

August 27, 2020  
File No. 01204082.01, Task 121

TV Tracking #: 58 (Semi-Annual)

TV Tracking #: 59 (Annual)

Mr. Jeffrey Gove  
Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, California 94105

1.  RECEIVED IN ENFORCEMENT: 08/31/2020

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2020 AUG 31 AM 10:54  
BAY AREA AIR QUALITY  
MANAGEMENT DISTRICT

**Subject: Title V Annual Compliance Certification Report; Title V Semi-Annual Report of Required Monitoring; BAAQMD Rule 8-34 Semi-Annual Report, and Semi-Annual SSM Plan Report, Potrero Hills Landfill, Suisun, California (Plant No. A2039)**

Dear Mr. Gove:

On behalf of Potrero Hills Landfill Inc. (Potrero), SCS Engineers (SCS) is submitting the Title V Annual Compliance Certification Report; Title V Semi-Annual Report of Required Monitoring; Bay Area Air Quality Management District (BAAQMD), Regulation 8, Rule 34 Semi-Annual Report; and Semi-Annual Startup, Shutdown and Malfunction (SSM) Plan Report for the Potrero Hills Landfill in Suisun, California (Plant # A2039) to the BAAQMD.

The Title V Annual Compliance Certification Report covers the period from August 1, 2019 through July 31, 2020. The Title V Semi-Annual Report of Required Monitoring, the BAAQMD Rule 8-34 Semi-Annual Report and the SSM Plan Report cover the period from February 1, 2020 through July 31, 2020.

The Title V reports meet the requirements specified in the Title V permit, BAAQMD guidance on Title V report submittals, and Regulation 2, Rule 6. Each includes a certification by the responsible official for the Potrero Hills Landfill, Inc. The Rule 8-34 report includes the information required by BAAQMD Rule 8-34-411. The semi-annual report also satisfies the requirements under the New Source Performance Standards (NSPS) for municipal solid waste landfills (40 California Code of Regulation [CFR] Part 60, Subpart WWW), and Emission Guidelines (EG; 40 CFR Part 60, Subpart CC), including 40 CFR 60.757(f). The Semi-Annual SSM Plan Report satisfies the requirements under the Maximum Achievable Control Technology (MACT) rule for semi-annual reporting of SSM Plan implementation including 40 CFR 63.10(d)(S). This Title V reports and the SSM Plan report each includes a certification by the responsible official for Potrero.



Mr. Jeffrey Gove  
Director of Compliance and Enforcement  
August 27, 2020  
Page 2

If you have any questions or need any additional information, please contact the undersigned at (707) 546-9461.

Sincerely,



Haley M. DeLong  
Project Professional  
**SCS ENGINEERS**



Michael O'Connor  
Project Manager  
**SCS ENGINEERS**

Enclosures:

Title V Semi-Annual Monitoring Report (with Certification Statement)  
Title V Annual Compliance Certification Report (with Certification Statement)  
BAAQMD Rule 8-34 Semi-Annual Report  
Semi-Annual SSM Plan Report (with Certification Statement)

cc: USEPA Region 9  
Dave Jappert; Waste Connections  
Jamison Pfister; Waste Connections  
Natalie Hicks; Waste Connections  
Kevin Iler; Waste Connections  
Tom Reilly; Waste Connections  
Randy Bodnar; Waste Connections  
Pat Sullivan; SCS Engineers  
Art Jones, SCS Field Services


POTRERO HILLS LANDFILL, INC.

TITLE V ANNUAL CERTIFICATION

SITE: POTRERO HILLS LANDFILL	FACILITY ID#: A2039
REPORTING PERIOD: from 08/01/2019	through 07/31/2020

CERTIFICATION:

I declare, under penalty of perjury under the laws of the state of California, that, based on information and belief formed after reasonable inquiry, all information provided in this reporting package is true, accurate, and addresses all deviations during the reporting period:

  
\_\_\_\_\_  
Signature of Responsible Official

8/27/2020  
\_\_\_\_\_  
Date

Dave Jappert  
\_\_\_\_\_  
Name of Responsible Official (please print)

District Manager  
\_\_\_\_\_  
Title of Responsible Official (please print)

**Mail to:**

Director of Compliance and Enforcement  
BAAQMD  
375 Beale Street, Suite 600  
San Francisco, CA 94105  
Attn: Title V reports

# Compliance Certification Report

**Site Name:** Potrero Hills Landfill  
**Reporting Period:** 08/1/2019 to 07/31/2020  
**City:** Suisun  
**Zip Code:** 94806  
**Source Name:** Facility

**Site #:** A2039  
**Address:** 3675 Potrero Hills Lane  
**Source #:** Facility

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Notes
BAAQMD Regulation 1	General Provisions and Definitions (5/4/11)	Y	C	
SIP Regulation 1	General Provisions and Definitions (6/28/99)	Y	C	
BAAQMD Regulation 2, Rule 1	Permits – General Requirements (4/18/12)	Y	C	
BAAQMD 2-1-429	Permits – General Requirements: Federal Emissions Statement (12/21/04)	Y	C	
SIP Regulation 2, Rule 1	Permits - General Requirements (1/26/99)	Y	C	
SIP Regulation 2-1-429	Permits – General Requirements: Federal Emissions Statement (4/3/95)	Y	C	
BAAQMD Regulation 2, Rule 5	Permits – New Source Review of Toxic Air Contaminants (1/6/10)	Y	C	
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	Y	C	
SIP Regulation 4	Air Pollution Episode Plan (8/6/90)	Y	C	
BAAQMD Regulation 5	Open Burning (7/09/08)	Y	C	
SIP Regulation 5	Open Burning (9/4/98)	Y	C	
BAAQMD Regulation 6, Rule 1	Particulate Matter – General Requirements (12/05/07)	Y	C	
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)	Y	C	
BAAQMD Regulation 7	Odorous Substances (3/17/82)	Y	C	
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y	C	
BAAQMD Regulation 8, Rule 2	Organic Compounds – Miscellaneous Operations (7/20/05)	Y	C	
SIP Regulation 8, Rule 2	Organic Compounds – Miscellaneous Operations (3/22/95)	Y	C	
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (7/1/09)	Y	C	
SIP Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (1/2/04)	Y	C	
BAAQMD Regulation 8, Rule 4	Organic Compounds - General Solvent and Surface Coating Operations (10/16/02)	Y	C	
BAAQMD Regulation 8, Rule 5	Organic Compounds – Storage of Organic Liquids (10/18/06)	Y	C	
SIP Regulation 8, Rule 5	Organic Compounds - Storage of Organic Liquids (6/5/03)	Y	C	
BAAQMD Regulation 8, Rule 15	Organic Compounds – Emulsified and Liquid Asphalts (6/1/94)	Y	C	
BAAQMD Regulation 8, Rule 16	Organic Compounds - Solvent Cleaning Operations (10/16/02)	Y	C	
BAAQMD Regulation 8, Rule 40	Organic Compounds – Aeration of Contaminated Soil and Removal of Underground Storage Tanks (6/15/05)	Y	C	



# Compliance Certification Report

**Site #:** A2039      **Address:** 3675 Potrero Hills Lane      **Site Name:** Potrero Hills Landfill      **Reporting Period:** 08/1/2019 to 07/31/2020  
**Source #:** Facility      **City:** Suisun      **Source Name:** Facility      **Zip Code:** 94806

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Notes
SIP Regulation 8, Rule 40	Organic Compounds – Aeration of Contaminated Soil and Removal of Underground Storage Tanks (4/19/01)	Y	C	
BAAQMD Regulation 8, Rule 47	Organic Compounds – Air Stripping and Soil Vapor Extraction Operations (6/15/05)	Y	C	
SIP Regulation 8, Rule 47	Organic Compounds – Air Stripping and Soil Vapor Extraction Operations (4/26/95)	Y	C	
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	Y	C	
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y	C	
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (7/17/02)	Y	C	
SIP Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (2/26/02)	Y	C	
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (3/15/95)	Y	C	
SIP Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (6/8/99)	Y	C	
BAAQMD Regulation 9, Rule 2	Inorganic Gaseous Pollutants – Hydrogen Sulfide (10/6/99)	Y	C	
BAAQMD Regulation 11, Rule 1	Hazardous Pollutants – Lead (3/17/82)	Y	C	
SIP Regulation 11, Rule 1	Hazardous Pollutants – Lead (9/2/81)	Y	C	
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (10/7/98)	Y	C	
BAAQMD Regulation 11, Rule 14	Hazardous Pollutants - Asbestos Containing Serpentine (7/17/91)	Y	C	
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	Y	C	
SIP Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (9/2/81)	Y	C	
California Health and Safety Code Section 41750 et seq.	Portable Equipment	Y	C	
California Health and Safety Code Section 44300 et seq.	Air Toxics "Hot Spots" Information and Assessment Act of 1987	Y	C	
California Health and Safety Code Title 17, 93105	Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying and Surface Mining Operations (7/26/01)	Y	C	
California Health and Safety Code Title 17, 93106	Asbestos Airborne Toxic Control Measure for Asbestos Containing Serpentine (7/20/00)	Y	C	

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Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Notes
California Health and Safety Code Title 17, 93116	Airborne Toxic Control Measure for Diesel Particulate Matter from Portable Engines Rated at 50 Horsepower and Greater (2/19/11)	Y	C	
40 CFR Part 61, Subpart A	National Emission Standards for Hazardous Air Pollutants – General Provisions (9/13/10)	Y	C	
40 CFR Part 61, Subpart M	National Emission Standards for Hazardous Air Pollutants – National Emission Standard for Asbestos (7/20/04)	Y	C	

# Compliance Certification Report

**Site Name:** Potrero Hills Landfill  
**City:** Suisun  
**Source Name:** MSW Landfill - Waste Decomposition  
**Process with LFG Collection System (S-1), abated by Flare (A-2) and Flare (A-4), Waste and Cover Material Dumping (S-202), Excavating, Bulldozing, and Compacting Activities (S-203)**

**Site #:** A2039  
**Address:** 3675 Potrero Hills Lane  
**Source #:** S-1, S-202, S-203

**Reporting Period:** 08/01/2019 to 07/31/2020  
**Zip Code:** 94585

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Comments
<b>BAAQMD Regulation 1</b>	<b>General Provisions and Definitions (5/4/11)</b>			
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	C	
1-523.1	Parametric monitor periods of inoperation	Y	C	
1-523.2	Limit on duration of inoperation	Y	C	
1-523.3	Reporting requirement for violations of any applicable limits	Y	C	
1-523.4	Records of inoperation, tests, calibrations, adjustments, & maintenance	Y	C	
1-523.5	Maintenance and calibration	Y	C	
<b>SIP Regulation 1</b>	<b>General Provisions and Definitions (6/28/99)</b>			
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	C	
1-523.3	Reports of Violations	Y	C	
<b>BAAQMD Regulation 6, Rule 1</b>	<b>Particulate Matter – General Requirements (12/5/07)</b>			
6-1-301	Ringelmann No. 1 Limitation	Y	C	
6-1-305	Visible Particles	Y	C	
6-1-310	Particle Weight Limitation (applies to Flares only)	Y	C	
6-1-401	Appearance of Emissions	Y	C	
<b>SIP Regulation 6</b>	<b>Particulate Matter and Visible Emissions (9/4/98)</b>			
6-301	Ringelmann No. 1 Limitation	Y	C	
6-305	Visible Particles	Y	C	
6-310	Particle Weight Limitation (applies to A-2 Flare only)	Y	C	
6-401	Appearance of Emissions	Y	C	

# Compliance Certification Report

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**Reporting Period:** 08/01/2019 to 07/31/2020  
**City:** Suisun  
**Zip Code:** 94585

**Site #:** A2039  
**Address:** 3675 Potrero Hills Lane  
**Source #:** S-1, S-202, S-203

**Source Name:** MSW Landfill - Waste Decomposition  
 Process with LFG Collection System (S-1), abated by  
 Flare (A-2) and Flare (A-4), Waste and Cover Material  
 Dumping (S-202), Excavating, Bulldozing, and  
 Compacting Activities (S-203)

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Comments
<b>BAAQMD Regulation 8, Rule 2</b>	<b>Organic Compounds – Miscellaneous Operations (7/20/05)</b>			
8-2-301	Miscellaneous Operations (applies to VOC-laden soil handling and disposal activities only)	Y	C	
<b>BAAQMD Regulation 8, Rule 34</b>	<b>Organic Compounds – Solid Waste Disposal Sites (6/15/05)</b>			
8-34-113	Limited Exemption, Inspection and Maintenance	Y	C	
8-34-113.1	Emission Minimization Requirement	Y	C	
8-34-113.2	Shutdown Time Limitation	Y	C	
8-34-113.3	Recordkeeping Requirement	Y	C	
8-34-116	Limited Exemption, Well Raising	Y	C	
8-34-116.1	New Fill	Y	C	
8-34-116.2	Limits on Number of Wells Shutdown	Y	C	
8-34-116.3	Shutdown Duration Limit	Y	C	
8-34-116.4	Capping Well Extensions	Y	C	
8-34-116.5	Well Disconnection Records	Y	C	
8-34-117	Limited Exemption, Gas Collection System Components	Y	C	
8-34-117.1	Necessity of Existing Component Repairs/Adjustments	Y	C	
8-34-117.2	New Components are Described in Collection and Control System Design Plan	Y	C	
8-34-117.3	Meets Section 8-34-118 Requirements	Y	C	
8-34-117.4	Limits on Number of Wells Shutdown	Y	C	
8-34-117.5	Shutdown Duration Limit	Y	C	
8-34-117.6	Well Disconnection Records	Y	C	
8-34-118	Limited Exemption, Construction Activities	Y	C	

# Compliance Certification Report

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**Address:** 3675 Potrero Hills Lane  
**Source #:** S-1, S-202, S-203

**Source Name:** MSW Landfill - Waste Decomposition Process with LFG Collection System (S-1), abated by Flare (A-2) and Flare (A-4), Waste and Cover Material Dumping (S-202), Excavating, Bulldozing, and Compacting Activities (S-203)

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Comments
8-34-118.1	Construction Plan	Y	C	
8-34-118.2	Activity is Required to Maintain Compliance with this Rule	Y	C	
8-34-118.3	Required or Approved by Other Enforcement Agencies	Y	C	
8-34-118.4	Emission Minimization Requirement	Y	C	
8-34-118.5	Excavated Refuse Requirements	Y	C	
8-34-118.6	Covering Requirements for Exposed Refuse	Y	C	
8-34-118.7	Installation Time Limit	Y	C	
8-34-118.8	Capping Required for New Components	Y	C	
8-34-118.9	Construction Activity Records	Y	C	
8-34-301	Landfill Gas Collection and Emission Control System Requirements	Y	C	
8-34-301.1	Continuous Operation	Y	C	
8-34-301.2	Collection and Control Systems Leak Limitations	Y	I (see following comment)	During a District inspection conducted on September 4, 2019, fourteen (14) surface exceedances and two (2) component leaks were identified by BAAQMD staff. This resulted in the BAAQMD issuing Notice of Violation (NOV) No. A 56042 and A 56043. For additional information, including corrective actions taken, please see the attached October 4, 2019 30-Day Follow-up Report. Note the September 13, 2019 10-Day Deviation Letter and NOV Response Letter is included as Attachment A of the 30-Day Follow-up Report.
8-34-301.3	Limits for Enclosed Flares (applies to A-2 Flare only)	Y	C	



# Compliance Certification Report

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**City:** Suisun  
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**Site #:** A2039  
**Address:** 3675 Potrero Hills Lane  
**Source #:** S-1, S-202, S-203

**Source Name:** MSW Landfill - Waste Decomposition Process with LFG Collection System (S-1), abated by Flare (A-2) and Flare (A-4), Waste and Cover Material Dumping (S-202), Excavating, Bulldozing, and Compacting Activities (S-203)

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Comments
8-34-303	Landfill Surface Requirements	Y	I (see following comment)	During a District inspection conducted on September 4, 2019, fourteen (14) surface exceedances and two (2) component leaks were identified by BAAQMD staff. This resulted in the BAAQMD issuing Notice of Violation (NOV) No. A 56042 and A 56043. For additional information, including corrective actions taken, please see the attached October 4, 2019 30-Day Follow-up Report. Note the September 13, 2019 10-Day Deviation Letter and NOV Response Letter is included as Attachment A of the 30-Day Follow-up Report.
8-34-304	Gas Collection System Installation Requirements	Y	C	
8-34-304.1	Based on Waste Age For Inactive or Closed Areas	Y	C	
8-34-304.2	Based on Waste Age For Active Areas	Y	C	
8-34-304.3	Based on Amount of Decomposable Waste Accepted	Y	C	
8-34-304.4	Based on NMOC Emission Rate	Y	C	
8-34-305	Wellhead Requirements	Y	C	
8-34-305.1	Wellhead Vacuum Requirements	Y	C	
8-34-305.2	Wellhead Temperature Limit	Y	C	
8-34-305.3	Nitrogen Concentration Limit for Wellhead Gas or	Y	C	
8-34-305.4	Oxygen Concentration Limit for Wellhead Gas	Y	C	
8-34-405	Design Capacity Reports	Y	C	
8-34-408	Collection and Control System Design Plans	Y	C	
8-34-408.2	Sites With Existing Collection and Control Systems	Y	C	
8-34-411	Annual Report	Y	C	
8-34-412	Compliance Demonstration Tests	Y	C	
8-34-413	Performance Test Report	Y	C	

# Compliance Certification Report

**Site Name:** Potrero Hills Landfill  
**City:** Suisun  
**Source Name:** MSW Landfill - Waste Decomposition  
**Process with LFG Collection System (S-1), abated by Flare (A-2) and Flare (A-4), Waste and Cover Material Dumping (S-202), Excavating, Bulldozing, and Compacting Activities (S-203)**

**Site #:** A2039  
**Address:** 3675 Potrero Hills Lane  
**Source #:** S-1, S-202, S-203

**Reporting Period:** 08/01/2019 to 07/31/2020  
**Zip Code:** 94585

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Comments
8-34-414	Repair Schedule for Wellhead Excesses	Y	C	
8-34-414.1	Records of Excesses	Y	C	
8-34-414.2	Corrective Action	Y	C	
8-34-414.3	Collection System Expansion	Y	C	
8-34-414.4	Operational Due Date for Expansion	Y	C	
8-34-415	Repair Schedule for Surface Leak Excesses	Y	C	
8-34-415.1	Records of Excesses	Y	C	
8-34-415.2	Corrective Action	Y	C	
8-34-415.3	Re-monitor Excess Location Within 10 Days	Y	C	
8-34-415.4	Re-monitor Excess Location Within 1 Month	Y	C	
8-34-415.5	If No More Excesses, No Further Re-Monitoring	Y	C	
8-34-415.6	Additional Corrective Action	Y	C	
8-34-415.7	Re-monitor Second Excess Within 10 days	Y	C	
8-34-415.8	Re-monitor Second Excess Within 1 Month	Y	C	
8-34-415.9	If No More Excesses, No Further Re-monitoring	Y	C	
8-34-415.10	Collection System Expansion for Third Excess in a Quarter	Y	C	
8-34-415.11	Operational Due Date for Expansion	Y	C	
8-34-416	Cover Repairs	Y	C	
8-34-501	Operating Records	Y	C	
8-34-501.1	Collection System Downtime	Y	C	
8-34-501.2	Emission Control System Downtime	Y	C	
8-34-501.3	Continuous Temperature Records for Enclosed Combustors (applies Flares)	Y	C	
8-34-501.4	Testing	Y	C	
8-34-501.6	Leak Discovery and Repair Records	Y	C	
8-34-501.7	Waste Acceptance Records	Y	C	

# Compliance Certification Report

**Site Name:** Potrero Hills Landfill  
**City:** Suisun  
**Source Name:** MSW Landfill - Waste Decomposition Process with LFG Collection System (S-1), abated by Flare (A-2) and Flare (A-4), Waste and Cover Material Dumping (S-202), Excavating, Bulldozing, and Compacting Activities (S-203)

**Site #:** A2039  
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**Reporting Period:** 08/01/2019 to 07/31/2020  
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Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Comments
8-34-501.8	Non-decomposable Waste Records	Y	C	
8-34-501.9	Wellhead Excesses and Repair Records	Y	C	
8-34-501.10	Gas Flow Rate Records for All Emission Control Systems	Y	C	
8-34-501.12	Records Retention for 5 Years	Y	C	
8-34-503	Landfill Gas Collection and Emission Control System Leak Testing	Y	C	
8-34-504	Portable Hydrocarbon Detector	Y	C	
8-34-505	Well Head Monitoring	Y	C	
8-34-506	Landfill Surface Monitoring	Y	C	
8-34-507	Continuous Temperature Monitor and Recorder	Y	C	
8-34-508	Gas Flow Meter	Y	C	
8-34-510	Cover Integrity Monitoring	Y	C	
<b>BAAQMD Regulation 9, Rule 1</b>	<b>Inorganic Gaseous Pollutants – Sulfur Dioxide (3/15/95)</b>			
9-1-301	Limitations on Ground Level Concentrations (applies Flares only)	Y	C	
9-1-302	General Emission Limitations (applies to Flares only)	Y	C	
<b>BAAQMD Regulation 9, Rule 2</b>	<b>Inorganic Gaseous Pollutants – Hydrogen Sulfide (10/6/99)</b>			
9-2-301	Limitations on Hydrogen Sulfide	Y	C	
<b>40 CFR Part 60, Subpart A</b>	<b>Standards of Performance for New Stationary Sources – General Provisions (9/13/10)</b>			
60.4	Address	Y	C	
60.4(b)	Requires Submission of Requests, Reports, Applications, and Other Correspondence to the Administrator	Y	C	
60.7	Notification and Record Keeping	Y	C	

# Compliance Certification Report

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 City: Suisun  
 Zip Code: 94585

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 Address: 3675 Potrero Hills Lane  
 Source #: S-1, S-202, S-203

Source Name: MSW Landfill - Waste Decomposition  
 Process with LFG Collection System (S-1), abated by  
 Flare (A-2) and Flare (A-4), Waste and Cover Material  
 Dumping (S-202), Excavating, Bulldozing, and  
 Compacting Activities (S-203)

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Comments
60.8	Performance Tests	Y	C	
60.11	Compliance with Standards and Maintenance Requirements	Y	C	
60.11(a)	Compliance determined by performance tests	Y	C	
60.11(d)	Control devices operated using good air pollution control practice	Y	C	
60.12	Circumvention	Y	C	
60.13	Monitoring Requirements	Y	C	
60.13(a)	Applies to all continuous monitoring systems	Y	C	
60.13(b)	Monitors shall be installed and operational before performing performance tests	Y	C	
60.13(c)	Continuous monitors shall operate continuously	Y	C	
60.13(f)	Monitors shall be installed in proper locations	Y	C	
60.13(g)	Requires multiple monitors for multiple stacks	Y	C	
60.14	Modification	Y	C	
60.15	Reconstruction	Y	C	
60.19	General Notification and Reporting Requirements	Y	C	
<b>40 CFR Part 60, Subpart Cc</b>	<b>Standards of Performance for New Stationary Sources – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (2/24/99)</b>			
60.36c	Compliance Times	Y	C	
60.36c(a)	Collection and Control Systems in Compliance by 30 months after Initial NMOC Emission Rate Report Shows NMOC Emissions $\geq$ 50 MG/year	Y	C	
<b>40 CFR Part 62, Subpart F</b>	<b>Approval and Promulgation of State Plans for Designated Facilities and Pollutants (4/20/06)</b>			
62.1100	Identification of Plan	Y	C	
62.1115	Identification of Sources – Existing Municipal Solid Waste Landfills	Y	C	

# Compliance Certification Report

**Site Name:** Potrero Hills Landfill  
**City:** Suisun  
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**Process with LFG Collection System (S-1), abated by Flare (A-2) and Flare (A-4), Waste and Cover Material Dumping (S-202), Excavating, Bulldozing, and Compacting Activities (S-203)**

**Site #:** A2039  
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**Zip Code:** 94585

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Comments
<b>40 CFR Part 63, Subpart A</b>	<b>National Emission Standards for Hazardous Air Pollutants: General Provisions (9/13/10)</b>			
63.4	Prohibited activities and circumvention	Y	C	
63.5	Preconstruction review and notification requirements	Y	C	
63.5(b)	Requirements for existing, newly constructed, and reconstructed sources	Y	C	
63.6	Compliance with standards and maintenance requirements	Y	C	
63.6(e)	Operation and maintenance requirements and SSM Plan	Y	C	
63.6(f)	Compliance with non-opacity emission standards	Y	C	
63.10	Recordkeeping and reporting requirements	Y	C	
63.10(b)	General recordkeeping requirements	Y	C	
63.10(b)(2)	For affected sources, maintain relevant records of	Y	C	
63.10(b)(2)(i-v)	Records for startup, shutdown, malfunction, and maintenance	Y	C	
63.10(d)	General reporting requirements	Y	C	
63.10(d)(5)	Startup, Shutdown, and Malfunction (SSM) Reports	Y	C	
<b>40 CFR Part 63, Subpart AAA</b>	<b>National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills (4/20/06)</b>			
63.1945	When do I have to comply with this subpart?	Y	C	
63.1945(b)	Compliance date for existing affected landfills	Y	C	
63.1955	What requirements must I meet?	Y	C	
63.1955(a)	Comply with either 63.1955(a)(1) or (a)(2)	Y	C	
63.1955(a)(2)	Comply with State Plan that implements 40 CFR Part 60, Subpart Cc	Y	C	



# Compliance Certification Report

**Site Name:** Potrero Hills Landfill  
**City:** Suisun  
**Reporting Period:** 08/01/2019 to 07/31/2020  
**Zip Code:** 94585

**Site #:** A2039  
**Address:** 3675 Potrero Hills Lane  
**Source #:** S-1, S-202, S-203

**Source Name:** MSW Landfill - Waste Decomposition  
 Process with LFG Collection System (S-1), abated by  
 Flare (A-2) and Flare (A-4), Waste and Cover Material  
 Dumping (S-202), Excavating, Bulldozing, and  
 Compacting Activities (S-203)

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Comments
63.1955(b)	Comply with 63.1960-63.1985, if a collection and control system is required by 40 CFR Part 60, Subpart WW or a State Plan implementing 40 CFR Part 60, Subpart Cc	Y	C	
63.1955(c)	Comply with all approved alternatives to standards for collection and control systems plus all SSM requirements and 6 month compliance reporting requirements	Y	C	
63.1960	How is compliance determined?	Y	C	
63.1965	What is a deviation?	Y	C	
63.1975	How do I calculate the 3-hour block average used to demonstrate compliance?	Y	C	
63.1980	What records and reports must I keep and submit?	Y	C	
63.1980(a)	Comply with all record keeping and reporting requirements in 40 CFR Part 60, Subpart WW or the State Plan implementing 40 CFR Part 60, Subpart Cc, except that the annual report required by 40 CFR 60.757(f) must be submitted every 6 months	Y	C	
63.1980(b)	Comply with all record keeping and reporting requirements in 40 CFR Part 60, Subpart A and 40 CFR Part 63, Subpart A, including SSM Plans and Reports	Y	C	
<b>BAAQMD Condition #1948</b>				

# Compliance Certification Report

**Reporting Period:** 08/01/2019 to 07/31/2020  
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**Site Name:** Potrero Hills Landfill

**City:** Suisun

**Source Name:** MSW Landfill - Waste Decomposition  
 Process with LFG Collection System (S-1), abated by  
 Flare (A-2) and Flare (A-4), Waste and Cover Material  
 Dumping (S-202), Excavating, Bulldozing, and  
 Compacting Activities (S-203)

**Site #:** A2039

**Address:** 3675 Potrero Hills Lane

**Source #:** S-1, S-202, S-203

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Comments
Part 1	Design capacity and waste acceptance rate limits (Regulations 2-1-301 and 2-1-234)	Y	I (see following comment)	Design capacity limits have been exceeded while Potrero awaits permit for landfill expansion. Note that Potrero has provided documentation (per Conditions 1948, #1b and #1c) demonstrating that the POC limit has not been exceeded. Also, compliance status related to delayed expansion permitting is being determined as part of Potrero's current Compliance Agreement with BAAQMD, effective 5/24/18. The Compliance Agreement has been extended three times, and the current Agreement expires on November 23, 2020.
Part 2	Acceptance criteria for soils containing VOCs (Regulation 8-40-301)	Y	C	
Part 3	Emission limit for low VOC soils (Regulation 8-2-301)	Y	C	
Part 4	Particulate emission control measures (Regulations 2-1-403, 6-301, and 6-305)	Y	C	
Part 5	Control requirements for collected landfill gas (Regulation 8-34-301)	Y	C	
Part 6	Landfill gas collection system description and operating requirements (Regulations 2-1-301, 8-34-303, 8-34-304, and 8-34-305)	Y	C	
Part 7	Landfill gas collection system operating requirements (Regulation 8-34-301.1)	Y	C	
Part 8	Flare heat input limits (Regulation 2-1-301)	Y	C	
Part 9	Flare temperature limit (Regulation 8-34-301.3)	Y	C	
Part 10	Landfill gas sulfur content limit and monitoring requirements (Regulation 9-1-302)	Y	C	
Part 11	Annual source test (Regulations 2-1-301, 8-34-301.3 and 8-34-412, 9-1-302)	Y	C	

# Compliance Certification Report

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**City:** Suisun  
**Zip Code:** 94585

**Site #:** A2039  
**Address:** 3675 Potrero Hills Lane  
**Source #:** S-1, S-202, S-203

**Source Name:** MSW Landfill - Waste Decomposition  
 Process with LFG Collection System (S-1), abated by  
 Flare (A-2) and Flare (A-4), Waste and Cover Material  
 Dumping (S-202), Excavating, Bulldozing, and  
 Compacting Activities (S-203)

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Comments
Part 12	Annual landfill gas characterization test (Regulations 2-5-302 and 8-34-412)	Y	C	
Part 13	Record keeping requirements (Cumulative Increase and Regulations 2-1-301, 2-6-501, 6-1-301, 6-1-305, 8-2-301, 8-34-301, 8-34-304, and 8-34-501, and 9-1-302)	Y	C	
Part 14	Waste Acceptance and Handling Requirements (basis: Regulation 2-1-403)	Y	C	
Part 15	Reporting periods and due dates for the Regulation 8, Rule 34 annual report (Regulation 8-34-411 and 40 CFR Part 63.1980(a))	Y	C	
Part 16	Hydrogen sulfide monitoring (Regulation 9-2-301)	Y	C	
Part 17	NOx limit for A-4	Y	C	
Part 18	CO limit for A-4	Y	C	
Part 19	Combined CO limit for A-2 and A-4	Y	C	
Part 20	Source Testing of A-4	Y	C	
Part 21	Alternate Wellhead Temperatures	Y	C	

## Compliance Certification Report

**Site #:** A2039      **Site Name:** Potrero Hills Landfill      **Reporting Period:** 08/01/2019 to 07/31/2020  
**Address:** 3675 Potrero Hills Lane      **City:** Suisun      **Zip Code:** 94585  
**Source #:** S-13      **Source Name:** Diesel IC Engine for Power Generation

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
<b>BAAQMD Regulation 6, Rule 1</b>	<b>Particulate Matter – General Requirements (12/5/07)</b>			
6-1-303	Ringelmann No. 2 Limitation	Y	C	Generator engine S-13 no longer in service; not operated during reporting period
6-1-303.1	Internal combustion engines below 1500 cubic inches displacement or standby engines	Y	C	"
6-1-305	Visible Particles	Y	C	"
6-1-310	Particulate Weight Limitation	Y	C	"
6-1-401	Appearance of Emissions	Y	C	"
<b>SIP Regulation 6</b>	<b>Particulate Matter and Visible Emissions (9/4/98)</b>			
6-303	Ringelmann No. 2 Limitation	Y	C	"
6-303.1	Internal combustion engines below 1500 cubic inches displacement or standby engines	Y	C	"
6-305	Visible Particles	Y	C	"
6-310	Particulate Weight Limitation	Y	C	"
6-401	Appearance of Emissions	Y	C	"
<b>BAAQMD Regulation 9, Rule 1</b>	<b>Inorganic Gaseous Pollutants – Sulfur Dioxide (3/15/1995)</b>			
9-1-301	Limitations on Ground Level Concentrations	Y	C	"
9-1-304	Liquid and Solid Fuels	Y	C	"
<b>BAAQMD Regulation 9, Rule 8</b>	<b>Inorganic Gaseous Pollutants – Nitrogen Oxides and Carbon Monoxide from Stationary Internal Combustion Engines (7/25/07)</b>			
9-8-304	Emission Limits – Compression-Ignition Engines	Y	C	"
9-8-304.2	Emission Limits – Compression-Ignition Engines > 175bhp	Y	C	"

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**Source #:** S-13      **Source Name:** Diesel IC Engine for Power Generation

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
9-8-305	Emission Limits – Delayed Compliance, Existing Compression-Ignition Engines, Model Year 1996 or Later	Y	C	“
9-8-401	Compliance Schedule	Y	C	“
9-8-402	Reporting Requirements for Delayed Compliance	Y	C	“
9-8-501	Initial Demonstration of Compliance	Y	C	“
9-8-502	Recordkeeping	Y	C	“
9-8-503	Quarterly Demonstration of Compliance	Y	C	“
<b>SIP Regulation 9, Rule 8</b>	<b>Inorganic Gaseous Pollutants – Nitrogen Oxides and Carbon Monoxide from Stationary Internal Combustion Engines (12-15-97)</b>			
9-8-110	Exemptions	Y	C	“
9-8-110.2	Exemption- engines fired exclusively by liquid fuels	Y	C	“
<b>40 CFR, Part 63, Subpart ZZZZ</b>	<b>National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (6/15/04)</b>			
63.6585	Applicability	Y	C	“
63.6590	Affected sources	Y	C	“
63.6595	Compliance dates	Y	C	“
63.6595(a)	Affected Sources	Y	C	“
63.6595(a)(1)	Compliance times for existing stationary CI RICE located at an area source	Y	C	“
63.6603	Emission limitations and operating limitations	Y	C	“
63.6603(a)	Comply with requirements in Table 2d.1	Y	C	“
63.6605	General compliance requirements	Y	C	“
63.6605(a)	Comply with emission limitations and operating requirements at all times	Y	C	“
63.6605(b)	Operate safely using good air pollution control practices to minimize emissions	Y	C	“



## Compliance Certification Report

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**Source #:** S-13      **Source Name:** Diesel IC Engine for Power Generation

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
63.6612	Initial performance/compliance demonstration deadlines	Y	C	"
63.6615	Subsequent performance test dates	Y	C	"
63.6620	Performance test procedures	Y	C	"
63.6625	Monitoring, installation, collection, operation, and maintenance requirements	Y	C	"
63.6625(c)	Operate and maintain the RICE and any required control devices in accordance with manufacturer specifications and maintenance plans	Y	C	"
63.6625(h)	Minimize idle and start-up times	Y	C	"
63.6625(i)	Comply with oil change frequency in Table 2d. I or comply with oil analysis requirements and maintenance plan to extend this oil change frequency.	Y	C	"
63.6630	How do I demonstrate initial compliance with emission limitations and operating limitations?	Y	C	"
63.6635	How do I monitor and collect data to demonstrate continuous compliance?	Y	C	"
63.6640	How do I demonstrate continuous compliance with the emission limitations and operating limitations?	Y	C	"
63.6640(a)	Demonstrate continuous compliance according to methods specified in Table 6: Operate engine in accordance with manufacturer instructions or develop and follow your own plan for minimizing emissions.	Y	C	"
63.6640(b)	Report each instance of non-compliance with an emission or operating limitation from Table 2d: Operate engine in accordance with manufacturer instructions or develop and follow your own plan for minimizing emissions.	Y	C	"
63.6640(e)	Report each instance of non-compliance with the applicable general provisions specified in Table 8	Y	C	"
63.6645	Required notifications and deadlines	Y	C	"

# Compliance Certification Report

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Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
63.6650	Required reports and deadlines	Y	C	"
63.6650(f)	Report all deviations in semi-annual Title V reports and in accordance with all Title V reporting requirements	Y	C	"
<b>63.6655</b>	<b>Records</b>			
63.6655(a)	Keep records required by (a)(1-5) of this section	Y	C	"
63.6655(d)	Keep records required in Table 6 (see Table 6-9)	Y	C	"
63.6655(e)	Keep records of maintenance conducted	Y	C	"
<b>63.6660</b>	<b>Record format and retention</b>			
63.6660(a)	Maintain records in a suitable format and have readily available	Y	C	"
63.6660(b)	Retain for at least 5 years	Y	C	"
63.6660(c)	Keep records accessible for 5 years	Y	C	"
63.6665	Applicable general provisions	Y	C	"
Table 2d	Requirements for Existing Stationary RICE located at Area Sources of HAP Emissions	Y	C	"
Table 6	Continuous Compliance with Emission Limitations, Operating Limitations, Work Practices, and Management Practices	Y	C	"
Table 8	Applicability of General Provisions to Subpart ZZZZ	Y	C	"
<b>CCR, Title 17, Section 93115</b>	<b>Airborne Toxic Control Measure for Stationary Compression Ignition Engines (5/19/11)</b>	Y	C	"
§93115.2	ATCM for Stationary CI Engines - Applicability	Y	C	"
§93115.2(b)	This ATCM applies to any person who owns or operates a stationary CI engine in California with a rated power of > 50 bhp	Y	C	"
§93115.5	Fuel and Fuel Additive Requirements for New and In-Use Stationary CI Engines That Have a Rated Brake Horsepower of Greater Than (>50 bhp)	Y	C	"
§93115.5(a)	For New Stationary CI Engines or In-Use Prime Stationary CI Engines	Y	C	"

# Compliance Certification Report

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**Address:** 3675 Potrero Hills Lane      **City:** Suisun      **Zip Code:** 94585  
**Source #:** S-13      **Source Name:** Diesel IC Engine for Power Generation

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
§93115.7	Stationary Prime Diesel-Fueled CI Engine (>50 bhp) Emission Standards	Y	C	"
§93115.7(b)	In-Use Stationary Prime Diesel-Fueled CI Engine (>50 bhp) Emission Standards	Y	C	"
§93115.7(b)(1)	Diesel PM Standard	Y	C	"
§93115.7(b)(2)	Additional Standards (NO, CO, NMHC)	Y	C	"
<b>§93115.10</b>	<b>Recordkeeping, Reporting and Monitoring Requirements</b>			
§93115.10(a)	Reporting Requirements for Owners and Operators of New and In-Use Stationary CI Engines >50 bhp	Y	C	"
§93115.10(c)	Demonstration of Compliance with Emission Limits	Y	C	"
§93115.10(c)(2)	Owners and Operators of In-Use Engines Shall Prove Emissions and Operational Data to Demonstrate Compliance	Y	C	"
§93115.10(c)	Monitoring Equipment	Y	C	"
§93115.10(c)(1)	Non-resettable Hour Meter Requirements	Y	C	"
§93115.10(c)(2)	Back pressure monitor requirements for DPF's	Y	C	"
§93115.10(c)(3)	Other monitoring may be required by the APCO for other control strategies	Y	C	"
§93115.11	Compliance Schedule for Owners or Operators of Three or Fewer Engines (>50 bhp) Within a District	Y	C	"

## Compliance Certification Report

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**Address:** 3675 Potrero Hills Lane      **City:** Suisun      **Zip Code:** 94585  
**Source #:** S-13      **Source Name:** Diesel IC Engine for Power Generation

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
§93115.11(b)	Compliance Schedule for Owners not Reducing Operating Hours	N	C	"
§93115.13	Compliance Demonstration	N	C	"
§93115.14	Test Methods	Y	C	"
§93115.15	Severability	Y	C	"
<b>BAAQMD Condition #18996</b>				
Part 1	Low sulfur fuel requirement, demonstration of sulfur content (Cumulative Increase, and Regulation 9-1-304)	Y	C	"
Part 2	Observation of emissions during operation of source (Regulations 2-1-403 and 6-303 and 6-1-401)	Y	C	"

# Compliance Certification Report

**Site #:** A2039      **Site Name:** Potrero Hills Landfill      **Reporting Period:** 08/01/2019 to 07/31/2020  
**Address:** 3675 Potrero Hills Lane      **City:** Suisun      **Zip Code:** 94585  
**Source #:** S-14      **Source Name:** Non-Retail Gasoline Dispensing Facility G#11138

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
<b>BAAQMD Regulation 8, Rule 5</b>	<b>Organic Compounds, Storage of Organic Liquids (10/18/06)</b>			
8-5-116	Exemption, Gasoline Storage Tanks at Gasoline Dispensing Facilities	Y	C	
<b>SIP Regulation 8, Rule 5</b>	<b>Organic Compounds, Storage of Organic Liquids (6/5/03)</b>			
8-5-206	Gas Tight	Y	C	
8-5-301	Storage Tank Control Requirements	Y	C	
8-5-303	Requirements for Pressure Vacuum Valves	Y	C	
8-5-303.1	Pressure Setting	Y	C	
8-5-303.2	Gas Tight	Y	C	
8-5-403	Inspection Requirements for Pressure Vacuum Valves	Y	C	
8-5-501	Records	Y	C	
8-5-501.1	Types and amounts of materials stored	Y	C	
8-5-503	Portable Hydrocarbon Detector	Y	C	
<b>BAAQMD Regulation 8, Rule 7</b>	<b>Organic Compounds, Gasoline Dispensing Facilities (11/6/02)</b>			
8-7-113	Tank Gauging and Inspection Exemption	Y	C	
8-7-114	Stationary Tank Testing Exemption	Y	C	
8-7-116	Periodic Testing Requirements Exemption	Y	C	
8-7-301	Phase I Requirements	Y	C	
8-7-301.1	Requirements for Transfers into Stationary Tanks, Cargo Tanks, and Mobile Refuelers	Y	C	
8-7-301.2	CARB Certification Requirements	Y	C	



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**Source #:** S-14      **Source Name:** Non-Retail Gasoline Dispensing Facility G#11138

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
8-7-301.3	Submerged Fill Pipe Requirement	Y	C	
8-7-301.5	Maintenance and Operating Requirement	Y	C	
8-7-301.6	Leak-Free and Vapor Tight Requirement for Components	Y	C	
8-7-301.7	Fitting Requirements for Vapor Return Line	Y	C	
8-7-301.8	Coaxial Phase I Systems Certified by CARB prior to January 1, 1994 may not be installed on New or Modified Systems	Y	C	
8-7-301.9	Anti-rotational Coupler or Swivel Adapter Required	Y	C	
8-7-301.10	Vapor Recovery Efficiency Requirements for New and Modified Systems	Y	C	
8-7-301.12	Spill Box Drain Valve Limitation	Y	C	
8-7-301.13	Annual Vapor Tightness Test Requirement	Y	C	
8-7-302	Phase II Requirements	Y	C	
8-7-302.1	Requirements for Transfers into Motor Vehicle Fuel Tanks	Y	C	
8-7-302.2	Maintenance Requirement	Y	C	
8-7-302.3	Proper Operation and Free of Defects Requirements	Y	C	
8-7-302.4	Repair Time Limit for Defective Components	Y	C	
8-7-302.5	Leak-Free and Vapor Tight Requirement for Components	Y	C	
8-7-302.6	Requirements for Bellows Nozzles	Y	C	
8-7-302.7	Requirements for Vapor Recovery Nozzles on Balance Systems	Y	C	
8-7-302.8	Minimum Liquid Removal Rate	Y	C	
8-7-302.9	Coaxial Hose Requirement	Y	C	
8-7-302.10	Construction Materials Specifications	Y	C	
8-7-302.12	Liquid Retain Limitation	Y	C	
8-7-302.13	Nozzle Spitting Limitation	Y	C	
8-7-302.14	Annual Back Pressure Test Requirements for Balance Systems	Y	C	

# Compliance Certification Report

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**Source #:** S-14      **Source Name:** Non-Retail Gasoline Dispensing Facility G#11138

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
8-7-302.15	Annual Testing Requirements for Vacuum Assist Systems	Y	C	
8-7-303	Topping Off	Y	C	
8-7-304	Certification Requirements	Y	C	
8-7-306	Prohibition of Use	Y	C	
8-7-307	Posting of Operating Instructions	Y	C	
8-7-308	Operating Practices	Y	C	
8-7-309	Contingent Vapor Recovery Requirement	Y	C	
8-7-313	Requirements for New or Modified Phase II Installations	Y	C	
8-7-314	Hold Open Latch Requirements	Y	C	
8-7-316	Pressure Vacuum Valve Requirements, Aboveground Storage Tanks and Vaulted Below Grade Storage Tanks	Y	C	
8-7-401	Equipment Installation and Modification	Y	C	
8-7-406	Testing Requirements, New and Modified Installations	Y	C	
8-7-407	Periodic Testing Requirements	Y	C	
8-7-408	Periodic Testing Notification and Submission Requirements	Y	C	
8-7-501	Burden of Proof	Y	C	
8-7-502	Right of Access	Y	C	
8-7-503	Recordkeeping Requirements	Y	C	
8-7-503.1	Gasoline Throughput Records	Y	C	
8-7-503.2	Maintenance Records	Y	C	
8-7-503.3	Records Retention Time	Y	C	
<b>40 CFR Part 63, Subpart A</b>	<b>National Emission Standards for Hazardous Air Pollutants-General Provisions (9/13/10)</b>			
63.4	Prohibited activities and circumvention	Y	C	
63.5	Preconstruction review and notification requirements	Y	C	

# Compliance Certification Report

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**Source #:** S-14      **Source Name:** Non-Retail Gasoline Dispensing Facility G#11138

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
63.5(b)	Requirements for existing, newly constructed, and reconstructed sources	Y	C	
63.6	Compliance with standards and maintenance requirements	Y	C	
63.8	Monitoring requirements	Y	C	
63.10	Record keeping and reporting requirements	Y	C	
63.10(b)	General record keeping requirements	Y	C	
63.10(c)	Additional record keeping requirements for sources with continuous monitoring systems	Y	C	
63.10(d)	General reporting requirements	Y	C	
63.10(e)	Additional reporting requirements for sources with continuous monitoring systems	Y	C	
<b>40 CFR Part 63, Subpart CCCCC</b>	<b>National Emission Standards for Hazardous Air Pollutants for Gasoline Dispensing Facilities (1/24/2011)</b>			
63.11110	What is the purpose of this subpart?	Y	C	
63.11111	Am I Subject to the requirements in this subpart	Y	C	
63.11111(a)	Each GDF that is located at an area source	Y	C	
63.11111(c)	Monthly throughput of 10,000 gallons of gasoline or more subject to 63.11117	Y	C	
63.11111(e)	Demonstrate their monthly throughput level as specified in 63.11112(d)	Y	C	
63.11111(i)	If throughput ever exceeds an applicable throughput threshold, the affected source will remain subject to the requirements for sources above the threshold	Y	C	
63.11112	What parts of my affected source does this subpart cover?	Y	C	
63.11112(a)	Gasoline storage tanks and associated equipment compounds in vapor or liquid gasoline service	Y	C	

# Compliance Certification Report

**Site #:** A2039      **Site Name:** Potrero Hills Landfill      **Reporting Period:** 08/01/2019 to 07/31/2020  
**Address:** 3675 Potrero Hills Lane      **City:** Suisun      **Zip Code:** 94585  
**Source #:** S-14      **Source Name:** Non-Retail Gasoline Dispensing Facility G#11138

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
63.11112(d)	An affected source is an existing affected source if it is not new or reconstructed	Y	C	
63.11113	When do I have to comply with this subpart?	Y	C	
63.11113(b)	Existing sources: January 10, 2011	Y	C	
63.11113(c)	If affected source becomes subject to control requirements in this subpart because of monthly throughput increases per 63.11111(c), you must comply with standard no later than 3 years after the affected source is subject to control requirements	Y	C	
63.11113(e)	Initial compliance demonstration test	Y	C	
63.11113(e)(2)	For existing affected source, you must conduct the initial compliance test as specified in paragraphs (c)(2)(i)	Y	C	
63.11113(e)(2)(i)	For vapor balance systems installed on or before December 15, 2009, you must test no later than 180 days after the applicable compliance date specified in paragraph c of this section.	Y	C	
63.11115	What are my general duties to minimize emissions?	Y	C	
63.11115(a)	Operate and maintain affected source safety and to minimize emissions.	Y	C	
63.11115(b)	Keep applicable records and submit reports as specified in 63.11125(d) and 63.11126(b)	Y	C	
63.11116	Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline	Y	C	
63.11116(a)	Gasoline handling requirements	Y	C	
63.11116(a)(1)	Minimize gasoline spills	Y	C	
63.11116(a)(2)	Clean up spills as expeditiously as practicable	Y	C	
63.11116(a)(3)	Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use	Y	C	

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Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
63.11116(a)(4)	Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices--such as oil/water separators	Y	C	
63.11117	Requirements for facilities with monthly throughput of 10,000 gallons of gasoline or more	Y	C	
63.11117(a)	Comply with the requirements in section 63.11116(a)	Y	C	
63.11117(b)	Only load gasoline into storage tanks utilizing submerged filling as defined in 63.11132 and as specified below	Y	C	
63.11117(b)(1)	Submerged fill pipes installed on or before November 9, 2006 must be no more than 12 inches from the bottom of the tank	Y	C	
63.11117(d)	Throughput records available within 24 hours	Y	C	
63.11117(e)	You must submit the applicable notification as specified in 63.11124(a)	Y	C	
63.11117(f)	You must comply with the requirements of this subpart by the applicable dates contained in 63.11113	Y	C	
63.11124	What notifications must I submit and when?	Y	C	
63.11124(a)	If subject to the control requirements in Section 63.11117, you must comply with (a)(1-3)	Y	C	
63.11124(a)(3)	Waiver of notification requirements if operating in compliance with a local or state requirement	Y	C	
63.11125	What are my recordkeeping requirements?	Y	C	
63.11125(d)	Keep records as specified in paragraphs (d)(1) and (d)(2) of this section	Y	C	
63.11125(d)(1)	Records of the occurrence and duration of each malfunction of operation or of air pollution control and monitoring equipment	Y	C	

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**Source #:** S-14      **Source Name:** Non-Retail Gasoline Dispensing Facility G#11138

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
63.11125(d)(2)	Records of actions taken during periods of malfunction to minimize emissions in accordance with Section 63.1115(a)	Y	C	
63.11126	What are my reporting requirements?	Y	C	
63.11126(b)	Each owner or operator of an affected source under this subpart shall report by March 15 of each year, the number, duration and a brief description of each type of malfunction which occurred during the previous calendar year and which caused any applicable emission limitation to be exceeded.	Y	C	
63.11130	What parts of the General Provisions apply to me?	Y	C	
Table 3 to Subpart CCCCCC of Part 63	Applicability of General Provisions	Y	C	
BAAQMD Condition #14098	Gasoline Throughput Limit (Toxic Risk Management Policy)	Y	C	
BAAQMD Condition #25107	Static Pressure Performance Test (Regulation 8-7-407)	Y	C	
State of California, Air Resources Board, Executive Order G-70-142-B	Certification of a Phase I Vapor Recovery System for Aboveground Gasoline Storage Tanks (9/9/94)			
Paragraph 11	Applicability of Order	Y	C	
Paragraph 12	Requirements for Phase I Components	Y	C	

## Compliance Certification Report

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**Source #:** S-14      **Source Name:** Non-Retail Gasoline Dispensing Facility G#11138

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
Paragraph 13	Requirements for Fuel Delivery Components	Y	C	
Paragraph 14	Requirement to Comply with Local Air District Rules	Y	C	
Paragraph 15	Requirement to Comply with Local Fire Official's Requirements	Y	C	
Paragraph 16	Leak Free Equipment and Fittings	Y	C	
Paragraph 17	Requirement to Comply with Other Specified Rules and Regulations	Y	C	
Paragraph 18	Prohibition on Alteration of Equipment, Parts, Design, or Operation	Y	C	
Paragraph 19	This Order Supersedes EO G-70-142-A (11/19/92)	Y	C	
State of California, Air Resources Board, Executive Order G-70-125-AA	<b>Modification of the Certification of the Husky Model V Phase II Vapor Balance System (3/16/93)</b>			
Paragraph 8	Applicability of Order	Y	C	
Paragraph 9	Requirements for Components	Y	C	
Paragraph 10	Requirements for Installation	Y	C	
Paragraph 11	Limit on Dispensing Rate	Y	C	
Paragraph 12	Requirement for Use with all Vehicles	Y	C	
Paragraph 13	Requirement to Comply with Department of Food and Agriculture, State Fire Marshall's Office, and OSHA	Y	C	
Paragraph 14	Performance Criterion	Y	C	
Paragraph 15	Prohibition on Alteration of Equipment, Parts, Design, or Operation	Y	C	
Paragraph 16	Requirement to Operate in Accordance with Manufacturer's Recommendations	Y	C	
Paragraph 17	Requirement for Performance Check	Y	C	



**Attachment – October 4, 2019 Title V 30-Day Follow-up Report  
(includes the September 13, 2019 Title V 10-Day Deviation  
Notification Letter and NOV Response Letter as Attachment A)**

October 4, 2019  
Project No. 01204082.01, Task 81

Salvador Rueda  
Compliance and Enforcement Division  
Bay Area Air Quality Management District  
375 Beale Street  
San Francisco, CA 94105  
(415) 749-5067

**Subject: TITLE V 30-DAY FOLLOW UP REPORTING FOR POTRERO HILLS LANDFILL  
(FACILITY NO. A2039)**

Dear Mr. Rueda:

SCS Engineers (SCS) is submitting this 30-day follow-up report on behalf of Potrero Hills Landfill, Inc. (PHLF) regarding the Bay Area Air Quality Management District (BAAQMD or District) Compliance and Enforcement Division's (Division) determination that several deviations from the Potrero Hills Landfill (Potrero) Permit to Operate (PTO) were identified by Division staff during a site visit on September 4, 2019. This determination resulted in the Division issuing two Notices of Violation (NOVs), #A56042 and #A56043. This letter includes supplemental information regarding the corrective actions that were completed to achieve compliance and is intended to satisfy the 30-day reporting requirement for both NOVs as specified in Potrero's Major Facility Review (MFR) Permit's Standard Condition F.

## **BACKGROUND**

On September 4, 2019, a total of eight Division personnel arrived at Potrero for a site inspection. PHLF staff and SCS staff were also present at the inspection. Division staff spent approximately 6 hours conducting surface emissions sweeps over an extensive portion of the waste area in search of any locations with methane emissions in excess of the regulatory limit of 500 parts per million by volume (ppmv). Their efforts were almost exclusively focused on penetrations of the landfill surface (e.g. landfill gas extraction wells and leachate system risers).

Division staff informed PHLF and SCS that they had identified surface emission monitoring (SEM) exceedances at 14 locations, all at surface penetrations. In addition they identified excessive emissions coming from two components, one landfill gas well and one leachate riser. NOV #A56043 was issued for the 14 surface penetration leak exceedances, and NOV #A56402 was issued for the two component leak exceedances.

Note that Division staff did not provide PHLF with a list of the fourteen out-of-compliance surface penetration locations or the two components on the day of the inspection; nor was any monitoring data or related documentation provided. The only details that PHLF and SCS had of alleged violations is a photo of an inspector's notes, taken by SCS staff with a cell phone camera. As a result, PHLF was not certain of which surface penetrations and components were found to be out of compliance. Nonetheless, PHLF staff proceeded with corrective action based on their best estimate of the out-of-compliance locations in order to meet the 5-day correction action requirement.



The above information as well as several concerns SCS and PHLF staff had with the District inspection procedures were included in the September 13, 2019 Title V 10-Day Deviation Notification Letter and NOV Response letter SCS submitted on behalf of PHLF which is included as **Attachment A** for reference. A copy of the cell phone photo of the inspector's notes as well as a 5-day corrective action table were also included in this submittal.

In addition, it was also discussed in the September 13, 2019 response letter that SCS staff commenced the third quarter SEM at Potrero on August 20, 2019. During this monitoring event, SCS staff had identified that 16 individual surface penetrations exceeded the regulatory limit of 500 ppmv. This information was disclosed to Division staff and documentation showing the corrective actions associated with these exceedances was provided to Division staff during the inspection. It was also discussed with Division staff that the initial corrective action was conducted the same day as the exceedance, on August 20, 2019, which involved opening the valve on each well in question to increase the vacuum, and reduce surface emissions at the well penetrations.

However, PHLF and SCS staff determined further corrective actions were needed which included removing the first 2 to 3 feet of material packed around the penetration and replacing it with bentonite, to provide a more effective seal. Borehole emission control (BEC) systems were also installed at each borehole. These actions were performed at each of the 16 wells on either August 26 or August 27, constituting the second round of corrective actions. The wells were re-monitored again on August 30, and all 16 were documented to be well below the compliance limit, but the required 30-day follow up testing had not yet been performed.

The repair log that was shared with Division staff during the inspection did not include the vacuum increases, and Division staff advised that an additional column may need to be added that indicated the initial corrective action was performed on the same day the initial exceedances were discovered. SCS and PHLF staff were told that they would be notified if that additional documentation was necessary. However, the next communication received from Division staff was an email on September 6, 2019 informing SCS and PHLF that "after a meticulous" review Division Management Staff had determined that PHLF failed to perform and document corrective action within 5 days. As a consequence, the Division intended to add 10 exceedances to the other violations cited on NOV #A56043 and stated that the amended NOV would include 24 surface leaks that needed to be repaired in order to clear the NOV.

The attached September 13, 2019 response letter included the August 20, 2019 field log, documenting that valve adjustments to increase vacuum to the wells in question were made within 5 days of the initial August 20 exceedances.

Please note that official documentation of the violations alleged to have been identified was not provided to PHLF until September 23, 2019, 14 days after the 5-day initial corrective action was due. In addition, documentation showing the 10 wells the Division intends to add to the NOV was also not provided until September 23, 2019.

## **CORRECTIVE ACTIONS**

As mentioned in the September 13, 2019 letter, initial corrective actions for the 14 surface exceedances identified by Division staff included removing the top 2 to 3 feet of material around the penetration and then re-sealing the borehole with bentonite/soil and wetting and compacting the

material which was conducted on September 5, 6, and 7, 2019. For the two component leaks, a silicone gasket seal was placed on leachate riser, LMW-02, on September 6 and 11, 2019, and the rubber flex connector on extraction well 18-01 was adjusted on September 6, 2019.

Once Division staff stated they would be adding 10 additional surface penetration exceedances to the NOV that had been previously identified by SCS staff, corrective action was conducted on all 16 surface penetrations, as Division staff did not specify which 10 locations of the 16 they were citing. Corrective actions also included removing the top 2 to 3 feet of material around the penetration and then sealing the borehole with bentonite/soil, wetting and compacting the material and re-installing the BEC system which was initiated on September 11, 2019 and completed on September 12, 2019.

On September 17, 2019, Division personnel returned to Potrero to re-monitor the locations. During the re-inspection, many of the areas had returned to compliance, but there were still eight surface exceedances and one component exceedance (LMW-02). Additional BEC systems were installed on the wells that still demonstrated exceedances on various dates. LMW-02 was also connected to a vacuum source on September 19, 2019 to apply slight negative pressure to this leachate monitoring well. **Table 1** (attached) lists the corrective actions for all of the 24 surface exceedances and the two component exceedances and the associated dates these actions were completed. Additionally, wellfield adjustments were also performed on September 9, 13, 17, 19, 24, 26, and 30, 2019 to enhance the landfill gas extraction in the entire area.

On October 3, 2019, Division staff returned to re-monitor the remaining locations that were observed to be out of compliance. During the October 3, 2019 event, all remaining locations indicated no exceedances of the 500 ppmv methane regulatory threshold, thus demonstrating compliance.

## CLOSING

SCS and PHLF would like to thank the BAAQMD for its consideration of the information provided in this letter as well as the September 13, 2019 10-Day Deviation Notification Letter and NOV Response letter previously submitted. Please contact Haley DeLong at 707-236-3788 or Marcus Dufort, Potrero Environmental Engineer, at 707-432-4624 if you have any questions or wish to discuss this matter further.

Sincerely,



Haley DeLong  
Project Professional  
**SCS ENGINEERS**



Michael O'Connor  
Project Manager  
**SCS ENGINEERS**

Mr. Rueda  
October 4, 2019  
Page 4

Cc: Ed Giacomo, BAAQMD  
Kevin Iler, WC  
Dave Jappert, WC  
Marcus Dufort, WC  
Tom Reilly, WC  
Jeff Clarin, WC  
John Perkey, WC  
Michael H. Zischke, Cox, Castle & Nicholson, LLP

Table: Table 1 - Corrective Action Log

Attachments: Attachment A - Title V 10-Day Deviation Notification Letter and NOV Response Letter  
dated September 13, 2019

Table 1 – Corrective Action Log

**BAAQMD INSPECTION CORRECTIVE ACTION LOG**  
**POTRERO HILLS LANDFILL**  
**Inspection Date: 09-04-2019**

<b>Well ID Number</b>	<b>Corrective Action, (Date Completed)</b>
07-07R	BEC installed (8/27/19), Bentonite Seal (9/11/19), Soil mound (9/11/19), Wetted and Compacted (9/11/19)
07-12	BEC installed (8/26/19), Bentonite Seal (9/11/19), Soil mound (9/11/19), Wetted and Compacted (9/11/19)
EW-14-07	BEC installed (8/26/19), Bentonite Seal (9/11/19), Soil mound (9/11/19), Wetted and Compacted (9/11/19)
HC 14-07	BEC installed (8/26/19), Bentonite Seal (9/11/19), Soil mound (9/11/19), Wetted and Compacted (9/11/19)
07-06R	BEC installed (8/26/19), Bentonite Seal (9/11/19), Soil mound (9/11/19), Wetted and Compacted (9/11/19)
16-03	BEC installed (8/27/19), Bentonite Seal (9/11/19), Soil mound (9/11/19), Wetted and Compacted (9/11/19)
18-05	Bentonite Seal (9/11/19), Soil mound (9/11/19), Wetted and Compacted (9/11/19)
15-13	BEC installed (8/26/19), Bentonite Seal (9/11/19), Soil mound (9/11/19), Wetted and Compacted (9/11/19)
15-18	Soil mound (9/12/19), Wetted and Compacted (9/12/19)
09-01	Wetted and Compacted (9/12/19)
EW-17-02	Bentonite seal (9/5/19), Soil mound (9/6/19), Wetted and Compacted (9/7/19), Bentonite Seal (9/11/19), Soil mound (9/11/19), Wetted and Compacted (9/11/19)
Decom Well (LEW 17-01)	Bentonite seal (9/5/19), Soil mound (9/6/19), Wetted and Compacted (9/7/19), Soil Mound (9/10/19), Wellhead Installed (9/14/19), BEC installed (9/23/19)
GW-14	Bentonite seal (9/5/19), Soil mound (9/9/19), Wetted and Compacted (9/10/19)
18-03	Bentonite seal (9/5/19), Soil mound (9/6/19), Wetted and Compacted (9/7/19)
15-04	Bentonite seal (9/5/19), Soil mound (9/6/19), Wetted and Compacted (9/7/19)
16-05	Bentonite seal (9/5/19), Soil mound (9/6/19), Wetted and Compacted (9/7/19), BEC installed (9/27/19)
15-16	Bentonite seal (9/5/19), Soil mound (9/6/19), Wetted and Compacted (9/7/19), BEC installed (10/2/19)
14-25	Bentonite seal (9/5/19), Soil mound (9/6/19), Wetted and Compacted (9/7/19)
14-24	Bentonite seal (9/5/19), Soil mound (9/6/19), Wetted and Compacted (9/7/19)
14-23	Bentonite seal (9/5/19), Soil mound (9/6/19), Wetted and Compacted (9/7/19), BEC installed (10/2/19)
15-17	Bentonite seal (9/5/19), Soil mound (9/6/19), Wetted and Compacted (9/7/19)
16-06	Bentonite seal (9/5/19), Soil mound (9/6/19), Wetted and Compacted (9/7/19), BEC installed (10/2/19)
14-06	Bentonite seal (9/5/19), Soil mound (9/6/19), Wetted and Compacted (9/7/19), Wetted and Compacted (10/2/19)
LCRS-05	Bentonite seal (9/5/19), Soil mound (9/9/19), Wetted and Compacted (9/10/19)
LMW-02	Silicone gasket seal (9/6/19 and 9/11/19), connected to vacuum source (9/19/19)
18-01	Adjusted rubber flex connector (9/6/19)



**Attachment A – Title V 10-Day Deviation Notification Letter and NOV  
Response Letter dated September 13, 2019**

September 13, 2019  
Project No. 01204082.01, Task 81

Salvador Rueda  
Compliance and Enforcement Division  
Bay Area Air Quality Management District  
375 Beale Street  
San Francisco, CA 94105  
(415) 749-5067

**Subject: TITLE V 10-DAY DEVIATION NOTIFICATION LETTER AND NOV RESPONSE  
LETTER FOR POTRERO HILLS LANDFILL (FACILITY NO. A2039)**

Dear Mr. Rueda:

SCS Engineers (SCS) is submitting this letter on behalf of Potrero Hills Landfill, Inc. (PHLF) responding to the Bay Area Air Quality Management District (BAAQMD or District) Compliance and Enforcement Division's (Division) determination that several deviations from the Potrero Hills Landfill (Potrero) Permit to Operate (PTO) were identified by Division staff during a site visit on September 4, 2019. This letter is intended to satisfy the 10-day deviation notification requirement specified in Potrero's Major Facility Review (MFR) Permit's Standard Condition F. This letter is also intended to satisfy the requirement to submit a written response to the two Notices of Violation (NOVs) that the Division issued on the same day as the site visit (NOV #A56042 and A56043).

## **DEVIATION AND CORRECTIVE ACTIONS**

A total of eight Division personnel arrived at Potrero on September 4. PHLF staff and SCS staff were also present at the inspection. Division staff spent approximately 6 hours conducting surface emissions sweeps over an extensive portion of the waste area in search of any locations with methane emissions in excess of the regulatory limit of 500 parts per million by volume (ppmv). Their efforts were almost exclusively focused on penetrations of the landfill surface (e.g. wells and leachate system risers). Note that Potrero is required to conduct surface emissions monitoring (SEM) at least quarterly, including penetration monitoring, and that SEM was conducted most recently on August 20, 2019. Per the required protocol, SEM involves proceeding at walking speed on a serpentine pattern across the waste area with a portable methane detector, while recording readings at a set time interval. In addition, as part of required SEM procedures, all penetrations of the landfill surface cover are checked for leakage at the penetration. This penetration monitoring process typically takes at most one minute at each penetration, and involves passing the detector over the soil or other material around the penetration as well as checking the component itself (piping, connections, etc.) for leaks.

Division staff informed PHLF and SCS that they had identified SEM exceedances at 14 locations, all at penetrations. In addition they identified excessive emissions coming from two components, one well and one leachate riser. NOV #A56043 was issued for the 14 penetration exceedances, and NOV #A56402 was issued for the two component leak exceedances.



Note that Division staff did not provide PHLF with a list of the out of compliance penetration locations or the two components on the day of the inspection; nor was any monitoring data or related documentation provided. The only details that PHLF and SCS has of alleged violations is a photo of an inspector's notes, taken by SCS staff with a cell phone camera. So PHLF still is not certain of which penetrations and components were found to be out of compliance. Nonetheless, PHLF staff have proceeded with corrective action based on their best guess of the out-of-compliance locations. A copy of the photo of the inspector's notes as well as a 5-day corrective action table are attached.

No documentation of the violations alleged to have been identified has been provided to PHLF to-date.

For routine, quarterly SEM, in the case of any self-identified SEM exceedance, adjustments to the gas collection system are typically made on the same day to increase vacuum in the vicinity of the exceedances. If that initial corrective measure is found to have controlled the exceedance, there would typically be no further corrective action performed. For any location for which this initial corrective action does not result in adequate control/correction of the exceedance, additional corrective measures are implemented. For a penetration, this may involve removing and replacing the material around the penetrating component. For non-penetration surface locations, additional cover soil would typically be applied over the location to control the exceedance.

In the case of the exceedances identified by the Division, adjustments were made to the wellfield by SCS and Potrero on September 5, the day after the inspection, due to the fact that Division staff did not finish the inspection activities until very late the previous day. In addition to the wellfield adjustments, corrective action at the locations (believed by PHLF to be those identified by Division staff), including the removal of the top 2 to 3 feet of material around the penetrations and replacement with bentonite, was initiated. Due to the high number of penetrations that were allegedly in exceedance (the Division subsequently added 10 more penetration locations to the list of violations), this work is ongoing. Upon completion of this corrective action, expected by September 13, 2019, all locations will be remonitored, and the data will be provided to the District as part of the required 30-day follow-up reporting. All exceedances will be corrected in the timeframes allowed by applicable rules.

## **DISCUSSION OF CONCERNS WITH INSPECTION PROCEDURES**

SCS would like to note several concerns that PHLF and SCS have with the manner in which the Potrero inspection was conducted.

### **Inspection of Surface Penetrations:**

Division inspectors were focusing almost exclusively on penetrations. SCS and PHLF staff observed that Division staff were spending an unusually long amount of time at each penetration, up to 15 minutes on a single penetration in many instances. In addition, SCS and PHLF observed inspectors repeatedly disturbing the ground and cover vegetation, attempting to disrupt the surface of the cover and to get the probe as close as possible to the surface. This type of activity is troubling considering that it is not in line with appropriate testing protocol. In contrast, the standard duration for checking penetrations and components for excessive emissions is a minute or less, and standard procedure would be to sweep the probe around the penetration and along any component that is present

without disturbing the ground. This is ample time to confirm whether or not there is a problem at a penetration. The duration of such individual surface testing and the behavior of the inspectors during such testing raises concerns regarding the protocol for conducting such testing. Further, any attempts to impact the ground around a penetration could actually cause a leak that would not have occurred otherwise.

#### **Self-Reported Exceedances Added To NOV**

SCS staff most recently commenced quarterly SEM at Potrero on August 20, 2019. This monitoring resulting in identifying 22 grids (out of a total of over 160 grids) that exceeded the integrated limit of 25 ppmv (the site is divided into 50,000 square foot grids, with a limit of 25 ppmv average for all readings taken within each grid). In addition, 16 individual penetrations were identified as exceeding the instantaneous limit of 500 ppmv. While this is certainly not a desirable outcome, we should note that this time of year is typically the worst for surface leaks, as the ground has become increasingly dry throughout the summer, and the surface material has a tendency to shrivel and develop cracks through which landfill gas could escape.

Corrective action and remonitoring of these grids and penetrations, as required by applicable regulation, is ongoing, as allowed by the regulations. In addition, it should be noted that PHLF had already identified the area that encompasses the detected exceedances as an area of concern for surface exceedances, and as such, PHLF already had a plan in place to install several new wells in the area. In short, the area in question was already, at the time of the inspection, undergoing short-term corrective action. And long-term corrective action (wellfield expansion) has already been scheduled. It is standard practice that any exceedances identified by the site and self-reported are not considered violations, as long as corrective action and remonitoring, as required by the regulation, is performed.

All of these considerations notwithstanding, SCS and Potrero were informed that Division management had made a determination that an additional 10 penetration exceedances which were already self-identified by Potrero were going to be added to NOV #A56043. The basis given by the inspector for determining that these 10 exceedances constituted violations was that Potrero had failed to satisfy the 5-day corrective action requirement. However, this was simply not the case.

The initial detection of the exceedances was August 20. As previously discussed, the standard corrective action, typically taken on the same day as the exceedance detection, would be to open the valve wider on the individual well in question to increase vacuum, and reduce surface emissions at the penetration. This was done in all 16 cases on August 20, the same day as the initial detection, as is the case 99.9% of the time in similar circumstances. A copy of the SCS field notes for August 20, 2019 is attached, documenting that valve adjustments were made on all 16 wells to increase vacuum. These actions clearly constitute corrective action within 5 days of the exceedance. It was determined that further corrective action was warranted. This corrective action included removing the first 2 to 3 feet of material packed around the penetration and replacing it with bentonite, to provide a more effective seal. In addition, a specialized component (a borehole emission control system) was installed at each borehole. These actions were performed at each of the 16 wells on either August 26 or August 27, constituting the second round of corrective actions. The wells were then remonitored again on August 30, and all 16 were documented to be well below the compliance limit.

This process plays out all the time at landfills throughout California and the United States; and the outcome is that there is no violation; corrective action requirements are met, exceedances are detected and corrected within the timeline specified in the applicable regulations. There is no compliance issue unless the site does not follow the specified corrective action and re-monitoring requirements. The Division has decided to add 10 more violations onto the previously issued NOV for those exceedances self-identified by PHLF, even though PHLF has followed the specified corrective action and re-monitoring requirements.

Division staff brought up the fact that the corrective action documented was completed after 5 days. It was then explained to Division staff that the standard initial corrective action, which was performed in this instance, is to increase vacuum at the penetration on the same day as the detection. However, this initial vacuum adjustment was not included in the repair log that was shown to Division staff on the day of the inspection; only the secondary corrective action and the remonitoring were included.

During the inspection and a subsequent meeting, SCS and PHLF staff discussed with Division staff the log from the August 20 SEM event of physical repairs that were performed at the penetration locations that SCS had self-identified as having exceedances; and this log was provided to Division staff. At that time, Division staff were told that the initial corrective action was a vacuum increase at each of the wells with exceedances. When that was not successful, additional repairs were performed within the 10 days, as required and as noted on the repair log. During the meeting, Division staff advised that an additional column may need to be added that indicated the initial activity was performed on the same day the initial exceedances were discovered. SCS and PHLF staff were told that they would be notified if that additional documentation was necessary. However, the next communication received from Division staff was an email informing SCS and PHLF that "after a meticulous review" Division Management Staff has determined that PHLF failed to perform and document corrective action within 5 days. As a consequence, the Division intended to add 10 exceedances to the other violations cited on the NOV.

The attached August 20, 2019 field log documents that valve adjustments to increase vacuum to the wells in question were made within 5 days of the initial August 20 exceedances. As such, none of those exceedances is violations, and none should be added to the NOV issued to Potrero on September 4, 2019. We wish to note that the Division never provided a list of the 10 wells it intended to add; however, as discussed, none of the 16 exceedances detected on August 20 constitute a violation.

#### **Citation of Violations Within Grids Already Self-Identified with Excessive Emissions**

During the inspection, SCS notified Division staff that there were numerous grids that had been self-identified as having excessive emissions. Therefore, for any such grid, the entire grid is currently above the compliance limit but within the regulatory corrective action timeline, and so no new exceedances could be cited as violations as part of the inspection. The intent was to avoid having Division staff focus their attention and efforts on those grids already identified as being in exceedance. However, Division staff informed SCS and PHLF that those grids were out of compliance with the integrated limit, but that the District could still cite them for violations if any individual locations within the grids were found to be over the instantaneous limit. In following up on this interpretation, Division staff inspected numerous penetrations within the grids in question and found several exceedances of the instantaneous limit, which were then cited on the NOV.



We strongly contend that Division's position on exceedances within grids already identified by the facility as having excessive integrated exceedances, is not a correct interpretation; and that no such exceedances should be deemed violations while the grids are within the corrective action timeline specified in the applicable regulation. Because PHLF has never received from the Division a list of penetrations allegedly identified as being out of compliance, PHLF and SCS cannot determine with certainty if or how many penetrations identified by the Division are within the already out-of-compliance grids. However, any such penetrations that have been cited as violations should not be considered violations.

#### **Failure to Provide Documentation of Division-Identified Exceedances**

Near the end of the inspection day, Division staff discussed with SCS and PHLF staff the violations they had identified; however, no violation locations or documentation had been provided to SCS or PHLF staff up to that point. Division staff said the information would be provided the next day; however, no documentation has been provided to-date. An SCS staff managed to take a cell-phone photo of an inspector's notes. This is the only documentation obtained to-date by SCS or PHLF associated with the inspection (see attached copy of photo)

On the day of the inspection, PHLF and SCS staff also requested additional documentation associated with the monitoring, information which is required to be recorded in accordance with the monitoring protocol, including equipment calibration data and background monitoring data. They were informed by Division staff that the information could be obtained by submitting a Freedom of Information Act request to the BAAQMD.

### **CLOSING**

It is our intention in submitting this letter to document, for the record, the events associated with the September 4, 2019 inspection and issuance of the two NOV. We are providing in this letter additional information, as well as observations, associated these events. We propose the following conclusions:

NOV #56042: This NOV identified two specific components with leaks in excess of the limit allowed under the applicable regulation. These leaks were verified by PHLF and SCS. PHLF considers this NOV to be warranted and is not contesting it.

NOV #56043: This NOV cited 14 surface leaks over the limit allowed under the applicable regulation. None of the 14 locations were cited on the NOV. We are contesting the cited violations for the following reasons:

- None of the 14 locations has been identified by the District nor has any documentation of the monitoring results or monitoring procedure been provided to PHLF. As such, the details could not be reviewed or assessed; and PHLF could not verify the violations, or even the location of the alleged violations.
- Numerous irregularities were observed in how Division staff were conducting the monitoring, which call into serious question the validity of the Divisions results.

Mr. Rueda  
September 13, 2019  
Page 6

Regarding the 10 alleged violations the Division has said it will add to NOV #56403, we have documented that corrective action was initiated in all cases within 5 days of the initial exceedance, and therefore, no violations occurred. We request that no additional citations be added to the NOV.

SCS and PHLF thank the BAAQMD for its consideration of the information provided in this letter. Please contact Michael O'Connor at 707-236-3791 or Marcus Dufort, Potrero Environmental Engineer, at 707-432-4624 if you have any questions or wish to discuss this matter further.

Sincerely,



Michael O'Connor  
Project Manager  
SCS Engineers

Cc: Ed Giacomo, BAAQMD  
Kevin Iler, WC  
Dave Jappert, WC  
Marcus Dufort, WC  
Tom Reilly, WC  
Jeff Clarin, WC  
John Perkey, WC  
Michael H. Zischke, Cox, Castle & Nicholson, LLP

Attachments: NOV # A-56042 and A-56043  
Photo of Division September 4, 2019 Inspection Notes [SCSFS]  
PHLF 5-day Corrective Action Log (9-10-2019) [SCSFS]  
PHLF Aug. 20, 2019 SEM - Testing Results and corrective action log (SCSFS)  
PHLF Aug. 20, 2019 SEM - Field Notes (SCSFS)



## Attachments

**NOTICE OF VIOLATION** No. **A 56043**

ISSUED TO: Robert Hillford Hill  P  G  N# A 2039  
 ADDRESS: 3625 Potrero Hill Road  
 CITY: Suisun STATE: CA ZIP: 94585  
 PHONE: (707) 432-4626  
 Mailing Address on F61

OCCURRENCE  
 NAME: \_\_\_\_\_  
 ADDRESS: \_\_\_\_\_  Same As Above  
 CITY: \_\_\_\_\_ ZIP: \_\_\_\_\_  
 SOURCE: S# 1 NAME: Landfill  
 EMISSION PT: P# \_\_\_\_\_ NAME: \_\_\_\_\_  
 DATE: 9-4-19 TIME: 15:45 HRS

REG 2 RULE 1 SEC 301 No Authority to Construct  
 REG 2 RULE 1 SEC 302 No Permit to Operate  
 REG 1 SEC 301 H & S CODE - 41700 Public Nuisance  
 REG 2 RULE SEC 307 Failure to Meet Permit Condition  
 REG 5 SEC 301 Prohibited Open Burning  
 REG 6 RULE 1 SEC 301 Excessive Visible Emissions  
 REG 8 RULE 34 SECTION 303 CODE \_\_\_\_\_  
 REG 17 RULE \_\_\_\_\_ SECTION 954646 CODE \_\_\_\_\_  
 Details: 14 Surface loads > 500 PPM

RECIPIENT NAME: Kevin Eker  
 TITLE: District operations manager  
 SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT

WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.

ISSUED BY: S. Rueda INSP # 7-667  
 DATE: 9-4-19 TIME: 15:45 HRS  MAILED

**PLEASE PRESS HARD**

**NOTICE OF VIOLATION** No. **A 56042**

ISSUED TO: Robert Hillford Hill  P  G  N# A 2039  
 ADDRESS: 3625 Potrero Hill Road  
 CITY: Suisun STATE: CA ZIP: 94585  
 PHONE: (707) 432-4626  
 Mailing Address on F61

OCCURRENCE  
 NAME: \_\_\_\_\_  
 ADDRESS: \_\_\_\_\_  Same As Above  
 CITY: \_\_\_\_\_ ZIP: \_\_\_\_\_  
 SOURCE: S# 1 NAME: Landfill  
 EMISSION PT: P# \_\_\_\_\_ NAME: \_\_\_\_\_  
 DATE: 9/4/19 TIME: 15:45 HRS

REG 2 RULE 1 SEC 301 No Authority to Construct  
 REG 2 RULE 1 SEC 302 No Permit to Operate  
 REG 1 SEC 301 H & S CODE - 41700 Public Nuisance  
 REG 2 RULE SEC 307 Failure to Meet Permit Condition  
 REG 5 SEC 301 Prohibited Open Burning  
 REG 6 RULE 1 SEC 301 Excessive Visible Emissions  
 REG 8 RULE 34 SECTION 306.2 CODE \_\_\_\_\_  
 REG \_\_\_\_\_ RULE \_\_\_\_\_ SECTION \_\_\_\_\_ CODE \_\_\_\_\_  
 Details: Component level loads #31001 & LNW-02

RECIPIENT NAME: Kevin Eker  
 TITLE: District operations manager  
 SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT

WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.

ISSUED BY: S. Rueda INSP # 7-667  
 DATE: 9-4-19 TIME: 15:45 HRS  MAILED

**PLEASE PRESS HARD**



Third Quarter 2019  
Potrero Hills Landfill  
Surface Emissions Testing Results

Well ID	Sample Date	Reading (ppm)	Report Date, Report Type	Test Result
17-02	2019-09-20 13:00	750	8-26-19	Surface emissions control system installed 2019-08-22
1803	2019-09-20 13:10	1000	8-27-19	Surface emissions control system installed 2019-08-22
1504	2019-09-20 13:20	900	8-26-19	Surface emissions control system installed 2019-08-22
1605	2019-09-20 13:30	1000	8-26-19	Surface emissions control system installed 2019-08-22
1516	2019-09-20 13:40	800	8-26-19	Surface emissions control system installed 2019-08-22
14-25	2019-09-20 13:50	700	8-27-19	Surface emissions control system installed 2019-08-22
14-24	2019-09-20 14:00	800	8-27-19	Surface emissions control system installed 2019-08-22
14-23	2019-09-20 14:10	900	8-27-19	Surface emissions control system installed 2019-08-22
15-17	2019-09-20 14:20	1000	8-27-19	Surface emissions control system installed 2019-08-22
16-06	2019-09-20 14:30	1100	8-27-19	Surface emissions control system installed 2019-08-22
14-06	2019-09-20 14:40	1200	8-27-19	Surface emissions control system installed 2019-08-22

- 1- Surface 17-02
- 2- Recomm well
  - GW14
  - 1803 - 1.440
  - 1504 - 9k
  - 1605 - 1.067.
  - 1516
  - 14-25
  - 14-24
  - 14-23
  - 15-17 \*07-07
  - 16-06
  - 14-06 LCRS05

Component LMW-02  
1.34% →  
EW1801 - 1.08% C.  
2

BAAQMD INSPECTION 5-DAY CORRECTIVE ACTION LOG  
 POTRERO HILLS LANDFILL  
 Inspection Date: 09-04-2019

Well ID Number	Corrective Action, (Date Completed)
EW-17-02	Bentonite seal (9/5), Soil mound (9/6), Wetted and Compacted (9/7)
Decom Well	Bentonite seal (9/5), Soil mound (9/6), Wetted and Compacted (9/7), Soil Mound (9/10)
GW-14	Bentonite seal (9/5), Soil mound (9/9), Wetted and Compacted (9/10)
18-03	Bentonite seal (9/5), Soil mound (9/6), Wetted and Compacted (9/7)
15-04	Bentonite seal (9/5), Soil mound (9/6), Wetted and Compacted (9/7)
16-05	Bentonite seal (9/5), Soil mound (9/6), Wetted and Compacted (9/7)
15-16	Bentonite seal (9/5), Soil mound (9/6), Wetted and Compacted (9/7)
14-25	Bentonite seal (9/5), Soil mound (9/6), Wetted and Compacted (9/7)
14-24	Bentonite seal (9/5), Soil mound (9/6), Wetted and Compacted (9/7)
14-23	Bentonite seal (9/5), Soil mound (9/6), Wetted and Compacted (9/7)
15-17	Bentonite seal (9/5), Soil mound (9/6), Wetted and Compacted (9/7)
16-06	Bentonite seal (9/5), Soil mound (9/6), Wetted and Compacted (9/7)
14-06	Bentonite seal (9/5), Soil mound (9/6), Wetted and Compacted (9/7)
LCRS-05	Bentonite seal (9/5), Soil mound (9/9), Wetted and Compacted (9/10)
LMW-02	Silicone gasket seal (9/6)
18-01	Adjusted rubber flex connector (9/6)

**Third Quarter 2019  
Potrero Hills Landfill  
Surface Emissions Testing Results**

Well ID	Date/Time	Initial Corrective Action	Reading (ppm)	Repair date/Repair type	Re-testing Date (10 - day)	Re-testing Results
0708R	2019-08-20T18:21:43Z	Vacuum Increase 8-20-19	750	8-26-19 - Borehole emissions control system installed	2019-08-30T17:48:07Z	100
0901	2019-08-20T18:10:15Z	Vacuum Increase 8-20-19	1000	8-27-19 - Borehole emissions control system installed	2019-08-30T19:27:33Z	35
1407	2019-08-20T18:29:10Z	Vacuum Increase 8-20-19	6000	8-26-19 - Borehole emissions control system installed	2019-08-30T19:20:43Z	250
1513	2019-08-20T18:26:47Z	Vacuum Increase 8-20-19	5800	8-26-19 - Borehole emissions control system installed	2019-08-30T17:59:40Z	350
EW0607R	2019-08-20T19:37:25Z	Vacuum Increase 8-20-19	3600	8-27-19 - Borehole emissions control system installed	2019-08-30T18:43:30Z	200
EW0706R	2019-08-20T19:55:57Z	Vacuum Increase 8-20-19	4500	8-26-19 - Borehole emissions control system installed	2019-08-30T19:36:18Z	150
EW0707R	2019-08-20T18:45:21Z	Vacuum Increase 8-20-19	5300	8-27-19 - Borehole emissions control system installed	2019-08-30T18:31:02Z	175
EW0712	2019-08-20T18:43:01Z	Vacuum Increase 8-20-19	7000	8-26-19 - Borehole emissions control system installed	2019-08-30T19:59:21Z	350
EW1407	2019-08-20T19:48:34Z	Vacuum Increase 8-20-19	2000	8-26-19 - Borehole emissions control system installed	2019-08-30T18:19:31Z	200
EW1518	2019-08-20T19:31:11Z	Vacuum Increase 8-20-19	4500	8-26-19 - Borehole emissions control system installed	2019-08-30T19:01:10Z	300
EW1520	2019-08-20T19:33:41Z	Vacuum Increase 8-20-19	3700	8-27-19 - Borehole emissions control system installed	2019-08-30T18:46:47Z	100
EW1532	2019-08-20T18:05:42Z	Vacuum Increase 8-20-19	600	8-26-19 - Borehole emissions control system installed	2019-08-30T17:38:57Z	15
EW1603	2019-08-20T19:54:06Z	Vacuum Increase 8-20-19	3300	8-27-19 - Borehole emissions control system installed	2019-08-30T19:10:34Z	325
EW1604	2019-08-20T18:24:31Z	Vacuum Increase 8-20-19	2500	8-27-19 - Borehole emissions control system installed	2019-08-30T17:52:49Z	70
EW1703	2019-08-20T19:45:34Z	Vacuum Increase 8-20-19	325-550	8-27-19 - Borehole emissions control system installed	2019-08-30T18:23:24Z	150
EW1805	2019-08-20T18:34:52Z	Vacuum Increase 8-20-19	500	8-27-19 - Borehole emissions control system installed	2019-08-30T18:09:53Z	150



# SCS FIELD SERVICES

# DAILY LOG

JOB NO. 07216067.00 TASK NO. 02 DATE 8-20-19 PROJECT NAME Potrero  
 TEMP 74 BARO 28.9 WIND 8 N WEATHER Clear

SCS-FS LABOR		HOURS	OT			HOURS	OT
Ryan Haslam		8		Liam McGinn		8	
Michael Morris		8					
Don Gibson		8					
				DAILY TOTAL			
EQUIP, SVCS, MTLs, MLG		QTY	UNITS			QTY	UNITS
M-40		3					
TVA 2020		3					
INSTRUMENT CALIBRATION (CAL. GAS)		CH4 (%-VOL)	CH4 (%-LEL)	O2 LOW SCALE (%-VOL)	CO2 (%-VOL)	H2S (PPM)	
MODEL	S/N						
Flare Data	Temp	CH4	CO2	O2	Flow	H2S	
	Totalizer	Flow rate	Tank Level (In)		Totalizer	Flow Rate	
	Leachate Computer Gallon				Leachate Disc Meter		
<b>SUMMARY</b>	Arrived on site at 6am. Set up weather station and calibrated TVA units. We started walking grids, then we switched						
	Over and started checking the components, the flare, and the engine room. There were 10 grids and 16 components out						
	Of compliance. Opened wels that we found out, no changes in readings. I left copies with Marcus.						
	EW0708R-750	64-43.33					
	EW0901 -1000	34-37.67					
	EW1407- 6000	25-36.47					
	EW1513-5800	63-34.35					
	EW0607R-3600	33-29.26					
	EW0706R-4500	59-28.30					
	EW0707R-5300	38-28.22					
	EW0712-7000	62-27.16					
	EW1407-2000	65-26.22					
	EW1518-4500	26-25.26					
	EW1520-3700						
	EW1532-600						
	EW1603-3300						
	EW1604-2500						
	EW1703-325						
	EW1805-500						

PREPARED BY: \_\_\_\_\_ ACCEPTED BY: \_\_\_\_\_

## DeLong, Haley

---

**From:** postmaster@baaqmd.onmicrosoft.com  
**To:** Jeffrey Gove  
**Sent:** Friday, October 4, 2019 3:14 PM  
**Subject:** Delivered: Potrero Hills Landfill 30-Day Follow-Up Report Submittal

**Your message has been delivered to the following recipients:**

[Jeffrey Gove \(JGove@baaqmd.gov\)](mailto:JGove@baaqmd.gov)

Subject: Potrero Hills Landfill 30-Day Follow-Up Report Submittal



Potrero Hills  
Landfill 30-Day ...



**DeLong, Haley**

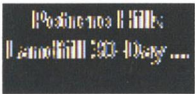
---

**From:** postmaster@baaqmd.onmicrosoft.com  
**To:** SRueda@baaqmd.gov  
**Sent:** Friday, October 4, 2019 3:14 PM  
**Subject:** Delivered: Potrero Hills Landfill 30-Day Follow-Up Report Submittal

**Your message has been delivered to the following recipients:**

[SRueda@baaqmd.gov](mailto:SRueda@baaqmd.gov) (SRueda@baaqmd.gov)

Subject: Potrero Hills Landfill 30-Day Follow-Up Report Submittal



**DeLong, Haley**

---

**From:** Microsoft Outlook  
**To:** mzischke@coxcastle.com  
**Sent:** Friday, October 4, 2019 3:14 PM  
**Subject:** Relayed: Potrero Hills Landfill 30-Day Follow-Up Report Submittal

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[mzischke@coxcastle.com](mailto:mzischke@coxcastle.com) (mzischke@coxcastle.com)

Subject: Potrero Hills Landfill 30-Day Follow-Up Report Submittal



Potrero Hills  
Landfill 30-Day ...

## DeLong, Haley

---

**From:** Microsoft Outlook  
**To:** Kevin Iler; Dave Jappert; Marcus Dufort; Tom Reilly; Jeff Clarin;  
John.Perkey@WasteConnections.com  
**Sent:** Friday, October 4, 2019 3:14 PM  
**Subject:** Relayed: Potrero Hills Landfill 30-Day Follow-Up Report Submittal

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[Kevin Iler \(kevin.iler@wasteconnections.com\)](mailto:kevin.iler@wasteconnections.com)

[Dave Jappert \(David.Jappert@WasteConnections.com\)](mailto:David.Jappert@WasteConnections.com)

[Marcus Dufort \(Marcus.Dufort@WasteConnections.com\)](mailto:Marcus.Dufort@WasteConnections.com)

[Tom Reilly \(Thomas.Reilly@WasteConnections.com\)](mailto:Thomas.Reilly@WasteConnections.com)

[Jeff Clarin \(Jeffrey.Clarin@WasteConnections.com\)](mailto:Jeffrey.Clarin@WasteConnections.com)

[John.Perkey@WasteConnections.com \(John.Perkey@WasteConnections.com\)](mailto:John.Perkey@WasteConnections.com)

Subject: Potrero Hills Landfill 30-Day Follow-Up Report Submittal



Potrero Hills  
Landfill 30-Day ...

## DeLong, Haley

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**From:** TrackingUpdates@fedex.com  
**Sent:** Tuesday, October 8, 2019 11:47 AM  
**To:** DeLong, Haley  
**Subject:** FedEx Shipment 776555294106 Delivered

===== This message originated outside of SCS Engineers =====

## Your package has been delivered

Tracking # 776555294106

Ship date:  
**Mon, 10/7/2019**

Donna Cote  
SCS Engineers  
Sacramento, CA 95827  
US

Delivery date:  
**Tue, 10/8/2019 11:43  
am**



Jeffrey Gove  
BAAQMD  
375 BEALE ST  
SAN FRANCISCO, CA 94105  
US




### Shipment Facts

Our records indicate that the following package has been delivered.

**Tracking number:** [776555294106](#)  
**Status:** Delivered: 10/08/2019 11:43 AM  
Signed for By: J.AGBUNAT  
**Reference:** 01204082.01, T-81  
**Signed for by:** J.AGBUNAT  
**Delivery location:** SAN FRANCISCO, CA  
**Delivered to:** Mailroom  
**Service type:** FedEx Standard Overnight®  
**Packaging type:** FedEx® Envelope  
**Number of pieces:** 1  
**Weight:** 0.50 lb.  
**Special handling/Services:** Deliver Weekday

**Standard transit:**

10/8/2019 by 3:00 pm

 Please do not respond to this message. This email was sent from an unattended mailbox. This report was generated at approximately 1:47 PM CDT on 10/08/2019.

All weights are estimated.

To track the latest status of your shipment, click on the tracking number above.

Standard transit is the date and time the package is scheduled to be delivered by, based on the selected service, destination and ship date. Limitations and exceptions may apply. Please see the FedEx Service Guide for terms and conditions of service, including the FedEx Money-Back Guarantee, or contact your FedEx Customer Support representative.

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Thank you for your business.