Site: City of Palo Alto Landfill	Facility ID#:	A2721
Permitted Unit: S -5 Wood Grinder and A-5 Water	Reporting Period:	from 12/1/2012 through 5/31/2013
Sprays		

Type of Limit or Criteria Periods of Inoperation for Parametric Monitors Opacity  Opacity  FP  Total Carbon	Requirement Citation BAAQMD 1-523.4  BAAQMD Condition #1028, Part 17d  None  None  BAAQMD Condition #1028, Part 3	Monitoring Type Operating records for all parametric monitors (gas flow meters and temperature monitors) Records of all site watering and road cleaning events NA  NA  Surface VOC Analysis and Records	Frequency Frequency Periodic/ Daily Periodic/ Event basis/ Monthly None None Periodic/ Event basis	Citation of Limit  BAAQMD 1-523.2  BAAQMD 6-1-301  BAAQMD 6-1-301  BAAQMD 6-1-301  BAAQMD 6-1-310  BAAQMD 6-1-310  BAAQMD 6-310  BAAQMD 6-310  BAAQMD 8-2-301  BAAQMD 8-2-301	Limit  ≤ 15 consecutive days per incident and ≤ 30 calendar days per 12 month period  Ringelmann No. 1 for < 3 minutes in any hour (applies to S-1)  Ringelmann No. 1 for < 3 minutes in any hour (applies to fiare)  ≤ 0.15 grains/dscf (applies to fiare)  ≤ 15 pounds per day or ≤ 300 ppmv, dry basis (applies only to aeration of contraction of the service of the serv	Continuous Continuous Continuous Continuous Continuous	Taken N/A N/A N/A N/A
Total Carbon	#1028, Part 3	Surface VOC Analysis and Records	Periodic/ Event basis	BAAQMD 8-2-301 and SIP 8-2-301	≤ 15 pounds per day or ≤ 300 ppmv, dry basis (applies only to aeration of or use as cover soil of soil containing ≤ 50 ppmw of volatile organic compounds)	Continuous	N/A
Collection and Control Systems Shutdown Time	BAAQMD 8-34-501.1	Operating Records	Periodic/ Event basis	BAAQMD 8-34-113.2	≤ 240 hours per year and ≤ 5 consecutive days	Continuous	N/A
Welt Shutdown Limits	BAAQMD 8-34-116.5 and 501.1	Records	Periodic/ Daily	BAAQMD 8-34-116.2	No more than 5 wells at a time or <10% of total collection system, whichever is less	Continuous	N/A
Well Shutdown Limits	BAAQMD 8-34-116.5 and 501.1	Records	Periodic/ Daily	BAAQMD 8-34-116.3	≤ 24 hours per well	Continuous	N/A

Site: City of Palo Alto Landfill	Facility ID#:	A2721
Permitted Unit: S -5 Wood Grinder and A-5 Water	Reporting Period:	: from 12/1/2012 through 5/31/2013
Sprays		

N/A	Continuous	≤ 500 ppmv as methane at 2 inches above surface	BAAQMD 8-34-303	Periodic/ Monthly, Quarterly, and Event basis	Monthly visual inspection of cover, quarterly inspection of surface with portable analyzer, various reinspection times for leaking areas and records	BAAQMD 8-34-415, 416, 501.6, 506 and 510 and BAAQMD Condition # 1028, Part 17h	100
N/A	Continuous	≤ 98% removal by weight OR < 30 ppmv dry basis @ 3% O2, expressed as methane (applies to A-3 only)	BAAQMD 8-34-301.3	Periodic/ Annual	Annual Source Tests and Records	BAAQMD 8-34-412 and 8-34-501.3 and 8-34-501.4 and 507 BAAQMD Condition # 1028, Parts 15 and 17h	Non-Methane Organic Compounds (NMOC)
N/A	Continuous	≤ 1000 ppmv as methane (component leak limit)	BAAQMD 8-34-301.2	Periodic/ Quarterly	Quarterly Inspection of collection and control system components with portable analyzer and Records	BAAQMD 8-34-501.6 and 503 and BAAQMD Condition # 1028, Part 17h	TOC (Total Organic Compounds Plus Methane)
N.A	Continuous	Landfill gas collection system shall operate continuously and all collected gases shall be vented to a properly operating control system	BAAQMD 8-34-301 and 301.1	Continuous	Gas Flow Meter and Recorder (every 15 minutes)	BAAQMD 8-34- 501.10 and 508	Gas Flow
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 Limits
Taken N/A	Compliance Continuous	Limit  No more than 5 wells at a time or < 10% of total collection system, whichever is less	Citation of Limit BAAQMD 8-34-117.6 and 501.1	Frequency Periodic/ Daily	Monitoring Type Records	Requirement Citation BAAQMD 8-34-117.4	Type of Limit or Criteria Well Shutdown Limits
Corrective						Monitoring	

Site: City of Palo Alto Landfill	Facility ID#:	A2721
ittec	Reporting Period	: from 12/1/2012 through 5/31/2013
Sprays		

		operating control system			Components		
		vented to a properly			Collection System	Part 17f	
		collected gases shall be			Downtime, and	Condition # 1028,	•
•		continuously and all	Parts 5, 6, and 7	Event basis	and Control Systems	508 and BAAQMD	
		system shall operate	Condition #1028,	Periodic /	Flow Rates, Collection	501.2, 501.10 and	
N/A	Continuous	Landfill gas collection	BAAQMD Permit	Continuous	Records of Landfill Gas	BAAQMD 8-34-501.1,	Gas Flow
	>				•	Part 17h	
						Condition # 1028,	
						505.4 and BAAQMD	s at Wellhead
		02 < 5% by volume	or 305.4	Monthly	Records	501.9 and 505.3 or	Concentration
N/A	Continuous	N2 < 20% by volume OR	BAAQMD 8-34-305.3	Periodic/	Monthly Inspection and	BAAQMD 8-34-414,	Gas
A 1.0	2					1028, Part 17h	
-		-	-	_		BAAQMD Condition #	Wellhead
				Monthly	Records	501.9 and 505.2 and	of Gas at
N/A	Continuous	< 55 C (< 131 F)	BAAQMD 8-34-305.2	Periodic/	Monthly Inspection and	BAAQMD 8-34-414,	Temperature
	>					#1028, Part 17h	
						BAAQMD Condition	
				Monthly	Records	501.9 and 505.1 and	Pressure
N/A	Continuous	< 0 psig	BAAQMD 8-34-305.1	Periodic/	Monthly Inspection and	BAAQMD 8-34-414,	Wellhead
		waste					
		tons of decomposable					
		accumulates 1,000,000					
		dicombied area of occi-					
		within oo days area or cell				12e-t	
		within 60 days after the				1020, Pails Iza-c,	Dates
		be installed and operating				1008 Dott 1000	Data
		system components must	-	1000		BAAOMD Condition #	System
		Areas or Cells: Collection		Event basis	Necolus	BAAUMU	Collection
N/A	Continuous	Ear Any I incontrolled	2 VOE VE 8 UMOVVO	Dationio			
_		initial waste stagement				Parts 12a-c, 12e-t	
		Figure 4 En dans after				Condition # 1028,	Dates
		components must be				and BAAQMD	Installation
		Collection system		Event pasis		8-34-501.7 and 501.8	System
7	Continuous	For Active Areas.	BAAQMD 8-34-304.2	Periodic /	Records	BAAQMD	Collection
	Confidence		CITATION OF LINES	Frequency	Monitoring Type	Citation	or Criteria
Taken	Compliance	- - -	Citation of Limit	Monitoring		Requirement	Type of Limit
Actions						Monitoring	
Composition							

Site: City of Palo Alto Landfill	Facility ID#:	A2721	
Permitted Unit: S -5 Wood Grinder and A-5 Water	Reporting Period:	from 12/1/2012 through 5/31/2013	
Sprays			

NA	Continuous	ppmv of TRS (expressed as H2S)	#1028, Part 14	Annual	Sulfur analysis of landfill gas	Permit Condition #1028, Part 14 and17h	Total Sulfur Content in LFG
N/A	Continuous	< 300 ppm (dry basis) (applies to A-3 only)	BAAQMD 9-1-302	Periodic / Quarterly	Sulfur analysis of landfill gas	Permit Condition #1028, Part 14 and17h	SO <sub>2</sub>
N/A	Continuous	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)	BAAQMD 9-1-301	None	None	None	SO <sub>2</sub>
N A	Continuous	< 208 ppmv @ 15% O2, dry	BAAQMD Permit Condition #1028, Part 12	Periodic / Annual	Annual Source Test and Records	BAAQMD Permit Condition #1028, Part 15 and 17h	CO
N/A	Continuous	< 32 ppmv at 15% O2, dry	BAAQMD Condition #1028, Part 11	Periodic / Annual	Annual Source Test and Records	BAAQMD Condition #1028, Part 15 and 17h	NOx
N/A	Continuous	CT > 1420 °F, averaged over any 3-hour period (applies to A-3 only)	Permit Condition #1028, Part 9	Continuous	Temperature Sensor and Recorder (continuous)	BAAQMD 8-34-501.3 and 507,	Temperature of Combustion Zone (CT)
N/A	Continuous	Minimize Emissions by Implementing SSM Plan	40 CFR 63.6(e)	Periodic / Event basis	Records (all occurrences, duration of each, and corrective actions)	40 CFR 63.1980(a-b)	Startup Shutdown or Malfunction Procedures
NA	Continuous	Requires Continuous Operation except for breakdowns, repairs, calibration, and required span adjustments	40 CFR 60.13(e)	Periodic / Daily	Operating Records for All Continuous Monitors (for gas flow and temperature monitors)	40 CFR 60.7(b)	Continuous Monitors
Corrective Actions Taken	Compliance	Limit	Citation of Limit	Monitoring Frequency	Monitoring Type	Monitoring Requirement Citation	Type of Limit or Criteria

Site: City of Palo Alto Landfill	Facility ID#:	A2721
Permitted Unit: S -5 Wood Grinder and A-5 Water	Reporting Period:	from 12/1/2012 through 5/31/2013
Sprays		

			_			11.	
			Part 4	Evell pasis	Operations	#204/5, Part 5	
NA A	Continuous	≤ Ringelmann 1.0	Permit Condition	Periodic /	Visual Observation of	Permit Condition	Opacity
N.	Conunuous	minutes in any hour	6-301 and SIP 6-301	Event basis	Operations	Permit Condition #20476, Part 5	Opacity
			Part 13		Analysis and Records	17h	Compounds in Landfill Gas
N/A	Continuous	< 104 ppmv, dry	Permit Condition #1028,	Periodic / Annual	Annual Gas Characterization	BAAQMD Condition #1028, Part 16 and	Total Chlorinated
NA	Continuous	≤ 720 MMBTU/day and ≤ 262,800 MMBTU/yr	Permit Condition #1028, Part 8	Periodic / Daily	Records	Permit Condition #1028, Part 8 and 17g	Heat Input
		materials)					
		and ≤ 7,759,000 yd3 (cumulative amount of all		·	-		
		decomposable materials)	1c	•			Accepted
		(cumulative amount of all	#1028, Part 1b and	Daily		1028. Part 17a	Waste
N/A	Continuous	≤ 5.830,000 tons	BAAQMD Condition	Periodic /	Records	BAAOMD Condition #	Amount of
		accepted and placed in S-	#1028, Part 1a	Daily		1028, Part 17a	Waste Accepted
N/A	Continuous	0 tons/day of waste	BAAQMD Condition	Periodic /	Records	BAAQMD Condition #	Amount of
		accepted and placed in S-	#1028, Part 1a	Daily		1028, Part 17a	Waste Accepted
N/A	Continuous	≤ 400 tons/day of waste	BAAQMD Condition	Periodic /	Records	BAAQMD Condition #	Amount of
		averaged over 60 min.					
		min. and < 0.05 ppm					
		and ≤ 0.03 ppm for 60					
		Level Limits: > 0.0 ppm					
N/A	Continuous	Property Line Ground	BAAQMD 9-2-301	None	NA	None	H <sub>2</sub> S
Taken	Compliance	Limit	Citation of Limit	Frequency	Monitoring Type	Citation	or Criteria
Actions				Monitoring		Requirement	Type of Limit
Corrective						Monitoring	

Site: City of Palo Alto Landfill	Facility ID#:	A2721
itted	Reporting Period:	from 12/1/2012 through 5/31/2013
Sprays		
- Control of the cont		
Monitoring		Correctiv

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

# TITLE V SEMI-ANNUAL MONITORING REPORT

13	ough 5/31/20	: from 12/1/2012 through 5/31/2013	Reporting Period:	ater	Permitted Unit: S -5 Wood Grinder and A-5 Water Sprays	S -5 Wood	d Unit:	Permitte Sprays
		1	Facility ID#:		andfill	City of Palo Alto Landfill	City o	Site:

<b>∃</b> ≤	ĘΡ	0	0	Ħ
Wood Throughput	יכר	Opacity	Opacity	Type of Limit or Criteria
Permit Condition #20476, Part 2	None	Permit Condition #20476, Part 5	Permit Condition #20476, Part 5	Monitoring Requirement Citation
Records	None	Visual Observation of Operations	Visual Observation of Operations	Monitoring Type
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
A/N	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

A2721
from 12/1/2012 through 5/31/2013

Continuous	00 tons/year	Permit Condition #20476, Part 1	Periodic / Daily	Records	Permit Condition #20478, Part 2	Wood Throughput
	pounds/hr: E = 40 pounds/hr where: E = Maximum allowable emission rate (lbs/hr); and P = process weight rate (lbs/hr)					
Continuous		BAAQMD Regulation 6-311	None	None	None	FP
Continuous	≤ Ringelmann 1.0 C	Permit Condition #20478, Part 4	Periodic / Event basis	Visual Observation of Operations	Permit Condition #20478, Part 5	Opacity
Continuous	Ringelmann 1.0 for < C 3 minutes in any hour	BAAQMD Regulation 6-301 and SIP 6-301	Periodic / Event basis	Visual Observation of Operations	Permit Condition #20478, Part 5	Opacity
Compliance		Citation of Limit	Monitoring Frequency	Monitoring Type	Monitoring Requirement Citation	Limit or Criteria
						Type of

Note:

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