Site: City of Palo Alto Landfill Fa	Facility ID#:	A2721	
Permitted Unit: S-1 Palo Alto Landfill with Gas Collection Reporting Period:	porting Period:	from 6/1/2013 through 11/30/2013	
System; and A-3 Landfill Gas Flare			

	Type of Limit	Monitoring Requirement	Manitarian Tung	Monitoring	Citation of	- -	Compliance	Corrective Actions Taken
	Periods of	BAAQMD 1-523.4	Operating records for all	Periodic/	BAAQMD	s 15	Continuous	N.
_	Inoperation		parametric monitors	Daily	1-523.2	consecutive		
	for Parametric Monitors		(gas flow meters and temperature monitors)		****	days per incident and s		
						30 calendar		
						month period		
_	Opacity	BAAQMD Condition	Records of all site	Periodic/	DMDAAB	Ringelmann No.	Continuous	Z
_	,	#1028, Part 17d	watering and road	Event basis/	6-1-301	1 for < 3		
			cleaning events	Monthly	and SIP 6-	minutes in any		
					301	hour (applies to S-1)		
	Opacity	None	AN	None	BAAQMD	Ringelmann No.	Continuous	NA
			•		6-1-301	1 for < 3		
		-			and SIP 6-	minutes in any		
					0	flare)		
	ed.	None	NA.	None	DMDAAB	≤ 0.15	Continuous	N/A
	-				6-1-310	grains/dscf		
					and SIP 6-	(applies to flare)		
	Total Carbon	BAAQMD Condition	Surface VOC Analysis	Periodic/	BAAQMD	≤ 15 pounds per	Continuous	N A
		#1028, Part 3	and Records	Event basis ·	8-2-301	day or ≤ 300		
					and SIP 8-	ppmv, dry basis		
					2-301	(applies only to		
						aeration of or		
						use as cover		
						soil of soil		
						containing ≤ 50		
						ppmw of volatile		
						organic		
						compounds)		

Site: City of Palo Alto Landfill	Facility ID#:	A2721	İ
Permitted Unit: S-1 Palo Alto Landfill with Gas Collection 1	Reporting Period	: from 6/1/2013 through 11/30/2013	0/2013
System; and A-3 Landfill Gas Flare			

N/A	Continuous	≤ 24 hours per well	BAAQMD 8-34-117.5	Periodic/ Daily	Records	BAAQMD 8-34-117.6 and 501.1	Well Shutdown
		system, whichever is less					
		total collection	and out.				Littilis
		wells at a time	8-34-117.6	Daily			Shutdown
N/A	Continuous	No more than 5	BAAQMD	Periodic/	Records	BAAQMD 8-34-117.4	Well
		Well	8-34-176.3	Daily		and 501.1	Limits
N/A	Continuous	≤ 24 hours per	BAAQMD	Periodic/	Records	BAAQMD 8-34-116.5	Well
		whichever is less		į			
		system					
•		or <10% of total		•			Limits
N/A	Continuous	No more than 5 wells at a time	BAAQMD 8-34-116.2	Periodic/ Daily	Records	BAAQMD 8-34-116.5 and 501.1	Well Shutdown
							Time
		days					Shutdown
		year and ≤ 5	8-34-113.2	Event basis			Control
N/A	Continuous	≤ 240 hours per	BAAQMD	Periodic/	Operating Records	BAAQMD 8-34-501.1	Collection and
Corrective Actions Taken	Compliance	Limit	Limit	Frequency	Monitoring Type	Citation	or Criteria
			Citation of	Monitoring		Requirement	Type of Limit
						Monitoring	

Site: City of Palo Alto Landfill	Facility ID#:	A2721
Permitted Unit: S-1 Palo Alto Landfill with Gas Collection Reporting Period: 1	Reporting Period	: from 6/1/2013 through 11/30/2013
System; and A-3 Landfill Gas Flare		

		control system					
		operating					
		properly			,		
		vented to a	,				-
•		gases shall be		•			
		and all collected		•			
		continuously					
		operate					
		system shall	and 301.1		minutes)		
		collection	8-34-301		Recorder (every 15	501.10 and 508	
z	Continuous	Landfill gas	BAAQMD	Continuous	Gas Flow Meter and	BAAQMD 8-34-	Gas Flow
Corrective Actions Taken	Compliance	Limit	Limit	Frequency	Monitoring Type	Citation	or Criteria
			Citation of	Monitoring		Requirement	Type of Limit
				****		Monitoring	

Site: City of Palo Alto Landfill	Facility ID#:	A2721
Permitted Unit: S-1 Palo Alto Landfill with Gas Collection Reporti	Reporting Period:	from 6/1/2013 through 11/30/2013
System; and A-3 Landfill Gas Flare		

7-00	
Methane)	Type of Limit or Criteria
BAAQMD 6-34-501.6 and 503 and BAAQMD Condition # 1028, Part 17h	Monitoring Requirement Citation
collection and control system components with portable analyzer and Records	Monitoring Type
Quarterly	Monitoring Frequency
8-34-301.2	Citation of Limit
methane (component leak limit)	Limit
	Compliance
August 7, 2013 at 10:00AM, Well E-34 had a TOC concentration of 2,500 ppmv. Landfill staff immediately (3 hours and 15 minutes after discovery) pulled and raised the vault, added and compacted soil around the well, and tightened all the leachate well head fittings. The inspector returned the same day and rescanned the LFG concentration, and documented that the concentration was under the regulatory requirement. The District issued Notice of Violation (NOV) # A51071 on the date of the inspection. The City submitted a follow-up letter dated August 9, 2013 which was intended to satisfy the requirements for a 10-day response for both the deviation and the NOV; as well as the 30-day follow-up corrective action reporting requirements, as specified in the MFR Permit.	Corrective Actions Taken

System; and A-3 Landfill Gas Flare	Permitted Unit: S-1 Palo Alto Landfill with Gas Collection Reporting Period: from	Site: City of Palo Alto Landfill
	Reporting Period:	Facility ID#:
	from 6/1/2013 through 1	A2721

Type of Limit	Monitoring Requirement Citation	Monitoring Type	Monitoring	Citation of	- -	Compliance	Corrective Actions Taken
Non-Methane	BAAQMD 8-34-412	Annual Source Tests	Periodic/	BAAQMD	≤ 98% removal	Continuous	N/A
Organic	and 8-34-501.3 and	and Records	Annual	8-34-301.3	by weight OR <		
(NMOC)	BAAQMD Condition #				basis @ 3% O2,		
	1028, Parts 15 and 17h		•		expressed as methane		•
					(applies to A-3		
100	DAACAD 0 34 445	NA DEFE		2	only)		
(416, 501.6, 506 and	inspection of cover,	Monthly,	8-34-303	methane at 2	Contained	
	510 and BAAQMD	quarterly inspection of	Quarterly,		inches above		
	Condition # 1028,	surface with portable	and Event		surface		
	Part 17h	analyzer, various re- inspection times for	basis				
		leaking areas and records					=
Collection	BAAQMD	Records	Periodic /	BAAQMD	For Active	Continuous	N/A
System	8-34-501.7 and 501.8		Event basis	8-34-304.2	Areas:		
Installation	and BAAQMD				Collection	••••	-
Dates	Condition # 1028,				system		
	Parts 12a-c, 12e-f				components		***************************************
					installed and		
					operating by 5		
					years + 60 days		
					after initial		
					waste		
					placement		

Site: City of Palo Alto Landfill	Facility ID#:	A2721	
Permitted Unit: S-1 Palo Alto Landfill with Gas Collection Reporting Period: from	Reporting Period:	from 6/1/2013 through 11/30/2013	
System; and A-3 Landfill Gas Flare			

Gas Concentration s at Wellhead	Temperature of Gas at Wellhead	Wellhead Pressure	Collection System Installation Dates	Type of Limit or Criteria
	шге			Limit
BAAQMD 8-34-414, 501.9 and 505.3 or 505.4 and BAAQMD Condition # 1028, Part 17h	BAAQMD 8-34-414, 501.9 and 505.2 and BAAQMD Condition # 1028, Part 17h	BAAQMD 8-34-414, 501.9 and 505.1 and BAAQMD Condition #1028, Part 17h	BAAQMD 8-34-501.7 and 8-AAQMD Condition # 1028, Parts 12a-c, 12e-f	Monitoring Requirement Citation
Monthly Inspection and Records	Monthly Inspection and Records	Monthly Inspection and Records	Records	Monitoring Type
Periodic/ Monthly	Periodic/ Monthly	Periodic/ Monthly	Periodic / Event basis	Monitoring Frequency
BAAQMD 8-34-305.3 or 305.4	BAAQMD 8-34-305.2	BAAQMD 8-34-305.1	BAAQMD 8-34-304.3	Citation of Limit
N2 < 20% by volume OR O2 < 5% by volume	< 55 C (< 131 F)	< 0 psig	For Any Uncontrolled Areas or Cells: Collection system components must be installed and operating within 60 days after the uncontrolled area or cell accumulates 1,000,000 tons of decomposable waste	∟ imit
Continuous	Continuous	Continuous	Continuous	Compliance
N/A	N/A	N/A	NA	Corrective Actions Taken

Site: City of Palo Alto Landfill	Facility ID#:	A2721
Permitted Unit: S-1 Palo Alto Landfill with Gas Collection	Reporting Period: from	from 6/1/2013 through 11/30/2013
System; and A-3 Landfill Gas Flare		

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Gas Flow	BAAQMD 8-34-501.1,	Records of Landfill Gas	Continuous	BAAQMD	Landfill gas	Continuous	N/A
	501.2, 501.10 and	Flow Rates, Collection	Periodic /	Permit	collection		
	508 and BAAQMD	and Control Systems	Event basis	Condition	system shall		
•	Coridiiloii # 1026,	Collection System		#1020, Darts 5 6	operate		
	9	Components		and 7	and all collected		
				•	gases shall be		
					vented to a		
					properly		
					operating		
2	10 CED 60 7/h)	Opposition Poposido for	Datio I	S C F B	control system	2	
Monitors	10 (01 11 (01)	All Continuous Monitors	Daily	60.13(e)	Continuous	00000	
		(for gas flow and	,	,	Operation		
		temperature monitors)			except for		
					breakdowns,		
					repairs, calibration, and		
					required span		
					adjustments		
Startup	40 CFR 63.1980(a-b)	Records (all	Periodic /	40 CFR	Minimize	Continuous	N/A
Shutdown or		occurrences, duration of	Event basis	63.6(e)	Emissions by		
Malfunction		each, and corrective			Implementing		
Procedures		actions)			SSM Plan		
Temperature	BAAQMD	Temperature Sensor	Continuous	Permit	CT > 1420 °F,	Continuous	N/A
o,	8-34-501.3 and 507,	and Recorder		Condition	averaged over		
Combustion		(continuous)		#1028,	any 3-hour		
Zone (CT)				Part 9	period (applies		
			:		to A-3 only)		
NOX	BAAQMD	Annual Source Test and	Periodic /	BAAQMD	< 32 ppmv at	Continuous	N/A
	Condition #1028,	Records	Annual	Condition	15% O2, dry		
	Part 15 and 1/h			#1028,			

Palo Alto Landfill S-1 Palo Alto Landfill with Gas Collection Reporting Period: from 6/1/2013 through 11/30/201

H ₂ S	Total Sulfur Content in LFG	SO ₂	SO ₂	CO	Type of Limit or Criteria
None	Permit Condition #1028, Part 14 and17h	Permit Condition #1028, Part 14 and17h	None	BAAQMD Permit Condition #1028, Part 15 and 17h	Monitoring Requirement Citation
NA	Suifur analysis of landfill gas	Sulfur analysis of landfill gas	None	Annual Source Test and Records	Monitoring Type
None	Periodic / Annual	Periodic / Quarterly	None	Periodic / Annual	Monitoring Frequency
BAAQMD 9-2-301	Permit Condition #1028, Part 14	BAAQMD 9-1-302	BAAQMD 9-1-301	BAAQMD Permit Condition #1028, Part 12	Citation of Limit
Property Line Ground Level Limits: < 0.6 ppm averaged over 3 min. and < 0.03 ppm for 60 min. and < 0.05 ppm averaged over 60 min.	In collected LFG: < 860 ppmv of TRS (expressed as H2S)	< 300 ppm (dry basis) (applies to A-3 only)	Property Line Ground Level Limits ≤ 0.5 ppm for 3 minutes and ≤ 0.25 ppm for 60 min. and ≤ 0.05 ppm for 24 hours (applies to A-3 only)	< 208 ppmv @ 15% O2, dry	Limit
Continuous	Continuous	Continuous	Continuous	Continuous	Compliance
N/A	N/A	N/A	N/A	N/A	Corrective Actions Taken

Permitted Unit: S-1 Palo Alto Landfill with Gas Collection Reporting Period: from 6/1/2013 through 11/30/2013 System: and A-3 I andfill Gas Flare	Site: City of Palo Alto Landfill	Facility ID#:	A2721	
System: and A-3 andfill Gas Flare	Permitted Unit: S-1 Palo Alto Landfill with Gas Collection	Reporting Period:	3	
Control of the contro	System; and A-3 Landfill Gas Flare			

Opacity	Opacity	Total Chlorinated Compounds in Landfill Gas	Heat Input	Amount of Waste Accepted	Amount of Waste Accepted	Amount of Waste Accepted	Type of Limit or Criteria
Permit Condition #20476, Part 5	Permit Condition #20476, Part 5	BAAQMD Condition #1028, Part 16 and 17h	Permit Condition #1028, Part 8 and 17g	BAAQMD Condition # 1028, Part 17a	BAAQMD Condition # 1028, Part 17a	BAAQMD Condition # 1028, Part 17a	Monitoring Requirement Citation
Visual Observation of Operations	Visual Observation of Operations	Annual Gas Characterization Analysis and Records	Records	Records	Records	Records	Monitoring Type
Periodic / Event basis	Periodic / Event basis	Periodic / Annual	Periodic / Daily	Periodic / Daily	Periodic / Daily	Periodic / Daily	Monitoring Frequency
Permit Condition #20476, Part 4	BAAQMD Regulation 6-301 and SIP 6-301	Permit Condition #1028, Part 13	Permit Condition #1028, Part 8	BAAQMD Condition #1028, Part 1b and 1c	BAAQMD Condition #1028, Part 1a	BAAQMD Condition #1028, Part 1a	Citation of Limit
≤ Ringelmann 1.0	Ringelmann 1.0 for <3 minutes in any hour	< 104 ppmv, dry	≤ 720 MMBTU/day and ≤ 262,800 MMBTU/yr	≤ 5,830,000 tons (cumulative amount of all decomposable materials) and ≤ 7,759,000 yd3 (cumulative amount of all wastes and cover materials)	0 tons/day of waste accepted and placed in S-	400 tons/day of waste accepted and placed in S-1	Limit .
Continuous	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous	Compliance
N/A	N/A	N/A	N/A	NA	N/A	N/A	Corrective Actions Taken

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Palo Alto Landfill	Facility ID#:	A2721	
Permitted Unit: S-1 Palo Alto Landfill with Gas Collection	Reporting Period:	: from 6/1/2013 through 11/30/2013	
System; and A-3 Landfill Gas Flare	į		

Wood Throughput	FP	Type of Limit or Criteria	-
		imit ria	
Permit Condition #20476, Part 2	None	Requirement Citation	
Records	None	Monitoring Type	
Periodic / Daily	None	Monitoring Frequency	
Permit Condition #20476, Part 1	BAAQMD Regulation 6-311 and SIP 6-311	Citation of Limit	
≤ 50,000 tons/year	For P<57,320 pounds/hour: E = 0.026(P)^0.67, For P>57,320 pounds/hr: E = 40 pounds/hr: E = 40 pounds/hr where: E = Maximum allowable emission rate (lbs/hr); and P = process weight rate (lbs/hr)	Limit	
Continuous	<u>`</u>	Compliance	
N/A	N/A	Corrective Actions Taken	

Note:

A new flare (A-10) was built and installed during the reporting period, replacing the existing flare (A-3) and went online on October 28, 2013. The A-10 flare is operating under ATC No. 22543 and is fully complying with those conditions.

TITLE V SEMI-ANNUAL MONITORING REPORT

Per	Site:
rmitted Unit:	
S-5 Wood Grinder and A-5 Water Sprays Reporting Period: from	
Rep	Faci
ortii	Ιŧγ
orting Period:	Facility ID#:
orting Period: from 6/1	Facility ID#: A2721
orting Period: from 6/1/2013 thro	lity ID#: A2721
6/1/2013 through :	lity ID#: A2721
orting Period: from 6/1/2013 through 11/30/2013	lity ID#: A2721

Wood Permit Condition Records Throughput #20476, Part 2	FP None None	Opacity Permit Condition Visual Obsult #20476, Operations Part 5	Opacity Permit Condition Visual Observations #20476, Operations Part 5	Type of Limit Requirement Mor Criteria Citation Mor
	Z	ervation of	ervation of	Monitoring Type F
Periodic / Daily	None	Periodic / Event basis	Periodic / Event basis	Monitoring Frequency
Permit Condition #20476, Part 1	BAAQMD Regulation 6-311	Permit Condition #20476, Part 4	BAAQMD Regulation 6-301	Citation of Limit
50,000 tons/year	40 pounds/hour	Ringelmann 1.0	Ringelmann 1.0 for 3 minutes in any hour	Limit
Continuous	Continuous	Continuous	Continuous	Compliance
N/A	N/A	N/A	N/A	Corrective Actions Taken

Note:

The Grinder was sold to a third party Iron Planet in September 2012.

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Palo Alto Landfill	Facility ID#:	A2721
Permitted Unit: S-7 TROMMEL SCREEN AND A-5 WATER	Reporting Period	: from 6/1/2013 through 11/30/2013
SPRAYS	•	
	** ***	

Wood Permit Condition Records Periodic / Permit Condition Throughput #20478, Part 2 Part 1	FP None None BAAQMD Regulation 6-311	Opacity Permit Condition Visual Observation of Periodic / Permit Condition #20478, Part 5 Operations Event basis #20478, Part 4	Opacity Permit Condition Visual Observation of Periodic / BAAQMD Regulation #20478, Operations Event basis 6-301 and SIP 6-301	Limit or Monitoring Monitoring Monitoring Type Frequency Citation of Limit
≤ 50,000 tons/year	pounds/hour: E = 0.026(P)^0.67, For P>57,320 pounds/hr: E = 40 pounds/hr where: E = Maximum allowable emission rate (ibs/hr); and P = process weight rate (ibs/hr)	≤ Ringelmann 1.0	Ringelmann 1.0 for < 3 minutes in any hour	
Continuous	Continuous	Continuous	Continuous	Compliance
N/A	N/A	N/A	N/A	Actions Taken

Note:

The Screener was sold to a third party Iron Planet in September 2012.