

2 COMBINED MONITORING REPORT

In accordance with Title V Permit Standard Condition 1.F, BAAQMD Rule 8-34-411 and §60.757(f) in the NSPS, this report is a Combined Semi-Annual Title V Report and Partial 8-34 Annual Report that is required to be submitted by West County. The report contains monitoring data for the operation of the landfill gas collection and control system (GCCS). The operational records have been reviewed and summarized. The timeframe included in this report is November 1, 2011 through April 30, 2012. The following table lists the rules and regulations that are required to be included in this Combined Report.

Table 2-1 Combined Report Requirements

Rule	Requirement	Location in Report
8-34-501.1 §60.757(f)(4)	All collection system downtime, including individual well shutdown times and the reason for the shutdown.	Section 2.1, Appendices C & D
8-34-501.2 §60.757(f)(3)	All emission control system downtime and the reason for the shutdown.	Section 2.2, Appendix E & F
8-34-501.3, 8-34-507, §60.757(f)(1)	Continuous temperature for all operating flares and any enclosed combustor subject to Section 8-34-507.	Section 2.3, Appendix G & H
8-34-501.4, 8-34-505, 8-34-510	Testing performed to satisfy any of the requirements of this rule.	Section 2.4 & 2.10 Appendices I, M, & O
8-34-501.5	Monthly landfill gas flow (LFG) rates and well concentration readings for facilities subject to 8-34-404.	Section 2.5, 2.11 Appendix Q
8-34-501.6, 8-34-503, 8-34-506, §60.757(f)(5)	For operations subject to Section 8-34-503 and 8-34-506, records of all monitoring dates, leaks in excess of the limits in Section 8-34-301.2 or 8-34-303 that are discovered by the operator, including the location of the leak, leak concentration in parts per million by volume (ppmv), date of discovery, the action taken to repair the leak, date of the repair, date of any required re-monitoring, and the re-monitored concentration in ppmv.	Section 2.6 & 2.7, Appendices K & L
8-34-501.7	Annual waste acceptance rate and current amount of waste in-place.	Section 2.8
8-34-501.8	Records of the nature, location, amount, and date of deposition of non-degradable wastes, for any landfill areas excluded from the collection system requirement as documented in the GCCS Design Plan.	Section 2.9

Rule	Requirement	Location in Report
8-34-501.9, 8-34-505, §60.757(f)(1)	For operations subject to Section 8-34-505, records of all monitoring dates and any excesses of the limits stated in Section 8-34-305 that are discovered by the operator, including well identification number, the measured excess, the action taken to repair the excess, and the date of repair.	Section 2.10, 2.10.1, Appendices M, N, O & P
8-34-501.10, 8-34-508, §60.757(f)(1)	Continuous gas flow rate records for any site subject to Section 8-34-508.	Section 2.11, Appendices Q
8-34-501.11, 8-34-509	For operations subject to Section 8-34-509, records of key emission control system operating parameters.	Section 2.2.2
8-34-501.12	The records required above shall be made available and retained for a period of five years.	Section 1.2
§60.757(f)(2)	Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under §60.756.	Section 2.2.1
§60.757(f)(6)	The date of installation and the location of each well or collection system expansion added pursuant to paragraphs (a)(3), (b), (c)(4) of §60.756.	Section 2.12, Appendices A, C & D
§60.10 (d)(5)(i)	Startup, Shutdown, Malfunction Events	Section 4.0, Appendices C D, E & F

2.1 Collection System Operation (BAAQMD 8-34-501.1 & §60.757(f)(4))

Appendix A contains a current map of West County's existing GCCS. West County currently has two separate GCCS's comprised of one flare (A-11) for Class I and one flare (A-8) and three lean burn Internal Combustion (IC) Engines (S-5, S-6 and S-37) for Class II. Section 2.1.1 includes the GCCS downtime for the reporting period. The information contained in Section 2.1.2 which references Appendix C and D, includes the individual well shutdown times and the reason for the shutdown.

2.1.1 Collection System Downtime

During the period covered in this report, both the Class I and Class II GCCS were not shut down for more than five days on any one occasion. Table 2-2 and 2-3 summarize the Class I and Class II device's downtime for the reporting period.

Table 2-2 Class I Downtime

Month	Total Class I Downtime (Hours)
November 2011	4.66
December 2011	15.89
January 2012	8.55
February 2012	2.97
March 2012	16.90
April 2012	10.72
Total Hours:	69.69

Table 2-3 Class II Downtime

Month	Total Class II GCCS Downtime
November 2011	2.75
December 2011	0.48
January 2012	12.55
February 2012	0.63
March 2012	7.88
April 2012	0.12
Total Hours:	24.22

Class II GCCS Downtime is accrued with all emission control devices (A-8, S-5, S-6 and S-37) are not operating.

Appendix E contains the A-11 Flare Downtime Reports which lists dates, times, and lengths of shutdowns for the reporting period including year-to-date and the GCCS Downtime for Class I. Appendix F contains the A-8 Flare and S-5, S-6 and S-37 IC Engine Downtime Reports which lists dates, times, and lengths of shutdowns for the reporting period including year-to-date and the GCCS Downtime for Class II.

2.1.2 Well Start-Up & Disconnection Log

There were 42 wellfield SSM events that occurred during the reporting period in Class I. No wells were started-up or decommissioned during the reporting period. See Appendix C, Class I Wellfield SSM Log for details of well disconnection and reconnection events.

There were 113 wellfield SSM events that occurred during the reporting period in Class II. No wells were started-up or decommissioned during the reporting period. See Appendix D, Class II Wellfield SSM Log for details of well disconnection and reconnection events.

2.2 Emission Control Device Downtime (BAAQMD 8-34-501.2 & §60.757(f)(3))

The emission control system at Class I consists of one flare (A-11), which began operation in 2004. The control system was not bypassed at any time during the reporting period. Raw LFG was not emitted during the reporting period. The SSM logs for the A-11 Flare are located in Appendix E.

The emission control system at Class II consists of one flare (A-8) which began operation in 1990, two (2) lean burn IC Engines (S-5, and S-6), which began operation in 1985 and one IC engine (S-37) which began operations in 1987. The control system was not bypassed at any time during the reporting period. Raw LFG was not emitted during the reporting period. The SSM logs for Class II are located in Appendix F.

2.2.1 LFG Bypass Operations (§60.757(f)(2))

Title 40 CFR §60.757(f)(2) is not applicable at West County because a by-pass line has not been installed. LFG cannot be diverted from the control equipment.

2.2.2 Key Emission Control Operating Parameters (BAAQMD 8-34-501.11 & 8-34-509)

BAAQMD Regulation 8-34-501.11 and 8-34-509 are not applicable to Class I and Class II because the control devices in each class are subject to continuous temperature monitoring as required in BAAQMD Regulation 8-34-507 and §60.757(f)(1).

2.3 Temperature Monitoring Results (BAAQMD 8-34-501.3, 8-34-507, & §60.757(f)(1))

Class I

The combustion zone temperature of the A-11 Flare was monitored with Pyromation Thermocouple, and as of April 12, 2012 is currently monitored with a Therm-X Thermocouple. The temperature is displayed with a Yokogawa digital recorder, which is downloaded and archived.

There were five (5) temperature deviations reported to the district during the reporting period. On December 16, 2011, Carol Allen of the BAAQMD clarified that the A-11 Flare combustion zone 3-hour average temperature limit for a deviation is 1450°F in accordance with Title V Permit Condition Number 20754

Part 4. Cornerstone will continue to monitor instances where the A-11 Flare drops below the 1566°F limit established during the March 17, 2011 Source test and 1563°F limit established during the March 13, 2012 Source test. However these instances, as clarified by BAAQMD, are not currently deemed temperature deviations, and will not be reported as such. Appendix G contains the Flare Temperature Deviation/ Inoperative Monitor/Missing Data Report for November 1, 2011 through April 30, 2012.

Class II

The combustion zone temperature of the A-8 flare is monitored with a Thermo Sensors Corp (TSC) Thermocouple. The temperature is displayed on a Honeywell digital display and Circular Chart recorder, which is routinely archived.

There were no temperature deviations during the reporting period. On December 16, 2011, Carol Allen of the BAAQMD clarified that the A-8 Flare combustion zone 3-hour average temperature limit for a deviation is 1400°F in accordance with Title V Permit Condition Number 17821 Part 9. Cornerstone will continue to monitor instances where the A-8 Flare drops below the 1550°F limit established during the March 17, 2011 and the March 13, 2012 Source tests. However these instances, as clarified by BAAQMD, are not currently deemed temperature deviations, and will not be reported as such. Appendix H contains the Class II Temperature Deviation/ Inoperative Monitor/Missing Data Report for November 1, 2011 through April 30, 2012.

The combustion zone temperatures of the S-5, S-6, and S-37 IC engines are monitored with a R. Blair Engineering Thermocouple. The temperature is displayed with Altronic 40 ETM Temperature Scanner connected to a Supervisory Control and Data Acquisition (SCADA) system, which is downloaded and archived.

There were no temperature deviations during the reporting period. Appendix H contains the Class II Temperature Deviation/Inoperative Monitor/Missing Data Report for November 1, 2011 through April 30, 2012.

2.4 Monthly Cover Integrity Monitoring (BAAQMD 8-34-501.4)

The cover integrity monitoring was performed for Class I and II on the following dates:

- November 28, 2011
- December 23, 2011
- January 27, 2012
- February 22, 2012
- March 23, 2012

- April 25, 2012

No cover issues were reported during the November through April monitoring events. The Monthly Cover Integrity Monitoring Logs are included in Appendix I.

2.5 Less Than Continuous Operation (BAAQMD 8-34-501.5)

West County does not operate under BAAQMD Regulation 8-34-404 (Less Than Continuous Operation) and, therefore, is not required to submit monthly LFG flow rates.

2.6 Surface Emissions Monitoring (BAAQMD 8-34-501.6, 8-34-506, & §60.757(f)(5) & California Code of Regulations (CCR) § 95469(a))

Field Solutions, Inc. (Field Solutions) completed the Fourth Quarter 2011 and the First Quarter 2012 Instantaneous and Integrated Surface Emission Monitoring (SEM) events and RMC Geoscience, Inc. (RMC) prepared the Fourth Quarter 2011 and the First Quarter 2012 SEM Reports. Refer to the Fourth Quarter 2011 and First Quarter 2012 SEM Reports, located in Appendix J, for detailed results.

2.7 Component Leak Testing (BAAQMD 8-34-501.6 & 8-34-503)

Weekly Class I Wells and Monthly GCCS component leak testing is completed at Class I to satisfy the requirements of Title V permit Condition 20754 Part 2(c)(v) and BAAQMD Regulation 8-34-503. Component leak testing occurred during the reporting period on the following days.

- November 2, 9, 14, 16, 21, and 28, 2011
- December 5, 12, 17, 19 and 26, 2011
- January 2, 9, 16, 18, 23, and 30, 2012
- February 8, 17, 20, and 27, 2012
- March 5, 12, 19, 23, and 26, 2012
- April 2, 9, 16, 23, 28, and 30, 2012

Refer to the Class I Weekly and Monthly Component Leak Monitoring Logs, located in Appendix K, for detailed results.

Monthly GCCS component leak testing is completed for the Class II Landfill Perimeter and LFG/Nove Plant to satisfy the requirements of BAAQMD Regulation 8-34-503. Component leak testing occurred during the reporting period on the following days.

- November 4, 5 16, and 23, 2011

- December 2, 3, 5, 9, and 14, 2011
- January 6, 7, 11, 13, and 14, 2012
- February 3, 10, and 15, 2012
- March 2, 3, 9, and 16, 2012
- April 13, 14, and 27, 2012

Refer to the Class II Component Leak Monitoring Logs, located in Appendix L, for detailed results.

Republic documents all emissions greater than the surface emission limit of 500 ppmv of methane instead of the 1,000 ppmv component leak limit in order to be conservative in regards to emissions from components (i.e. well boreholes) which are subject to the lower surface emission limit.

Application Number 21424, approved by BAAQMD on December 23, 2011, allows for alternative operating conditions for the twenty (20) Class II Horizontals similar to Class I Title V Permit Condition Number 20754 Part 2(c)(v-vi). Therefore, any GCCS components disconnected during the reporting period were monitored for component leaks within 7 and 30 days following the initial disconnection. Details of the GCCS component leak testing and results are included in the Class II Well SSM Log in Appendix D.

2.8 Waste Acceptance Records (BAAQMD 8-34-501.7)

The West County Class I and Class II landfills are closed and no longer accept waste. The Waste-In-Place as of closure is approximately 376,110 tons and 12,330,387 tons, respectively.

2.9 Non-Degradable Waste Acceptance Records (BAAQMD 8-34-501.8)

The GCCS Design Plan for West County does not indicate non-degradable waste areas that are excluded from the collection system. Therefore, BAAQMD Regulation 8-34-501.8 is not applicable. However, the closed Class I hazardous waste management facility (HWMF) has limited records of waste accepted. A layer of municipal solid waste (MSW) was placed in the landfill directly preceding closure in which the GCCS was installed, however the waste below is generally considered non-degradable waste.

2.10 Wellhead Monitoring Data (BAAQMD 8-34-501.4 & 8-34-505)

Wellhead monitoring was performed on a monthly basis pursuant to 8-34-505. The well readings for November 1, 2011 through April 30, 2012 are included in Appendix J. Each well was monitored in accordance with the following requirements:

- 8-34-305.1 – Each wellhead shall operate under a vacuum;
- 8-34-305.2 – The LFG temperature in each wellhead shall be less than 55 degrees Celsius (°C) (131 degrees Fahrenheit [°F]); and
- 8-34-305.4 – The oxygen concentration in each wellhead shall be less than 5 percent by volume.

Wellhead monitoring was performed on the following dates for Class I:

- November 2, 9, 14, 21, and 28, 2011
- December 5, 12, 19, 21 and 26, 2011
- January 2, 9, 11, 16, 23, and 30, 2012
- February 6, 15, 20, and 27, 2012
- March 5, 12, 19, and 26, 2012
- April 2, 9, 16, 23, and 30, 2012

Wellhead monitoring was performed on the following dates for Class II:

- November 4, 5, 7, 14, 21, and 28, 2011
- December 2, 3, 5, 10, 19, 26, and 28, 2011
- January 2, 6, 7, 9, 11, 16, 23, 27, and 30, 2012
- February 3, 4, 8, 10, 13, 15, 20, 22, and 27, 2012
- March 2, 3, 7, 10, 12, 19, 21, and 26, 2012
- April 4, 9, 13, 14, 18, 23, and 25, 2012

2.10.1 Wellhead Deviations (BAAQMD 8-34-501.9 & §60.757(f)(1))

There were 11 wells in Class I and 23 wells in Class II with readings that exceeded the limits set forth in BAAQMD Regulation 8-34-305, Permit to Operate (PTO) Condition Number 20754 Part 2(d)(iii) and Application Number (AN) 21424 during the reporting period. Corrective action for wells was initiated within the required 5-day time period and re-monitoring was completed within 15 days of the deviation pursuant to BAAQMD Regulation 8-34-414. All wells were returned to compliant operating levels within the 120-day timeline specified in Regulation 8-34, with the exception of Horizontal Collector WCLFH04A. Methane concentrations at WCLFH04A during this reporting period were below one percent and in response every effort was made to operate this collector continuously and with oxygen concentrations less than 5 percent. Alternative compliance limits were requested in December 2009 (to BAAQMD) to operate the Class II horizontals less than continuously. In order to avoid having to decommission the well due to excessive oxygen, it operated under the requested alternatives (AN 21424) and as of December 23, 2011, AN21424 is approved by BAAQMD. Therefore, Class II horizontals have been operating with 15 percent oxygen limit and are temporarily disconnected from the system when an oxygen exceedance is in conjunction with methane concentrations below five (5) percent.

See Appendix K, Wellfield Deviation Log, for more detail.

2.10.2 Higher Operating Value (HOV) Wells

As of April 30, 2012, the following wells are approved to operate at a HOV for oxygen and temperature pursuant to Permit Condition Number 20754 Part 2(c)(ii) and AN 21424, respectively:

Oxygen HOV Wells

Pursuant to Permit Condition Number 20754 Part 2(c)(ii) and AN 21424, all horizontal collectors at Class I and II are allowed to operate up to 15 percent oxygen by volume. These wells are also allowed to operate above 15 percent oxygen in order to meet the criteria to be temporarily disconnected from the system when corresponding methane concentrations are less than 5 percent by volume.

2.11 Gas Flow Monitoring Results (BAAQMD 8-34-501.10 & 8-34-508, & §60.757(f)(1))

The flare LFG flow rate at the A-11 Flare is measured with a Fluid Components International (FCI) Model ST-98 flow meter. The General Electric data panel displays the LFG flow and the digital Yokogawa data recorder records LFG flow and temperature every 20 seconds and is downloaded and saved to a compact flash card.

The flare LFG flow rate at the A-8 Flare is measured with a FCI Model ST-98 flow meter. The Honeywell Digital panel displays the LFG flow and the Honeywell Circular Chart data recorder records LFG flow continuously and is routinely archived. The IC Engine LFG flow rate at S-5, S-6, and S-37 is measured with a Rosemount Model 1151DP flow meter. The Rockwell Automation panel displays the LFG flow rate. The SCADA records LFG flow every 15 minutes and is downloaded and saved in PDF format for record keeping.

The flare and engines flow meters meet the requirements of BAAQMD Regulation 8-34-508 by recording data at least every 15 minutes. The flow meters are maintained and calibrated pursuant to manufacturer's recommendations. The flow data for the flares and IC engines are available for review at West County. Appendix Q contains a summary of the monthly LFG flow rates for the flares and engines. Appendix G and H contain the Class I and Class II Temperature Deviation/ Inoperative Monitor/Missing Data Reports for November 1, 2011 through April 30, 2012. Table 2-2 below is a summary of the total LFG flow for the reporting period of November 1, 2011 through April 30, 2012.

Table 2-2 Total LFG Flow for November 1, 2011 through April 30, 2012

Emission Control Device	Average Flow (scfm)	Average CH ₄ (%) ^a	Total LFG Volume (scf)	Total CH ₄ Volume (scf)	Heat Input (MMBTU)
A-11 Flare	150.3	28.6	38,838,382.2	11,088,375.8	11,232.5
A-8 Flare	888.6	53.6	230,078,757.0	124,046,302.3	125,598.9
S-5 IC Engine	385.6	42.8	92,102,098.0	39,442,386.6	39,955.1
S-6 IC Engine	348.0	42.7	82,306,922.0	35,150,062.2	35,606.7
S-37 IC Engine	321.9	42.2	76,564,502.0	32,320,993.1	32,741.0

scfm = standard cubic feet per minute

CH₄ = methane

scf = standard cubic feet

^aMethane content determined from the average of the 2011 and 2012 Annual Source Tests for each device

MMBTU = million British thermal units

2.12 Compliance with Title V Permit Condition Number 17821 Part 10

Pursuant to Title V Permit Condition Number 17821, Part 10(a)(2), quarterly hydrogen sulfide (H₂S) readings were taken using Draeger tubes. Results of the Fourth Quarter 2011 and First Quarter 2012 H₂S readings were 50 and 39 ppmv, respectively. No quarterly readings were in exceedance of 300 ppmv, during the reporting period.

2.13 Compliance with §60.757(f)(6)

"The date of installation and the location of each well or collection system expansion added pursuant to (a)(3), (b), (c)(4) of §60.755."

No wells were decommissioned or started up during the reporting period for Class II pursuant to PTO Condition Number 17821 Part 6(b). There were no GCCS modifications made for Class I pursuant to PTO Condition Number 20754 Part 2(b).

PTO Condition Number 17821 Part 6(b) still allows for the installation of up to 94 new vertical wells, installation of up to 20 new horizontal wells, the decommissioning of up to 21 vertical wells, and the decommissioning of up to 9 horizontal collectors. PTO Condition Number 20754 Part 2(b) still allows for the connection of up to 32 leachate removal wells.

As of April 30, 2012, West County consists of 16 horizontal collectors in Class I, and 95 vertical wells and 20 horizontal collectors in Class II.

2.14 Compliance with Title V Permit Condition Number 22792 for S-50 Solid Waste Transfer Station; and A-50 Water Mist System

The total quantity of waste accepted at the waste transfer station, S-50, for the period of November 1, 2011 through April 30, 2012 is 72,932 tons. The annual amount of waste accepted for the period of March 1, 2011, through April 30, 2012 is 151,042 tons. This is within the limit of 2,000 tons per day or 730,000 tons per any consecutive 12-month period pursuant to Title V Permit Condition Number 22792 Part 1. Monthly waste acceptance totals for the reporting period are in Appendix T. These records are maintained at West County's Golden Bear Transfer Station and can be made available upon request.

Pursuant to Title V Permit Condition Number 22792 Part 2-4, all wastes (mixed wastes, green material and wood wastes) were removed from the transfer station within 48 hours after being accepted. All visible particulate emissions were prevented and/or minimized by use of the water (A-50 water spray system) and/or dust suppressants applied on all unpaved roadways. All paved roadways were cleared from dirt and debris resulting visible particulate emissions at S-50 not exceeding Ringlemann 1.0 or resulting in fallout on neighboring property during the reporting period (November 1, 2011 through April 30, 2012). Records of all vehicle route maintenance (cleaning of paved roads and application of water or dust suppressant on unpaved roads) are maintained at West County's Golden Bear Transfer Station and can be made available upon request.

Pursuant to Title V Permit Condition Number 22792 Part 6 and 7 (c-d) the S-50 waste transfer station daily round-trip vehicle trips did not exceed 1,075 on any day and did not exceed 232,900 over any consecutive 12-month period. Monthly numbers of vehicle trip totals and consecutive 12-month vehicle trip totals for the reporting period are listed in Appendix T.

2.15 Compliance with Title V Permit Condition Number 23110 for S-41 HiPOx Advanced Oxidation System, Ozone Generator and A-41 Ozone Gas Destruct Unit.

Pursuant to Title V Permit Condition Number 23110 Part 2, S-41, abated by A-41 Ozone gas destruct unit, is equipped with a continuous ozone monitoring sensor in the exhaust gas stack and will shut down the ozone generator upon detection of ozone concentrations above 0.1 ppmv. All records of shutdowns and ozone concentrations are on site and can be made available upon request.

Pursuant to Title V Permit Condition Number 23110 Part 3, wastewater through S-41 did not exceed 40,800 gallons per day and 14,492,000 gallons per

year. Total throughput for S-41 for the reporting period is listed for the Leachate Treatment System in Appendix U.

As of February 2012, S-41 is no longer in operation.

2.16 Compliance with Title V Permit Condition Number 23220 and Authority to Construct (ATC) Application Number 20621 Condition Number 20054

ATC Application Number 20621 was issued on July 14, 2011 for the upgrade of the Leachate Treatment System. As of February 2012 Sources: S-48, S-73, S-75, and S-76 are no longer in operation. On April 2, 2012 the following sources were started up, seven days following the submission of the ATC start-up notification on March 21, 2012: S-S-120, S-123, S-140, S-141, S-142, S-145, S-146, S-151, S-153, S-155, S-156, and S-157. All requirements pursuant to ATC Application Number 20621 Condition Number 20054 are applicable as of the April 2, 2012 start-up date.

Pursuant to Title V Permit Condition Number 23220 the total combined wastewater throughput at the inlet storage tanks (S-69 and S-70) and the leachate treatment facility sources (S-71, S-72, S-73, S-74, S-75 and S-76) did not exceed 40,800 gallons per day and 14,892,000 gallons during any consecutive 12-month period. In addition, pursuant to ATC Application Number 20621 Condition Number 25004, the wastewater throughput at the inlet storage tanks (S-69, S-70, S-141 and S-156) and the leachate treatment facility (S-71, S-72, S-140, S-74, S-123, S-151, S-142, S-145, S-146, S-150, S-153, S-155 and S-157) as of initial start-up of the new sources through the end of the reporting period (April 30, 2012) did not exceed 40,800 gallons per day and 14,892,000 gallons during any consecutive 12-month period. The total throughput to the inlet storage tanks S-69, S-70, S-141, and S-156 and the leachate treatment facility sources for each month (gallons/month) and the total cumulative throughput for each rolling 12-month period were recorded. These records are available on-site at West County upon request. A summary of the total combined wastewater throughput (gallons) and 12-month combined rolling throughput (gallons) for the reporting period (November 1, 2011 through April 30, 2012) is listed for the Leachate Treatment System in Appendix U and available on site upon request.

Pursuant to Title V Permit Condition Number 23220 Part 2, influent vapor flow to the A-12 and A-13 Carbon Adsorber's did not exceed 200 scfm during the reporting period (November 1, 2011 through end of operation). In addition, pursuant to ATC Application Number 20621 Condition Number 20054 Part 2, influent vapor flow to the A-20 and A-21 Carbon Adsorber's did not exceed 300 scfm during the reporting period (start of operation through April 30, 2012).

Pursuant to Title V Permit Condition Number 23220 and ATC Application Number 20621 Condition Number 20054 Part 4, NMOC leaks from all valves, flanges and pumps did not exceed concentrations above 100 ppmv during the reporting period.

Pursuant to Title V Permit Condition Number 23220 Part 5 and 6, NMOC concentrations are measured, with an FID, at the inlet to A-12, outlet of A-12 and the outlet of A-13. Pursuant to ATC Application Number 20621 Condition Number 20054 Part 5 and 6, NMOC concentrations are measured with an FID, at the inlet to A-20, outlet of A-20 and outlet of A-21. The A-12 or A-20 is changed out if NMOC concentrations at the A-12 and A-20 outlet is 10 ppmv or greater and is 10 percent greater than the A-12 and A-20 inlet concentrations. The A-13 or A-21 is changed out when measured NMOC concentrations at the A-13 or A-21 outlet are 8 ppmv or greater. Pursuant to Title V Permit Condition Number 23110 and ATC Application Number 20621 Condition Number 20054 Part 8 NMOC concentrations are measured at the A-12 and A-13 or A-20 and A-21 on a weekly basis, in relation to a breakthrough period of 60-120 days. During the reporting period up to the end of operation in February 2012, the A-12 and the A-13 were not changed. Since operation begin on April 2, 2012 the A-20, and the A-21 carbon vessels have not been changed as of the end of the reporting period (April 30, 2012).

A-12 and A-13 ceased operation in February 2012, and were replaced on April 2, 2012 with A-20 and A-21 pursuant to ATC Application Number 20621 Condition Number 20054.

2.17 Compliance with Title V Permit Condition Number 23220 and ATC Application Number 20621 Condition Number 20054 Part 3

Wastewater separators S-71 and S-72 were kept closed at all times during the reporting period (November 1, 2011 through April 30, 2012) except when opening for inspection and maintenance. Pursuant to ATC Application Number 20621 Condition Number 20054 Part 3, S-141 and S-156 were kept closed at all times from start-up (April 2, 2012) through the end of the reporting period (April 30, 2012) except while opening for inspection and maintenance. Records of all openings for inspection and maintenance are on-site and available upon request.

2.18 Compliance with Title V Permit Condition Number 23316 and ATC Application Number 20621 Condition Number 20054 for S-48, S-120 and S-130 Air Strippers and A-14, A-15, A-16, A-17, A-18 and A-19 Carbon Absorbers

Pursuant to Title V Permit Condition Number 23316 Parts 1 and 7, the total combined wastewater throughput at the S-48 Air Stripper did not exceed 40,800 gallons per day and 14,892,000 gallons during any consecutive 12-month period.

The total throughput to S-48 for each month (gallons/month) during the reporting period and the total cumulative throughput for each rolling 12-month period were recorded. A summary of the total combined wastewater throughput (gallons) and 12-month combined rolling throughput (gallons) for the reporting period (November 1, 2011 through April 30, 2012) is listed for the Leachate Treatment System in Appendix U. These records are also on-site and available upon request.

S-48 was taken out of operation in February 2012, within 90 days following the start-up of the S-120 and backup S-130 Air Strippers.

Pursuant to ATC Application Number 20621 Condition Number 20054 Parts 1 and 7, the total combined wastewater throughput at the S-120 and backup S-130 Air Strippers did not exceed 40,800 gallons per day and 14,892,000 gallons during any consecutive 12-month period. S-120 began operation on April 2, 2012. S-130 is a backup source has not been used as of its start-up through the end of the reporting period (April 30, 2012). Liquid throughput information for S-120 since start-up through the end of the reporting period is on-site and available upon request and listed in Appendix U.

Pursuant to Title V Permit Condition Number 23316 Part 2, influent vapor flow to the A-14 and A-15 Carbon Adsorber's or the A-16 and A-17 Carbon Adsorber's did not exceed 295 scfm during the reporting period (November 1, 2011 through February 2012). Pursuant to ATC Application Number 20621 Condition Number 20054 Part 2, influent vapor flow to the A-14, A-15 and A-16 activated carbon vessels or the A-17, A-18, and A-19 activated carbon vessels did not exceed a cumulative flow rate of 850 scfm beginning from the initial start-up of A-18 and A-19, on April 2, 2012, through the end of the reporting period (April 30, 2012)

Pursuant to Title V Permit Condition Number 23316 and ATC Application Number 20621 Condition Number 20054 Part 3, NMOC leaks from all valves, flanges and pumps did not exceed concentrations above 100 ppmv during the reporting period.

Pursuant to Title V Permit Condition Number 23316 and ATC Application Number 20621 Condition Number 20054 Part 4, 5 and 8, NMOC concentrations are measured with an FID, at the inlet to A-14, A-16 or A-18, outlet of A-14, A-16 or A-18 and the outlet of A-15, A-17, and A-19. The A-14 or A-16 is changed out if NMOC concentrations at the A-14 or A-16 outlet is 10ppmv or greater and is 10 percent greater than the A-14 or A-16 inlet concentrations. The A-15 or A-17 is changed out when measured NMOC concentrations at the A-15 or A-17 outlet are 6 ppmv or greater.

Pursuant to ATC Application Number 20621 Condition Number 20054, following the start-up of A-18 and A-19 activated carbon vessels on April 2, 2012, the A-14 and A-15 or the A-17 and A-18 are changed out if NMOC concentrations at the A-14 and A-15 outlet or the A-17 and A-18 outlet is 10 ppmv or greater and is 10 percent greater than NMOC concentrations at the A-14 and A-15 or A-17 and A-18 inlet concentrations. The A-16 or A-19 is changed out when measured NMOC concentrations at the A-16 or A-19 outlet are 6 ppmv or greater.

Pursuant to Title V Permit Condition Number 23316 and ATC Application Number 20621 Condition Number 20054 Part 8, NMOC concentrations are measured at the A-14, A-15 and A-16 or the A-17, A-18 and A-19 on a weekly basis, in relation to a breakthrough period of 60-120 days. During the reporting period, the A-14, A-15, A-16 and the A-17 carbon vessels were not changed.

Pursuant to ATC Application Number 20621 Condition Number 20054, following start-up through the end of the reporting period (April 30, 2012) the A-18 and the A-19 have not been changed.

These records are available on-site at West County upon request.

2.19 Compliance with Title V Permit Condition Number 23350 for S-111 Concrete Crusher and A-111 Water Spray System

Pursuant to Title V Permit Condition Number 23350 Part 2, the S-111 Concrete Crusher did not operate during the reporting period and therefore did not exceed 30,000 tons of concrete throughput in any consecutive 12-month period during this reporting period (November 1, 2011 through April 30, 2012). Records are available on-site at West County upon request.

Pursuant to Title V Permit Condition Number 23350 Parts 3 and 4, the S-111 was not in operation on site during the reporting period and therefore no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

Waterborne petroleum resin dust suppressant or another equivalent chemical dust suppressant (which includes water) was applied to all unpaved on-site truck routes, to and from concrete and asphalt recycling operations achieving a minimum particulate matter (TSP) control efficiency of 75 percent by weight for the reporting period, pursuant to Title V Permit Condition Number 23350 Part 5.

2.20 Compliance with Title V Permit Condition Number 23351 for S-112 Crushed Concrete Screener and A-112 Water Spray System

Pursuant to Title V Permit Condition Number 23351 Part 2, the S-112 Crushed Concrete Screener did not operate during the reporting period and therefore did not exceed 30,000 tons of concrete throughput in any consecutive 12-month period during this reporting period (November 1, 2011 through April 30, 2012). Records are available on-site at West County upon request.

Pursuant to Title V Permit Condition Number 23351 Part 3-4, S-112 was not in operation, therefore no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

2.21 Compliance with Title V Permit Condition Number 23352 for S-113 Concrete/Asphalt Storage Piles and A-113 Water Spray System

Pursuant to Title V Permit Condition Number 23351 Part 1, the S-113 Concrete/Asphalt Storage Piles did not exceed 30,000 tons of concrete throughput or 5,000 tons of asphalt throughput in any consecutive 12-month period during this reporting period (November 1, 2011 through April 30, 2012). The total monthly and annual throughput to S-113 was recorded pursuant to Title V Permit Condition Number 23351 Part 4. Total monthly throughput is listed in Concrete and Asphalt Throughput in Appendix W, and all throughput records are available on-site upon request.

Pursuant to Title V Permit Condition Number 23352 Part 2-3, all times during operation of S-113, abated by A-113 as necessary, no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

2.22 Compliance with Title V Permit Condition Number 23353 for S-114 Conveyors (Crushed Concrete) and A-114 Water Spray System

Pursuant to Title V Permit Condition Number 23353 Part 1, the S-114 Conveyors did not operate during the reporting period and therefore did not exceed 30,000 tons of crushed concrete throughput in any consecutive 12-month period during this reporting period (November 1, 2011 through April 30, 2012). The total monthly and annual throughput to S-114 was recorded pursuant to Title V Permit Condition Number 23353 Part 5 and are available on-site at West County upon request.

Pursuant to Title V Permit Condition Number 23353 Parts 3 and 4, all times during operation of S-114, abated by A-114, no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

2.23 Compliance with Title V Permit Condition Number 23354 for S-115 Wood/Yard Waste Shredder (Tub Grinder) and A-115 Water Spray System

Pursuant to Title V Permit Condition Number 23354 Part 2, the S-115 Wood/Yard Waste Shredder did exceed 19,000 tons of wood waste throughput in any consecutive 12-month period during this reporting period (November 1, 2011 through April 30, 2012). Inspection by BAAQMD indicated no deviation per the pending Change of Permit Conditions Application Number 23078 which was filed on February 15, 2011, to increase the 12-month throughput limit. The final terms of the Change of Permit Conditions is currently in negotiations as of the end of the reporting period. The total monthly and annual throughput to S-115 was recorded pursuant to Title V Permit Condition Number 23354 Part 5 and is listed in the Organic Throughput in Appendix V. Records are available on-site at West County upon request.

Pursuant to Title V Permit Condition Number 23354 Part 3-4, all times during operation of S-115, abated by A-115, no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

In accordance with Title V Permit Condition Number 23354 Part 6, the facility did not receive any violation notices for public nuisance in any consecutive 12-month period, during this reporting period of November 1, 2011 through April 30, 2012.

2.24 Compliance with Title V Permit Condition Number 23355 for S-116 Wood Waste Screener and A-116 Water Spray System

Pursuant to Title V Permit Condition Number 23355 Part 2, the S-116 Wood Waste Screener did not exceed 19,000 tons of wood waste throughput in any consecutive 12-month period during this reporting period (November 1, 2011 through April 30, 2012). Inspection by BAAQMD indicated no deviation per the pending Change of Permit Conditions Application Number 23078 which was filed on February 15, 2011, to increase the 12-month throughput limit. The final terms of the Change of Permit Conditions is currently in negotiations as of the end of the reporting period. The total monthly and annual throughput to S-115 was recorded pursuant to Title V Permit Condition Number 23355 Part 5 and is listed in the Organic Throughput in Appendix V. Records are available on-site at West County upon request.

Pursuant to Title V Permit Condition Number 23355 Part 3-4, all times during operation of S-116, abated by A-116, no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

2.25 Compliance with Title V Permit Condition Number 23356 for S-117 Composting Operation and A-117 Water Spray System

Pursuant to Title V Permit Condition Number 23356 Part 1, the S-117 Composting operation did exceed 19,000 tons of compost material throughput in any consecutive 12-month period during this reporting period (November 1, 2011 through April 30, 2012). Inspection by BAAQMD indicated no deviation per the pending Change of Permit Conditions Application Number 23078 which was filed on February 15, 2011, to increase the 12-month throughput limit. The final terms of the Change of Permit Conditions is currently in negotiations as of the end of the reporting period. The total monthly and annual throughput to S-117 was recorded pursuant to Title V Permit Condition Number 23356 Part 5 and is listed in the Organic Throughput in Appendix V.

Pursuant to Title V Permit Condition Number 23356 Part 2-3, all times during operation of S-117, abated by A-117, no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

Waterborne petroleum resin dust suppressant or another equivalent chemical dust suppressant (which includes water) was applied to all unpaved on-site truck routes, to and from compost operations achieving a minimum TSP control efficiency of 75 percent by weight for the reporting period, pursuant to Title V Permit Condition Number 23356 Part 4.

2.26 Compliance with Title V Permit Condition Number 23357 for S-118 Crushing of Asphalt Debris and A-118 Water Spray System

Pursuant to Title V Permit Condition Number 23357 Part 1, the S-118 Crushing of Asphalt Debris, did not exceed 5,000 tons of asphalt throughput in any consecutive 12-month period during this reporting period (November 1, 2011 through April 30, 2012). The total monthly and annual throughput to S-118 was recorded pursuant to Title V Permit Condition Number 23357 Part 4 and records are available on-site at West County upon request.

Pursuant to Title V Permit Condition Number 23357 Part 2-3, all times during operation of S-118, abated by A-118, no visible emissions as dark or darker than

Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

**2.27 Compliance ATC Application Number 20621 Condition Number 20054
Part 1a**

As of receipt of ATC Application Number 20621 Condition Number 20054 on July 13, 2011, wastewater inlet to S-69, S-70, S-141 and S-156 did not have a VOC content, analyzed by method 8260 or 8021, in excess of 809 pounds per day or 295,285 pounds per year. Samples are taken, on a semi-annual basis, from the discharge side of the inlet storage tanks. Pursuant to ATC Application Number 20621 Condition Number 20054, a sample was taken within one month of operation and submitted to the BAAQMD engineering division. The initial VOC sample results for the reporting period will be included in the subsequent May 1, 2012 through October 31, 2012 Combined Title V Semi-Annual and Partial 8-34 Annual Report.

3 PERFORMANCE TEST REPORT

In accordance with BAAQMD Rule 8-34-413 and 40 CFR §60.757(g) in the NSPS, a Performance Test Report is required to be submitted from subject facilities containing performance and monitoring data for the operation of the GCCS. The operational records listed in Table 3-1 have been reviewed, summarized, and are included in the Performance Test Report section of this report. A copy of the most recent Performance Tests for Flares A-8 and A-11, and IC Engines S-6, S-7 and S-37 conducted on March 12, 13, and 27, 2012, respectively, is included in Appendix S.

Table 3-1 Performance Test Requirements

Rule	Requirement	Location in Report
8-34-412, §60.8, §60.752(b)(2)(iii)(B), §60.754(d)	Compliance Demonstration Tests	Section 3.1 Appendix S
§60.757(g)(1)	A diagram of the collection system showing collection system positioning including all wells, horizontal collectors, surface collectors, or other gas extraction devices, including the locations of any areas excluded from collection and the proposed sites for future collection system expansion.	Section 3.2, Appendix A
§60.757(g)(2)	The data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based.	Section 3.3
§60.757(g)(3)	The documentation of the presence of asbestos or non-degradable material for each area from which collection wells have been excluded based on the presence of asbestos or non-degradable material.	Section 3.4
§60.757(g)(4)	The sum of the gas generation flow rates for all areas from which collection wells have been excluded based on non-productivity and the calculations of gas generation flow rate for each excluded area.	Section 3.5
§60.757(g)(5)	The provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill.	Section 3.6
§60.757(g)(6)	The provisions for the control of off-site migration.	Section 3.7 Appendix M

3.1 A-11 Flare Compliance Demonstration Test Results (BAAQMD 8-34-412)

The 2012 Annual Compliance Demonstration Test (Source Test) was performed on the A-11 Flare by Blue Sky Environmental, LLC (Blue Sky) on March 13, 2012 pursuant to Title V Permit Condition Number 20754, Part 8. The results of the 2012 test (below) for the A-11 Flare indicate that the flare is in compliance with BAAQMD Regulation 8-34-301.3. As required, the flare met the NMOC emission rate of less than 30 ppmv and therefore meets the minimum destruction efficiency for hazardous air pollutants (HAPs) in compliance with Title V Condition 20754 Part 8. Table 3-2 below shows the results of the March 13, 2012 source test, averaged from three test runs.

Table 3-2 A-11 Flare Source Test Results

Condition	Flare (A-11) Average Results	Permit Limit	Regulatory limit	Compliance Status
NO _x (ppmv @ 15% O ₂)	7.7	15	---	In Compliance
CO (ppmv @ 15% O ₂)	0.77	122	---	In Compliance
NMOC (ppmv @ 3% O ₂)	3.8	---	30	In Compliance
SO ₂ (ppmv dry)	2.2	---	300	In Compliance

A LFG characterization test was conducted at the A-11 Flare during the March 13, 2012 source test pursuant to the West County Title V Permit Condition Number 20754, Part 9. Compounds detected in the A-11 Flare LFG analysis did not exceed the limits required in Title V Permit Condition Number 20754 Part 10. Please refer to the March 13, 2012 source test results included in Appendix S, for further information.

3.2 A-8 Flare Compliance Demonstration Test Results (BAAQMD 8-34-412)

The 2012 Annual Compliance Demonstration Test (Source Test) was performed on the A-8 Flare by Blue Sky on March 13, 2012 pursuant to Title V Permit Condition Number 17821, Part 11. The results of the 2012 test (below) for the A-8 Flare indicate that the flare is in compliance with BAAQMD Regulation 8-34-301.3. As required, the flare met the NMOC emission rate of less than 30 ppmv and therefore meets the minimum destruction efficiency for HAPs in compliance with Title V Condition 17821 Part 11. Table 3-3 below shows the results of the March 13, 2012 source test, averaged from three test runs.

Table 3-3 A-8 Flare Source Test Results

Condition	Flare (A-8) Average Results	Permit Limit	Regulatory limit	Compliance Status
NO _x (ppmv @ 15% O ₂)	6.1	---	---	In Compliance
CO (ppmv @ 15% O ₂)	11.8	---	---	In Compliance
NMOC (ppmv @ 3% O ₂)	<3.9	---	30	In Compliance
SO ₂ (ppm dry)	4.4	---	300	In Compliance

A LFG characterization test was conducted at the A-8 Flare during the March 13, 2012 source test pursuant to the West County Title V Permit Condition Number 17821, Part 12. Compounds detected in the A-8 Flare LFG analysis did not exceed the limits required in Title V Permit Condition Number 17821 Part 13. Please refer to the March 13, 2012 source test results included in Appendix S, for further information.

3.3 S-5 and S-6 IC Engine Compliance Demonstration Test Results (BAAQMD 8-34-412)

The 2012 Annual Compliance Demonstration Tests (Source Test) were performed on the S-5 and S-6 IC Engines by Blue Sky on March 12, and 27, 2012, respectively, pursuant to Title V Permit Condition Number 5771, Part 7. The results of the 2012 test (below) for S-5 and S-6 IC Engines indicate that the engines are in compliance with BAAQMD Regulation 8-34-301.4. As required, the engine met the NMOC emission rate of less than 120 ppmv and therefore meets the minimum destruction efficiency for HAPs in compliance with Title V Condition 5771 Part 7. Table 3-4 below shows the results of the March 12, and 27, 2012 source test, averaged from three test runs.

Table 3-4 S-5 and S-6 IC Engines Source Test Results

Condition	S-5 Engine Average Results	S-6 Engine Average Results	Permit Limit	Regulatory limit	Compliance Status
NO _x (ppmv @ 15% O ₂)	32	16.0	63	---	In Compliance
CO (ppmv @ 15% O ₂)	302.7	264.4	376	---	In Compliance
NMOC (ppmv @ 3% O ₂)	27.1	<42.1	---	120	In Compliance
SO ₂ (ppm dry)	2.8	3.9	---	300	In Compliance

3.4 S-7 IC Engine Compliance Demonstration Test Results (BAAQMD 8-34-412)

The 2012 Annual Compliance Demonstration Test (Source Test) was performed on the S-37 IC Engine by Blue Sky on March 27, 2012 pursuant to Title V Permit Condition Number 17812, Part 8. The results of the 2012 test (below) for S-37 IC Engine indicate that the engine is in compliance with BAAQMD Regulation 8-34-

301.4. As required, the engine met the NMOC emission rate of less than 120 ppmv and therefore meets the minimum destruction efficiency for HAPs in compliance with Title V Condition 17812 Part 8. Table 3-5 below shows the results of the March 27, 2012 source test, averaged from three test runs.

Table 3-5 S-37 IC Engine Source Test Results

Condition	S-37 Engine Average Results	Permit Limit	Regulatory limit	Compliance Status
NO _x (ppmv @ 15% O ₂)	18.0	63	--	In Compliance
CO (ppmv @ 15% O ₂)	294.7	309	---	In Compliance
NMOC (ppmv @ 3% O ₂)	<21.3	--	120	In Compliance
SO ₂ (ppm dry)	2.0	--	300	In Compliance

3.5 Compliance with §60.757(g)(1)

"A diagram of the collection system showing collection system positioning including wells, horizontal collectors..."

A map of the LFG collection system showing the location of all vertical wells, horizontal collectors, and other LFG extraction devices is included in Appendix A.

3.6 Compliance with §60.757(g)(2)

"The data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based."

The existing GCCS has historically provided LFG wells and collectors spaced in accordance with standard industry practices. Based on continuous compliance and operational experience the installed collector density appears more than adequate for controlling surface emissions and subsurface LFG migration.

The landfill operator conducts routine monitoring in accordance with NSPS requirements. If the GCCS at the Landfill does not meet the measures of performance set forth in the NSPS, the GCCS will be adjusted or modified as required.

The existing GCCS conveyance piping and emission control devices have sufficient capacity to handle all current and future LFG flow rates (based on quarterly surface emissions monitoring results and monthly wellhead readings). New emission control devices will be designed and permitted as appropriate for future landfill LFG generation rates.

3.7 Compliance with §60.757(g)(3)

"The documentation of the presence of asbestos or non-degradable material for each area from which collection wells have been excluded based on the presence of asbestos or non-degradable material."

Segregated areas or accumulations of asbestos material were not documented for the site in the GCCS Design Plan. Therefore, §60.757(g)(3) is not applicable.

3.8 Compliance with §60.757(g)(4)

"The sum of the gas generation flow rates for all areas from which collection wells have been excluded based on non-productivity and the calculations of gas generation flow rate for each excluded area."

There are not any non-productive areas within the landfill footprint that have been excluded from the coverage of the GCCS. Therefore, §60.757(g)(4) is not applicable. However, the closed Class 1 hazardous waste management facility (HWMF) has limited records of waste accepted. A layer of municipal solid waste was placed in the landfill directly preceding closure in which the GCCS was installed, however the waste below is generally considered non-degradable waste.

3.9 Compliance with §60.757(g)(5)

"The provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill."

The existing GCCS conveyance piping and emission control devices have sufficient capacity to handle all current and future LFG flow rates. New emission control devices will be designed and permitted as appropriate for future landfill LFG generation rates.

3.10 Compliance with §60.757(g)(6)

"The provisions for the control of off-site migration."

LFG migration monitoring, including all probes and on-site buildings, are performed weekly and monthly. LFG migration monitoring occurred on the following dates during each month for the reporting period:

- November 2011: 7, 11, 16, 23, and 30
- December 2011: 7, 9, 14, 21, and 28

- **January 2012: 4, 11, 13, 18, and 25**
- **February 2012: 1, 8, 10, 15, 22, and 29**
- **March 2012: 7, 9, 14, 21, and 28**
- **April 2012: 4, 11, 18, 25, and 30**

There were no exceedances detected during November 2011 through April 2012 Probe and building monitoring events. The LFG Probe and In-Structure Monitoring logs are included in Appendix M.

The Landfill operator will continue surface and perimeter monitoring in accordance with the approved monitoring plans. If the GCCS at the Landfill does not meet the measures of performance set forth in the NSPS, the GCCS will be adjusted or modified in accordance with the NSPS requirements. A California Code of Regulations (CCR) Title 27 perimeter landfill gas probe monitoring alternative was accepted on April 6, 2011 which exempts all probes except GP-1-97 and GP-2-97 from the State required 5 percent methane limit.

4 STARTUP, SHUTDOWN, MALFUNCTION (SSM) PLAN

4.1 SSM Log for the GCCS at West County

The NESHAP contained in 40 CFR Part 63, AAAA for MSW landfills to control hazardous air pollutants include the regulatory requirements for submittal of a semi-annual report (under 40 CFR §63.10(d)(5) of the general provisions) if an SSM event occurred during the reporting period. The reports required by §63.1960(a) of the NESHAP and §60.757(f) of the NSPS summarize the GCCS exceedances. These two semi-annual reports contain similar information and have been combined as allowed by §63.10(d)(5)(i) of the General Provisions.

NESHAP 40 CFR part 63, AAAA became effective on January 16, 2004. Those SSM events that occurred during the NSPS semi-annual reporting period are reported in this section (November 1, 2011 through April 30, 2012). The following information is included as required:

- During the reporting period, 27 A-11 Flare SSM events occurred. The A-11 Flare was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log.
- During the reporting period, 16 A-8 Flare SSM events occurred. The A-8 Flare was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log.
- During the reporting period, 72 S-5 IC Engine SSM events occurred. The S-5 IC Engine was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log.
- During the reporting period, 81 S-6 IC Engine SSM events occurred. The S-6 IC Engine was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log.
- During the reporting period, 51 S-37 IC Engine SSM events occurred. The S-37 IC Engine was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log.
- During the reporting period, 42 Class I Wellfield SSM events and 113 Class II Wellfield SSM events occurred. Details are included in Appendix C, Well SSM Log.

- There were 402 events in total, 69 SSM events in Class I and 333 SSM events in Class II. In all 402 events, automatic systems and operator actions were consistent with the standard operating procedures contained in the SSM Plan. There were no deviations from the SSM plan.
- Exceedances were not identified during the reporting period in any applicable emission limitation in the landfills NESHAP (§63.10(d)(5)(i)).
- Revisions of the SSM Plan to correct deficiencies in the landfill operations or procedures were neither required, nor prepared (§63.6(e)(3)(viii)).