

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, 2012 through April 30, 2013. 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
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 or 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 §60.755.	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 had two (2) separate GCCS's comprised of one (1) flare (A-11) for Class I and 1 flare (A-8) and three (3) lean burn IC Engines (S-5, S-6, and S-37) for Class II. On November 29, 2012, an additional flare (A-120) was started up in Class II. On December 11, 2012, the Class I A-11 Flare was decommissioned and the GCCS was reconfigured to combine the GCCS for Class I and Class II. As of December 15, 2012, West County has 1 combined GCCS (Combined Class I/II) comprised of 1 flare (A-120), 1 back-up flare (A-8) and 3 IC Engines (S-5, S-6, and S-37). Section 2.1.1 includes the GCCS downtime for the reporting period. The information contained in Section 2.1.2 discusses the wellfield SSM log for the reporting period.

2.1.1 Collection System Downtime

During the period covered in this report, neither the Class I, Class II nor the Combined Class I/II GCCS were shut down for more than five (5) days on any one occasion. Table 2-2, 2-3 and 2-4 summarize the Class I, Class II and Combined Class I/II GCCS downtime for the reporting period.

TABLE 2-2 CLASS I DOWNTIME

CLASS I DOWNTIME	
November 2012	20.94
December 2012	123.74
Total Hours:	144.68

TABLE 2-3 CLASS II DOWNTIME

MONTH	TOTAL CLASS II GCCS DOWNTIME
November 2012	18.07
December 2012	9.43
Total Hours:	27.50

TABLE 2-4 COMBINED CLASS I/II DOWNTIME

MONTH	TOTAL CLASS I/II GCCS DOWNTIME
January 2013	1.98
February 2013	2.88
March 2013	0.00
April 2013	0.00
Total Hours:	4.87

Class II GCCS Downtime from November 2012 through December 2012 is accrued when all emission control devices (A-8, S-5, S-6, and S-37) are not operating. As of January 2013 the Combined Class I/II GCCS Downtime is accrued when all emission control devices (A-120, A-8, S-5, S-6, and S-37) are not operating.

Appendix E contains the A-11 Flare Downtime Reports which list 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 and A-120 Flares and S-5, S-6, and S-37 IC Engine Downtime Reports which list dates, times, and lengths of shutdowns for the reporting period including year-to-date and the GCCS downtime for Class II through 2012 and the combined Class I/II as of 2013.

2.1.2 Well Start-Up & Disconnection Log

There were 18 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 67 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 consisted of the A-11 Flare which began operation in 2004. The A-11 Flare was permanently shut down and decommissioned on December 11, 2012. The control system was not bypassed at any time during the operation of the flare during the reporting period. Raw LFG was not emitted during the reporting period. The SSM Log for the A-11 Flare is located in Appendix E.

The emission control system at Class II consists of the A-8 Back-Up Flare which began operation in 1990, two (2) lean burn IC Engines (S-5, and S-6), which began operation in 1985 and 1 IC Engine (S-37) which began operation in 1987.

The combined emission control system at S-15 consists of the devices listed above (A-8, S-5, S-6, and S-37) and 1 additional flare (A-120) which commenced operation in November 2012. 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 and combined Class I/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 bypass 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 West County because the control devices 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

A-11 Flare

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

There were no temperature deviations reported to the BAAQMD 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 degrees Fahrenheit (°F) in accordance with Title V Permit Condition Number 20754 Part 4. Cornerstone continued to monitor instances where the A-11 Flare dropped below the

1566°F limit established during the March 13, 2012 Source test even though these instances, as clarified by BAAQMD, were not deemed temperature deviations, and were not reported as such.

Flare operating records indicated that the A-11 Flare three-hour average combustion zone temperature did drop below the 1,450°F limit, as specified Title V Permit Condition 20754 Part 4, on four (4) occasions in December 2012. These instances were associated with the preparations for construction of the Class I tie-in and blower skid relocation to the new A-120 Flare under BAAQMD Regulation 8-34-113, and were not deemed to be reportable events. As of December 11, 2012 the A-11 Flare is no longer in operation.

Appendix G contains the A-11 Flare Temperature Deviation/Inoperative Monitor/Missing Data Report for November 1, 2012 through April 30, 2013.

Class II

A-8 Back-Up Flare

The combustion zone temperature of the A-8 Back-Up 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 reported to the BAAQMD during the reporting period. On December 16, 2011, Carol Allen of the BAAQMD clarified that the A-8 Back-Up 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 Back-Up Flare drops below the 1550°F limit established during the March 13, 2012 source test even though these instances, as clarified by BAAQMD, are not currently deemed temperature deviations, and will not be reported as such.

Appendix H contains the A-8 Back-Up Flare Temperature Deviation/Inoperative Monitor/Missing Data Report for November 1, 2012 through April 30, 2013.

Inoperable Monitor

On February 19, 2013, the BAAQMD issued a Notice of Violation (NOV) for the inoperable monitor event on August 10-12, 2012 (Reportable Compliance Activity [RCA] Number A52174) for the A-8 Back-Up Flare. A 10 and 30 Day Notification Letter was submitted to the BAAQMD on August 23, 2013. This inoperable monitor was noted in the May 1, 2012 through October 31, 2012 Semi-Annual Report. West County submitted a 10-day NOV response letter on February 28, 2013.

IC Engines

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 reported to the BAAQMD during the reporting period. Appendix H contains the S-5, S-6, and S-37 IC Engine Temperature Deviation/Inoperative Monitor/Missing Data Report for November 1, 2012 through April 30, 2013.

Combined Class I/II

A-120 Flare

The combustion zone temperature of the A-120 Flare is monitored with a Thermo Sensors Corp (TSC) Thermocouple. The temperature is displayed with a Yokogawa digital recorder, which is downloaded and archived.

There were no temperature deviations reported to the BAAQMD during the reporting period. Appendix H contains the A-120 Flare Temperature Deviation/Inoperative Monitor/Missing Data Report for November 1, 2012 through April 30, 2013.

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

The monthly cover integrity monitoring was performed at West County on the following dates:

- November 21, 2012
- December 28, 2012
- January 21, 2013
- February 18, 2013
- March 18, 2013
- April 23, 2013

No cover issues were reported during these 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 2012 and First Quarter 2013 Instantaneous and Integrated Surface Emission Monitoring (SEM) events and RMC Geoscience, Inc. (RMC) prepared the Fourth Quarter 2012 and First Quarter 2013 SEM Reports. Refer to the Fourth Quarter 2012 and First Quarter 2013 SEM Reports, located in Appendix J, for detailed results.

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

Weekly Wellfield and Monthly GCCS component leak testing are conducted at the Class I landfill to satisfy the requirements of Title V permit Condition 20754 Part 2(c)(v), AN 21826 Condition Number 25293 Part 7(b)(iv) and BAAQMD Regulation 8-34-503. Component leak testing occurred during the reporting period on the following days:

- November 5, 9, 12, 14, 16, 19, and 26, 2012
- December 3, 10, 22, 26, and 31, 2012
- January 10, 14, 16, 24, and 29, 2013
- February 6, 11, 15, 18, and 28, 2013
- March 7, 13, 21, and 28, 2013
- April 5, 10, 11, 15, 24, and 30, 2013

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, Wellfield and Nove Investments, LLC (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 2, 7, 16, 17, and 19, 2012
- December 7, 8, 15, and 20, 2012
- January 2, 3, and 9, 2013
- February 2, 8, 13, and 15, 2013
- March 1, 8, 11, and 12, 2013
- April 11, 12, and 17, 2013

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 500 ppmv surface emission limit.

AN 21826 Condition 25293 Part 7 allows for alternative operating conditions for the 16 Class I Horizontals and the 20 Class II Horizontals. Therefore, any GCCS components disconnected during the reporting period were monitored for component leaks within 10 and 30 days following the initial disconnection. Details of the GCCS component leak testing and results are included in the Class I and Class II Well SSM Log in Appendix C and 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 (WIP) 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. A layer of MSW was placed in the Class I Hazardous Waste Material Facility (HWMF) 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, 2012 through April 30, 2013 are included in Appendix M and O. 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 5, 12, 19, and 26, 2012
- December 3, 10, 17, 26, and 31, 2012
- January 10, 17, 24, and 29, 2013
- February 4, 14, and 20, 2013
- March 1, 7, 14, and 21, 2013
- April 5, 9, 15, 24, and 30, 2013

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

- November 16 and 17, 2012
- December 7, 8, 17, and 20, 2012
- January 2, 3, 14, and 21, 2013
- February 2, 8, 13, and 21, 2013
- March 1, 4, 6, 8, 11, 19, 20, 21, and 28, 2013
- April 1, 3, 5, 8, and 12, 2013

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

There were five (5) wells in Class I and 23 wells in Class II with readings that exceeded the limits set forth in BAAQMD Regulation 8-34-305, AN 21826 Condition Number Part 7(d)(iii) 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.

See Appendix N and P, Class I and Class II Wellfield Deviation Log, for more detail.

2.10.2 Higher Operating Value (HOV) Wells

As of April 30, 2013, the following wells are approved to operate at a HOV of 15 percent oxygen by volume pursuant to Permit Condition Number 20754 Part 2(c)(ii) and AN 21826 Condition Number 25293 Part 7(d)(iii):

- All 16 Class I Wells; and
- All 20 Class II Horizontal Collectors.

These wells are also allowed to operate above 15 percent oxygen in order to meet the criteria to be temporarily disconnected from the system.

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 was measured with a Fluid Components International (FCI) Model ST-98 flow meter. The General Electric data panel displayed the LFG flow and the digital Yokogawa data recorder recorded LFG flow and temperature every 20 seconds and was downloaded and saved to a compact flash card.

The flare LFG flow rate at the A-8 Back-Up 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 flare LFG flow rate at the A-120 Flare is measured with a Thermal Instrument Company Model 62-9/9500 flow meter. The Allen Bradley Micrologix 1200R programmable logic controller (PLC) displays the LFG flow and the digital Yokogawa data recorder records LFG flow and temperature every minute and is downloaded and saved to a compact flash drive.

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, 2012 through April 30, 2013. Table 2-5 below is a summary of the total LFG flow for the reporting period of November 1, 2012 through April 30, 2013.

**TABLE 2-2 TOTAL LFG FLOW FOR
NOVEMBER 1, 2012 THROUGH APRIL 30, 2013**

EMISSION CONTROL DEVICE	AVERAGE FLOW (SCFM)	AVERAGE CH ₄ (%)	TOTAL LFG VOLUME (SCF)	TOTAL CH ₄ VOLUME (SCF)	HEAT INPUT (MMBTU)
A-11 Flare	157.0	32.3	8,785,554.7	2,837,734.2	2,874.6
A-8 Back-Up Flare	686.9	40.8	42,749,504.0	17,441,797.6	17,668.5
A-120 Flare	546.9	43.8	109,553,405.5	48,627,582.6	49,259.7
S-5 IC Engine	429.3	42.1	98,713,035.0	41,592,817.8	42,133.5
S-6 IC Engine	416.8	42.6	96,216,330.0	41,005,942.6	41,539.0
S-37 IC Engine	387.3	42.2	89,215,157.0	37,651,709.7	38,141.2

*Methane content determined from the average of the 2012 and 2013 Annual Source Tests for each device.

scfm = standard cubic feet per minute

CH₄ = methane

scf = standard cubic feet

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) and AN 21826 Condition Number 25293 Part 10, quarterly hydrogen sulfide (H₂S) readings were taken using Draeger tubes. Results of the Fourth Quarter 2012 and First Quarter 2013 H₂S readings were 50 and 48 ppmv, respectively. No quarterly readings were in exceedance of 300 ppmv, during the reporting period.

Pursuant to ATC Number 21826 Condition Number 17821 Part 10, Quarterly H₂S monitoring will be scheduled for the A-120 Flare within 3 months of start-up and will be performed quarterly thereafter. The initial quarterly H₂S monitoring was completed on December 28, 2012. Results were 58 ppm.

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."

There were no GCCS modifications made for Class I pursuant to PTO Condition Number 20754 Part 2(b), and AN 21826 Condition Number 25293 Part 6(b). There were no GCCS modifications made for Class II pursuant to PTO Condition Number 17821 Part 6(b), and AN 21826 Condition Number 25293 Part 6(b).

PTO Condition Number 17821 Part 6(b) and AN 21826 Condition Number 25293 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 25 vertical wells, and the decommissioning of up to nine (9) horizontal collectors.

As of April 30, 2013, West County consists of 16 horizontal collectors in Class I, and 94 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 solid waste transfer station, S-50, for the period of November 1, 2012 through April 30, 2013 was 70,319 tons. The total annual amount of waste accepted for the period of May 1, 2012 through April 30, 2013 is 144,086 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 included 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 period of November 1, 2012 through April 30, 2013. 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, the S-41 HiPOx Oxidation System, abated by the A-41 Ozone Gas Destruct Unit, did not operate during the reporting period and therefore did not exceed 40,800 gallons per day and 14,892,000 gallons during any consecutive 12-month period.

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

Pursuant to ATC AN 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) from November 1, 2012 through April 30, 2013 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 onsite at West County upon request. A summary of the total combined wastewater throughput (gallons) and 12-month combined rolling throughput (gallons) for the period of November 1, 2012 through April 30, 2013 is listed for the Leachate Treatment System in Appendix U.

Pursuant to ATC AN 20621 Condition Number 20054 Part 2, influent vapor flow to the A-20 and A-21 Carbon Adsorbers did not exceed 200 scfm during the reporting period .

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 ATC AN 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. A-20 is changed out if NMOC concentrations at the A-20 outlet are 10 ppmv or greater and are 10 percent greater than the A-20 inlet concentrations. The A-21 is changed out when measured NMOC concentrations at the A-21 outlet are 6 ppmv or greater. Pursuant to Title V Permit Condition Number 23110 and ATC AN 20621 Condition Number 20054 Part 8 NMOC concentrations are measured at the A-20 and A-21 on a weekly basis. Since November 1, 2012 the A-20, and the A-21 carbon vessels have not been changed as of the end of the reporting period.

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

Wastewater separators S-71, S-72, S-141 and S-156 were kept closed at all times during the period of November 1, 2012 through April 30, 2013 except when 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 ATC AN 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-130 is a backup source and has not been used as of April 30, 2013. Liquid throughput information for S-120 for the period of November 1, 2012 through April 30, 2013 is summarized in Appendix U and available upon request.

Pursuant to Title V Permit Condition Number 23316 Part 2 and ATC AN 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 during November 1, 2012 through April 30, 2013.

Pursuant to Title V Permit Condition Number 23316 and ATC AN 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 AN 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 10 ppmv 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 AN 20621 Condition Number 20054, 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 AN 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. During the reporting period, the A-14, A-15, A-16, A-17, A-18, and A-19 carbon vessels were not 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 November 1, 2012 through April 30, 2013. 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 November 1, 2012 through April 30, 2013. 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 November 1, 2012 through April 30, 2013. 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 November 1, 2012 through April 30, 2013. The total monthly and annual throughput to S-114 was recorded pursuant to Title V Permit Condition Number 23353 Part 5 and is 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 Shredded (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 during consecutive 12-month periods between November 1, 2012 through April 30, 2013. Inspection by BAAQMD indicated no deviation per the pending Change of Permit Conditions AN 23078 which was filed on February 15, 2011, to increase the 12-month throughput limit. The final terms of the Change of Permit Conditions are 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 November 1, 2012 through April 30, 2013.

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 exceed 19,000 tons of wood waste throughput during consecutive 12-month periods between November 1, 2012 through April 30, 2013. 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 are 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 during consecutive 12-month periods between November 1, 2012 through April 30, 2013. Inspection by BAAQMD indicated no deviation per the pending Change of Permit Conditions AN 23078 which was filed on February 15, 2011, to increase the 12-month throughput limit. The final terms of the Change of Permit Conditions are 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 operate and therefore did not exceed 5,000 tons of asphalt throughput in any consecutive 12-month period during 1, 2012 through April 30, 2013. 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

For the reporting period wastewater inlet to S-69, S-70, S-141, and S-156 did not have a volatile organic compounds (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 AN 20621 Condition Number 20054, a sample was taken on November 15, 2012 and submitted to the BAAQMD Engineering Division. The VOC sample results are provided in Appendix X.

4 START-UP, 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 HAPs 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 §63.1980(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, 2012 through April 30, 2013). The following information is included as required:

- During the reporting period, 16 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 E, A-11 Flare SSM Log. As of December 11, 2012, the A-11 Flare was permanently shut down and decommissioned.
- During the reporting period, 9 A-8 Back-Up Flare SSM events occurred. The A-8 Back-Up Flare was shut down and restarted during the reporting period due to the reasons noted in Appendix F, A-8 Back-Up Flare SSM Log.
- During the reporting period, 31 A-120 Flare SSM events occurred. The A-120 Flare was started-up, shut down, and restarted during the reporting period due to reasons noted in Appendix F, A-120 Flare SSM Log.
- During the reporting period, 27 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 F, S-5 IC Engine SSM Log.
- During the reporting period, 67 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 F, S-6 IC Engine SSM Log.
- During the reporting period, 21 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 F, S-37 IC Engine SSM Log.

- During the reporting period, 18 Class I Wellfield SSM events and 67 Class II Wellfield SSM events occurred. Details are included in Appendix C and D, Class I and Class II Well SSM Log.
- There were 256 events in total, 34 SSM events in Class I and 222 SSM events in Class II. In all 256 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)).