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

August 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 January 1, 2020 to June 30, 2020;
2. Semi-Annual Startup, Shutdown and Malfunction (SSM) Plan Report for January 1, 2020 to June 30, 2020;
3. 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 supplemental information that has been historically provided to the Ventura County Air Pollution Control District (VCAPCD), but is not specifically required as part of the Semi-Annual Monitoring Report. This attachment includes the monthly landfill throughputs and volume of gasoline used at VRSD.

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) 658-4679 or Edward Pettit at (805) 207-2218.

Sincerely,

Richard Jones
Interim Director of Operations
Ventura Regional Sanitation District

Attachments

1. Semi-Annual NSPS/Title V Report for January 1, 2020 to June 30, 2020
2. Semi-Annual Startup, Shutdown and Malfunction Plan Report for January 1, 2020 to June 30, 2020
3. Supplemental Information Historically Submitted with Title V Reports

Copy: United States Environmental Protection Agency, Region IX

ATTACHMENT 1

SEMI-ANNUAL NSPS/TITLE V REPORT

First Semi-Annual 2020 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

August 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: Richard Jones Interim Director of Operations	Date: 8/14/20

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

01/01/2020 to 06/30/2020

Table of Contents

Section Page

List of Tables

No.

Appendices

1.0 INTRODUCTION

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

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

The semi-annual report includes the following information, as required by VCAPCD Rule 74.17.1 and 40 CFR 60.757(f), for the reporting period from January 1 through June 30, 2020:

- 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 TRL is shown in the site plan provided in Appendix A, and consists of the following components:

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

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

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

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

3.0 MONITORING AND RECORDS REQUIRED UNDER NSPS

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
    - First Quarter Monitoring
    - Second 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 three (3) events. Per CFR 60.755 (a)(3), corrective action was initiated (through valve adjustments) and re-monitoring was performed, and two (2) wells were corrected within 15 days. For the remaining one (1) well, the well was temporarily decommissioned, but online and compliant within 120 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)
31D	2/20/20	0.81	2/20/20 3/3/20	-0.47	12
31D	4/1/20	0.05	4/21/20	-0.07	20 days; well temporarily decommissioned on 4/1/20; online and compliant on 4/21/20
1808D	6/17/20	8.00	6/17/20	-0.26	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 six (6) events. Per 40 CFR 60.755(a), corrective action (through valve adjustments) and re-monitoring was performed, and five (5) wells

were corrected within 15 days. For the remaining one (1) well, the well was temporarily decommissioned, but online and compliant within 120 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.

Table 2. Summary of Wells Above 131 °F

Well	Initial Date	Initial Temperature (°F)	Re-Monitoring Date (s)	Compliant Temperature (°F)	Duration (Days)
31D	2/20/20	137.5	2/20/20 3/3/20	88.4	12
81D	2/20/20	131.3	2/20/20	129.6	0
1808D	3/3/20	151.2	3/3/20	127.8	0
1808S	3/3/20	134.5	3/3/20	130.8	0
31D	4/1/20	134.8	4/1/20 4/21/20	83.6	20 days; well temporarily decommissioned on 4/1/20; online and compliant on 4/21/20
12S	6/4/20	133.9	6/4/20	129.9	0

- During the reporting period, all operational extraction wells had oxygen contents of less than 5%, except thirty-one (31) events. Per CFR 60.755 (a)(5), corrective action and re-monitoring was taken and sixteen (16) of the thirty-one (31) events were corrected within 15 days. Nine (9) events resulted in the wells being corrected between 15 and 120 days. Four (4) wells were 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 was corrected between 15 and 120 days; however the data from the 15-day re-monitoring event was not maintained. Well dates and duration when oxygen at the wellheads were above 5% are summarized below in Table 3. Wells that could not be corrected for oxygen exceedances from the previous semi-annual reporting period and their status is summarized in Table 4.

Table 3. Summary of Wells Above 5% Oxygen

Well	Initial Date	Initial Oxygen (% O2)	Re-Monitoring Date (s)	Compliant Oxygen (% O2)	Duration (Days)
75D	1/13/20	10.0	1/13/20 3/3/20	2.9	50 days; Well temporarily decommissioned on 1/27/20; online and compliant on 3/3/20
TLH-1703B	1/20/20	8.7	1/20/20 1/31/20 2/12/20	1.8	23
36S	1/20/20	8.7	1/20/20 1/31/20	0.0	11
400L	1/22/20	19.6	1/22/20	Pending	Well temporarily decommissioned on 1/27/20; offline as of end of reporting period
STEELRIS	1/22/20	21.0	1/22/20 2/18/20 2/26/20 3/5/20	0.0	43
36S	2/18/20	7.8	2/18/20 3/5/20	0.0	16
1810B	2/25/20	5.7	2/25/20 3/4/20 3/19/20 4/2/20 4/21/20	4.8	56
TLH-1811A	2/25/20	5.5	2/25/20 3/4/20	4.6	8
TLH-1703A	2/25/20	6.6	2/25/20 3/4/20	4.9	8
84	2/25/20	8.0	2/25/20 3/4/20	1.4	8
18D	2/25/20	9.8	2/25/20 3/10/20	4.8	14
304L	4/7/20	15.1	4/29/20 5/21/20 6/11/20	3.7	43 days; Well temporarily decommissioned on 4/7/20; online and compliant (3.7%) on 6/11/20

Well	Initial Date	Initial Oxygen (% O2)	Re-Monitoring Date (s)	Compliant Oxygen (% O2)	Duration (Days)
5S	4/7/20	18.6	4/7/20 4/21/20	3.1	14
84	4/7/20	13.6	4/7/20 4/21/20	0.2	14
17S	4/7/20	6.9	4/7/20 4/21/20	4.6	14
36S	4/7/20	5.9	4/7/20 4/21/20	0.3	14
43S	4/7/20	7.6	4/7/20 4/27/20	0.7	20
46D	4/7/20	8.8	4/7/20 4/21/20	3.1	14
83D	4/7/20	16.5	4/7/20	4.5	0
TLH-1903B	4/22/20	10.2	4/22/20 4/27/20 4/29/20	1.2	7
78D	5/14/20	6.9	5/14/20 5/18/20	0.0	4
TLH-1703A	5/21/20	6.6	5/21/20 6/2/20	4.1	12
TLH-1811A	5/21/20	7.4	5/21/20 6/1/20	0.0	11
45S	5/26/20	9.0	5/26/20 6/2/20 7/9/20	3.7	44
46D	5/26/20	6.7	5/26/20 6/16/20	0.4	21
TLH-2003B	6/3/20	6.7	6/3/20 7/17/20	2.8	44 days; Well temporarily decommissioned on 6/3/20; online and compliant on 7/17/20
TLH-2004B	6/3/20	5.8	7/14/20 8/5/20	0.0	63; 15-day re-check not maintained
84	6/3/20	6.0	6/3/20 7/17/20	0.8	44 days; Well temporarily decommissioned on 6/3/20; online and compliant on 7/17/20

Well	Initial Date	Initial Oxygen (% O2)	Re-Monitoring Date (s)	Compliant Oxygen (% O2)	Duration (Days)
17S	6/3/20	8.2	6/3/20 7/17/20	4.4	44
1810B	6/11/20	17.5	6/11/20	1.7	0
TLH-1903B	6/16/20	9.6	6/16/20 7/3/20	1.9	17

Table 4. 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; online and compliant (1.5%) on 6/17/20
19S	Well could not be corrected for high oxygen on 5/4/18. Offline due to operations on 5/10/18 ; abandoned on 6/17/20
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.
38SR	Well could not be corrected for high oxygen on 12/19/19; Temporarily decommissioned on 12/19/19 due to pinch and concern for potential subsurface oxidation; abandoned on 3/2/20 within 120 days.
78D	Well could not be corrected for high oxygen on 12/19/19; Corrected on 1/13/20 (0.1%) within 120 days.

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 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, 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 temperature 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 temperature, 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 January 1 through June 30, 2020 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 5 below.

Table 5. Summary of Flare Downtime Greater than 1 Hour

Control System Periods of Downtime Exceeding 1 Hour		
Date	Duration (Hrs:Min)	Reason for Shutdown
1/23/20	1:49	Flare manually shutdown for scheduled blower maintenance
1/27/20	2:21	Flare manually shutdown for scheduled GCCS maintenance
2/5/20	33:18	Flare manually shutdown for scheduled header maintenance
2/25/20	2:21	Flare manually shutdown for scheduled header maintenance
2/27/20	1:03	Flare manually shutdown for scheduled blower maintenance
3/29/20	16:40	Flare shutdown due to high oxygen
3/31/20	5:46	Flare manually shutdown for scheduled blower maintenance
4/26/20	3:15	Flare shutdown due to blower high vibration fault
5/11/20	10:03	Flare manually shutdown for scheduled blower maintenance
5/15/20	1:08	Flare shutdown due to Southern California Edison (SCE) power outage
5/20/20	2:23	Flare shutdown due to high oxygen
5/27/20	1:35	Flare manually shutdown for scheduled maintenance
5/28/20	2:18	Flare manually shutdown for scheduled maintenance
6/16/20	1:38	Flare shutdown due to blower fault
6/23/20	3:46	Flare manually shutdown for scheduled flow meter calibration
6/23/20	12:25	Flare shutdown due to blower high vibration fault and left off for maintenance

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 First Quarter Monitoring

The first quarter 2020 instantaneous surface emissions monitoring event was performed on March 20, 2020 by RES Environmental, Inc. (RES). The event resulted in twenty-two (22) 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 March 30, 2020, resulted in zero (0) areas with

TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed April 17, 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.

3.2.2 Second Quarter Monitoring

The second quarter 2020 instantaneous surface emissions monitoring event was performed on June 17, 2020 by RES. The event resulted in thirteen (13) 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 June 25, 2020, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed July 16, 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.

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 6 below.

Table 6. GCCS Installations, Upgrades, and Abandonments

DATE	DESCRIPTION
2/27/20	Well 72D abandoned
3/2/20	Well 38SR abandoned
3/16/20	Well TLH-1703B abandoned
4/22/20	New wells TLH-1901B, TLH-1902B, and TLH-1903B online and operational
5/8/20	New wells TLH-2003A and TLH-2003B online and operational
5/27/20	New wells TLH-2004A and TLH-2004B online and operational
5/29/20	New wells TLH-2005A and TLH-2005B online and operational
6/16/20	New wells TLH-2002A and TLH-2002B online and operational
6/17/20	New well TLH-2002C online and operational
6/17/20	Well 19S 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 7 below.

Table 7. 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.

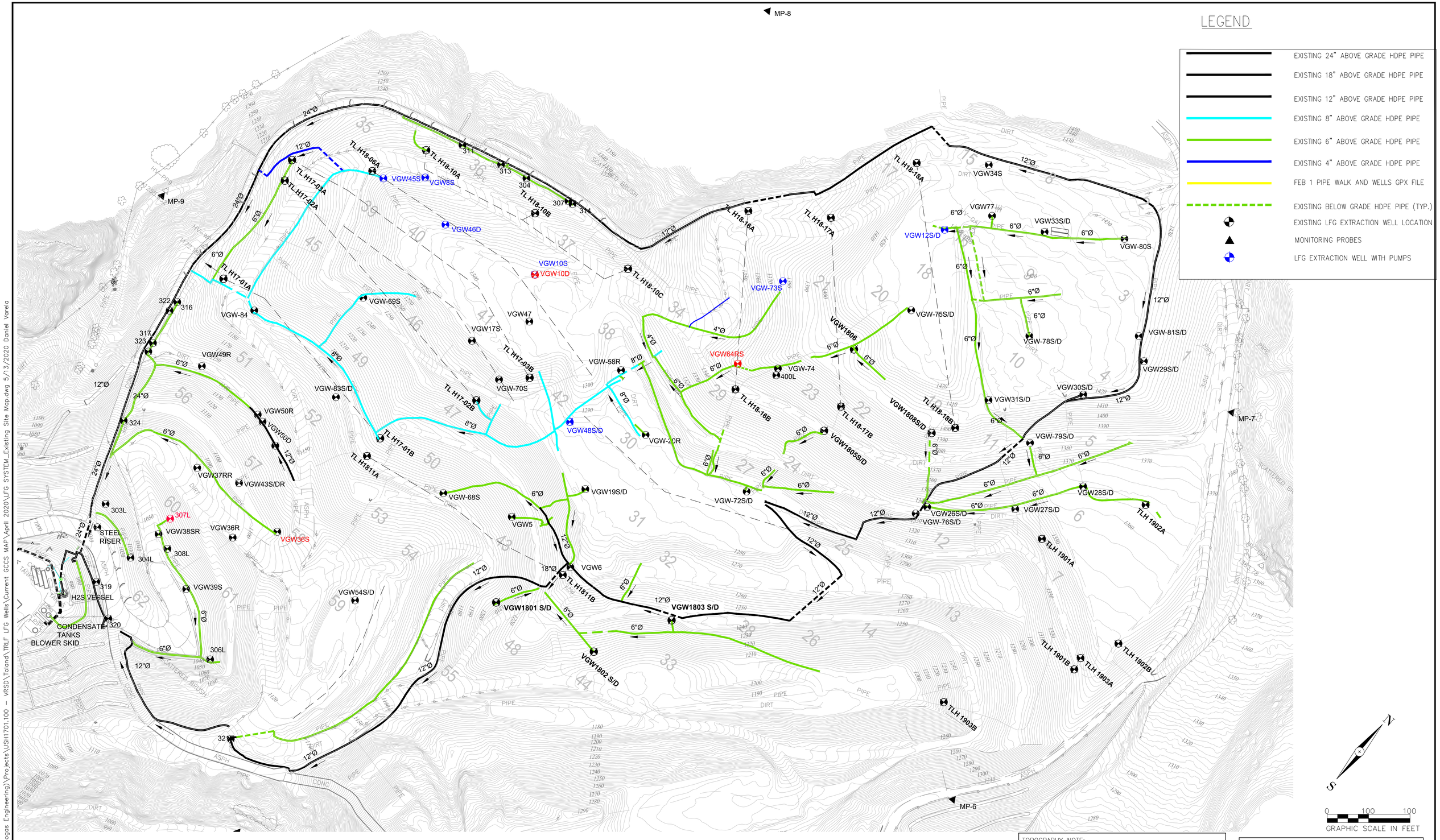
5.0 TITLE V COMPLIANCE

During the reporting period, the Landfill performed all required monitoring and maintained the appropriate records, except for one (1) event.

On 6/3/20, well TLH-2004B had an oxygen content greater than 5 percent. Corrective action was initiated within 5 days and a 15-day re-monitoring event was performed (the same day). However, the 15-day re-monitoring event record was not maintained. Therefore, there is a recordkeeping deviation for not retaining the 15-day reading.

APPENDIX A

LANDFILL SITE PLAN



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 - MAY 2020

TOLAND ROAD LANDFILL
EXISTING GCCS

DRAWING NO.
-
-

C:\Users\Daniel Varela\Dropbox (Biogas Engineering)\Projects\USH1701.100 - VRSD\Toland\TRLF LFG Wells\Current GCCS MAP\April 2020\LFG SYSTEM_Existing Site Map.dwg 5/13/2020 Daniel Varela

APPENDIX B

COVER INTEGRITY MONITORING

INSPECTOR: Alan C. DATE: 01-20-2020

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: 02-04-2020

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: 03-05-2020

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: 04/16/2020

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: 05/21/2020

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: 06/09/2020

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: Interim Director of Operations	Date: 8/14/20

DESCRIPTION OF SSM EVENTS FOR FLARE

Reporting period January 1 through June 30, 2020

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 *
1/23/20	1/23/20	1:49	Flare	Shutdown/Startup	Flare manually shutdown for scheduled blower maintenance	Y	N/A
1/23/20	1/23/20	0:53	Flare	Shutdown/Startup	Flare manually shutdown for scheduled blower maintenance	Y	N/A
1/27/20	1/27/20	2:21	Flare	Shutdown/Startup	Flare manually shutdown for scheduled gas collection and control system (GCCS) maintenance	Y	N/A
2/4/20	2/4/20	0:55	Flare	Shutdown/Startup	Flare manually shutdown for scheduled GCCS header maintenance	Y	N/A
2/5/20	2/6/20	33:18	Flare	Shutdown/Startup	Flare manually shutdown for scheduled header maintenance	Y	N/A
2/21/20	2/21/20	0:51	Flare	Shutdown/Startup	Flare manually shutdown for scheduled HMI reset	Y	N/A
2/25/20	2/25/20	2:21	Flare	Shutdown/Startup	Flare manually shutdown for scheduled header maintenance	Y	N/A
2/27/20	2/27/20	1:03	Flare	Shutdown/Startup	Flare manually shutdown for scheduled blower maintenance	Y	N/A
3/29/20	3/30/20	16:40	Flare	Malfunction	Flare shutdown due to high oxygen	Y	N/A
3/30/20	3/30/20	0:20	Flare	Malfunction	Flare shutdown due to a louvers linkage malfunction	Y	N/A
3/31/20	3/31/20	5:46	Flare	Shutdown/Startup	Flare manually shutdown for scheduled blower maintenance	Y	N/A
4/14/20	4/14/20	0:54	Flare	Shutdown/Startup	Flare manually shutdown for scheduled sulfur treatment system sample and flare inspection	Y	N/A
4/26/20	4/26/20	3:15	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 *
5/11/20	5/11/20	10:03	Flare	Shutdown/Startup	Flare manually shutdown for scheduled blower maintenance	Y	N/A
5/12/20	5/12/20	0:17	Flare	Shutdown/Startup	Flare manually shutdown for scheduled blower maintenance	Y	N/A
5/15/20	5/15/20	0:16	Flare	Shutdown/Startup	Flare manually shutdown for scheduled blower maintenance	Y	N/A
5/15/20	5/15/20	1:08	Flare	Malfunction	Flare shutdown due to Southern California Edison (SCE) power outage	Y	N/A
5/19/20	5/19/20	0:40	Flare	Shutdown/Startup	Flare manually shutdown for scheduled maintenance	Y	N/A
5/20/20	5/20/20	2:23	Flare	Malfunction	Flare shutdown due to high oxygen	Y	N/A
5/21/20	5/21/20	0:38	Flare	Shutdown/Startup	Flare manually shutdown for scheduled maintenance	Y	N/A
5/27/20	5/27/20	1:35	Flare	Shutdown/Startup	Flare manually shutdown for scheduled maintenance	Y	N/A
5/28/20	5/28/20	2:18	Flare	Shutdown/Startup	Flare manually shutdown for scheduled maintenance	Y	N/A
5/28/20	5/28/20	0:19	Flare	Shutdown/Startup	Flare manually shutdown for scheduled maintenance	Y	N/A
6/2/20	6/2/20	0:24	Flare	Shutdown/Startup	Flare manually shutdown for scheduled flare maintenance	Y	N/A
6/2/20	6/2/20	0:45	Flare	Shutdown/Startup	Flare manually shutdown for scheduled flare maintenance	Y	N/A
6/10/20	6/10/20	0:29	Flare	Shutdown/Startup	Flare manually shutdown for scheduled sulfur treatment system sample collection	Y	N/A
6/16/20	6/16/20	1:38	Flare	Malfunction	Flare shutdown due to blower fault	Y	N/A
6/23/20	6/23/20	3:46	Flare	Shutdown/Startup	Flare manually shutdown for scheduled flow meter calibration	Y	N/A
6/23/20	6/24/20	12:25	Flare	Malfunction	Flare shutdown due to blower high vibration fault and left off for maintenance	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 *
6/29/20	6/29/20	0:44	Flare	Shutdown/Startup	Flare manually shutdown for scheduled blower maintenance	Y	N/A
6/29/20	6/29/20	0:45	Flare	Shutdown/Startup	Flare manually shutdown for scheduled blower maintenance	Y	N/A

*Not Applicable if SSM Plan Procedures were followed during event

**Malfunction events assume automatic startup unless otherwise noted

DESCRIPTION OF SSM EVENTS FOR FLARE MONITORING DEVICES

Reporting period January 1 through June 30, 2020

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 *
1/30/20	1/30/20	1:54	Flare Data Recorder	Malfunction	Loss of temperature data due to data recorder malfunction	Y	N/A

*Not Applicable if SSM Plan Procedures were followed during event

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 01-23-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 01-23-2020 Time: 12:39 PM – 2:28 PM

Duration: 1 Hours 49 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 12:39 PM for scheduled Blower Maintenance by Atlas Copco.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 2:28 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 01-23-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 01-23-2020 Time: 3:16 PM – 4:09 PM

Duration: 0 Hours 53 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 3:16 PM for scheduled Blower Maintenance by Atlas Copco.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 4:09 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 01-27-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 01-27-2020 Time: 1:35 PM – 3:56 PM

Duration: 2 Hours 21 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 1:35 PM for scheduled GCCS Maintenance.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 3:56 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 02-04-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 02-04-2020 Time: 4:06 PM – 5:01 PM

Duration: 0 Hours 55 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 4:06 PM for scheduled GCCS Header Maintenance.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 5:01 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 02-06-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 02-05-2020 Time: 6:50 AM – 02-06-2020 4:08 PM

Duration: 33 Hours 18 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 6:50 AM for scheduled GCCS 24" Header Maintenance.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 4:08 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 02-21-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 02-21-2020 Time: 10:53 AM – 11:44 AM

Duration: 0 Hours 51 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 10:53 AM for a scheduled HMI reset.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 11:44 AM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 02-25-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 02-25-2020 Time: 12:53 PM – 3:14 PM

Duration: 2 Hours 21 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 12:53 PM for a scheduled GCCS Header Maintenance.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 3:14 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 02-27-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 02-27-2020 Time: 11:45 AM – 12:48 PM

Duration: 1 Hours 3 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 11:45 AM for scheduled Blower Maintenance.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 12:48 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 03-30-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 03-29-2020 Time: 2:51 PM – 03/30/2020 7:31 AM

Duration: 16 Hours 40 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 2:51 PM due to high O_2.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 7:31 AM after the GCCS repair were completed.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 03-30-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 03-30-2020 Time: 8:47 AM – 9:07 AM

Duration: 0 Hours 20 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare shutdown at 8:47 AM due to a Louvers Linkage malfunction.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 9:07 AM after linkage repairs.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 03-31-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 03-31-2020 Time: 12:07 PM –5:53 PM

Duration: 5 Hours 46 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 12:07 PM for scheduled Blower Skid Maintenance (Atlas Copco).

Provide description of corrective action:

The Flare was restarted and operating at temperature by 5:53 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 04-14-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 04-14-2020 Time: 1:28 PM – 2:22 PM

Duration: 0 Hours 54 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 1:28 PM for scheduled H_2S Vessel GAC Sample and Flare Inspection.

Provide description of corrective action:
The Flare was restarted and operating at temperature by 2:22 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 04-27-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 04-26-2020 Time: 11:54 AM – 3:09 PM

Duration: 3 Hours 15 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare shutdown at 11:54 AM due to Blower High Vibration Fault.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 3:09 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 05-12-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 05-11-2020 Time: 9:21 AM – 7:24 PM

Duration: 10 Hours 3 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 9:21 AM for scheduled Blower Maintenance (Atlas Copco).

Provide description of corrective action:

The Flare was restarted and operating at temperature by 7:24 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 05-12-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 05-12-2020 Time: 10:49 AM – 11:06 AM

Duration: 0 Hours 17 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 10:49 AM for scheduled Blower Maintenance.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 11:06 AM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 05-15-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 05-15-2020 Time: 7:55 AM – 8:11 AM

Duration: 0 Hours 16 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 7:55 AM for scheduled Blower Maintenance (switch Blowers).

Provide description of corrective action:

The Flare was restarted and operating at temperature by 8:11 AM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 05-18-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 05-15-2020 Time: 3:28 PM – 4:36 PM

Duration: 1 Hours 8 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 3:28 PM due to SCE Power Outage.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 4:36 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 05-19-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 05-19-2020 Time: 9:28 AM – 10:08 AM

Duration: 0 Hours 40 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 9:28 AM for scheduled Flare Maintenance (Tuning by BioGas).

Provide description of corrective action:

The Flare was restarted and operating at temperature by 10:08 AM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 05-21-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 05-20-2020 Time: 2:33 PM – 4:56 PM

Duration: 2 Hours 23 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 2:33 PM due to GCCS High O_2 shutdown.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 4:56 PM after GCCS repairs.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 05-22-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 05-21-2020 Time: 3:57 PM – 4:35 PM

Duration: 0 Hours 38 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 3:57 PM for scheduled Flare Maintenance (Tuning).

Provide description of corrective action:

The Flare was restarted and operating at temperature by 4:35 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 05-28-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 05-27-2020 Time: 5:29 PM – 7:04 PM

Duration: 1 Hours 35 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 5:29 PM for schedule Flare Maintenance (Tuning)

Provide description of corrective action:

The Flare was restarted and operating at temperature by 7:04 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 05-28-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 05-28-2020 Time: 10:50 AM – 1:08 PM

Duration: 2 Hours 18 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 10:50 AM for scheduled Flare Maintenance (Tuning)

Provide description of corrective action:

The Flare was restarted and operating at temperature by 1:08 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 05-28-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 05-28-2020 Time: 3:47 PM – 4:06 PM

Duration: 0 Hours 19 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 3:47 PM for scheduled Flare Maintenance (Tuning)

Provide description of corrective action:

The Flare was restarted and operating at temperature by 4:06 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 06-02-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 06-02-2020 Time: 10:12 AM – 10:36 AM

Duration: 0 Hours 24 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 10:12 AM for Scheduled Flare Maintenance (Tuning).

Provide description of corrective action:

The Flare was restarted and operating at temperature by 10:36 AM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 06-02-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 06-02-2020 Time: 2:37 PM – 3:22 PM

Duration: 0 Hours 45 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 2:37 PM for Scheduled Flare Maintenance (Tuning).

Provide description of corrective action:

The Flare was restarted and operating at temperature by 3:22 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 06-10-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 06-10-2020 Time: 11:32 AM – 12:01 PM

Duration: 0 Hours 29 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 11:32 AM for Scheduled GAC Sample Collection.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 12:01 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 06-17-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 06-16-2020 Time: 4:11 PM – 5:49 PM

Duration: 1 Hours 38 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 4:11 PM due to All Blowers Faulted.

Provide description of corrective action:

The Flare was restarted and operating at temperature by 5:49 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 06-23-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 06-23-2020 Time: 9:02 AM – 12:48 PM

Duration: 3 Hours 46 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 9:02 AM for Scheduled Flowmeter Calibrations (Rosemount).

Provide description of corrective action:

The Flare was restarted and operating at temperature by 12:48 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 06-24-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☑ Malfunction

Date: 06-23-2020 Time: 10:09 PM – 6-24-2020 10:34 AM

Duration: 12 Hours 25 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare shutdown at 10:09 PM Blower High Vibration Fault and left off for Scheduled Flare Maintenance on next morning (Replace Flame Arrestor and Remove Mesh Pad Separator from Knockout).

Provide description of corrective action:

The Flare was restarted and operating at temperature on 6-24-2020 by 10:34 AM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 06-29-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 06-29-2020 Time: 11:06 AM – 11:50 AM

Duration: 0 Hours 44 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 11:06 AM for Scheduled Blower Maintenance (Atlas Copco).

Provide description of corrective action:

The Flare was restarted and operating at temperature by 11:50 AM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 06-29-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 06-29-2020 Time: 12:52 PM – 13:37 PM

Duration: 0 Hours 45 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Toland Flare was shutdown at 12:52 PM for Scheduled Blower Maintenance (Atlas Copco).

Provide description of corrective action:

The Flare was restarted and operating at temperature by 13:37 PM.

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

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

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

☐ Yes ☑ No

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Toland Road Landfill Date Form Completed: 01-30-2020

Unit ID: Flare

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 01-30-2020 Time: 1:13 PM – 3:07 PM

Duration: 1 Hours 54 Minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

Temperature data did not record on the SCADA nor local memory card from 1:13 PM to 3:07 PM resulting in (null) data values due to a data recorder malfunction.

Provide description of corrective action:

The Flare was operating at temperature during this time period based on flow, CH4, and O2 values recorded.

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

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

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

☐ Yes ☑ No

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.
14D	8/5/2017 8:00			Disconnected for filling operations	N	N	Alan C.
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	N/A	N/A	Gas well taken offline for operations; abandoned on 6/17/20 due to pinched/watered in	N	N	Ricky O
19D	5/10/18 8:00	6/17/2020	18459:20	Gas well taken offline for 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	4/2/2020 11:59	12459:59	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
1802	2/22/19 8:00	3/18/2019 10:13	578:13	Gas well offline for filling operations	N	N	Alan C
1801S	2/22/19 8:00	3/30/2020 10:37	9650:37	Gas well offline for filling operations	N	N	Alan C
1801D	2/22/19 8:00	3/30/2020 10:41	9650:41	Gas well offline for filling operations	N	N	Alan C
1803S	4/30/2019 8:30	4/2/2020 11:59	8115:29	Gas well taken offline due to filling operations	N	N	Juan B
1803D	4/30/2019 8:30	4/2/2020 11:59	8115:29	Gas well taken offline due to filling operations	N	N	Juan B
1811B	7/1/19 11:00	4/2/2020 11:59	6624:59	Gas well disconnected due to trash filling operations.	N	N	Chris F.
1810B	7/24/2019 13:53			Gas well temporarily taken offline due to possible subsurface oxidation; high O2	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

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:
1802S	9/30/2019 12:00	4/2/2020 11:59	4439:59	Gas well temporarily taken offline for filling operations	N	N	Alan C
1802D	9/30/2019 12:00	4/2/2020 11:59	4439:59	Gas well temporarily taken offline for filling operations	N	N	Alan C
47S	11/14/2019 12:00			Temporarily disconnected due to header pipework	N	N	Chris F.
20RS	12/9/2019 12:00			Gas well off line due to active fill	N	N	Alan C.
58RS	12/9/2019 12:00	6/24/2020 15:03	4755:03	Gas well off line due to active fill	N	N	Alan C.
48 D	12/9/2019 12:00	6/24/2020 15:03	4755:03	Gas well off line due to active fill	N	N	Alan C.
1814A	12/9/2019 12:00	6/24/2020 15:03	4755:03	Gas well off line due to active fill	N	N	Alan C.
38SR	12/19/2019 14:31	N/A	N/A	Gas well taken offline due to possible subsurface oxidation; high O2; possibly pinched; abandoned on 3/2/20	N	N	Alan C.
36S	1/20/2020 10:15	1/31/2020 10:56	264:41	Gas well temporarily decommissioned due to high oxygen; concern for potential subsurface oxidation	N	N	Alan C.
400L	1/27/20 8:45			Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
TLH-1813A	1/27/20 8:45			Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
76S	1/27/20 8:45			Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
76D	1/27/20 8:45			Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
26S	1/27/20 8:45			Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
26D	1/27/20 8:45			Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
TLH-1901A	1/27/20 8:45	2/20/20 11:00	578:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
27S	1/27/20 8:45	6/3/20 0:00	3063:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
27D	1/27/20 8:45	6/3/20 0:00	3063:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
64S	1/27/2020	3/3/2020 8:00	863:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
74S	1/27/2020	3/3/2020 8:00	863:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
TLH-1817B	1/27/2020	3/3/2020 8:00	863:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
1805S	1/27/2020	3/3/2020 8:00	863:15	Gas well taken offline due to imminent fill, header realignment	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:
1805D	1/27/2020	3/3/2020 8:00	863:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
1808S	1/27/2020	2/20/2020	578:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
1808D	1/27/2020	2/20/2020	578:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
79S	1/27/20 8:45	2/20/20 11:00	578:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
79D	1/27/20 8:45	2/20/20 11:00	578:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
82S	1/27/20 8:45	2/20/20 11:00	578:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
80S	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
81S	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
81D	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
29S	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
29D	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
30S	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
30D	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
78S	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
78D	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
13S	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
32S	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
33S	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
33D	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
34S	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	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:
77S	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
12S	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
12D	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
31S	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
31D	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
TLH-1818B	1/27/2020	3/3/2020 8:00	863:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
1806S	1/27/2020	3/3/2020 8:00	863:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
75S	1/27/2020	3/3/2020 8:00	863:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
75D	1/27/2020	3/3/2020 8:00	863:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
TLH-1816B	1/27/2020	3/3/2020 8:00	863:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
73S	1/27/20 8:45	2/28/20 11:58	771:13	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
TLH-1817A	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
TLH-1818A	1/27/20 8:45	1/27/20 17:00	8:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
TLH 1902A	1/27/20 8:45	2/20/20 11:00	578:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
28S	1/27/20 8:45	2/20/20 11:00	578:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
28D	1/27/20 8:45	2/20/20 11:00	578:15	Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
72S	1/27/20 8:45			Gas well taken offline due to imminent fill, header realignment	N	N	Alan C.
31D	2/20/20 13:33	3/3/20 8:46	283:13	Gas well temporarily decommissioned due to high temperature; concern for potential subsurface oxidation	N	N	Alan C.
72D	2/27/20 0:00	N/A	N/A	Gas well abandoned due to pinched/watered in	N	N	Alan C.
TLH-1703B	3/16/20 0:00	N/A	N/A	Gas well abandoned due to pinched/watered in	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:
31D	4/1/20 13:53	4/21/20 9:35	475:42	Gas well temporarily decommissioned due to high temperature; concern for potential subsurface oxidation	N	N	Alan C.
304L	4/7/20 13:30	6/11/20 14:01	1560:31	Gas well temporarily decommissioned due to high oxygen; concern for potential subsurface oxidation	N	N	Alan C.
TLH-1901B	4/22/20 0:00	N/A	N/A	New Horizontal Gas Well	N	N	Alan C.
TLH-1902B	4/22/20 0:00	N/A	N/A	New Horizontal Gas Well	N	N	Alan C.
TLH-1903B	4/22/20 0:00	N/A	N/A	New Horizontal Gas Well	N	N	Alan C.
37RR	5/6/20 0:00			Gas well offline due to liner slope cover work	N	N	Alan C.
3240EDGE	5/6/20 0:00			Gas well offline due to liner slope cover work	N	N	Alan C.
TLH-2003A	5/8/2020 13:21	N/A	N/A	New Horizontal Gas Well	N	N	Alan C.
TLH-2003B	5/8/2020 13:14	N/A	N/A	New Horizontal Gas Well	N	N	Alan C.
TLH-2004A	5/27/2020 10:22	N/A	N/A	New Horizontal Gas Well	N	N	Alan C.
TLH-2004B	5/27/2020 10:12	N/A	N/A	New Horizontal Gas Well	N	N	Alan C.
TLH-2005A	5/29/2020 11:09	N/A	N/A	New Horizontal Gas Well	N	N	Alan C.
TLH-2005B	5/29/2020 11:02	N/A	N/A	New Horizontal Gas Well	N	N	Alan C.
84	6/3/2020 11:43	7/17/2020 11:41	1055:58	Gas well temporarily decommissioned due to high oxygen; concern for potential subsurface oxidation	N	N	Alan C.
TLH-2002A	6/16/2020 12:38	N/A	N/A	New Horizontal Gas Well	N	N	Alan C.
TLH-2002B	6/16/2020 12:42	N/A	N/A	New Horizontal Gas Well	N	N	Alan C.
TLH-2002C	6/17/2020 12:47	N/A	N/A	New Horizontal Gas Well	N	N	Alan C.
82	6/30/20 10:45			Gas wells taken offline due to imminent fill header work	N	N	Alan C.
TLH-1902A	6/30/20 10:45			Gas wells taken offline due to imminent fill header work	N	N	Alan C.
28S	6/30/20 10:45			Gas wells taken offline due to imminent fill header work	N	N	Alan C.
28D	6/30/20 10:45			Gas wells taken offline due to imminent fill header work	N	N	Alan C.
TLH-1901A	6/30/20 10:45			Gas wells taken offline due to imminent fill header work	N	N	Alan C.
27S	6/30/20 10:45			Gas wells taken offline due to imminent fill header work	N	N	Alan C.
27D	6/30/20 10:45			Gas wells taken offline due to imminent fill header work	N	N	Alan C.

ATTACHMENT 3

SUPPLEMENTAL INFORMATION HISTORICALLY SUBMITTED WITH TITLE V REPORTS

Toland Road Landfill 2020 Throughputs

Date	Flare (scf)	Total MMBtu	HHV
Jan	67,061,187	30,754	459
Feb	54,302,297	22,942	422
Mar	68,313,041	28,915	423
Apr	68,687,938	30,854	449
May	72,152,821	30,368	421
Jun	68,064,145	27,924	410
Totals	398,581,429	171,756	

Toland Road Landfill
2020 SC Fuels Gasoline Volumes

Purchase Date	Month	Order #	Gas Type	# of Gallons	*Days between Deliveries*
n/a	JAN	n/a	UNL REG	0	
02/06/20	FEB	1585332	UNL REG	995	***45***
03/16/20	MAR	1602822	UNL REG	945	***39***
04/29/20	APR	1620541	UNL REG	999	***44***
n/a	MAY	n/a	UNL REG	0	
06/03/20	JUN	1643676	UNL REG	991	***35***

2020 Total Volume	**3,930**