



August 15, 2024

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. Emission Guidelines (EG), National Emission Standards for Hazardous Air Pollutants (NESHAP) and Title V Report for January 1, 2024 to June 30, 2024;
2. Supplemental information historically submitted with Title V Reports.

Attachment 1 includes the Semi-Annual EG/NESHAP report/Title V report.

Attachment 2 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, the approved California state plan for the EG, which includes compliance with the AB 32 Landfill Methane Rule (LMR) and specific portions of 40 CFR Part 62 Subpart OOO, and the NESHAP for municipal solid waste landfills (40 CFR Part 63, Subpart AAAA).

If you have any questions or require additional information, please contact me at (805) 658-4679 or Edward Pettit at (805) 207-2218.

Mr. Keith Macias  
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Sincerely,



Richard Jones  
Director of Operations

Attachments

1. Semi-Annual EG/NESHAP/Title V Report for January 1, 2024 to June 30, 2024
2. Supplemental Information Historically Submitted with Title V Reports

Copy: United States Environmental Protection Agency, Region IX

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

**First Semi-Annual 2024 Title V Report  
and Emissions Guidelines (EG)/ National Emission  
Standards for Hazardous Air Pollutants (NESHAP)  
Report  
Toland Road Landfill  
Santa Paula, California**



**From:**  
**Ventura Regional Sanitation District**  
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Oxnard, California 93036

For Submittal to:  
**Ventura County Air Pollution Control District**  
4567 Telephone Road, 2<sup>nd</sup> Floor  
Ventura, California 93003  
(805) 303-4005

August 15, 2024

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

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

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

**Certification by Responsible Official**

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

Signature and Title of Responsible Official:  Title: Richard Jones Director of Operations	 Date: 8/15/24
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Time Period Covered by the Semi-Annual Report of Required Monitoring:  01/01/2024 to 06/30/2024
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## 1.0 INTRODUCTION

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

- Portions of 40 Code of Federal Regulations (CFR) Part 62, Subpart OOO (“Federal Plan”) as of June 21, 2021
- In compliance with 40 CFR 63, Subpart AAAA (NESHAP) for Landfills), the annual report is submitted semi-annually
- Revised 40 CFR 63, Subpart AAAA (NESHAP) as of September 27, 2021
- To fulfill the semi-annual reporting requirement under the facility’s Title V permit (No. 07340)

### 1.1 EMISSION GUIDELINE CF RULE

TRL is considered a “new” landfill under the original landfill NSPS, and as such was subject to 40 CFR Part 60, Subpart WWW, and is considered an “existing” landfill under the new EG rule, promulgated under 40 CFR Part 60, Subpart Cf in August 2016. The California Air Resources Board (CARB) submitted a State Plan, dated May 25, 2017, to implement the United States Environmental Protection Agency’s (EPA’s) EG rule. CARB’s State Plan claimed that the California AB 32 Landfill Methane Rule (LMR), which TRL is already subject to, is already more stringent than the EG rule, and that compliance with the LMR should be sufficient to comply with the EG rule. The EPA partially approved and partially disapproved CARB’s State Plan on January 9, 2020 because CARB’s State Plan did not fully meet certain provisions of the EG rule. EPA published its Federal Plan for the EG under 40 CFR Part 62, Subpart OOO in May 2021, and it became effective on June 21, 2021. At that time, the approved EG Cf rule in California became the LMR plus specific sections of Subpart OOO related to wellhead temperature. TRL has continued to comply with the California EG rule since June 2021.

### 1.2 UPDATED NESHAP 40 CFR 63, SUBPART AAAA

Due to the site’s permitted design capacity being over the 2.5 million Megagram/2.5 million cubic meter limits and having an uncontrolled non-methane organic compound (NMOC) content exceeding 50 Megagrams per year, TRL is subject to the landfill NESHAP under 40 CFR Part 63, Subpart AAAA. Landfills subject to Subpart AAAA can choose to comply with Subpart AAAA in lieu of the major compliance provisions of Subpart WWW and OOO, as of September 27, 2021. The new NESHAP rule also removed the Startup, Shutdown, Malfunction (SSM) Plan requirements that were in the previous rule. Note that the facility is complying with the relevant major compliance provisions of Subpart OOO by choosing to comply with the equivalent sections under Subpart AAAA as allowed. Note that per a June 24, 2021 email from the VCAPCD, it is the District’s policy to enforce the current regulations. Therefore, although the Title V Permit references Subpart WWW, the facility does not have to comply with the outdated regulations. This includes VCAPCD Rule 74.17.1, which references the NSPS Subpart WWW. In the past, it was interpreted that the landfills subject to Subpart AAAA can choose to comply with Subpart AAAA in lieu of the major compliance provisions of Subparts WWW and OOO, as of September 27, 2021. Please note, in accordance with the California Air Pollution Control Officers Association’s (CAPCOA) October 2023 meeting and the EPA

Region IX's updated guidance, the Site also complies with the portions of Subpart 000 that are applicable to the CA State Plan for EG sites, which includes 40 CFR Part 62.16716(c), wellhead temperature of 55 degrees Celsius (°C) (131 Fahrenheit (°F)).

For the reporting period from January 1 through June 30, 2024, this Semi-Annual Report complies with the sections specified in Subpart AAAA, 40 CFR 63.1981(h), which describes the items to be submitted in an annual report for landfills using an active collection system. In accordance with NESHAP 40 CFR 63, Subpart AAAA, this report is submitted semi-annually.



## 2.0 BACKGROUND INFORMATION

### 2.1 OWNER AND OPERATOR INFORMATION

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

TRL is located in eastern Ventura County between the cities of Santa Paula and Fillmore, north of Highway 126. The landfill has been in operation since 1962. In 2000, a landfill gas (LFG) collection system and control system (GCCS) was installed at the Landfill, which included an 85.8 million British Thermal Units per hour (MMBtu/hr) LFG-fired enclosed flare. In 2009, nine (9) 3.2 MMBtu/hr microturbines were installed. In April 2019, the microturbines were permanently shut down. On July 13, 2022, VRSD was issued an Authority to Construct (ATC) for a new, replacement 120 MMBtu/hr LFG-fired enclosed flare. The new, replacement flare officially started up on March 6, 2024.

### 2.2 DESCRIPTION OF LANDFILL GAS COLLECTION AND CONTROL SYSTEM

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

- Vertical extraction wells and horizontal trench collectors.
- A system of lateral piping which connects the vertical wells and trench collectors to a main header system.
- A main collection header, which transports LFG to the control devices.
- An 85.8 MMBtu/hr LFG Specialties flare through March 6, 2024.
- A 120 MMBtu/hr Perennial Energy Inc. (PEI) flare starting March 6, 2024.
- Leachate collection and storage.
- Condensate collection, storage, and injection system.

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

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

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

### 3.0 MONITORING AND RECORDS REQUIRED UNDER NSPS/NESHAP

The following information in Table 1 is required to be reported in a semi-annual report:

**Table 1. Reporting Requirements, Corresponding Regulatory References**

<b>Updated NESHAP Subpart AAAA</b>
<b>40 CFR 63.1981(h), (i), (j), (k), (l)</b>
Number of times that applicable parameters monitored under 40 CFR 63.1958(b), (c), and (d) were exceeded and when the gas collection and control system was not operating under 40 CFR 63.1958(e), including periods of SSM.
Description and duration of all periods when the gas stream was diverted from the control device or treatment system through a bypass line or the indication of bypass flow as specified under 40 CFR 63.1961.
Description and duration of all periods when the control device or treatment system was not operating and length of time the control device or treatment system was not operating.
All periods when the collection system was not operating.
The location of each exceedance of the 500-ppm methane concentration as provided in 40 CFR 63.1958(d) and the concentration recorded at each location for which an exceedance was recorded in the previous month.
The date of installation and the location of each well or collection system expansion added pursuant to 40 CFR 63.1960(a)(3) and (4), (b), and (c)(4).
Required information of the initial performance source test report pursuant to 40 CFR 63.1981(i).
For any corrective action analysis for which corrective actions are required in 40 CFR 63.1960(a)(3)(i) or (a)(5) and that take more than 60 days to correct the exceedance, the root cause analysis conducted.
Each owner or operator required to conduct enhanced monitoring in 40 CFR 63.1961(a)(5) and (6) must include the results of all monitoring activities conducted during the period.
Where an owner or operator subject to the provisions of subpart 40 CFR 63.1981(k) seeks to demonstrate compliance with the operational standard for temperature in § 63.1958(c)(1) and a landfill gas temperature measured at either the wellhead or at any point in the well is greater than or equal to 76.7 degrees Celsius (170 degrees Fahrenheit) and the carbon monoxide concentration measured is greater than or equal to 1,000 ppmv, then you must report the date, time, well identifier, temperature and carbon monoxide reading via email to the Administrator within 24 hours of the measurement.
Beginning no later than September 27, 2021, the owner or operator must submit reports electronically according to paragraphs 40 CFR 63.1981(l)(1) and (2) of this section.
--
Submit semi-annual CMS summary reports including required items listed in 40 CFR 63.10(e)(3)(vi)

The following information required to be submitted in the NSPS/NESHAP semi-annual report is organized as follows:

- Monitored Parameters
  - Wellhead Monitoring Data
  - Flare Station Monitoring Data
  - Description and Duration of Periods when Gas was Diverted from the Control System
  - Minimum Flare Temperature
  - Control System and Collection System Downtime
  
- Surface Emissions Monitoring Data
  - First Quarter Monitoring
  - Second Quarter Monitoring
  
- Cover Integrity Monitoring
  
- Gas Collection System Installations and Upgrades
  
- Performance Testing
  - Source Test Results
  
- 24-Hour High Temperature
  
- CMS Summary Report
  
- Title V Compliance

### 3.1 MONITORED PARAMETERS

The following information in Table 2 is required to be monitored:

**Table 2. Monitored Parameters, Corresponding Regulatory References**

Updated NESHAP Subpart AAAA	NSPS Subpart OOO
40 CFR 63.1961(a), (b), (f)	40 CFR 62.16722(a)(3)
Vacuum applied to the extraction wells via the gas collection header is monitored on a monthly basis. A vacuum must be maintained at each wellhead to be in compliance with 40 CFR 63.1961 (a)(1).	--
Nitrogen or oxygen content of LFG at the wellheads is monitored on a monthly basis.	--
Temperature of the LFG at the wellheads is monitored on a monthly basis. Temperature must be maintained below 62.8 degrees C (145 degrees F) to comply with 40 CFR	Monitor temperature of the landfill gas on a monthly basis as provided in § 62.16720(a)(4). The temperature measuring device must be calibrated annually using the procedure in 40

Updated NESHAP Subpart AAAA	NSPS Subpart OOO
40 CFR 63.1961(a), (b), (f)	40 CFR 62.16722(a)(3)
63.1961(a)(3).	CFR part 60, appendix A-1, EPA Method 2, section 10.3.  (Please note, 62.16720(a)(4) references 62.16716(c), which states temperature must be less than 55 degrees C (131 degrees F).
A temperature or flame presence monitoring device with a continuous recorder, and a gas flow rate measuring device, which records flow at least once every 15 minutes, must be installed at the flare station. The temperature/flame presence and LFG flow rate monitoring data are used to determine the amount of time the LFG collection and control systems are on-line and to ensure compliance with the minimum temperature requirement for enclosed flares. The flare monitoring devices must be operating continuously to comply with 40 CFR 63.1961(b) and to show that the flare is on-line at any time that the collection system is operating (in compliance with 40 CFR 63.1958 (e) and (f)).	--
Landfill surface emissions monitoring was performed on a quarterly basis to measure concentrations of TOC as methane. A portable FID organic vapor analyzer, which meets NSPS specifications, was used to measure concentrations of TOC as methane (in compliance with 40 CFR 63.1961(f)).	--
The landfill surface was inspected at least monthly for evidence of cracks or other surface integrity issues, in accordance with 40 CFR 63.1960(c)(5).	--
Per 40 CFR 63.1983(c)(1)(i), the average temperature of the flare for a 3-hour time period cannot fall below 28°C (82°F) less than the average operation temperature based on the most recent source test. Please note, continuous monitoring of temperature monitoring is required at all times except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (in compliance with 40 CFR 63.1961(h)).	--

### 3.1.1 Wellhead Monitoring Data

Wellhead monitoring data from the monthly monitoring events during the reporting period included wellhead vacuum and the temperature of LFG at the wellheads. Please note that wellhead oxygen was monitored on a monthly basis; however, under the revised NESHAP Subpart AAAA regulations, there is no longer a well oxygen limit. These data provide the following information regarding compliance with 40 CFR 63.1961:

- During the reporting period, all operational extraction wells had negative pressure during all monitoring events.
- During the reporting period, all of the operational extraction wells were operated with LFG less than 55 °C (131 °F) during all monitoring events.

Wellhead readings for wells that were off-line due to maintenance, active filling or on-site construction activities; and/or shut-off to control increased well temperature to prevent a subsurface fire, were excluded from the above review. 40 CFR 63.1981(j) requires notifications for corrective action that will exceed 60 days to implement. Such corrective actions also require a “root cause analysis” to determine the reason for the exceedance if exceedances cannot be corrected in 15 days. For corrective actions that require more than 60 days to complete, an additional “corrective action analysis” is also required. There were no exceedances during the reporting period and therefore no corrective actions or root cause analyses to report.

### **3.1.2 Flare Station Monitoring Data**

A temperature monitoring device with a continuous recorder and a LFG flow rate monitoring device which records flows at least every 15 minutes is installed at the flare station. The monitoring records are summarized and kept on file at the landfill. During the reporting period, the gas collection system was operated in compliance with the requirement to operate the control or treatment system at all times when the collected gas is routed to the system (40 CFR 63.19586(f)). The flare station is equipped with an automatic shutdown and alarm system, which shuts down the blowers and closes a valve on the main header pipe whenever the flare shuts down. This ensures that no collected LFG is vented to the atmosphere untreated.

### **3.1.3 Description and Duration of Periods when Gas was Diverted from Control System**

As noted above, flare station blowers automatically shut down whenever the flare shuts down. Thus, collected LFG was at no time diverted from combustion at the control device during the reporting period.

### **3.1.4 Minimum Flare Temperature**

The 2023 source test for biennial emission compliance and methane destruction for the old LFG Specialties flare was performed on July 13, 2023, and the source test report was submitted on August 29, 2023 with a temperature at 1,686 °F. During the reporting period from January 1 through March 6, 2024, the minimum temperature at which the flare should operate was 1,636 °F (1,686 °F – 50 °F).

The new PEI flare was started up and began operations on March 6, 2024. During the reporting period from March 6 through June 30, 2024, the minimum temperature at which the flare should operate was 1,400 °F per manufacturer’s minimum operating range as the source test was not performed until July 18, 2024.

The average temperature for the flare for a three (3)-hour time period cannot fall below the established minimum temperatures. Note that the permitted minimum temperature for the old LFG Specialties flare is 1,500 °F, which is below the minimum under the NSPS/NESHAP. The NESHAP minimum temperature is no more than 82 degrees F below the more recent source test but is 50 °F per the LMR.

During the reporting period, the average temperature for either flare did not drop below the minimum temperature while operational. Missing or invalid data can potentially be a deviation for the temperature monitoring requirement for the flare if one or more hours of data in a 3-hour block is missing or invalid as defined by having more than 15 minutes of invalid or missing data in an hour. There were zero (0) missing data events for the flare during the reporting period, except for periods excluded per 40 CFR 63.1961.

### 3.1.5 Control System and Collection System Downtime

Due to the control system setup at the site, it would be a unique instance when the flare went off-line for an extended period, which could result in a condition whereby adequate LFG control capacity was not available. Collection system shutdown occurs when the blower/flare station is shut down. If this occurs, all exit valves automatically shut and LFG would not be vented to the atmosphere.

Blower/flare station shutdowns occurred at various times during the reporting period of January 1 through June 30, 2024 due to some, but not limited to, the following reasons:

- Low flow
- Low temperature
- Scheduled new flare programming
- Scheduled or unscheduled flare or collection system maintenance/repair

Collected LFG was at no time diverted from the flare because the blower automatically shuts down whenever the flare shuts down. Therefore, at no time was the collected LFG emitted without combustion during the reporting period. Also, in no instances did free venting of LFG occur during the reporting period. Individual flare station shutdowns during the reporting period are included in Table 3. Per 40 CFR 63.1955(c), the equipment was operated in a manner consistent with safety and good air pollution control practices for minimizing emissions, and the work practice standard was met.

**Table 3. Summary of Flare Downtime from January 1 through June 30, 2024**

<b>Control System Periods of Downtime</b>		
<b>Date</b>	<b>Duration (Hrs:Min)</b>	<b>Reason for Shutdown</b>
1/17/24	3:09	LFG Specialties flare shutdown due to blower fault
1/17/24	0:15	LFG Specialties flare shutdown due to blower fault
1/27/24	0:12	LFG Specialties flare manual shutdown for programming PEI flare
1/31/24	6:05	LFG Specialties flare manual shutdown for programming PEI flare
2/1/24	7:07	LFG Specialties flare manual shutdown to attempt to start PEI flare
2/1/24	0:37	LFG Specialties flare shutdown due to low temperature/high oxygen
2/2/24	7:20	LFG Specialties flare manual shutdown to attempt to start PEI flare
2/5/24	0:34	LFG Specialties flare shutdown due to pre-hydrogen sulfide sump flooding
2/6/24	1:01	LFG Specialties flare shutdown due to low flow
2/6/24	2:03	LFG Specialties flare shutdown due to low temperature
2/14/24	4:22	LFG Specialties flare manual shutdown for programming PEI flare
2/15/24	28:02	LFG Specialties flare manual shutdown for Southern California Edison planned power outage (maintenance) and then programming PEI flare
2/16/24	2:08	LFG Specialties flare manual shutdown for programming PEI flare
3/4/24	0:03	PEI flare manual shutdown for program adjustments
3/4/24	0:02	PEI flare manual shutdown for program adjustments

<b>Control System Periods of Downtime</b>		
<b>Date</b>	<b>Duration</b>	<b>Reason for Shutdown</b>
	<b>(Hrs:Min)</b>	
3/4/24	0:03	PEI flare manual shutdown for program adjustments
3/4/24	0:58	PEI flare manual shutdown for program adjustments
3/4/24	0:57	PEI flare manual shutdown for program adjustments
3/4/24	0:29	PEI flare manual shutdown for program adjustments
3/5/24	0:28	PEI flare manual shutdown for program adjustments
3/6/24	2:30	PEI flare manual shutdown for program adjustments
3/6/24	0:41	PEI flare manual shutdown for program adjustments
3/6/24	0:03	PEI flare manual shutdown for program adjustments
3/26/24	5:42	PEI flare manual shutdown for program adjustments
4/4/24	0:26	PEI flare manual shutdown for valve installation on main header
4/4/24	0:56	PEI flare manual shutdown for valve installation on main header
4/4/24	0:46	PEI flare manual shutdown for valve installation on main header
4/9/24	1:46	PEI flare shutdown due to low flow
4/14/24	23:04	PEI flare shutdown due to bad electrical pressure switch
4/16/24	1:11	PEI flare manual shutdown for blower swap
4/23/24	6:46	PEI flare manual shutdown for new construction
4/24/24	0:22	PEI flare shutdown due to broken pipe
5/3/24	0:03	PEI flare shutdown due to power glitch
5/8/24	0:02	PEI flare shutdown due to blower stoppage
5/10/24	1:52	PEI flare shutdown due to bad pressure switch
5/10/24	0:14	PEI flare shutdown due to bad pressure switch
5/10/24	19:12	PEI flare shutdown due to bad pressure switch
5/17/24	7:59	PEI flare manual shutdown for road construction on header
5/20/24	0:44	PEI flare shutdown due to condensate causing low flow
5/28/24	20:46	PEI flare shutdown due to power glitch from Southern California Edison work
6/4/24	3:32	PEI flare manual shutdown for construction in Area 5
6/5/24	8:16	PEI flare manual shutdown for construction tie-in in Area 5

## 3.2 SURFACE EMISSION MONITORING DATA

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

### 3.2.1 First Quarter Monitoring

The first quarter 2024 instantaneous surface emissions monitoring event was performed on March 5, 2024 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 water, and a 10-day re-monitoring event performed March 15, 2024, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. The one (1)-month re-monitoring event performed April 2, 2024, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane. There were no areas which triggered the NESHAP 120-day timeline to implement a system expansion.

### 3.2.2 Second Quarter Monitoring

The second quarter 2024 instantaneous surface emissions monitoring event was performed on June 11, 2024 by RES. The event resulted in fourteen (14) areas of the landfill having TOC concentrations above 500 ppmv, measured as methane. Remediation activities were performed, including adding soil/water and compacting soil, and a 10-day re-monitoring event performed on June 20, 2024, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane for thirteen (13) areas. One (1) area could not be re-monitored due to the location being in a dangerous area (cell construction activities). The area will be re-monitored when it is no longer dangerous. The one (1)-month re-monitoring event performed July 10, 2024, resulted in zero (0) areas with TOC concentrations above 500 ppmv, measured as methane for seven (7) areas. The remaining seven (7) areas could not be re-monitored due to the locations being in a dangerous area (cell construction activities). The areas will be re-monitored when it is no longer dangerous. There were no areas which triggered the NESHAP 120-day timeline to implement a system expansion.

## 3.3 COVER INTEGRITY MONITORING

The site must implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis. TRL monitored for cover integrity on a monthly basis during the reporting period. Cover integrity monitoring results are located in Appendix B.

## 3.4 GAS COLLECTION SYSTEM INSTALLATIONS AND UPGRADES

During the reporting period, the following gas collection system installations, upgrades and/or abandonments are noted in Table 4 below. Note that the landfill had sufficient well density with the abandonment of wells as new collectors were installed.

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

<b>DATE</b>	<b>DESCRIPTION</b>
4/8/24	Wells VGW2223D, TLH2007A, TLH2007A, TLH2007B, TLH307U, TLH1817B, VGW2210S, and VGW2209D abandoned
4/8/24	New collectors TLH2301A, TLH2302A, TLH2303A, TLH2304A, TLH2305A, TLH2306A, TLH2307A, TLH2308A, TLH2301B, and TLH2302B installed and online
4/9/24	New collector TLH2309A installed and online
4/19/24	Wells VGW2220D, VGW26S, VGW26D, TLH2201S, and TLH1702B abandoned
5/3/24	Wells 303L, 304L, 306L, 307L, 319, 320, TLH2005A, and TLH2006A abandoned



## 4.0 PERFORMANCE TEST

The facility is required to perform a source test on the flare once every two years as required by Rule 74.17.1 and an air toxics test once every four years as required by Condition No. 10 of the PTO. The compliance test for Non-Methane Organic Compounds (NMOC), Nitrogen Oxides (NOx), Sulfur Oxides (SOx), Carbon Monoxide (CO), and toxics for the LFG Specialties flare was performed on July 13, 2023. The source test for the new PEI flare is scheduled for July 2024 and will be reported in the next semi-annual report.

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

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

Test Date	Parameter	Flare Result	Emission Limit
Flare 7/13/23	NOx Emission Rate (lb/MMBtu)	0.032	0.06 lb/MMBtu
	CO Emission Rate (lb/MMBtu)	0.0014	0.20 lb/MMBtu
	SOx Emission Rate (lb/MMBtu)	0.0084	0.02 lb/MMBtu
	NMOC Emission Rate (ppmv, as hexane @ 3% O <sub>2</sub> )	0.1	20 ppmv
	NMOC Destruction Efficiency (%)	99%	98%

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

Please note that methane destruction efficiency testing under Condition No. 3 from the Title 17 California Code of Regulations (CCR) section in the PTO was also conducted on July 13, 2023. The methane destruction efficiency was 99.98%, which is in compliance with 17 CCR requirements.

## 5.0 24-HOUR HIGH TEMPERATURE

40 CFR 63.1981(k) requires the reporting of any landfill gas temperature measurements greater than or equal to 170°F. During the reporting period, there were no readings greater or equal to 170°F.

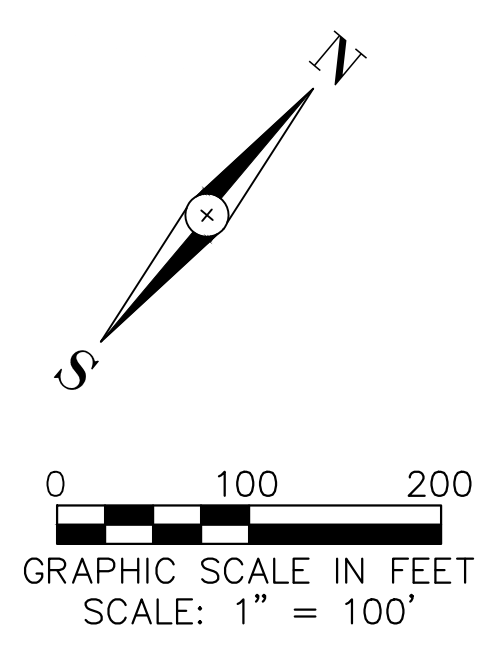
## 6.0 CMS SUMMARY REPORT

The additional reporting requirements for continuous monitoring systems (CMS) per 40 CFR 63.10(e)(3)(vi) is included in Appendix C.

## 7.0 TITLE V COMPLIANCE

During the reporting period, the Landfill performed all required monitoring and maintained the appropriate records except for one (1) event. During a VCAPCD inspection on April 10, 2024, a leak was discovered coming from a hatch on a leachate storage tank with a concentration of 4,000 ppmv. A Notice of Violation (NOV) (No. 24543) was issued on April 11, 2024 for failing to route emissions from the leachate storage tank to the flare for destruction per Condition No. 8 in Attachment PO07340PC. VRSD remediated the leak and re-monitored and corrected within 10 days. In addition, the inspector conducted a follow-up monitoring event and also confirmed the leak had been remediated.

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




**LEGEND**

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

TOPOGRAPHY NOTE:  
 1. BASED ON SURVEY INFORMATION RECEIVED FROM VENTURA REGIONAL SANITATION DISTRICT DATE: 01-02-2024

REV	DATE	DESCRIPTION	DRN BY	CHK BY	APRV BY
1.0	08.14.24	GCCS MAP	AW	MC	GA

OWNER:



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

ENGINEER:



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

LFG GCCS MAP - AUGUST 2024

TOLAND ROAD LANDFILL  
 MASTER LFG SITE PLAN

DRAWING NO. \_\_\_\_\_

C:\Users\AntonioWearmouth\Biosgas Engineering Dropbox\Projects\USA\USHT1701.100 - VRSD Toland\Drawings\20240813 Toland GCCS Master Site Map.dwg 8/14/2024 AntonioWearmouth

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















**APPENDIX C**  
**NESHAP/CMS SUMMARY REPORT**

## SUMMARY REPORT – GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

The National Emission Standards for Hazardous Air Pollutants (NESHAP) Maximum Achievable Control Technology (MACT) Rule for Landfills (40 CFR 63 Subpart AAAA) was amended in March 2020. These amendments became effective September 27, 2021 and include additional reporting requirements for continuous monitoring systems (CMS) per §63.10(e)(3)(vi).

- A. The company name and address of the affected source:

Toland Road Landfill  
3500 Toland Road  
Santa Paula, California 93060

- B. An identification of each hazardous air pollutant monitored at the affected source.

N/A. Subpart AAAA establishes a relevant emission standard for total non-methane organic compounds (NMOCs) and does not require hazardous air pollutant monitoring.

- C. The beginning and ending dates of the reporting period.

The reporting period covers the period of July 1 – December 31, 2023.

- D. A brief description of the process units.

The landfill gas collection and control system (GCCS) CMS components which are subject to the QC program and additional reporting requirements are:

- Enclosed flare(s) with thermocouples to measure combustion temperature
- Associated data recorder(s)

- E. The emission and operating parameter limitations specified in the relevant standard(s).

Subpart AAAA establishes a relevant emission standard for non-methane organic compound (NMOC) emissions from enclosed flares of 98 percent weight-reduction or 20 parts per million by volume (ppmv) dry basis, as hexane at 3 percent oxygen. The monitoring requirement associated with this emission standard is established in §63.1983(b)(2) and requires that the landfill maintain records of monitoring of average combustion temperature measured at least every 15 minutes. Exceedances are established in §63.1983(c)(1) as all 3-hour periods of operation during which the average temperature was more than 28 degrees Celsius (82 degrees Fahrenheit) below the average combustion temperature during the most recent performance test at which compliance with the relevant emission standard of §63.1959(b)(2)(iii) was determined.

F. The monitoring equipment manufacturer(s) and model number(s).

LFG Specialties Flare:

- Thermocouples: Tempco Model MTA01208
- Data Recorder: Yokogawa Model S5P0211

PEI Flare:

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

G. The date of the latest CMS certification or audit.

N/A. Per Table 1 to Subpart AAAA of Part 63, the CMS performance evaluation requirements of §63.8(e) do not apply to municipal solid waste (MSW) landfills.

H. The total operating time of the affected source during the reporting period.

During the reporting period (1/1/2024 – 6/30/2024) the GCCS operated a total of 4,070.4 hours.

I. An emission data summary (or similar summary if the owner or operator monitors control system parameters), including the total duration of excess emissions during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

- There were no instances during the reporting period during which the average operational combustion temperature of the LFG Specialties flare was measured to be less than 1,604 °F for at least 3 hours (i.e., 28 °C (82 °F)) below the average combustion temperature measured for the enclosed flare during the most recent performance test).
- There were no instances during the reporting period during which the average operational combustion temperature of the PEI flare was measured to be less than 1,400 °F for at least 3 hours. The operational temperature was based on manufacturer's operating range as performance test not performed during reporting period.

J. A CMS performance summary (or similar summary if the owner or operator monitors control system parameters), including the total CMS downtime during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of CMS downtime expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total CMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes.

During the reporting period, there were no instances where combustion temperature was not measured and recorded during flare operation as required.

- K. A description of any changes in CMS, processes, or controls since the last reporting period.

No changes in applicable CMS, process, or controls occurred since the last reporting period.

- L. The name, title, and signature of the responsible official who is certifying the accuracy of the report.

See Certification at beginning of report.

- M. The date of the report.

See Cover Page.

**ATTACHMENT 2**

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



**Toland Road Landfill  
2024  
Monthly Throughput**

<b>Month</b>	<b>LFG scf</b>	<b>HHV</b>	<b>CH4 Average</b>
<b>Jan</b>	72,387,338	446	44.1
<b>Feb</b>	59,750,289	468	46.3
<b>Mar</b>	75,457,200	480	47.4
<b>Apr</b>	62,497,157	463	45.8
<b>May</b>	61,349,544	470	46.4
<b>Jun</b>	52,606,697	470	46.5

<b>Blower Hours</b>	
<b>Blower 1</b>	<b>Blower 2</b>
734.40	0.00
612.00	0.00
708.00	0.00
344.00	318.00
142.00	528.00
0.00	684.00
<b>2,540.40</b>	<b>1,530.00</b>

	<b>Total LFG</b>	<b>Ave HHV</b>	<b>MMBtu</b>
<b>2024</b>	<b>384,048,225</b>	<b>466</b>	<b>179,094</b>

<b>2024 Total Hours</b>
<b>4,070.40</b>

**Toland Road Landfill  
2024 SC Fuels Gasoline Volumes**

<b>Date</b>	<b>Gas Type</b>	<b>Amount (Gallons)</b>
January	Unleaded Regular	682.0
February	Unleaded Regular	759.5
March	Unleaded Regular	759.2
April	Unleaded Regular	877.2
May	Unleaded Regular	607.5
June	Unleaded Regular	657.2
<b>Total</b>		<b>4,342.6</b>