitoring:
B. Description: Condition No. 3 and 4 – Rule 54 Sulfur Compounds	Quadrennially
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Source test flare every 4 years for sulfur compounds using EPA test method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD method 307-94, as appropriate.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 5 – Rule 57.1 Particulate Matter Emissions from Fuel Burning Equipment	Not applicable.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Not required based on District EPA emission factor analysis.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 6 – Rule 26 Flare UV Flame Scanner Requirements	Not applicable.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: The flare is operated with a UV flame scanner to ensure flare is operating.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 7 – Rule 26 Flare Condensate Knockout / Filter Vessel Requirements	Not applicable.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: The flare is operated with a condensate knockout / filter vessel.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 8 – Rule 26 Condensate and Leachate Collection Vessel Emission Requirements	Monthly
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Monthly inspections of collection vessel.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): I H. *Excursions, exceedances, or other non-compliance? (Y or N): Y *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 9 – Rule 51 Flare Dimensions and Exhaust Velocity	Bi-annually
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Source Testing of the flare stack exit velocity using APCD approved testing protocol.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 9 – Rule 51 Flare Dimensions and Exhaust Velocity	Bi-annually
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Source Testing of the flare stack exit velocity using APCD approved testing protocol.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC2	D. Frequency of monitoring:
B. Description: Condition No. 10 & 11 – Rule 51 Toxics Testing and HRA Requirements	Every 1000 hours, but not less than 10 years and not more than every 4 years.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Source Testing of the flare for Toxics using APCD approved testing protocol.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

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A. Attachment # or Permit Condition #: P07340PC3	D. Frequency of monitoring:
B. Description: Condition Nos. 1 - CARB Executive Order DG-027	Not applicable.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: The 250kW micro-turbines comply with ARB Executive Order DG-027 and are CARB certified. The micro-turbines did not operate in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC3	D. Frequency of monitoring:
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	Daily, Monthly and Annually.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
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 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P07340PC3	D. Frequency of monitoring:
B. Description: Condition No. 4 – Rule 40 CFR Part 60, Subpart WWW, 250kW Micro-Turbines	Not applicable.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain documentation of EPA compliance determination that 250kW Micro-turbines are subject to Section 60.752(b)(2)(iii)(C). The micro-turbines did not operate in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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A. Attachment # or Permit Condition #: P07340PC3	D. Frequency of monitoring: Daily, Monthly, Semi-Annually
B. Description: Condition No. 6 – Rule 74.17.1 Micro-Turbine Metering Requirement	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 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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A. Attachment # or Permit Condition #: 50	D. Frequency of monitoring:
B. Description: Rule 50 - Opacity	Annual formal survey
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment in Second Semi-Annual 2024 Report.
C. Method of monitoring: Routine surveillance and visual inspections of the control devices emissions. Annual formal survey of the control devices emissions.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

A. Attachment # or Permit Condition #: 54.B.2	D. Frequency of monitoring:
B. Description: Rule 54.B.2 Sulfur Dioxide 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.	Bi-annually
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Exhaust analysis and compliance demonstration. Source test exhaust value of Sulfur Dioxide of 0.211 lb/hr in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

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

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

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

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

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

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A. Attachment # or Permit Condition #: 74.1	D. Frequency of monitoring:
B. Description: Rule 74.1 Abrasive Blasting	As needed. E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No abrasive blasting was conducted in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.2	D. Frequency of monitoring:
B. Description: Rule 74.2 Architectural Coatings	Annually E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain VOC records of coatings used. Only coatings that are in compliance with Rule 74.2 are used. No coatings were used in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.4.D	D. Frequency of monitoring:
B. Description: Rule 74.4.D Cut Back Asphalt	As needed. E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No road oils were applied in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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A. Attachment # or Permit Condition #: 74.28	D. Frequency of monitoring:
B. Description: Rule 74.28 Asphalt Roofing Operations	As needed. E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No asphalt roofing operations were conducted in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.29	D. Frequency of monitoring:
B. Description: Rule 74.29 Soil Decontamination Operations	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No soil decontamination operations were conducted in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 40CFR.61.M	D. Frequency of monitoring:
B. Description: 40 CFR, Part 61, Subpart M – National Emission Standard for Asbestos	As needed. E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No asbestos demolition or renovation activities were conducted in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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A. Attachment # or Permit Condition #: 17CCR	D. Frequency of monitoring: Varies
B. Description: 17 CCR Landfill Methane Rule (Sections 95460-95476)	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: Annual (or every 3 yrs) for CH_4 DE
C. Method of monitoring: • 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	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): I H. *Excursions, exceedances, or other non-compliance? (Y or N): Y *If yes, attach Deviation Summary Form

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

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SOURCE TEST SUMMARY FORM

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A. Emission Unit Description: 120 MMBtu/Hr Perennial Energy, Inc. Model FL-150-48-E Landfill Gas Flare			B. Pollutant: NMOC
C. Measured Emission Rate: 2.04 ppm	D. Limited Emission Rate: 20 ppm	E. Specific Source Test or Monitoring Record Citation: Modified EPA Method 25.3	F. Test Date: July 18, 2024

A. Emission Unit Description: 120 MMBtu/Hr Perennial Energy, Inc. Model FL-150-48-E Landfill Gas Flare			B. Pollutant: NO_x
C. Measured Emission Rate: 0.014 lb/MMBtu	D. Limited Emission Rate: 0.025 lb/MMBtu	E. Specific Source Test or Monitoring Record Citation: EPA Method 7E/CARB Method 100	F. Test Date: July 18, 2024

A. Emission Unit Description: 120 MMBtu/Hr Perennial Energy, Inc. Model FL-150-48-E Landfill Gas Flare			B. Pollutant: CO
C. Measured Emission Rate: 0.0163 lb/MMBtu	D. Limited Emission Rate: 0.06 lb/MMBtu	E. Specific Source Test or Monitoring Record Citation: EPA Method 10/CARB Method 100	F. Test Date: July 18, 2024

A. Emission Unit Description: 120 MMBtu/Hr Perennial Energy, Inc. Model FL-150-48-E Landfill Gas Flare			B. Pollutant: SO_x
C. Measured Emission Rate: 0.0053 lb/MMBtu (as SO_2)	D. Limited Emission Rate: 0.02 lb/MMBtu (as SO_2)	E. Specific Source Test or Monitoring Record Citation: Modified SCAQMD 307-91	F. Test Date: July 18, 2024

A. Emission Unit Description: 120 MMBtu/Hr Perennial Energy, Inc. Model FL-150-48-E Landfill Gas Flare			B. Pollutant: SO_x
C. Measured Emission Rate: 0.0053 lb/MMBtu (as SO_2)	D. Limited Emission Rate: 0.02 lb/MMBtu (as SO_2)	E. Specific Source Test or Monitoring Record Citation: Modified SCAQMD 307-91	F. Test Date: July 18, 2024

A. Emission Unit Description: 120 MMBtu/Hr Perennial Energy, Inc. Model FL-150-48-E Landfill Gas Flare			B. Pollutant: PM
C. Measured Emission Rate: 0.0092 lb/MMBtu (as SO_2)	D. Limited Emission Rate: 0.012 lb/MMBtu	E. Specific Source Test or Monitoring Record Citation: CARB Method 5	F. Test Date: July 18, 2024

A. Emission Unit Description: 120 MMBtu/Hr Perennial Energy, Inc. Model FL-150-48-E Landfill Gas Flare			B. Pollutant: ROC
C. Measured Emission Rate: 0.0058 lb/MMBtu	D. Limited Emission Rate: 0.038 lb/MMBtu	E. Specific Source Test or Monitoring Record Citation: Modified EPA Method 25.3	F. Test Date: July 18, 2024

A. Emission Unit Description: 120 MMBtu/Hr Perennial Energy, Inc. Model FL-150-48-E Landfill Gas Flare			B. Pollutant: Destruction Eff.%
C. Measured Emission Rate: NMOC: 2.04 ppm (DE could not be determined due to compromised sample for Run 3) MDE: 99.4%	D. Limited Emission Rate: NMOC: 98%, or 20 ppm MDE: 99%	E. Specific Source Test or Monitoring Record Citation: Modified EPA Method 25C	F. Test Date: July 18, 2024

ATTACHMENT 3

SUPPLEMENTAL INFORMATION HISTORICALLY SUBMITTED WITH TITLE V REPORTS

Toland Road Landfill
2024
Monthly Throughput

Month	*LFG scf*	*HHV*	*CH4 Average*
Jan	72,387,338	446	44.1
Feb	59,750,289	468	46.3
Mar	75,457,200	480	47.4
Apr	62,497,157	463	45.8
May	61,349,544	470	46.4
Jun	52,606,697	470	46.5
Jul	46,126,890	460	45.4
Aug	37,679,361	465	46.0
Sep	40,126,363	484	47.9
Oct	28,295,715	483	47.7
Nov	46,234,615	463	45.7
Dec	40,476,129	471	46.5

Flare Operational Hours
734.40
612.00
708.00
662.00
670.00
684.00
610.41
468.12
510.52
378.41
594.91
509.63

	Total LFG	**Average HHV**	**MMBtu**
2024	**622,987,297**	**469**	**291,937**

2024 Total Hours
7,142.40

Toland Road Landfill
2024 SC Fuels Gasoline Volumes

Date	Gas Type	Amount (Gallons)
January	Unleaded Regular	682.0
February	Unleaded Regular	759.5
March	Unleaded Regular	759.2
April	Unleaded Regular	877.2
May	Unleaded Regular	607.5
June	Unleaded Regular	657.2
July	Unleaded Regular	702.9
August	Unleaded Regular	673.4
September	Unleaded Regular	600.3
October	Unleaded Regular	671.3
November	Unleaded Regular	569.7
December	Unleaded Regular	599.4
Total		**8,159.6**

VCAPCD Rule 50, Opacity

Annual Compliance Survey

Survey Information:

By: Alan Charlesworth

Date: 11-11-2024

Time: 08:00 / 08:30

Emissions Unit: Toland Landfill Flare

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

X Alan E. Charlesworth

Alan Charlesworth

Alan E. Charlesworth—Engineering Technician

Renewable Diesel + Biodiesel

InfiniD™ | PuriD™ | VelociD™ | UltraClean BlenD™ | BeyonD™

EnDura Fuels™
Scalable. Reliable. Responsible.

UltraClean BlenD™

Simplify lower-carbon efforts with a better blend.

UltraClean BlenD™ is a proprietary fuel that combines renewable diesel and biodiesel to help you meet lower-carbon goals simply—with no infrastructure changes.

Excellent performance.

UltraClean BlenD™ provides excellent lubricity, high Cetane number, and low Cloud Point for excellent performance, all while enabling your carbon intensity reduction goals to be met.

Chevron

Renewable Energy Group

Superior lubricity to renewable diesel and can even have a lower freezing point

Carbon Intensity (CI) scores that are lower than petroleum diesel allow for emissions carbon intensity reduction today

UltraClean BlenD™ can provide one of the lowest overall engine emissions of any diesel fuel option

Elastomer swell, density and bulk modulus properties of UltraClean BlenD™ are a better match for conventional diesel than straight renewable diesel

UltraClean BlenD™

UltraClean BlenD™ is a proprietary, renewable fuel combination of VelociD™ and PuriD™ that allows for reduced carbon intensity today in virtually any diesel application.

Our focus is on your success.

For more than 25 years, we've helped industries implement practical solutions to complex sustainability challenges by providing leading-edge quality, go-to-market agility, strategic partnerships and sensible lower-carbon solutions.

For more information

North America: Contact Chevron Renewable Energy Group at 844.405.0160 or connect with us at ***regi.com***

Europe: Contact Chevron Renewable Energy Group at +31 20 757 6800 or ***eur-sales@regi.com***

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Renewable Energy Group

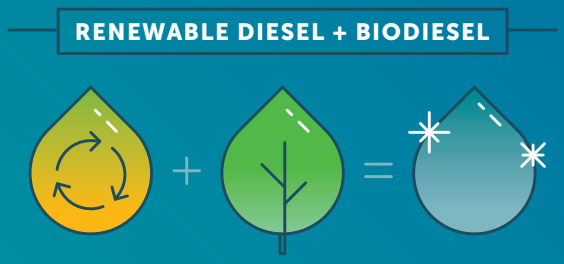
The renewable fuel blend with more benefits.

REG's latest fuel offering combines renewable diesel and biodiesel to reduce emissions and help you meet your fossil carbon reduction goals. Biodiesel was the first widely available bio-based diesel, followed by renewable diesel. The two fuels provide distinctly different benefits, which through their combination create a 100% renewable fuel with a powerful combination of benefits.

Blending renewable diesel and biodiesel

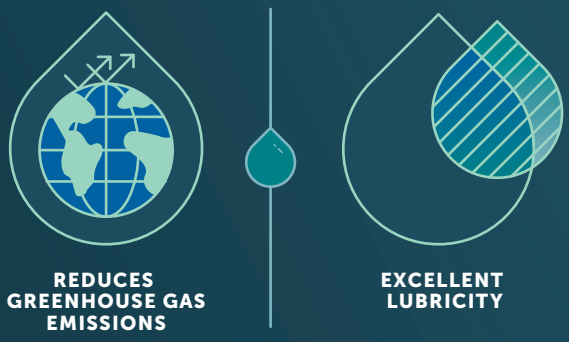
REG has found that blending renewable diesel and biodiesel enhances the benefits of using either fuel alone while meeting 100% renewable fuel targets.

UltraClean BlenD™ delivers those enhanced benefits either as a standalone fuel or for easy blending with petroleum diesel. UltraClean BlenD™ meets all requirements set by the California Air Resources Board (CARB).



A Winning Combination

Compared to petroleum diesel, UltraClean BlenD™ significantly reduces major engine emissions, including greenhouse gas (GHG) emissions. It also has multiple performance advantages, such as higher Cetane and lubricity.



Here's how UltraClean BlenD™ delivers the best of both renewable diesel and biodiesel.

Emissions Benefits

Both renewable diesel and biodiesel produce fewer harmful engine emissions than conventional ultra-low sulfur diesel (ULSD). When blended together, these emission reductions are enhanced.

Compared to petroleum diesel, UltraClean BlenD™ can reduce:

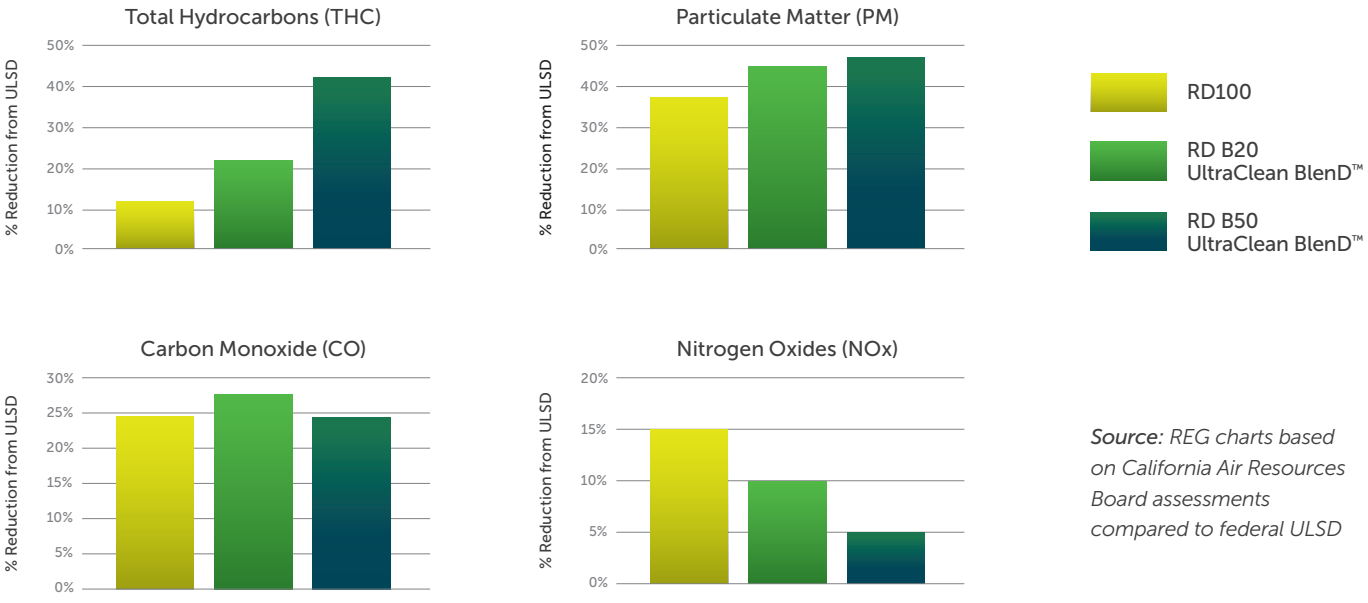
Total hydrocarbon emissions — up to **40%**

Particulate matter emissions — more than **40%**

Carbon monoxide emissions — by approximately **25%**

Nitrogen oxides (NOx) — up to **10%**

Bio-Based Diesel Emissions Reduction Estimates



Source: REG charts based on California Air Resources Board assessments compared to federal ULSD

Performance Benefits

Biodiesel and renewable diesel have complementary properties that result in a 100% renewable fuel with a powerful combination of performance benefits.

Renewable diesel Offers increased Cetane.	+	**Biodiesel** Offers increased lubricity and more complete combustion.	=	**UltraClean BlenD™** Offers the potential for smoother-running engines, less engine wear, and reliable operation in all conditions.

Cost and Supply Benefits

In addition to potential state and federal incentives — including LCFS credits and RINs — UltraClean BlenD™ can offer economic advantages over renewable diesel. Blending the two renewable fuels has a positive impact on supply availability — making it easier to meet sustainability goals and emissions targets.

REG Quality and Expertise Can Positively Impact Your Business

You can count on Renewable Energy Group to deliver quality fuel to meet your operational needs and sustainability goals. REG is a feedstock flexible company that uses a variety of lower Carbon Intensity (CI) feedstocks. Feedstock flexibility allows us to deliver UltraClean BlenD™ with lower CI scores, helping you maximize credits in LCFS markets.

UltraClean Blend™

RENEWABLE DIESEL + BIODIESEL

A proprietary and sustainable fuel blend that combines excellent lubricity, high Cetane and low emissions in a 100% renewable fuel. It's a low-carbon diesel fuel that's an easy-to-use solution for fleets.

Start achieving your sustainability goals today.
Contact REG at **(844) 405-0160** or **connect@regi.com**

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