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

February 14, 2020

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

SUBJECT: TITLE V COMPLIANCE REPORTS FOR THE TOLAND ROAD LANDFILL

Dear 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) and Title V Report for July 1, 2019 to December 31, 2019;
2. Semi-Annual Startup, Shutdown and Malfunction (SSM) Plan Report for July 1, 2019 to December 31, 2019;
3. Annual Title V Compliance Certification for January 1 to December 31, 2019
4. Supplemental information historically submitted with Title V Reports.

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

A separate Responsible Official's Certification Form is included in Attachment 2 for the SSM Plan Report. Attachment 2 also includes summary tables of all SSM events and the individual SSM Plan Forms.

Attachment 3 includes the Annual Title V Compliance Certification. Attachment 3 also includes the Annual Deviation Summary Form, Permit Attachment Form, and Flare Source Test Summary Form.

Attachment 4 includes supplemental information that has been historically provided to the Ventura County Air Pollution Control District (VCAPCD), but is not specifically required as part of the Annual Compliance Certification Report or the Semi-Annual Monitoring Report. This attachment includes the monthly landfill throughputs, opacity compliance forms, volume of gasoline used at VRSD, 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, VCAPCD Rule 74.17.1, the NSPS for municipal solid waste landfills (40 CFR Part 60, Subpart WWW), and the National Emission Standards for Hazardous Air Pollutants for municipal solid waste landfills (40 CFR Part 63, Subpart AAAA).

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

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

Sincerely,

Matt Baumgardner
Director of Operations
Ventura Regional Sanitation District

Attachments

1. Semi-Annual NSPS/Title V Report for July 1, 2019 to December 31, 2019
2. Semi-Annual Startup, Shutdown and Malfunction Plan Report for July 1, 2019 to December 31, 2019
3. Annual Title V Compliance Certification for January 1, 2019 to December 31, 2019
4. Supplemental Information Historically Submitted with Title V Reports

Copy: United States Environmental Protection Agency, Region IX

ATTACHMENT 1

SEMI-ANNUAL NSPS/TITLE V REPORT

Second Semi-Annual 2019 Title V Report and New Source Performance Standards (NSPS) Report Toland Road Landfill Santa Paula, California

From:
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, California 93003

For Submittal to:

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

February 2020

SEMI-ANNUAL TITLE V REPORT OF REQUIRED MONITORING

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

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

Certification by Responsible Official

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

Signature and Title of Responsible Official: Title: Matt Baumgardner Director of Operations	Date: 2/14/20

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

07/01/2019 to 12/31/2019

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1.0 INTRODUCTION

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

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

The semi-annual report includes the following information, as required by VCAPCD Rule 74.17.1 and 40 CFR 60.757(f), for the reporting period from July 1 through December 31, 2019:

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

2.0 BACKGROUND INFORMATION

2.1 OWNER AND OPERATOR INFORMATION

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

TRL is located in eastern Ventura County between the cities of Santa Paula and Fillmore, north of Highway 126. The landfill has been in operation since 1962. In 2000, a landfill gas (LFG) collection system and control system (GCCS) was installed at the Landfill, which included an 85.8 million British Thermal Units per hour (MMBtu/hr) LFG-fired enclosed flare. In 2009, nine (9) 3.2 MMBtu/hr microturbines were installed. In April 2019, the microturbines were permanently shut down.

2.2 DESCRIPTION OF LANDFILL GAS COLLECTION AND CONTROL SYSTEM

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

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

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

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

3.1 CONTINUOUSLY MONITORED PARAMETERS

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

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

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

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

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

3.1.1 Wellhead Monitoring Data

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

- During the reporting period, all operation of extraction wells had negative pressure, except for five (5) events. Per CFR 60.755 (a)(3), corrective action was initiated (through valve adjustments) and re-monitoring was performed, and all five (5) wells were corrected within 15 days. The dates and duration when wells were under positive pressure are detailed in Table 1 below.

Table 1. Summary of Wells with Positive Pressure

Well	Initial Date	Initial Pressure	Re-Monitoring Date s)	Compliant Pressure	Duration
		(in H2O)		(in H2O)	(Days)
36S	9/12/19	12.65	9/12/19	-25.1	0
50R	9/12/19	0.11	9/12/19	-0.01	0
50SOP	9/12/19	3.6	9/12/19	-15.07	0
30S	11/13/19	0.11	11/13/19 11/18/19	-0.03	5
TLH-1816A	11/14/19	0.03	11/14/19 11/19/19	-1.48	5

- 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 six (6) events. Per 40 CFR 60.755(a), corrective action (through valve adjustments) and re-monitoring was performed, and all six (6) wells were corrected within 15 days. 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 2 below. Wells that could not be corrected for temperature exceedances from the previous semi-annual reporting period and their status is summarized in Table 3.

Table 2. Summary of Wells Above 131 °F

Well	Initial Date	Initial Temperature	Re-Monitoring Date (s)	Compliant Temperature	Duration
		(°F)		(°F)	(Days)
13S	7/12/19	144	7/12/19 7/18/19	126.7	6
79D	7/12/19	137.2	7/12/19 7/23/19	128.2	11
12S	7/23/19	134.6	7/23/19	127.7	0
30S	7/24/19	136.3	7/24/19	128.9	0
81D	7/24/19	134.4	7/24/19	129.9	0
13S	8/14/19	131.3	8/14/19	130.1	0

Table 3. Summary of Wells Not Corrected for Temperature in Previous Reporting Periods

Well	Exceedance Duration for High Temperature
31D	Well could not be corrected for high temperature on 5/14/19. Well corrected on 7/18/19 (128.8 °F) within 120-day timeframe

- During the reporting period, all operational extraction wells had oxygen contents of less than 5%, except twenty-two (22) events. Per CFR 60.755 (a)(5), corrective action and re-monitoring was taken and five (5) of the twenty-two (22) events were corrected within 15 days. Eight (8) events resulted in the wells being corrected between 15 and 120 days. Six (6) wells were abandoned within 120 days. One (1) well was temporarily decommissioned under SSM but back online and compliant within 120 days. One (1) well was temporarily decommissioned under SSM and is offline as of the end of the reporting period. One (1) well is currently in the 120-day period as of the end of the reporting period. Well dates and duration when oxygen at the wellheads were above 5% are summarized below in Table 4. Wells that could not be corrected for oxygen exceedances from the previous semi-annual reporting period and their status is summarized in Table 5.

Table 4. Summary of Wells Above 5% Oxygen

Well	Initial Date	Initial Oxygen (% O2)	Re-Monitoring Date (s)	Compliant Oxygen (% O2)	Duration (Days)
H-1810B	7/24/19	18.0	7/24/19 8/14/19 9/12/19 9/12/19	4.8	50
18D	7/25/19	7.3	7/25/19 8/14/19	2.9	20 days; Well temporarily decommissioned on 7/30/19; online and compliant on 8/14/19
50R	9/12/19	16.3	9/12/19 10/2/19	4.0	20
50SOP	9/12/19	19.0	9/12/19 10/2/19	0.1	20
50D	9/13/19	19.7	9/13/19 10/2/19	1.2	19
1807	10/7/19	10.4	10/7/19 10/23/19	1.1	16
3240 EDGE	11/11/19	9.8	11/11/19 11/22/19 12/6/19 12/17/19	4.3	36
STEELIRIS	11/11/19	20.5	11/11/19 11/12/19	1.6	1
36S	11/11/19	5.9	11/11/19 11/22/19	1.4	11
60S	11/13/19	18.8	--	--	Abandoned on 11/13/19 within 120 days
1807	11/14/19	13.1	11/14/19	--	Temporarily decommissioned on 11/14/19; Abandoned on 11/18/19 within 120 days
3230 EDGE	12/9/19	6.2	12/9/19 12/20/19 12/26/19	1.0	17

Well	Initial Date	Initial Oxygen (% O2)	Re-Monitoring Date (s)	Compliant Oxygen (% O2)	Duration (Days)
1S	12/9/19	17.2	12/9/19 12/20/19 12/30/19 12/31/19	--	Abandoned on 12/31/19 within 120 days
10D	12/9/19	5.7	12/9/19 12/20/19	4.7	11
10S	12/9/19	10.7	12/9/19 12/20/19	4.3	11
46S	12/9/19	15.4	12/9/19 12/20/19 12/26/19 12/31/19	--	Abandoned on 12/31/19 within 120 days
57D	12/9/19	6.7	12/9/19 12/20/19 12/26/19	0.0	17
83D	12/9/19	9.0	12/9/19	4.3	0
35S	12/19/19	20.8	12/19/19 12/31/19	--	Abandoned on 12/31/19 within 120 days
78D	12/19/19	5.8	12/19/19 12/30/19	--	Currently in 120-day period for corrective action
38SR	12/19/19	21.1	12/19/19	--	Temporarily decommissioned on 12/19/19; offline as of end of reporting period
57D	12/31/19	14.4	--	--	Abandoned on 12/31/19 within 120 days

Table 5. Summary of Wells Not Corrected for Oxygen in Previous Reporting Periods

Well	Exceedance Duration for High Oxygen
53D	Well could not be corrected for high oxygen on 3/14/17. Temporarily decommissioned on 4/4/17 due to filling operations. Offline as of end of reporting period.
54S	Well could not be corrected for high oxygen on 3/14/17. Temporarily decommissioned on 4/14/17 due to filling operations. Offline as of end of reporting period.
19D	Well could not be corrected for high oxygen on 5/4/18. Offline due to operations on 5/10/18 and offline as of end of reporting period.
19S	Well could not be corrected for high oxygen on 5/4/18. Offline due to operations on 5/10/18 and offline as of end of reporting period.
37L	Well could not be corrected for high oxygen on 10/26/18. Offline due to filling activities on 10/31/18 and offline as of end of reporting period.
37R	Well could not be corrected for high oxygen on 2/25/19. Not monitored or corrected within 120 days; abandoned on 9/12/19
TLH-1812A	Well could not be corrected for high oxygen on 3/19/19. Temporarily decommissioned on 4/30/19; abandoned on 7/1/19

Wellhead readings for wells that were off-line due to maintenance, active filling or on-site construction activities; taken offline for well SSM events; and/or shut-off to control increased well temperature to prevent a subsurface fire as exempt under 40 CFR 60.753(b), were excluded from the above review.

3.1.2 Flare Station Monitoring Data

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

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

3.1.3 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 2017 source test for quadrennial emission compliance and methane destruction for the flare was performed on October 26, 2017, and the source test report was submitted on December 5, 2017 with a temperature at 1,680 °F. During the reporting period from July 1 through September 2, 2019, the minimum temperature at which the flare should operate was 1,630 °F (1,680 °F – 50 °F).

The 2019 source test for biennial emission compliance and methane destruction for the flare was performed on August 13, 2019, and the source test report was submitted on September 3, 2019 with a temperature at 1,692 °F. During the reporting period from September 3 through December 31, 2019, the minimum temperature at which the flare should operate was 1,642 °F (1,692 °F – 50 °F).

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

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

3.1.5 Control 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.

Blower/flare station shutdowns (for more than one hour) occurred at various times during the reporting period of July 1 through December 31, 2019 due to some, but not limited to, the following reasons:

- High oxygen
- Blower high vibration fault
- Scheduled or unscheduled flare or collection system maintenance/repair

Collected LFG was at no time diverted from the flare because the blowers automatically shut down whenever the control device shuts down. Therefore, at no time was the collected LFG emitted without destruction during the reporting period. Also, in no instances did free venting of LFG occur during the reporting period. Individual flare shutdowns exceeding 1 hour in duration are included in Table 6 below.

Table 6. Summary of Flare Downtime Greater than 1 Hour

Control System Periods of Downtime Exceeding 1 Hour		
Date	Duration (Hrs:Min)	Reason for Shutdown
7/1/19	3:15	Flare manually shutdown for scheduled maintenance
7/8/19	3:58	Flare manually shutdown for scheduled condensate injection system (CIS) maintenance
7/15/19	4:03	Flare manually shutdown for scheduled CIS maintenance
7/16/19	10:35	Flare manually shutdown for scheduled collection system maintenance
7/31/19	8:54	Flare manually shutdown for scheduled CIS maintenance
8/1/19	12:54	Flare shutdown due to gas analyzer failure
8/22/19	4:43	Flare manually shutdown for scheduled leachate system maintenance
9/19/19	1:23	Flare manually shutdown for scheduled CIS maintenance
9/26/19	32:55	Flare manually shutdown for sulfur treatment carbon change out
9/29/19	1:53	Flare shutdown due to blower high vibration fault
10/3/19	1:31	Flare shutdown due to low air pressure
10/5/19	5:36	Flare shutdown due to high oxygen
10/10/19	18:35	Flare shutdown due to power outage
10/23/19	1:07	Flare shutdown due to blower high vibration fault
10/29/19	47:59	Flare manually shutdown for scheduled power outage by Southern California Edison
11/4/19	5:54	Flare shutdown due to high oxygen

3.1.6 Collection System Downtime

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

3.2 SURFACE EMISSION MONITORING DATA

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

3.2.1 Third Quarter Monitoring

The third quarter 2019 instantaneous surface emissions monitoring event was performed on September 16 and 17, 2019 by RES Environmental, Inc. (RES). The event resulted in eight (8) areas of the landfill having TOC concentrations above 500 ppmv, measured as methane. Remediation activities were performed, including adding soil, and a 10-day re-monitoring event performed September 25, 2019, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed October 16, 2019, resulted in zero (0) areas with TOC concentrations above 500 ppmv,

measured as methane. There were no areas which triggered the NSPS 120-day timeline to implement a system expansion.

3.2.2 Fourth Quarter Monitoring

The fourth quarter 2019 instantaneous surface emissions monitoring event was performed on December 3, 2019 by RES. The event resulted in fourteen (14) areas of the landfill having TOC concentrations above 500 ppmv, measured as methane. Remediation activities were performed, including adding soil, and a 10-day re-monitoring event performed on December 12, 2019, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed January 2, 2020, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. There were no areas which triggered the NSPS 120-day timeline to implement a system expansion.

Please note that TRL received a Notice of Violation (NOV) on December 11, 2019 for instantaneous surface emissions exceedances during an inspection on December 10, 2019 by the VCAPCD. During the inspection, there were four (4) areas of the landfill having TOC concentrations above 500 ppmv, measured as methane. Remediation activities were immediately performed, including adding soil and compacting, and a 10-day re-monitoring event performed on December 19, 2019, results in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed on January 8, 2020, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. There were no areas which triggered the NSPS 120-day timeline to implement a system expansion. The deviation is reported in Section 5.0 of this report and in the Annual Title V compliance certification.

3.3 COVER INTEGRITY MONITORING

Per 40 CFR 60.755(c)(5), the site must implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis. TRL monitored for cover integrity on a monthly basis during the reporting period. Cover integrity monitoring results are located in Appendix B.

3.4 GAS COLLECTION SYSTEM INSTALLATIONS AND UPGRADES

During the reporting period, the following gas collection system installations, upgrades and abandonments are noted in Table 7 below.

Table 7. GCCS Installations, Upgrades, and Abandonments

DATE	DESCRIPTION
7/1/19	Well TLH-1812A abandoned
7/24/19	Well 11S abandoned
7/25/19	Wells 59 and 71S abandoned
9/12/19	Well 37R abandoned
11/11/19	Wells 302L, 48S, and 1813B abandoned

DATE	DESCRIPTION
11/11/19	Wells 43DR, 37RR, 38SR, 1901A, 1902A, and 64R online and operational
11/13/19	Wells 60S and 13D abandoned
11/18/19	Well 1807 abandoned
11/19/19	Well 2D abandoned
12/31/19	Wells 38SR, 1, 46S, 57D, and 35S abandoned

4.0 PERFORMANCE TEST

The facility is required to perform a source test on the flare once every two years as required by Rule 74.17.1 and an air toxics test once every four years as required by Condition No. 10 of the PTO. The compliance test for Non-Methane Organic Compounds (NMOC), Nitrogen Oxides (NOx), Sulfur Oxides (SOx), and Carbon Monoxide (CO) for the flare was performed on August 13, 2019.

Performance test summary information on the NMOCs, NOx, SOx, and CO emissions for the flare is provided in Table 8 below.

Table 8. Summary of Source Test Results

Test Date	Parameter	Flare Result	Emission Limit
Flare 8/13/19	NOx Emission Rate (lb/MMBtu)	0.0568	0.06 lb/MMBtu
	CO Emission Rate (lb/MMBtu)	0.145	0.20 lb/MMBtu
	SOx Emission Rate (lb/MMBtu)	0.0044	0.02 lb/MMBtu
	NMOC Emission Rate (ppmv, as hexane @ 3% O_2)	0.518	20 ppmv
	NMOC Destruction Efficiency (%)	99.75	98%

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

Please note that methane destruction efficiency testing under Condition No. 3 from the Title 17 California Code of Regulations (CCR) section in the PTO was also conducted on August 13, 2019. The methane destruction efficiency was 99.995%, which is in compliance with 17 CCR requirements. The next methane destruction testing is required by 2022.

5.0 TITLE V COMPLIANCE

During the reporting period, the Landfill performed all required monitoring and maintained the appropriate records. There was one (1) deviation during the reporting period as detailed below.

TRL received an NOV on December 11, 2019 for instantaneous surface emissions exceedances during an inspection on December 10, 2019 by the VCAPCD. During the inspection, there were four (4) areas of the landfill having TOC concentrations above 500 ppmv, measured as methane. Remediation activities were immediately performed, including adding soil and compacting, and a 10-day re-monitoring event performed on December 19, 2019, results in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed on January 8, 2020, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. There were no areas which triggered the NSPS 120-day timeline to implement a system expansion. The deviation is also reported in the Annual Title V compliance certification.

APPENDIX A

LANDFILL SITE PLAN

\\Mac\Dropbox for Business\Engineering\Projects\VRSD\Toland\TRLF LFG Wells\Current GCCS MAP\LFG SYSTEM_Dec-2018_rev 6.dwg 3/26/19 gautamarora

REV	DATE	DESCRIPTION	DRN BY	CHK BY	APRV BY

OWNER:

VENTURA REGIONAL SANITATION DISTRICT

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

ENGINEER:

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

LFG GCCS MAP - DECEMBER 2018

TOLAND ROAD LANDFILL
EXITING GCCS-2018

DRAWING NO.
EX-1
PROJECT NO.

APPENDIX B

COVER INTEGRITY MONITORING

INSPECTOR: Juan Barajas DATE: 07/19/2019

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

Corrective action

Date	Location	Corrective action taken

INSPECTOR: Juan Barajas DATE: 08/27/2019

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

Corrective action

Date	Location	Corrective action taken

INSPECTOR: Juan Barajas DATE: 09-03-2019

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

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Chris Fear (SCS) DATE: 10/2/2019

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: 11/14/2019

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: 12/10/2019

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

ATTACHMENT 2

SEMI-ANNUAL SSM PLAN REPORT

Ventura County
Air Pollution
Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

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

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

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

Certification by Responsible Official

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

Signature and Title of Responsible Official: Signature: _____ Title: Director of Operations	Date: 2/14/20

DESCRIPTION OF SSM EVENTS FOR FLARE

Reporting period July 1 through December 31, 2019

Start of Event	End of Event	Total Duration (Hrs:Min)	Equipment Affected*	Type of Event	Description of Event	Were SSM Plan Procedures Followed (Y/N)	Date of SSM Plan Revision to Address Event *
7/1/19	7/1/19	3:15	Flare	Shutdown/Startup	Flare manually shutdown for scheduled maintenance	Y	N/A
7/8/19	7/8/19	3:58	Flare	Shutdown/Startup	Flare manually shutdown for scheduled condensate injection system (CIS) maintenance	Y	N/A
7/15/19	7/15/19	4:03	Flare	Shutdown/Startup	Flare manually shutdown for scheduled CIS maintenance	Y	N/A
7/16/19	7/16/19	10:35	Flare	Shutdown/Startup	Flare manually shutdown for scheduled collection system maintenance	Y	N/A
7/22/19	7/22/19	0:20	Flare	Shutdown/Startup	Flare manually shutdown for scheduled CIS engineering test	Y	N/A
7/22/19	7/22/19	0:24	Flare	Shutdown/Startup	Flare manually shutdown for scheduled CIS engineering test	Y	N/A
7/29/19	7/29/19	0:45	Flare	Malfunction	Flare shutdown while checking the flare HMI screen	Y	N/A
7/31/19	7/31/19	8:54	Flare	Shutdown/Startup	Flare manually shutdown for scheduled CIS maintenance	Y	N/A
8/1/19	8/2/19	12:54	Flare	Malfunction	Flare shutdown due to gas analyzer failure	Y	N/A
8/22/19	8/22/19	4:43	Flare	Shutdown/Startup	Flare manually shutdown for scheduled leachate system maintenance	Y	N/A
9/6/19	9/6/19	0:15	Flare	Malfunction	Flare shutdown due to blower high vibration fault	Y	N/A
9/19/19	9/19/19	1:23	Flare	Shutdown/Startup	Flare manually shutdown for scheduled CIS maintenance	Y	N/A
9/26/19	9/27/19	32:55	Flare	Shutdown/Startup	Flare manually shutdown for sulfur treatment carbon change out	Y	N/A
9/29/19	9/29/19	1:53	Flare	Malfunction	Flare shutdown due to blower high vibration fault	Y	N/A

Start of Event	End of Event	Total Duration (Hrs:Min)	Equipment Affected*	Type of Event	Description of Event	Were SSM Plan Procedures Followed (Y/N)	Date of SSM Plan Revision to Address Event *
10/3/19	10/3/19	1:31	Flare	Malfunction	Flare shutdown due to low air pressure	Y	N/A
10/5/19	10/5/19	5:36	Flare	Malfunction	Flare shutdown due to high oxygen	Y	N/A
10/7/19	10/7/19	0:20	Flare	Malfunction	Flare shutdown due to blower high vibration fault	Y	N/A
10/9/19	10/9/19	0:56	Flare	Shutdown/Startup	Flare manually shutdown for scheduled electrical maintenance	Y	N/A
10/10/19	10/11/19	18:35	Flare	Malfunction	Flare shutdown due to power outage	Y	N/A
10/23/19	10/23/19	1:07	Flare	Malfunction	Flare shutdown due to blower high vibration fault	Y	N/A
10/29/19	10/31/19	47:59	Flare	Shutdown/Startup	Flare manually shutdown for scheduled power outage by Southern California Edison	Y	N/A
11/4/19	11/4/19	5:54	Flare	Malfunction	Flare shutdown due to high oxygen	Y	N/A

*Not Applicable if SSM Plan Procedures were followed during event

**Malfunction events assume automatic startup unless otherwise noted

***There were no SSM events for the flare monitoring devices during the reporting period

STARTUP, SHUTDOWN, AND MALFUNCTION LOG
COLLECTION SYSTEM
TOLAND ROAD LANDFILL

DEVICE	START OF EVENT DATE AND TIME	END OF EVENT DATE AND TIME	TOTAL DOWNTIME (HRS:MIN)	CAUSE OR REASON	DID SSM VARY FROM PROCEDURE IN SSM PLAN (Y OR N)	WAS THERE AN EXCEEDANCE OF AN EMISSION LIMITATION?	COMPLETED BY:
23S	1/9/2017 9:00			Disconnected for filling operations	N	N	Alan C.
23D	1/9/17 9:00			Disconnected for filling operations	N	N	Alan C.
53D	4/4/2017 10:30			Disconnected for filling operations	N	N	Alan C.
54S	4/14/2017 10:30			Disconnected for filling operations	N	N	Alan C.
54D	4/14/2017 10:30			Disconnected for filling operations	N	N	Alan C.
84S	4/28/2017 13:00			Disconnected for filling operations; offline for operations and possible subsurface oxidation	N	N	Alan C.
49S	5/9/2017 7:30			Disconnected for filling operations	N	N	Alan C.
307L	5/9/2017 10:00	10/31/2019 10:30	21720:30	Disconnected for filling operations	N	N	Alan C.
14D	8/5/2017 8:00			Disconnected for filling operations	N	N	Alan C.
62S	10/17/2017 10:00			Disconnected for filling operations	N	N	Ricky O.
62D	10/17/2017 13:00			Disconnected for filling operations	N	N	Ricky O.
4S	10/17/2017 14:00			Disconnected for filling operations	N	N	Ricky O.
17D	10/2/2017 11:00			Disconnected for filling operations	N	N	Alan C.
16D	10/2/2017 11:00			Disconnected for filling operations	N	N	Alan C.
322	12/5/2017 9:30			Gas well shutdown due to fire onsite	N	N	Ricky O
66D	12/28/17 10:00			Disconnected for filling operations	N	N	Alan C.
19S	5/10/18 8:00			Gas well taken offline for operations	N	N	Ricky O
19D	5/10/18 8:00			Gas well taken offline for operations	N	N	Ricky O
	8/1/2018 16:00			Gas well offline for filling operations	N	N	Ricky O
1808S	9/13/2018 10:00			Gas well offline for filling operations	N	N	Ricky O
1808D	9/13/2018 10:00			Gas well offline for filling operations	N	N	Ricky O
40S	9/27/2018 10:00			Gas well offline for filling operations	N	N	Ricky O
5S	10/31/2018 8:00			Gas well offline for filling operations	N	N	Ricky O
6S	10/31/2018 8:00			Gas well offline for filling operations	N	N	Ricky O
1802S	11/1/2018 10:00	1/11/2019 12:26	1706:26	Gas well offline for filling operations	N	N	Ricky O
1802D	11/1/2018 10:00	1/11/2019 12:28	1706:28	Gas well offline for filling operations	N	N	Ricky O
TLH1814B	1/22/19 10:30			Gas well offline for filling operations	N	N	Alan C
VGW1802	2/22/19 8:00			Gas well offline for filling operations	N	N	Alan C
VGW1801S	2/22/19 8:00			Gas well offline for filling operations	N	N	Alan C
VGW1801D	2/22/19 8:00			Gas well offline for filling operations	N	N	Alan C
VGW1803S	4/3/19 10:00			Gas well offline for filling operations	N	N	Alan C
VGW1803D	4/3/19 10:00			Gas well offline for filling operations	N	N	Alan C
TLH1812A	4/30/2019 8:30	N/A	N/A	Gas well taken offline due to possible subsurface oxidation; high O2; Abandoned on 7/1/19	N	N	Juan B
1803S	4/30/2019 8:30			Gas well taken offline due to filling operations	N	N	Juan B
1803D	4/30/2019 8:30			Gas well taken offline due to filling operations	N	N	Juan B

DEVICE	START OF EVENT DATE AND TIME	END OF EVENT DATE AND TIME	TOTAL DOWNTIME (HRS:MIN)	CAUSE OR REASON	DID SSM VARY FROM PROCEDURE IN SSM PLAN (Y OR N)	WAS THERE AN EXCEEDANCE OF AN EMISSION LIMITATION?	COMPLETED BY:
47S	5/20/19 10:30	10/22/2019 13:30	3723:00	Gas well offline for filling operations	N	N	Alan C
H-1813B	6/1/2019	11/1/2019 0:00	3672:00	Gas well take offline due to trash filling operations	N	N	Alan C
17S	6/1/2019	10/31/2019 0:00	3648:00	Gas well taken offline due to possible subsurface oxidation; high O2	N	N	Juan B
1811B	7/1/19 11:00			Gas well disconnected due to trash filling operations.	N	N	Chris F.
1811C	7/1/19 11:00	10/31/19 16:28	2933:28	Gas well disconnected due to trash filling operations.	N	N	Chris F.
59	7/25/19 11:19	N/A	N/A	Gas well permanently abandoned due to potential subsurface oxidation and decline in gas quality	N	N	Alan C
71S	7/25/19 13:30	N/A	N/A	GW abandoned due to being destroyed by heavy equipment in active area.	N	N	Alan C
18D	7/30/2019 8:00	8/14/19 14:37	366:37	Gas well taken offline due to possible subsurface oxidation; high O2	N	N	Juan B
60S	7/24/2019 13:00	10/31/2019 11:00	2374:00	Gas well taken offline due to being pinched above well perferation. Pump was installed in casing and was lost inside casing beneath the pinch point. Liquids unable to be pumped out.	N	N	Juan B
11S	7/24/2019 13:20	N/A	N/A	Gas Well permanently abandoned due to being pinched above perf, subsurface oxidation; high O2	N	N	Juan B
1810B	7/24/2019 13:53			Gas well temporarily taken offline due to possible subsurface oxidation; high O2	N	N	Juan B
28S	8/19/2019 7:30	11/11/2019 3:29	2011:59	Gas well taken offline for filling operations	N	N	Alan C
28D	8/19/2019 7:35	11/11/2019 3:29	2011:54	Gas well taken offline for filling operations	N	N	Alan C
48S	8/28/2019 13:15	11/11/19 10:45	1797:29	Gas well taken offline due to possible subsurface oxidation; high O2	N	N	Juan B
2D	8/28/2019 11:38	11/19/2019 12:15	1992:37	Gas well taken offline due to possible subsurface oxidation; high O2. Permanently abandoned 11/19/2019 due to subsurface oxidation; high O2	N	N	Juan B
TLH-1815A	8/28/2019 15:15	10/2/2019 11:00	835:44	Gas well taken offline for filling operations	N	N	Juan B
54RS	8/28/2019 13:23			Gas well temporarily taken offline for stockpile/filling operations	N	N	Alan C
54RD	8/28/2019 13:25			Gas well temporarily taken offline for stockpile/filling operations	N	N	Alan C
37R	9/12/2019 8:00	N/A	N/A	Gas well permanently abandoned due to declining LFG and subsurface oxidation; high O2.	N	N	Alan C
1802S	9/31/2019 12:00			Gas well temporarily taken offline for filling operations	N	N	Alan C
1802D	9/31/2019 12:00			Gas well temporarily taken offline for filling operations	N	N	Alan C

DEVICE	START OF EVENT DATE AND TIME	END OF EVENT DATE AND TIME	TOTAL DOWNTIME (HRS:MIN)	CAUSE OR REASON	DID SSM VARY FROM PROCEDURE IN SSM PLAN (Y OR N)	WAS THERE AN EXCEEDANCE OF AN EMISSION LIMITATION?	COMPLETED BY:
302L	11/11/2019 10:00	N/A	N/A	Gas well permanently abandoned due to declining LFG and subsurface oxidation; high O2.	N	N	Chris F.
43DR	11/11/19 10:00	N/A	N/A	New gas well	N	N	Chris F.
37RR	11/11/2019 10:15	N/A	N/A	New gas well	N	N	Chris F.
38SR	11/11/2019 10:30	N/A	N/A	New gas well	N	N	Chris F.
1901A	11/11/2019 11:00	N/A	N/A	New gas well	N	N	Chris F.
1902A	11/11/2019 11:00	N/A	N/A	New gas well	N	N	Chris F.
48S	11/11/2019 10:45	N/A	N/A	Gas well permanently abandoned due to subsurface oxidation; high O2	N	N	Chris F.
1813B	11/11/2019 11:00	N/A	N/A	Gas well permanently abandoned due to subsurface oxidation; high O2	N	N	Chris F.
64R	11/11/2019 11:15	N/A	N/A	New gas well	N	N	Chris F.
60S	11/13/2019 10:13	N/A	N/A	Gas well permanently abandoned due to pinch above well perferation. Pump lost in casing. Unable to pump liquids. High O2	N	N	Chris F.
13D	11/13/2019 2:06	N/A	N/A	Gas well permanently abandoned due to declining LFG and subsurface oxidation; high O2.	N	N	Alan C.
47S	11/14/2019 12:00			Temporarily disconnected due to header pipework	N	N	Chris F.
1807	11/14/2019 14:04	N/A	N/A	Gas well taken offline due to possible subsurface oxidation; high O2. Permanently abandoned on 11/18/19	N	N	Alan C.
20RS	12/9/2019 12:00			Gas well off line due to active fill	N	N	Alan C.
58RS	12/9/2019 12:00			Gas well off line due to active fill	N	N	Alan C.
48 D	12/9/2019 12:00			Gas well off line due to active fill	N	N	Alan C.
1814A	12/9/2019 12:00			Gas well off line due to active fill	N	N	Alan C.
38SR	12/19/2019 14:31			Gas well taken offline due to possible subsurface oxidation; high O2; possibly pinched	N	N	Alan C.
VGW 1	12/31/2019 12:00	N/A	N/A	Gas well permanently abandoned due to high O2 Pinched Pipe; unable to sound	N	N	Alan C.
VGW 46S	12/31/2019 12:00	N/A	N/A	Gas well permanently abandoned due to high O2 Pinched Pipe; unable to sound	N	N	Alan C.
VGW 57D	12/31/2019 12:00	N/A	N/A	Gas well permanently abandoned due to high O2, pinched pipe above perfs at 27'.	N	N	Alan C.
VGW 35S	12/31/2019 12:00	N/A	N/A	Gas well permanently abandoned due to high O2, pinched pipe above perfs at 31'.	N	N	Alan C.

ATTACHMENT 3

ANNUAL TITLE V COMPLIANCE CERTIFICATION

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM

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

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

Confidentiality

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

Certification by Responsible Official

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

Signature and Title of Responsible Official: Title: DIRECTOR OF OPERATIONS	Date: 2/14/20

Time Period Covered by Compliance Certification

01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
40 CFR 60.755(a)(3) and (5)	LFG Collection Wells 67S, 67D, TLH-1701B, TLH-1818B, 37R, 17S, and 47S	Begin: 03/01/19 End: 06/30/19 When Discovered: Date & Time 08/01/19
D. Parameters monitored: Monthly monitoring of LFG collection wells required	E. Limit: < 5% oxygen <131 degrees Fahrenheit Negative pressure on wellhead required	F. Actual: Monthly monitoring was not conducted for wells 67S and 67D in March, TLH-1701B and TLH-1818B in April, 37R in May and June, 17S and 47S in June
G. Probable Cause of Deviation: VRSD did not recognize that wells were not monitored during the monthly events.	H. Corrective actions taken: VRSD personnel have been instructed on the proper monitoring, reporting, and recordkeeping requirements under this provision. There was also a change in field personnel after the firs semi-annual reporting period.	

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
40 CFR 60.755(a)(5)	LFG Collection Well 33S	Begin: 05/14/19 End: 06/27/19 When Discovered: Date & Time 08/01/19
D. Parameters monitored: Monthly monitoring of LFG collection wells require re-monitoring within 15 days for wells with exceedances	E. Limit: < 5% oxygen	F. Actual: Re-monitoring within 15 days was not conducted for exceedances for the well
G. Probable Cause of Deviation: VRSD did not recognize that 15-day re-monitoring was not performed for the well	H. Corrective actions taken: VRSD personnel have been instructed on the proper monitoring, reporting, and recordkeeping requirements under this provision. The well was corrected within the 120-day timeframe.	

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
40 CFR 60.755(a)(3)	LFG Collection Well 81D	Begin: 05/22/19 End: 06/27/19 When Discovered: Date & Time 08/01/19
D. Parameters monitored: Monthly monitoring of LFG collection wells require initiation of corrective action within five (5) days and re-monitoring within 15 days for wells with exceedances	E. Limit: Negative pressure on wellhead required	F. Actual: Initiation of corrective action within 5 days and re-monitoring within 15 days was not conducted for exceedances for the well
G. Probable Cause of Deviation: VRSD did not recognize the exceedance so initiation of corrective action within 5 days and 15-day re-monitoring was not performed for the well.	H. Corrective actions taken: VRSD personnel have been instructed on the proper monitoring, reporting, and recordkeeping requirements under this provision. The well was corrected within the 120-day timeframe.	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
17 CCR 95464(a)(1) and 40 CFR 60.753(d) and 60.755(c)(4)(iv)	Surface Near Wells VGW-56S and VGW-57 S/D	Begin: 03/27/19 End: 04/26/19 When Discovered: Date & Time 03/27/19 during APCD inspection
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 3/27/19, the inspector found two exceedances greater than 500 ppmv as methane around the casing of wells VGW-56S and VGW-57 S/D.	H. Corrective actions taken: The surface was repaired (added cover material and compacted) and re-monitoring was performed on 4/4/19, which resulted in emissions below 500 ppmv, as methane for both locations.	

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
40 CFR 60.755(a)(5)	LFG Collection Wells 14S, 16S, 37R, 32D, and 81S	Begin: 12/28/18 End: 09/12/19 When Discovered: Date & Time 08/01/19
D. Parameters monitored: Monthly monitoring of LFG collection wells require compliance within 120 days for wells with oxygen and/or temperature exceedances that could not be corrected within 15 days.	E. Limit: Corrective action and compliance within 120 days of initial exceedance.	F. Actual: Compliance of five (5) wells with exceedances that could not be corrected for temperature within 15 days was not met within 120 days.
G. Probable Cause of Deviation: VRSD did not recognize that the 120-day period had ended for the five (5) wells.	H. Corrective actions taken: VRSD personnel have been instructed on the proper monitoring, reporting, and recordkeeping requirements under this provision. Wells 14S and 16S were corrected within 175 days, and well 32D was corrected within 122 days of the initial exceedance. Well 81S received an HOV demonstration approval on 3/6/19. Well 37R was abandoned on 9/12/19.	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
Condition 3(b) of Section 7 of Attachment PO07340PC2-171, 191	Sulfur Sampling	Begin: 06/01/19 End: 06/30/19 When Discovered: Date & Time 07/01/19
D. Parameters monitored: Monthly sulfur sampling at exhaust of sulfur removal system	E. Limit: Monthly sampling	F. Actual: Monthly sampling for June not performed
G. Probable Cause of Deviation: Monthly sampling for June scheduled to be taken during flare source testing on 6/27/19; however, testing was postponed until August 2019 and therefore sampling not conducted	H. Corrective actions taken: Monthly sampling resumed in July 2019	

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
17 CCR 95464(a)(1) and 40 CFR 60.753(d) and 60.755(c)(4)(iv)	Area around casing of well 303L Area around casing of well 18D Area near unnamed sump between Sump Nos. 2 and 4 Area beneath an aboveground header pipe adjacent to wells 26S and 26D	Begin: 12/09/19 End: 01/08/20 When Discovered: Date & Time 12/09/19
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 12/9/19, the inspector found four exceedances greater than 500 ppmv as methane.	H. Corrective actions taken: The surface was repaired (added cover material and compacted) and the 10-day re-monitoring was performed on 12/19/19, which resulted in emissions below 500 ppmv, as methane for all four (4) locations. The 1-month re-monitoring event was performed on 1/8/20, which resulted in emissions below 500 ppmv, as methane for all four (4) locations.	

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

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

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

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION

PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

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.	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. 1 – Rule 26 Annual Flare Combustion Limit The annual amount of landfill gas combusted in the destruction devices shall not exceed 450,000 MMBtU per year.	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 a totalizer.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Control District

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Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

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

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

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

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

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

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

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

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

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

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

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

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

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Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

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

A. Attachment # or Permit Condition #: 54.B.1	D. Frequency of monitoring:
B. Description: Rule 54.B.1 Sulfur Compounds 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 0.19 lb/hr.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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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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Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

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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Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

A. Attachment # or Permit Condition #: 74.1	D. Frequency of monitoring:
B. Description: Rule 74.1 Abrasive Blasting	As needed.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No abrasive blasting was conducted in 2019.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

A. Attachment # or Permit Condition #: 74.4.D	D. Frequency of monitoring:
B. Description: Rule 74.4.D Cut Back Asphalt	As needed.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No road oils were applied in 2019.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

A. Attachment # or Permit Condition #: 74.28	D. Frequency of monitoring:
B. Description: Rule 74.28 Asphalt Roofing Operations	As needed. E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No asphalt roofing operations were conducted in 2019.	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 2019.	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 2019.	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

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SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: NMOC
C. Measured Emission Rate: 0.518 ppm 0.0669 lb/hr	D. Limited Emission Rate: 20 ppm 1.00 lb/hr	E. Specific Source Test or Monitoring Record Citation: Modified EPA Method 25	F. Test Date: August 13, 2019

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: NO_x
C. Measured Emission Rate: 2.69 lb/hr 0.0568 lb/MMBtu	D. Limited Emission Rate: 5.15 lb/hr 0.06 lb/MMBtu	E. Specific Source Test or Monitoring Record Citation: EPA Method 7E	F. Test Date: August 13, 2019

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: CO
C. Measured Emission Rate: 6.84 lbs/hr 0.145 lb/MMBtu	D. Limited Emission Rate: 17.16 lbs/hr 0.2 lb/MMBtu	E. Specific Source Test or Monitoring Record Citation: EPA Method 10	F. Test Date: August 13, 2019

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: SO_x
C. Measured Emission Rate: 0.19 lb/hr (as SO_2) 0.0044 lb/MMBtu (as SO_2)	D. Limited Emission Rate: 1.72 lb/hr (as SO_2) 0.02 lb/MMBtu (as SO_4)	E. Specific Source Test or Monitoring Record Citation: Modified SCAQMD 307-91	F. Test Date: August 13, 2019

A. Emission Unit Description: 85.8 MMBtu/Hr LFG Specialties, Inc. Model EF945112 Landfill Gas Flare			B. Pollutant: Destruction Eff.%
C. Measured Emission Rate: NMOC: 99.75%, or 0.518 ppm MDE: 99.995 %	D. Limited Emission Rate: NMOC: 98%, or 20 ppm MDE: 99 %	E. Specific Source Test or Monitoring Record Citation: Modified EPA Method 25	F. Test Date: August 13, 2019

ATTACHMENT 4

SUPPLEMENTAL INFORMATION HISTORICALLY SUBMITTED WITH TITLE V REPORTS

Toland Road Landfill
2019 Throughputs

Date	Flare (scf)	Total MMBtu	HHV
Jul	69,995,919	34,694	496
Aug	67,973,283	37,366	550
Sep	58,564,604	28,340	484
Oct	56,552,632	26,853	475
Nov	66,184,981	29,987	453
Dec	71,913,699	34,157	475

VCAPCD Rule 50, Opacity
Annual Compliance Survey

Survey Information:
By: David Thomas
Date: August 13, 2019
Time: 12:30 PM to 1:30 PM
Emissions Unit: Toland Road Landfill - Flare

Verification: On the above date I observed no visible emissions (smoke) for a period or periods aggregating more than three (3) minutes during the time observed (1.0 hour).

David F Thomas

DAVID F. THOMAS – ENGINEERING TECHNICIAN

Toland Road Landfill
2019 SC Fuels Gasoline Volumes

Purchase Date	Month	Order #	Gas Type	# of Gallons	*Days between Deliveries*
01/21/19	JAN	1349042	UNL REG	1,722	***48***
n/a	FEB	n/a	UNL REG	0	
03/20/19	MAR	1382162	UNL REG	993	***58***
04/17/19	APR	1401978	UNL REG	1,000	***28***
05/30/19	MAY	1431859	UNL REG	600	***43***
06/05/19	JUN	1434617	UNL REG	977	***6***
n/a	JUL	n/a	UNL REG	0	
08/29/19	AUG	1499107	UNL REG	1,008	***85***
n/a	SEP	n/a	UNL REG	0	
10/02/19	OCT	1520078	UNL REG	994	**34**
11/13/19	NOV	1544075	UNL REG	993	**42**
12/23/19	DEC	1564626	UNL REG	992	**40**

2019 Total Volume	**9,279**

Letter of Conformance

January 15,2020

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to Ventura Regional Sanitation District in 2019

Was in compliance with South Coast Air Quality Management District requirements for Ventura and Santa Barbara Counties. The test Results meet ASTM D-5453 and are Typical of all CARB Ultra Low Sulfur Dyed Diesel Fuel sold by SC Fuels. The sulfur Content is guaranteed to be less than .0015%. (15PPM) The high heat content is typically in the 19,950-20,200 BTU per pound range.

Terri Merritt

Terri Merritt

Account Manager
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Oxnard Division
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