



August 13, 2021

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, 2021 to June 30, 2021;
2. Semi-Annual Startup, Shutdown and Malfunction (SSM) Plan Report for January 1, 2021 to June 30, 2021;
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). Please note that as of June 21, 2021, the facility complies with the new Emission Guidelines (EG) requirements in California. The approved state plan for the EG

includes compliance with Title 17 California Code of Regulations (CCR) Sections 95460 to 95476, known as AB 32 Landfill Methane Rule (LMR) and specific portions of 40 CFR Part 62 Subpart OOO. The NSPS/EG references will be updated in the next semi-annual report.

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  
Director of Operations  
Ventura Regional Sanitation District

#### Attachments

1. Semi-Annual NSPS/Title V Report for January 1, 2021 to June 30, 2021
2. Semi-Annual Startup, Shutdown and Malfunction Plan Report for January 1, 2021 to June 30, 2021
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 2021 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 2021

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**SEMI-ANNUAL TITLE V REPORT OF REQUIRED MONITORING**

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

Ed Swede  
Air Quality Engineer  
Ventura County Air Pollution Control District  
4567 Telephone Road  
Ventura, CA 93003

**Certification by Responsible Official**

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

Signature and Title of Responsible Official:  Title: Richard Jones Interim Director of Operations	Date: 8/13/21
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Time Period Covered by the Semi-Annual Report of Required Monitoring:  01/01/2021 to 06/30/2021
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## 1.0 INTRODUCTION

This semi-annual Title V and New Source Performance Standards (NSPS), and Startup, Shutdown, and Malfunction (SSM) Plan 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
- SSM reporting under the NESHAP rule
- To fulfill the semi-annual reporting requirement under the facility’s Title V permit (No. 07340)

Please note that as of June 21, 2021, the facility complies with the new Emission Guidelines (EG) requirements in California. The approved state plan for the EG includes compliance with Title 17 California Code of Regulations (CCR) Sections 95460 to 95476, known as AB 32 Landfill Methane Rule (LMR) and specific portions of 40 CFR Part 62 Subpart OOO. The NSPS/EG references will be updated in the next semi-annual report.

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, 2021:

- 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, with the exception of seven (7) events. Per 40 CFR 60.755(a)(3), corrective action (through valve adjustments) and re-monitoring was performed, and three (3) wells were corrected within 15 days. Due to an oversight, well 1808D did not have re-monitoring performed within 15 days from the exceedance on March 3, 2021. The well was corrected between 15 and 120 days. A summary of the deviation is provided in Section 5.0. The remaining three (3) events resulted in the wells being corrected between 15 and 120 days. Date(s) and duration when pressure at the wellhead(s) was positive are summarized in Table 1 below.

**Table 1. Summary of Wells with Positive Pressure**

Well	Initial Date	Initial Pressure	Re-Monitoring Date(s)	Compliant Pressure	Duration (Days)
		("H2O)		("H2O)	
400L	1/21/21	0.06	1/21/21 1/25/21	-0.54	4
308L	1/25/21	6.91	1/25/21 2/16/21 3/9/21 4/21/21	-4.46	86
78S	2/2/21	0.09	2/8/21	-0.02	6
1808D	3/3/21	0.06	4/20/21	-0.36	48
1808D	4/20/21	1.21	4/20/21	-3.05	16

Well	Initial Date	Initial Pressure	Re-Monitoring Date(s)	Compliant Pressure	Duration (Days)
		("H2O)		("H2O)	
308L	5/11/21	0.09	5/11/21 6/29/21	-6.08	49
303L	6/21/21	3.34	6/21/21 6/29/21	-17.0	8

- 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 eleven (11) events. Per 40 CFR 60.755(a), corrective action (through valve adjustments) and re-monitoring was performed, and six (6) wells were corrected within 15 days. Due to an oversight, well TLH-1817B did not have re-monitoring performed within 15 days. The well was corrected between 15 and 120 days. A summary of the deviation is provided in Section 5.0. An additional well was corrected between 15 and 120 days. The remaining three (3) wells were temporarily decommissioned under an SSM event, and offline as of the end of the reporting period. 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	Re-Monitoring Date(s)	Compliant Temperature	Duration (Days)
		(°F)		(°F)	
81D	1/8/21	133.4	1/8/21	129.9	0
1808D	2/15/21	133.6	2/15/21 2/18/21	126.8	3
31D	3/3/21	140.2	3/3/21	129.9	0
1808D	3/3/21	139.3	3/3/21 4/20/21	129.8	48
1808S	4/20/21	135.0	4/20/21	130.5	0
29D	5/6/21	139.2	5/6/21	129.9	0
31D	5/6/21	140.9	5/6/21	Pending	Well temporarily decommissioned on 5/6/21; offline as of end of reporting period
81D	5/6/21	136.1	5/6/21	130.8	0

Well	Initial Date	Initial Temperature	Re-Monitoring Date(s)	Compliant Temperature	Duration
		(°F)		(°F)	
1808D	5/6/21	141.0	5/6/21	Pending	Well temporarily decommissioned on 5/24/21; offline as of end of reporting period
1808S	5/6/21	136.5	5/6/21	Pending	Well temporarily decommissioned on 5/24/21; offline as of end of reporting period
TLH-1817B	5/12/21	131	6/9/21	130.9	28

- During the reporting period, all operational extraction wells had oxygen contents of less than 5%, except thirty-four (34) events. Per CFR 60.755 (a)(5), corrective action and re-monitoring was taken and twelve (12) of the thirty-four (34) events were corrected within 15 days. Sixteen (16) events resulted in the wells being corrected between 15 and 120 days. One (1) well was temporarily decommissioned under SSM and is offline as of the end of the reporting period. Three (3) wells were abandoned within 120 days. The remaining two (2) wells are currently in the 120-day period for corrective action and will be reported in the next semi-annual report. 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	Re-Monitoring Date(s)	Compliant Oxygen	Duration
		(% O2)		(% O2)	
TLH-1902A	1/8/21	13.6	1/8/21 1/28/21 2/3/21	3.3	26
TLH-2005A	1/8/21	8.6	1/8/21 1/28/21 2/2/21	0.4	25
TLH-1814A	1/11/21	6.9	1/11/21	4.6	0
TLH-2001B	1/11/21	11.1	1/11/21 1/28/21	2.7	17
TLH-1811C	1/25/21	5.7	1/25/21 1/28/21 2/16/21	2.4	22

Well	Initial Date	Initial Oxygen	Re-Monitoring Date(s)	Compliant Oxygen	Duration
		(% O2)		(% O2)	(Days)
83D	1/25/21	7.9	1/25/21 1/28/21	4.8	3
47S	2/3/21	6.3	2/3/21	4.8	0
TH-1813BR	2/15/21	5.4	2/15/21 3/3/21	0.0	16
TLH-2001A	2/15/21	19.8	2/15/21 2/18/21	0.6	3
72S	2/15/21	5.6	2/15/21	4.7	0
STEELRIS	2/16/21	16.1	2/16/21 3/9/21	0.6	21
36S	2/16/21	5.4	2/16/21 3/9/21	1.8	21
TLH-1816B	3/3/21	5.4	3/3/21	0.7	0
TLH-2005A	3/3/21	13.0	3/3/21 4/20/21	0.1	48
TLH-2006A	3/3/21	17.1	3/3/21 4/20/21	0.5	48
TLH-1702A	3/8/21	5.2	3/8/21	4.1	0
TLH-2001B	3/8/21	18.1	3/8/21 4/20/21 5/7/21	3.7	60
TLH-2004A	3/8/21	8.1	3/8/21 4/7/21 5/11/21 5/27/21 6/8/21 6/24/21	N/A	Abandoned on 6/24/21 within 120 days
TLH-2004B	3/8/21	8.2	3/8/21	4.9	0
50SOP	4/7/21	5.8	4/7/21 5/7/21	4.9	30
TLH-2006B	4/20/21	14.1	4/20/21 5/6/21 6/4/21 6/29/21	--	Abandoned on 8/4/21 within 120 days
20RS	4/20/21	18.4	4/20/21 5/11/21	2.6	21
TLH-1811C	4/21/21	17.6	4/21/21 5/12/21	Pending	Well temporarily decommissioned on 6/3/21; offline as of end of reporting period

Well	Initial Date	Initial Oxygen	Re-Monitoring Date(s)	Compliant Oxygen	Duration
		(% O2)		(% O2)	(Days)
TLH-1902B	4/21/21	19.1	4/21/21 5/6/21 6/23/21 6/29/21	--	Abandoned on 8/4/21 within 120 days
47S	4/21/21	17.8	4/21/21 5/25/21	3.9	34
311U0000	5/7/21	7.0	5/7/21 6/8/21	1.5	32
56SOP	5/7/21	18.5	5/7/21 6/7/21 6/29/21	1.5	53
53S	5/12/21	5.3	5/12/21	3.4	0
27D	5/25/21	8.8	5/25/21	3.7	0
50SOP	6/7/21	5.6	6/7/21	4.6	0
36S	6/8/21	16.0	6/8/21 6/29/21	1.5	21
75S	6/9/21	9.1	6/9/21	3.4	0
27D	6/23/21	13.9	6/23/21 6/29/21	Pending	Currently in 120-day period
76D	6/23/21	6.9	6/23/21 6/29/21	Pending	Currently in 120-day period

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.
53S	Well could not be corrected for high oxygen on 11/6/20. Temporarily decommissioned on 12/26/20 due to filling operations. Online and compliant (3.9%) on 4/21/21.
32000000	Well could not be corrected for high oxygen on 12/17/20. Temporarily decommissioned on 12/17/20; online and compliant (1.6%) on 1/21/21 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, 2021 due to some, but not limited to, the following reasons:

- High oxygen
- Communication 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**

<b>Control System Periods of Downtime Exceeding 1 Hour</b>		
<b>Date</b>	<b>Duration</b>	<b>Reason for Shutdown</b>
	<b>(Hrs:Min)</b>	
1/13/21	2:02	Flare manual shutdown for scheduled flare maintenance
1/15/21	6:37	Flare shutdown due to high oxygen
1/21/21	1:54	Flare shutdown due to communication fault
1/26/21	1:02	Flare manual shutdown for scheduled flare maintenance
1/29/21	12:57	Flare shutdown due to communication fault
1/31/21	7:54	Flare shutdown due to communication fault
2/6/21	1:42	Flare shutdown due to communication fault
2/21/21	7:32	Flare shutdown due to low temperature
3/3/21	1:21	Flare manual shutdown for data logger maintenance
3/4/21	1:57	Flare shutdown due to communication fault
3/23/21	2:54	Flare shutdown due to high oxygen
3/28/21	11:13	Flare shutdown due to communication fault
3/29/21	2:59	Flare shutdown due to communication fault
4/2/21	4:47	Flare manual shutdown for scheduled GCCS maintenance
4/12/21	26:29	Flare shutdown due to communication fault
4/16/21	1:17	Flare manually shutdown for scheduled flare and blower skid maintenance
4/30/21	1:53	Flare shutdown due to communication fault
5/5/21	1:06	Flare shutdown due to high oxygen
6/15/21	5:47	Flare manually shutdown for maintenance on the condensate injection system
6/16/21	2:18	Flare shutdown due to low temperature/low flow
6/16/21	1:26	Flare shutdown due to temperature and flow issues
6/16/21	1:49	Flare shutdown due to temperature and flow issues
6/17/21	7:22	Flare shutdown due to temperature and flow issues
6/19/21	16:05	Flare shutdown due to heat issues caused by faulty air conditioning unit
6/22/21	2:29	Flare manually shutdown for scheduled blower maintenance
6/28/21	1:31	Flare shutdown due to low temperature



### 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 2021 instantaneous surface emissions monitoring event was performed on March 9, 2021 by RES Environmental, Inc. (RES). The event resulted in nine (9) 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 19, 2021, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed April 8, 2021, 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 2021 instantaneous surface emissions monitoring event was performed on June 2, 2021 by RES. The event resulted in thirty-five (35) 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 11, 2021, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed July 1, 2021, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. Please note that two (2) locations could not be re-monitored due to active filling activities. The locations will be re-monitored once the active filling activities are complete. 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
6/24/21	Well TLH-2004A 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. The next testing event is scheduled for the second half of 2021 and will be reported in the next semi-annual report.

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 <sub>2</sub> )	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; however, there were two (2) deviations.

On March 13<sup>th</sup>, 2021, well 1808D had positive pressure. Due to an oversight, a 15-day re-monitoring event was not performed. The well was corrected during the next monitoring event on April 20, 2021.

On May 12, 2021, well VC-103 had temperature greater than 131 degrees Fahrenheit. Due to an oversight, a 15-day re-monitoring event was not performed. The well was corrected during the next monitoring event on June 9, 2021.

APPENDIX A  
LANDFILL SITE PLAN



**Toland Road Landfill**  
**GCCS**  
*February 2021 Topo*

**APPENDIX B**  
**COVER INTEGRITY MONITORING**















**ATTACHMENT 2**  
**SEMI-ANNUAL SSM PLAN REPORT**

## DESCRIPTION OF SSM EVENTS FOR FLARE

Reporting period January 1 through June 30, 2021

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 *
1/13/21	1/13/21	2:02	Flare	Shutdown/Startup	Flare manual shutdown for scheduled flare maintenance	Y	N/A
1/15/21	1/15/21	6:37	Flare	Malfunction	Flare shutdown due to high oxygen	Y	N/A
1/21/21	1/21/21	1:54	Flare	Malfunction	Flare shutdown due to communication fault	Y	N/A
1/26/21	1/26/21	1:02	Flare	Shutdown/Startup	Flare manual shutdown for scheduled flare maintenance	Y	N/A
1/29/21	1/30/21	12:57	Flare	Malfunction	Flare shutdown due to communication fault	Y	N/A
1/31/21	2/1/21	7:54	Flare	Malfunction	Flare shutdown due to communication fault	Y	N/A
2/3/21	2/3/21	0:31	Flare	Shutdown/Startup	Flare manual shutdown for scheduled blower maintenance	Y	N/A
2/6/21	2/6/21	1:42	Flare	Malfunction	Flare shutdown due to communication fault	Y	N/A
2/21/21	2/21/21	7:32	Flare	Malfunction	Flare shutdown due to low temperature	Y	N/A
3/3/21	3/3/21	1:21	Flare	Shutdown/Startup	Flare manual shutdown for data logger maintenance	Y	N/A
3/4/21	3/4/21	0:24	Flare	Shutdown/Startup	Flare manually shutdown for scheduled gas collection and control system (GCCS) maintenance	Y	N/A
3/4/21	3/4/21	1:57	Flare	Malfunction	Flare shutdown due to communication fault	Y	N/A
3/12/21	3/12/21	0:46	Flare	Malfunction	Flare shutdown due to communication fault	Y	N/A
3/23/21	3/23/21	2:54	Flare	Malfunction	Flare shutdown due to high oxygen	Y	N/A
3/28/21	3/28/21	11:13	Flare	Malfunction	Flare shutdown due to communication fault	Y	N/A
3/29/21	3/29/21	2:59	Flare	Malfunction	Flare shutdown due to communication fault	Y	N/A
4/2/21	4/2/21	4:47	Flare	Shutdown/Startup	Flare manual shutdown for scheduled GCCS maintenance	Y	N/A
4/2/21	4/2/21	0:18	Flare	Malfunction	Flare shutdown for Southern California Edison (SCE) power 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 *
4/12/21	4/13/21	26:29	Flare	Malfunction	Flare shutdown due to communication fault	Y	N/A
4/16/21	4/16/21	1:17	Flare	Shutdown/Startup	Flare manually shutdown for scheduled flare and blower skid maintenance	Y	N/A
4/28/21	4/28/21	0:46	Flare	Shutdown/Startup	Flare manually shutdown for scheduled GCCS maintenance	Y	N/A
4/30/21	4/30/21	1:53	Flare	Malfunction	Flare shutdown due to communication fault	Y	N/A
5/5/21	5/5/21	1:06	Flare	Malfunction	Flare shutdown due to high oxygen	Y	N/A
5/10/21	5/10/21	0:33	Flare	Shutdown/Startup	Flare manually shutdown for scheduled GCCS maintenance	Y	N/A
6/10/21	6/10/21	0:39	Flare	Malfunction	Flare shutdown due to purge time exceedance	Y	N/A
6/15/21	6/15/21	5:47	Flare	Shutdown/Startup	Flare manually shutdown for maintenance on the condensate injection system	Y	N/A
6/16/21	6/16/21	2:18	Flare	Malfunction	Flare shutdown due to low temperature/low flow	Y	N/A
6/16/21	6/16/21	1:26	Flare	Malfunction	Flare shutdown due to temperature and flow issues	Y	N/A
6/16/21	6/16/21	1:49	Flare	Malfunction	Flare shutdown due to temperature and flow issues	Y	N/A
6/16/21	6/16/21	0:33	Flare	Malfunction	Flare shutdown due to temperature and flow issues	Y	N/A
6/17/21	6/17/21	7:22	Flare	Malfunction	Flare shutdown due to temperature and flow issues	Y	N/A
6/19/21	6/19/21	16:05	Flare	Malfunction	Flare shutdown due to heat issues caused by faulty air conditioning unit	Y	N/A
6/22/21	6/22/21	2:29	Flare	Shutdown/Startup	Flare manually shutdown for scheduled blower maintenance	Y	N/A
6/25/21	6/25/21	0:50	Flare	Malfunction	Flare shutdown due to low temperature	Y	N/A
6/26/21	6/26/21	0:27	Flare	Malfunction	Flare shutdown due to low flow	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 *
6/28/21	6/28/21	0:31	Flare	Malfunction	Flare shutdown due to input/output switch fault	Y	N/A
6/28/21	6/28/21	1:31	Flare	Malfunction	Flare shutdown due to low temperature	Y	N/A

\*Not Applicable if SSM Plan Procedures were followed during event

\*\*Malfunction events assume automatic startup unless otherwise noted

During the reporting period, there were no SSM events for the flare monitoring devices.

**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.
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
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
20RS	12/9/2019 12:00			Gas well off line due to active fill	N	N	Alan C.
78S	7/20/2020 15:30	1/25/2021 9:59	4530:29	Gas well taken offline due to removal of stockpile	N	N	Alan C.
78D	7/20/2020 15:30			Gas well taken offline due to removal of stockpile	N	N	Alan C.
1805S	8/17/2020 12:00			Gas well taken offline due to filling operations	N	N	Alan C.
1805D	8/17/2020 12:00			Gas well taken offline due to filling operations	N	N	Alan C.
80S	9/29/2020 6:30	2/12/2021 15:00	3272:30	Gas well taken offline due to wet weather construction	N	N	Alan C.
33S	9/29/2020 6:30	2/12/2021 15:00	3272:30	Gas well taken offline due to wet weather construction	N	N	Alan C.
33D	9/29/2020 6:30	2/12/2021 15:00	3272:30	Gas well taken offline due to wet weather construction	N	N	Alan C.
12S	9/29/2020 6:30	3/3/2021 12:00	3725:30	Gas well taken offline due to wet weather construction	N	N	Alan C.
12D	9/29/2020 6:30	3/3/2021 12:00	3725:30	Gas well taken offline due to wet weather construction	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:
31S	9/29/2020 6:30	2/12/2021 15:00	3272:30	Gas well taken offline due to wet weather construction	N	N	Alan C.
31D	9/29/2020 6:30	2/12/2021 15:00	3272:30	Gas well taken offline due to wet weather construction	N	N	Alan C.
13S	9/29/2020 6:30	2/12/2021 15:00	3272:30	Gas well taken offline due to wet weather construction	N	N	Alan C.
TLH1818B	11/20/2020 14:25	2/12/2021 15:00	2016:35	Gas well taken offline due to filling operations	N	N	Alan C.
TLH1808S	12/9/2020 13:40	2/10/2021 7:00	1505:20	Gas well taken offline due to filling operations	N	N	Alan C.
TLH1808D	12/9/2020 13:40	2/10/2021 7:00	1505:20	Gas well taken offline due to filling operations	N	N	Alan C.
32000000	12/17/2020 0:00	1/21/2021 13:13	853:13	Gas well temporarily taken offline due to concern for possible subsurface oxidation, high O2	N	N	Alan C.
53S	12/26/2020 16:51	4/13/2021 10:38	2585:47	Well taken offline due to stockpile-C fill	N	N	Alan C.
VGW27S	1/11/2021 15:28	5/13/2021 3:00	2915:32	Gas well taken offline due to filling operations	N	N	Alan C.
VGW27D	1/11/2021 15:28	5/13/2021 3:00	2915:32	Gas well taken offline due to filling operations	N	N	Alan C.
VGW29S	1/11/2021 15:28	1/18/2021 15:28	168:00	Gas well taken offline due to filling operations	N	N	Alan C.
VGW29D	1/11/2021 15:28	1/18/2021 15:28	168:00	Gas well taken offline due to filling operations	N	N	Alan C.
VGW64R	1/28/2021 10:00			Gas well taken offline due to filling operations	N	N	Alan C.
VGW82S	2/9/2021 10:00			Gas well taken offline due to filling operations	N	N	Alan C.
TLH1901A	2/9/2021 10:00	5/13/2021 3:00	2225:00	Gas well taken offline due to filling operations	N	N	Alan C.
TLH1902A	2/9/2021 10:00			Gas well taken offline due to filling operations	N	N	Alan C.
TLH2008A	2/10/2021 10:00			Gas well taken offline due to filling operations	N	N	Alan C.
VGW28S	2/10/2021 10:00			Gas well taken offline due to filling operations	N	N	Alan C.
VGW28D	2/10/2021 10:00			Gas well taken offline due to filling operations	N	N	Alan C.
VGW68S	3/9/2021 9:00	4/13/2021 10:31	841:31	Gas well taken offline due to filling operations	N	N	Alan C.
TLH1811C	3/9/2021 9:00	4/13/2021 10:31	841:31	Gas well taken offline due to filling operations	N	N	Alan C.
TLH2008B	3/16/2021 12:00	N/A	N/A	Destroyed in filling operations	N	N	Alan C.
TLH2008C	3/30/2021 13:15	4/7/2021 15:24	194:09	Well taken offline due to stockpile-C fill	N	N	Alan C.
TLH1902B	3/30/2021 13:15	4/7/2021 15:24	194:09	Well taken offline due to stockpile-C fill	N	N	Alan C.
TLH2005B	3/30/2021 13:15	4/7/2021 15:24	194:09	Well taken offline due to stockpile-C fill	N	N	Alan C.
VGW1811B	3/30/2021 11:30			Offline due to next phase construction	N	N	Alan C.
VGW6S	3/30/2021 11:30			Offline due to next phase construction	N	N	Alan C.
VGW1801S	4/27/2021 10:00			Offline due to header realignment/phase construction	N	N	Alan C.
VGW1801D	4/27/2021 10:00			Offline due to header realignment/phase construction	N	N	Alan C.
VGW1802S	4/27/2021 10:00			Offline due to header realignment/phase construction	N	N	Alan C.
VGW1802D	4/27/2021 10:00			Offline due to header realignment/phase construction	N	N	Alan C.
VGW1803S	4/27/2021 10:00			Offline due to header realignment/phase construction	N	N	Alan C.
VGW1803D	4/27/2021 10:00			Offline due to header realignment/phase construction	N	N	Alan C.
VGW20RS	4/27/2021 10:00	5/6/2021 14:00	220:00	Offline due to header realignment	N	N	Alan C.
TLH2001A	4/27/2021 10:00	5/6/2021 14:00	220:00	Offline due to header realignment	N	N	Alan C.
TLH1813BR	4/27/2021 10:00	5/6/2021 14:00	220:00	Offline due to header realignment	N	N	Alan C.
VGW72S	4/27/2021 10:00	5/6/2021 14:00	220:00	Offline due to 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:
TLH2002A	4/27/2021 10:00			Offline due to header realignment	N	N	Alan C.
TLH1816B	4/27/2021 10:00	6/9/2021 12:28	1034:28	Offline due to header realignment	N	N	Alan C.
TLH2002B	4/27/2021 10:00	5/6/2021 14:00	220:00	Offline due to header realignment	N	N	Alan C.
TLH2001B	4/27/2021 10:00	5/6/2021 14:00	220:00	Offline due to header realignment	N	N	Alan C.
VGW26S	4/27/2021 10:00	5/6/2021 14:00	220:00	Offline due to header realignment	N	N	Alan C.
VGW26D	4/27/2021 10:00	5/6/2021 14:00	220:00	Offline due to header realignment	N	N	Alan C.
VGW76S	4/27/2021 10:00	5/6/2021 14:00	220:00	Offline due to header realignment	N	N	Alan C.
VGW76D	4/27/2021 10:00	5/6/2021 14:00	220:00	Offline due to header realignment	N	N	Alan C.
TLH2002C	4/27/2021 10:00	5/6/2021 14:00	220:00	Offline due to header realignment	N	N	Alan C.
TLH400L	4/27/2021 10:00	5/6/2021 14:00	220:00	Offline due to header realignment	N	N	Alan C.
TLH1702B	5/3/2021 8:00	5/10/2021 2:00	162:00	Offline due to header work	N	N	Alan C.
TLH2005B	5/12/2021 10:30			Gas well taken offline due to filling operations	N	N	Alan C.
VGW1808S	5/24/2021 15:00			Gas well taken offline due to filling operations	N	N	Alan C.
VGW1808D	5/24/2021 15:00			Gas well taken offline due to filling operations	N	N	Alan C.
VGW31S	5/24/2021 15:00			Gas well taken offline due to filling operations	N	N	Alan C.
VGW31D	5/24/2021 15:00			Gas well taken offline due to filling operations	N	N	Alan C.
TLH1818B	5/24/2021 15:00			Gas well taken offline due to filling operations	N	N	Alan C.
VGW 74S	5/24/2021 15:00	7/6/2021 11:45	1028:45	Offline due to header realignment	N	N	Alan C.
VGW68S	6/3/2021 9:00			Well taken offline due to stockpile-C fill	N	N	Alan C.
TLH1811C	6/3/2021 9:00			Well taken offline due to stockpile-C fill	N	N	Alan C.
TLH1701B	6/3/2021 9:00			Well taken offline due to stockpile-C fill	N	N	Alan C.
VGW20RS	6/8/2021 13:05			Gas well taken offline due to filling operations	N	N	Alan C.
TLH2004A	6/24/2021 0:00	N/A	N/A	Gas well abandoned due to due poor LFG quality	N	N	Alan C.

**ATTACHMENT 3**

**SUPPLEMENTAL INFORMATION HISTORICALLY SUBMITTED WITH TITLE V REPORTS**

**Toland Road Landfill**  
**2021 SC Fuels Gasoline Volumes**

<u>Month</u>	<u>Gas Type</u>	<u># of Gallons</u>
JAN	UNL REG	0
FEB	UNL REG	1,000
MAR	UNL REG	1,017
APR	UNL REG	1,004
MAY	UNL REG	993
JUN	UNL REG	700
JUL	UNL REG	
AUG	UNL REG	
SEP	UNL REG	
OCT	UNL REG	
NOV	UNL REG	
DEC	UNL REG	

**2021 Total  
Volume**

**4,715**

**2021 Flare Landfill Gas Throughput  
Toland Road Landfill**

<b>Month</b>	<b>LFG scf</b>	<b>HHV</b>	<b>CH4 Average</b>
<b>Jan</b>	55,065,307	463	45.8
<b>Feb</b>	57,742,815	453	44.8
<b>Mar</b>	66,429,709	443	43.8
<b>Apr</b>	59,197,977	434	42.9
<b>May</b>	58,872,994	447	44.2
<b>Jun</b>	55,386,155	432	42.7

<b>Blower Hours</b>					
<b>Blower 1</b>			<b>Blower 2</b>		
0.00	17,840.30	17,840.30	595.38	27,202.09	27,797.47
0.00	17,840.30	17,840.30	602.37	27,843.03	28,445.40
0.00	17,840.30	17,840.30	699.06	28,511.43	29,210.49
0.00	17,840.30	17,840.30	667.14	29,234.43	29,901.57
0.00	17,840.30	17,840.30	601.63	29,967.55	30,569.18
185.71	17,840.30	18,026.01	468.15	30,665.20	31,133.35
<b>185.71</b>	<b>Total</b>		<b>3,633.73</b>	<b>Total</b>	