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April 27, 2022

Director of Compliance and Enforcement Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, CA 94105

Attn: Title V Reports

Director of the Air Division USEPA, Region IX 75 Hawthorne Street San Francisco, CA 94105

PO Box 20957

T: 408.268.1670

Guadalupe Rubbish Disposal Company, Inc.

15999 Guadalupe Mines Road

San Jose, California 95160

Attn: Air-3

SUBJECT: Combined Title V Semi-Annual and Partial 8-34 Annual Report 40 CFR 63

Subpart AAAA Semi-Annual Report Guadalupe Recycling & Disposal Facility

15999 Guadalupe Mines Road, San Jose, CA 95120

Facility Number A3294

Dear Sir or Madam:

The Guadalupe Rubbish Disposal Co., Inc. (GRDC) is pleased to submit the attached Combined Title V Semi-Annual and Partial 8-34 Annual Report for the period of October 1, 2021, through March 31, 2022, to the Bay Area Air Quality Management District (BAAQMD) and the United States Environmental Protection Agency (USEPA), Region IX. As required by 40 Code of Federal Regulations (CFR) Part 63 Subpart AAAA, the Semi-Annual Startup, Shutdown and Malfunction (SSM) Report is also enclosed. The Combined Title V Semi-Annual and Partial 8-34 Annual Report satisfies the requirements of the Title V Permit listed in Title V Permit Condition Number 6188 Part 22 and Standard Condition I.F.

Based on information and belief formed after reasonable inquiry, I certify under penalty of law that the statements included in this report are true, accurate, and complete.

Sincerely,

Guadalupe Rubbish Disposal Co., Inc.

Paul Inrigue Perez

Enrique Perez District Manager

Attachments:

Combined Title V Semi-Annual and Partial 8-34 Annual Report

Combined Title V Semi-Annual and Partial 8-34 Annual Report

For the Guadalupe Rubbish Disposal Co., Inc. 15999 Guadalupe Mines Road San Jose, California 95120 Facility Number A3294

October 1, 2021, through March 31, 2022

Submitted on: April 27, 2022

Prepared for Guadalupe Recycling & Disposal Facility 15999 Guadalupe Mines Road San Jose, California 95120

For Submittal to:
The Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

And

The United States Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Prepared by



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1 INTRODUCTION

1.1 Purpose

This document is a Combined Semi-Annual Title V and Partial 8-34 Annual Report for the Guadalupe Recycling & Disposal Facility (GRDF) pursuant to Title V Permit Standard Condition 1.F and Condition Number 6188 Part 22. This report satisfies the requirements of Bay Area Air Quality Management District's (BAAQMD) Regulation 8, Rule 34, Section 411 and Title 40 Code of Federal Regulations (CFR) Part 60 Subpart WWW, New Source Performance Standards (NSPS) for municipal solid waste (MSW) landfills. This Combined Report meets the requirements of Title V Standard Condition 1.F, BAAQMD Rule 8-34-411 and 40 CFR §60.757(f) and covers compliance activities conducted from October 1, 2021, through March 31, 2022. During the timeframe included in this report from October 1, 2021, through March 31, 2022, the site also began compliance activities with specific conditions of 40 CFR part 63, Subpart AAAA (effective September 27, 2021) for wellhead temperature and pressure standards. This Combined Report also includes the Semi-Annual Report of Start-up, Shutdown, and Malfunction (SSM) Plan activities pursuant to National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart AAAA for Landfills.

Section 2 of this Combined Report contains the elements required to satisfy both BAAQMD 8-34-411 and 40 CFR §60.757(f). A Performance Test Report for the A-9 Flare that meets the requirements of both BAAQMD Rule 8-34-413 and 40 CFR §60.758(g) was submitted to the BAAQMD on June 24, 2020, and results of the test are included in Appendix N of this Combined Report. Section 3 of this Combined Report includes a discussion of the data from the most recent Performance Test on A-9 Flare, which was conducted on April 29, 2020, in compliance with BAAQMD Rule 8-34-412 and Title V Permit Condition Number 6188, Part 14. Initial Performance Test Report for the Flare A-17 (previously designated as A-14) that meets the requirements of both BAAQMD Rule 8-34-413 and 40 CFR §60.758(g) was submitted to the BAAQMD on April 9, 2021, and summary of test results are included in Appendix N of this Combined Report. Section 3 of this Combined Report includes a discussion of the data from the Performance Test on A-17 Flare, which was conducted on February 18, 2021, in compliance with BAAQMD Rule 8-34-412 and Title V Permit Condition Number 6188, Part 14. The 2022 Annual Performance Test Report for the Flare A-17 that meets the requirements of both BAAQMD Rule 8-34-413 and 40 CFR §60.758(g) was submitted to the BAAQMD on April 8, 2022. Section 4 of this Combined Report includes the Semi-Annual Report of the SSM Plan activities pursuant to the NESHAP, 40 CFR Part 63, Subpart AAAA for Landfills.

1.2 Record Keeping and Reporting

Records are maintained and available for inspection in accordance with BAAQMD Rule 8-34-501.12 and 40 CFR §60.758. The primary location for records storage is at the GRDF. Records are maintained at this location for a minimum of five years.

2 COMBINED MONITORING REPORT

In accordance with Title V Permit Standard Condition 1.F, BAAQMD Rule 8-34-411 and §60.757(f) in the NSPS, this report is a Combined Semi-Annual Title V Report and Partial 8-34 Annual Report that is required to be submitted by the GRDF. The report contains monitoring data for the operation of the landfill gas collection and control system (GCCS). The operational records have been reviewed and summarized. The timeframe included in this report is October 1, 2021, through March 31, 2022. The following table lists the rules and regulations that are required to be included in this Combined Report.

Table 2-1 Combined Report Requirements

	Table 2-1 Combined Report Requirements	LOCATION IN
RULE	REQUIREMENT	REPORT
	All collection system downtime, including individual well shutdown times and the reason for the shutdown.	Section 2.1, Appendices B, D, & E
8-34-501.2 §60.757(f)(3)	All emission control system downtime and the reason for the shutdown.	Section 2.2, Appendices B & E
8-34-501.3, 8-34-507, §60.757(f)(1)	Continuous temperature for all operating flares and any enclosed combustor subject to Section 8-34-507.	Section 2.3, Appendix F
8-34-501.4, 8-34-505, 8-34-510	Testing performed to satisfy any of the requirements of this rule.	Section 2.4 & 2.10 Appendices G & J
8-34-501.5	Monthly landfill gas flow (LFG) rates and well concentration readings for facilities subject to 8-34-404.	Section 2.5, 2.11 Appendix L
8-34-503, 8-34-506,	For operations subject to Section 8-34-503 and 8-34-506, records of all monitoring dates, leaks in excess of the limits in Section 8-34-301.2 or 8-34-303 that are discovered by the operator, including the location of the leak, leak concentration in parts per million by volume (ppmv), date of discovery, the action taken to repair the leak, date of the repair, date of any required re-monitoring, and the re-monitored concentration in ppmv.	Section 2.6 & 2.7, Appendix H
8-34-501.7	Annual waste acceptance rate and current amount of waste in-place.	Section 2.8 Appendix I
8-34-501.8	Records of the nature, location, amount, and date of deposition of non- degradable wastes, for any landfill areas excluded from the collection system requirement as documented in the GCCS Design Plan.	Section 2.9

RULE	REQUIREMENT	LOCATION IN REPORT
8-34-505,	For operations subject to Section 8-34-505, records of all monitoring dates and any excesses of the limits stated in Section 8-34-305 that are discovered by the operator, including well identification number, the measured excess, the action taken to repair the excess, and the date of repair.	Section 2.10, 2.10.1, Appendices J & K
	Continuous gas flow rate records for any site subject to Section 8-34-508.	Section 2.11, Appendices F and L
	For operations subject to Section 8-34-509, records or key emission control system operating parameters.	Section 2.2.2
8-34-501.12	The records required above shall be made available and retained for a period of five years.	Section 1.2
§60.757(f)(2)	Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under §60.756.	Section 2.2.1
§60.757(f)(6)	The date of installation and the location of each well or collection system expansion added pursuant to paragraphs (a)(3), (b), (c)(4) of §60.755.	Section 2.12
§60.10 (d)(5)(i)	Startup, Shutdown, Malfunction Events	Section 4.0, Appendices D & E
§63	Subpart AAAA	Section 2.10

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

Appendix A contains a current map of the GRDF's existing GCCS. Section 2.1.1 includes the GCCS downtime for the reporting period. The information contained in Section 2.1.2 includes the wellfield SSM information.

2.1.1 Collection System Downtime

During the period covered in this report, the GCCS was not shut down for more than five days on any one occasion. Downtime for 2021 calendar year from January 1, 2021, through December 31, 2021, was 70.4 hours, out of an allowable 240 hours per year. The partial total downtime for the reporting period of October 1, 2021, through March 31, 2022, was 70.1 hours.

Appendix B contains the GCCS Downtime Report which lists dates, times, and lengths of shutdowns for the reporting period and year-to-date.

2.1.2 Well Start-Up & Disconnection Log

There were eight (8) wellfield SSM events during the reporting period. See Appendix D, Wellfield SSM Log for details of well disconnection and reconnection events.

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

GRDF flare (A-9) began operation in August 2003 and was operated in conjunction with flare (A-14), which started initial operation in November 2016. The stack on flare A-14 was then replaced with a new stack in October 2020. Based on the correspondence with the BAAQMD, flare A-14 is now designated as flare A-17. The control system was not bypassed at any time during the reporting period. Raw LFG was not emitted during the reporting period. The SSM logs for the flare A-9 and flare A-17 are located in Appendix E. As indicated in Section 2.1.1, the total downtime for 2021 calendar year from January 1, 2021, through December 31, 2021, was 70.4 hours, out of an allowable 240 hours per year. The total downtime for the reporting period of October 31, 2021, through March 31, 2022, was 70.1 hours. The GCCS Downtime Log for the reporting period is included in Appendix B.

During the reporting period, BAAQMD issued GRDF Notice of Violation ("NOV") Number A-59781 dated December 8, 2021, for alleged temporary flare shutdown event caused by unplanned utility power outage on October 20 and 22, 2021. KCRDF submitted the request for Breakdown Relief from BAAQMD for the October 20 and 22, 2021, PG&E unplanned power outage via BAAQMD's Reportable Compliance Activity (RCA) notification forms submitted on October 21 and 22, 2021, and was assigned RCA numbers 08C52 and 08C55. GRDF submitted the 10-day NOV response on December 14, 2021; 30-day follow-up report for breakdown relief on November 12, 2021; and Title V 10-day and 30-day letter on October 29, 2021. Copies of submitted letters are included in Appendix C.

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

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

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

BAAQMD Regulation 8-34-501.11 and 8-34-509 are not applicable to the A-9 and A-17 Flares because the A-9 and A-17 Flares are subject to continuous temperature monitoring as required in BAAQMD Regulation 8-34-507 and §60.757(f)(1).

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

The combustion zone temperature of the flare is monitored with Thermo-Electric Thermocouples. The temperature is displayed and recorded every two minutes with a Yokogawa FX1000 digital recorder on flare A-9 and Yokogawa DX1000 digital recorder on flare A-17. There were no temperature deviations during the reporting period that were below the permit limit of 1,593 Degree F and 1,449 Degree F for flare A-9 and flare A-17. Appendix F contains the Flare Temperature Deviation/ Inoperative Monitor/Missing Data Report for October 1, 2021, through March 31, 2022.

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

The cover integrity monitoring was performed on the following dates:

- October 27, 2021
- November 26, 2021
- December 28, 2021
- January 26, 2022
- February 24, 2022
- March 29, 2022

During December 2021 monthly monitoring event, four locations with surface cracks were identified. The corrective actions were completed on January 20, 2022, by adding soil and compacting. No other breaches of cover integrity (e.g. cover cracks or exposed garbage) were found during the reporting period. The Monthly Cover Integrity Monitoring reports are included in Appendix G.

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

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

2.6 Surface Emissions Monitoring (BAAQMD 8-34-501.6, 8-34-506, & §60.757(f)(5))

Quarterly Surface Emissions Monitoring (SEM), pursuant to BAAQMD Regulation 8-34-506 occurred during the reporting period on the following dates:

- Fourth Quarter 2021 November 12, 2021
- First Quarter 2022 February 9, 2022

A Photovac Micro Flame Ionization Detector (FID) was used to monitor the path along the landfill surface according to the Landfill Surface Emissions Monitoring Plan map. Any areas suspected of having emissions problems based on visible observations were also monitored. Prior to both monitoring events, the FID instrument was zeroed and

calibrated using zero air and 500 parts per million by volume (ppmv) methane calibration gas.

The Initial monitoring event for the Fourth Quarter 2021 SEM was conducted by Roberts Environmental Services (RES) on November 12, 2021, identifying 6 exceedance locations. GRDF personnel performed the ten-day re-monitoring on November 19, 2021. GRDF personnel performed the thirty-day follow-up monitoring event on December 6, 2021. No exceedances were observed during the 30-day re-monitoring events. Detailed monitoring results are available in the Fourth Quarter 2021 SEM Report, included in Appendix H.

The Initial monitoring event for the First Quarter 2022 SEM was conducted by Roberts Environmental Services (RES) on February 9, 2022, identifying 4 exceedance locations. GRDF personnel performed the first ten-day re-monitoring on February 10, 2022, with no exceedance identified. GRDF personnel performed the thirty-day follow-up monitoring event on March 2, 2022. No exceedances were observed during the 30-day re-monitoring events. Detailed monitoring results are available in the First Quarter 2022 SEM Report, included in Appendix H.

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

Quarterly component leak testing, pursuant to BAAQMD Regulation 8-34-503, occurred during the reporting period on the following dates:

- Fourth Quarter 2021 November 12, 2021
- First Quarter 2022 February 9, 2022

A TVA was used to perform the leak testing. No exceedances were identified during the reporting period. Appendix H contains the Quarterly LFG Component Leak Monitoring Reports.

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

The Annual Waste Acceptance Rate was compiled for the timeframe of October 1, 2021 through March 31, 2022. The Current Waste-In-Place figure includes waste placed through the end of this reporting period. Below is a summary of the waste acceptance records for the reporting period. A table of monthly totals for the reporting period is provided in Appendix I.

Table 2-2 Waste Acceptance

Description	Total Waste Landfilled (Decomposable)
Total Waste Acceptance October 1, 2021, through March 31, 2022	54,548
Current Waste In Place as March 31, 2022	Approximately 9.93 Million tons

2.9 Non-degradable waste acceptance records (BAAQMD 8-34-501.8)

The GCCS Design Plan for the GRDF does not indicate non-degradable waste areas that are excluded from the collection system. Therefore, BAAQMD Regulation 8-34-501.8 is not applicable.

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

Wellhead monitoring was performed on a monthly basis pursuant to 8-34-505. Effective September 27, 2021, the site began compliance activities with specific conditions of 40 CFR part 63, Subpart AAAA for wellhead temperature and pressure standards. No wellhead monitoring was conducted during September 27 through September 30, 2021. The well readings for October 1, 2021, through March 31, 2022, are included in Appendix J. Each well was monitored in accordance with the following requirements:

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

The wellhead monitoring was performed on the following dates:

- October 5, 6, 7, 8, 11, 12, and 13, 2021
- November 1, 2, 3, 4, 8, 9, 10, 15, and 18, 2021
- December 1, 2, 3, 6, 10, 14, 15 and 16, 2021
- January 4, 5, 6, 10, 11, 12, and 13, 2022
- February 2, 3, 4, and 7, 2022
- March 10, 14, 15, and 16, 2022

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

There were eight (8) well deviations with readings that exceeded limits per BAAQMD Regulation 8-34-305 during the reporting period. During this reporting period, there were no additional exceedances associated with specific conditions of 40 CFR part 63, Subpart AAAA for wellhead temperature and pressure standards. All exceedances were corrected within 120-days. See Appendix K, Wellfield Deviation Log, for more detail.

2.10.2 Higher Operating Value (HOV) Wells

As of March 31, 2022, the following list of wells are approved to operate at a temperature HOV of 145°F: Wells 114, 122, 134, 135, 146, 151, 152, 154, 161, 162, 180, 181, 185, 186, 188, 189, 199, 200, 204, 205, 207, 209, 213, 215, 216, 217, and 218.

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

The flare LFG flow rate was measured with a dedicated Kurz MFT-B flow meter at both the flares. The General Electric data panel displays the LFG flow and the digital Yokogawa data recorder records LFG flow every two minutes and is downloaded and saved to a compact flash card. The flare flow meters meet the requirements of BAAQMD Regulation 8-34-508 by recording data at least every 15 minutes. The flow meter is maintained and calibrated pursuant to manufacturer's recommendations. The flow data for the flare is available for review at the GRDF. Appendix L contains a summary of the monthly LFG flow rates for the flare. Appendix F contains the Flare Temperature Deviation/ Inoperative Monitor/Missing Data Report for October 1, 2021, through March 31, 2022.

Table 2-3 below is a summary of the total LFG flow for the reporting period of October 1, 2021, through March 31, 2022.

Table 2-3 Total LFG Flow for October 1, 2021, through March 31, 2022

Emission Control Device	Average Flow (scfm)	Average CH ₄ (%)*	Total LFG Volume (scf)	Total CH₄ Volume (scf)	Heat Input (MMBTU)
A-9 Flare	0.0	49.9	0.0	0.0	0.0
A-17 Flare	1,660	40.4	427,780,727	172,973,137	175,222

scfm = standard cubic feet per minute

CH₄ = methane

scf = standard cubic feet

MMBTU = million British thermal units

2.12 Compliance with §60.757(f)(6)

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

The GCCS was modified pursuant to Title V Permit Condition Number 6188 Part 2 as modified by the Permit to Operate (PTO) Condition Number 28011, during the reporting period. No wells were decommissioned or started during the reporting period.

As of March 31, 2022, the GRDF has a total 87 collectors, (85 vertical wells and 2 horizontal Leachate collectors). See Appendix C, for copies of the Notification Letters.

2.13 Compliance with Title V Permit Condition Number 6188, Part 19 and 20

Contaminated soil containing volatile organic compounds (VOCs) greater than 50 ppm_v was not received during the reporting period. A total of 0.0 tons of Low-VOC soil

^{*}Methane content determined from April 29, 2020, Source Test on Flare A-9.

^{*}Methane content determined from February 18, 2021, Source Test on Flare A-17.

(containing less than 50 ppm of VOCs) was received during the reporting period. Condition Number 6188, Part 19 of the Title V Permit requires that GRDF limit the quantity of low VOC-laden soil handled per day so that no more than 15 pounds of total carbon could be emitted to the atmosphere per day. GRDF was in compliance with this requirement during the reporting period. All records required by the permit are available onsite.

2.14 Compliance with Title V Permit Condition Number 25537 for S-24

For Source S-24, Construction & Demolition Debris Stockpile, the total construction and demolition debris accepted at S-24 in any consecutive 12-month period is limited to 200,000 tons and the combined amount processed is 2,500 tons per day. During the reporting period, the site did not exceed the permitted annual and daily limits. Required records are available for review at the GRDF.

2.15 Compliance with Title V Permit Condition Number 7649 for S-5

For Source S-5, Wood Debris Stockpile, during the reporting period, the operation did not operate for over 12 hours within any consecutive 24-hours. Required records are available for review at the GRDF.

2.16 Compliance with Title V Permit Condition Number 7650 for S-6

For Source S-6, Shredded Storage Stockpiles and Loadout, during the reporting period, the operation did not operate for over 12 hours within any consecutive 24-hours. Required records are available for review at the GRDF.

2.17 Compliance with Title V Permit Condition Number 18258 for S-18

For Source S-18, Materials Recovery Operation, the total throughput did not exceed 900 tons per day average, based on a calendar month. Required records are available for review at the GRDF.

3 PERFORMANCE TEST REPORT SUMMARY

In accordance with BAAQMD Rule 8-34-413 and 40 CFR §60.757(g) in the NSPS, a Performance Test Report is required to be submitted from subject facilities containing performance and monitoring data for the operation of the GCCS. The operational records listed in Table 3-1 have been reviewed, summarized, and are included in the Performance Test Report section of this report.

Table 3-1 Performance Test Requirements

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

3.1 Flare (A-9) Compliance Demonstration Test Results (BAAQMD 8-34-412)

The Compliance Demonstration Test (Performance Test) was performed on the A-9 Flare by Blue Sky Environmental, Inc. on April 29, 2020, pursuant to BAAQMD Regulation 8-34-412. Two sets of three runs were conducted, one set without condensate injection running and one set with condensate injection running. The final test report was submitted on June 24, 2020.

As required by BAAQMD Regulation 8-34-301.3, the A-9 Flare meets the non-methane organic compound (NMOC) emission concentration of less than 30 ppm $_{V}$. Pursuant to Title V Permit Condition Number 6188 Part 9, the A-9 Flare meets the nitrogen oxide (NO $_{X}$) emission concentration of less than 16 ppm $_{V}$. Also, the A-9 Flare meets the carbon monoxide (CO) emission concentration of less than 134 ppm $_{V}$ pursuant to the Title V Permit Condition Number 6188, Part 10. The old Flare A9 was shutdown starting November 2020 since Flare A17 is equipped to handle the maximum flow rate expected over the life of the landfill.

The stack on flare A-14 was replaced with a new stack in October 2020. Based on the correspondence with the BAAQMD, flare A-14 is now designated as flare A-17. The Initial Compliance Demonstration Test was performed on the A-17 Flare by Blue Sky Environmental, Inc. on February 18, 2021, pursuant to BAAQMD Regulation 8-34-412. Results indicate that the flare A-17 was in compliance with BAAQMD Regulation 8-34-301.3 and all conditions in the authority to construct. As required by BAAQMD Regulation 8-34-301.3, the A-17 Flare meets the non-methane organic compound (NMOC) emission concentration of less than 30 ppm_V. The A-17 Flare meets the nitrogen oxide (NO_x) emission concentration of less than 15 ppm_V. Also, the A-17 Flare meets the carbon monoxide (CO) emission concentration of less than 81 ppm_V.

Table 3-2 shows the results of the A-9 Flare Performance Test, averaged from each set of three test runs. Table 3-3 shows the results of the A-17 Flare Performance Test, averaged from each set of three test runs. A summary of this Performance Test Results can be found in Appendix N.

Table 3-2 Flare Compliance Demonstration Test Results- Test Data April 29, 2020

1 4510 0 2 1 1410	Comphanice Ben	ionotration root	rtoounto root De	ita Aprili 20, 2020
Condition	Flare (A-9) (Condensate Off) Average Results	Flare (A-9) (Condensate On) Average Results	8-34-301.3 limit	Compliance Status
NMOC (either 98% DRE or 30 ppm @ 3% O ₂)	<0.5 ppm	<1.6 ppm	30 ppm	In Compliance
NO _x (ppm @ 15% O ₂)	8.4	9.5	16	In Compliance
CO (ppm @ 15% O ₂)	<3.3	<3.4	134	In Compliance

Table 3-3 Flare Initial Compliance Demonstration Test Results- Test Data February 18, 2021

Condition	Flare (A-17) (Condensate Off) Average Results	Flare (A-17) (Condensate On) Average Results	8-34-301.3 limit	Compliance Status
NMOC (either 98% DRE or 30 ppm @ 3% O ₂)	<2.6 ppm	<5.79 ppm	30 ppm	In Compliance
NO _x (ppm @ 15% O ₂)	10.3	13.3	15	In Compliance
CO (ppm @ 15% O ₂)	2.5	1.24	81	In Compliance

^{*}Flare A-14 Stack was replaced in October 2020. The new flare designation will be flare A-17.

3.2 Compliance with §60.757(g)(1)

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

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

3.3 Compliance with §60.757(g)(2).

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

The GRDF GCCS has historically provided LFG wells and collectors spaced in accordance with standard industry practice. The GCCS systems are adequate to move the current LFG flow rate. GRDF will continue to add additional LFG control capacity as necessary with the approval of BAAQMD. The installed collector density appears adequate for controlling surface emissions, based on continuous compliance and operational experience.

The total capacity of the LFG mover equipment was designed and will be designed to meet the current United States Environmental Protection Agency (USEPA) Model AP-42 projections of LFG generation and the historic LFG extraction rates determined to be continuously available from the facility.

3.3.1 Demonstrating Compliance with §60.757(g)(2)

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

Compliance with 40 CFR §60.757(g)(2) is maintained by performing quarterly SEM. Refer to Section 2.6, Surface Emissions Monitoring for information pertaining to the SEM results. These results show that the GCCS has sufficient coverage over the waste footprint. The current GCCS has the capacity to handle the actual recovery. Well monitoring data shows that adequate vacuum is available at all points in the wellfield, demonstrating that the piping network is sufficient to handle extracted LFG.

3.4 Compliance With §60.757(g)(3)

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

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

3.5 Compliance With §60.757(g)(4)

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

The site does not contain non-productive areas that have been excluded from the coverage of the GCCS. Therefore, §60.757(g)(4) is not applicable.

3.6 Compliance With §60.757(g)(5)

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

The current GCCS has the capacity to handle LFG flow rates for future.

3.7 Compliance with §60.757(g)(6)

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

Quarterly LFG migration monitoring, including all on-site buildings, occurred on the following dates:

- Fourth Quarter 2021 December 21, 2021
- First Quarter 2022- March 17, 2022

The LFG migration monitoring results for the quarterly events are included in Appendix M.

3.7.1 Demonstrating Compliance with §60.757(g)(6)

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

The Landfill operator will continue surface and perimeter monitoring in accordance with the approved monitoring plans. If the GCCS at the Landfill does not meet the measures of performance set forth in the NSPS, the GCCS will be adjusted or modified in accordance with the NSPS requirements.

4 STARTUP, SHUTDOWN, MALFUNCTION (SSM) PLAN

4.1 SSM Log for the GCCS at the GRDF

The NESHAP contained in 40 CFR Part 63, AAAA for MSW landfills to control hazardous air pollutants include the regulatory requirements for submittal of a semi-annual report (under 40 CFR §63.10(d)(5) of the general provisions) if an SSM event occurred during the reporting period. The reports required by §63.1980(a) of the NESHAP and §60.757(f) of the NSPS summarize the GCCS exceedances. These two semi-annual reports contain similar information and have been combined as allowed by §63.10(d)(5)(i) of the General Provisions.

NESHAP 40 CFR part 63, AAAA became effective on January 16, 2004. Those SSM events that occurred during the NSPS semi-annual reporting period are reported in this section (October 1, 2021, through March 31, 2022). The following information is included as required:

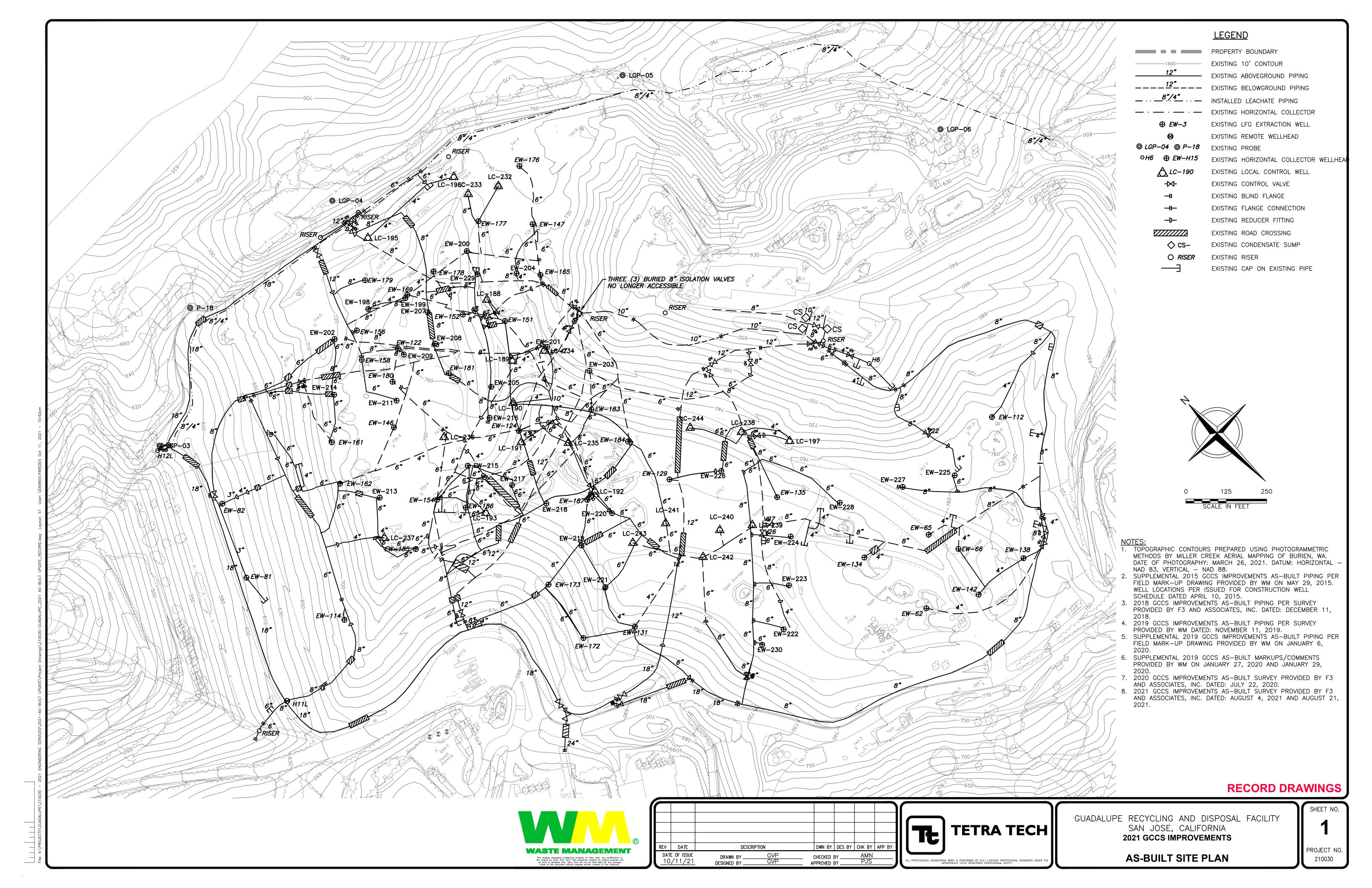
- During the reporting period, eight (8) Wellfield SSM events occurred. Details are included in Appendix D, Well SSM Log.
- During the reporting period, zero (0) A-9 Flare SSM events occurred. The A-9 Flare did not operate during the reporting period due to the reasons noted in Appendix E, Flare SSM Log.
- During the reporting period, fifty-two (52) A-17 Flare (formerly designated as Flare A-14) Flare SSM events occurred. The A-17 Flare was shut down and restarted during the reporting period due to the reasons noted in Appendix E, Flare SSM Log.
- During the reporting period, zero (0) monitoring/recorder equipment SSM events occurred. Details are included in Appendix F, Temperature Deviation/Inoperative Monitor/Missing Data Report.
- There were sixty (60) events in total. In all events, automatic systems and operator actions were consistent with the standard operating procedures contained in the SSM Plan. There were no deviations from the SSM plan.
- Exceedances were not identified during the reporting period in any applicable emission limitation in the landfills NESHAP (§63.10(d)(5)(i)).
- Revisions of the SSM Plan to correct deficiencies in the landfill operations or procedures were neither required, nor prepared (§63.6(e)(3)(viii)).

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Based on information and belief formed after reasonable inquiry, information on the startup, shutdown, malfunction forms, all accompanying reports, and other required certifications are true, accurate, and complete.

Paul Enrique Perez	4/19/2022
Signature of Responsible Official	Date
Enrique Perez	
Name of Responsible Official	

APPENDIX A SITE MAP



APPENDIX B GCCS DOWNTIME REPORT

LFG Collection System: October 1, 2021 through December 31, 2021

2021 (Partial) GCCS DOWNTIME LOG

GUADALUPE RECYCLING & DISPOSAL FACILITY, San Jose, CA

SHUTDOWN DATE/ TIME	START-UP DATE/ TIME	TOTAL DOWNTIME (HOURS)	COMMENTS OR REASONS
10/20/21 17:40	10/21/21 11:24	17.73	Flare shutdown during PG&E power outage. RCA was filed and RCA No. 08C52 was assigned. Flare was inspected and restarted.
10/22/21 05:58	10/22/21 13:10	7.20	Flare shutdown during PG&E power outage. Amended RCA was filed and RCA No. 08C55 was assigned. Flare was inspected and restarted.
10/25/21 04:24	10/25/21 05:36	1.20	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 05:42	10/25/21 06:00	0.30	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 06:02	10/25/21 06:24	0.37	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 06:26	10/25/21 06:44	0.30	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 06:48	10/25/21 09:12	2.40	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 09:16	10/25/21 09:44	0.47	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 09:46	10/25/21 11:12	1.43	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 11:14	10/25/21 11:44	0.50	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 11:46	10/25/21 14:02	2.27	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 14:10	10/25/21 14:18	0.13	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 14:24	10/25/21 14:36	0.20	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 14:42	10/25/21 14:58	0.27	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 15:04	10/25/21 15:14	0.17	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 15:20	10/25/21 15:34	0.23	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 15:56	10/25/21 16:10	0.23	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 16:16	10/25/21 16:28	0.20	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.
10/25/21 16:34	10/25/21 17:04	0.50	Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.

Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/25/21 17:32	10/25/21 17:10
Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/25/21 17:54	10/25/21 17:40
Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/25/21 18:26	10/25/21 18:00
Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/25/21 18:38	10/25/21 18:32
Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/25/21 19:26	10/25/21 18:44
Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/25/21 19:38	10/25/21 19:32
Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/25/21 19:52	10/25/21 19:44
Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/25/21 21:02	10/25/21 19:58
Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/25/21 21:22	10/25/21 21:10
Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/25/21 21:38	10/25/21 21:30
Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/25/21 22:10	10/25/21 21:44
Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/25/21 22:30	10/25/21 22:18
Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/26/21 10:30	10/25/21 22:36
Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/26/21 10:52	10/26/21 10:44
Flare shutdown due to blower VFD malfunction. Flare was inspected and restarted.	10/26/21 11:12	10/26/21 10:58
Flare was shutdown to replace VFD and switch blowers. Flare was inspected and restarted.	11/24/21 12:12	11/24/21 11:40

11/24/21 12:22	11/24/21 12:40	0.30	Flare shutdown during startup sequence. Flare was inspected and restarted.
11/24/21 12:50	11/24/21 12:56	0.10	Flare shutdown during startup sequence. Flare was inspected and restarted.
11/24/21 13:06	11/24/21 13:14	0.13	Flare shutdown during startup sequence. Flare was inspected and restarted.
11/24/21 13:18	11/24/21 13:28	0.17	Flare shutdown during startup sequence. Flare was inspected and restarted.
12/09/21 09:20	12/09/21 09:28	0.13	Flare shutdown due to low temperature alarm during maintenance and inspection on louver. Flare was inspected and restarted.
12/09/21 09:30	12/09/21 10:14	0.73	Flare shutdown due to low temperature alarm during maintenance and inspection on louver. Flare was inspected and restarted.
12/09/21 10:18	12/09/21 10:28	0.17	Flare shutdown due to low temperature alarm during maintenance and inspection on louver. Flare was inspected and restarted.
12/09/21 10:32	12/09/21 10:40	0.13	Flare shutdown due to low temperature alarm during maintenance and inspection on louver. Flare was inspected and restarted.
12/09/21 10:54	12/09/21 10:58	0.07	Flare shutdown due to low temperature alarm during maintenance and inspection on louver. Flare was inspected and restarted.
12/23/21 09:36	12/23/21 11:10	1.57	Flare shutdown during PG&E power outage. RCA was filed and RCA No. 08E36 was assigned. Flare was inspected and restarted.
TOTAL DOWNTIN	TOTAL DOWNTIME January 1 through December 31, 2021 (HOURS)		
TOTAL DOWNTIME O	TOTAL DOWNTIME October 1, 2021 through December 31, 2021 (HOURS)		
TOTAL PERMITTED DOWNTIME FOR 1 YEAR (HOURS):		240.0	

LFG Collection System: January 1 through March 31, 2022

2022 GCCS DOWNTIME LOG (Partial)

GUADALUPE RECYCLING & DISPOSAL FACILITY, San Jose, CA

SHUTDOWN DATE/ TIME	START-UP DATE/ TIME	TOTAL DOWNTIME (HOURS)	COMMENTS OR REASONS
01/18/22 08:34	01/18/22 09:28	0.90	Flare A-17 was shutdown during annual flare inspection and maintenance. Flare was inspected and restarted.
01/25/22 10:00	01/25/22 12:36	2.60	Flare A-17 was shutdown during maintenance and repair on Dry Vac. Flare was inspected and restarted.
02/15/22 07:38	02/15/22 07:50	0.20	Flare A-17 shutdown due to low temperature alarm. Flare was inspected and restarted.
02/24/22 07:16	02/24/22 10:08	2.87	Flare A-17 was shutdown during blower maintenance. Seal and bearings were replaced. Flare was inspected and restarted.
02/24/22 10:22	02/24/22 11:40	1.30	Flare A-17 was shutdown during blower maintenance. Seal and bearings were replaced. Flare was inspected and restarted.
03/11/22 07:18	03/11/22 12:52	5.57	Flare A-17 was shutdown during repairs on condensate system part in the stack. Flare was inspected and restarted.
03/11/22 12:54	03/11/22 13:06	0.20	Flare shutdown during startup sequence after repair and maintenance on condensate system. Flare was inspected and restarted.
TOTAL [OOWNTIME January 1 through March 31, 2022 (HOURS)-	13.63	
TOTAL PERMITTED DOWNTIME FOR 1 YEAR (HOURS):		240	

APPENDIX C BAAQMD Correspondence





910 Coyote Creek Golf Drive P.O. Box 1870 Morgan Hill, CA 95037 (408) 779-2206 (408) 779-5165 Fax

October 21, 2021 (via email rca@baaqmd.gov)

Compliance & Enforcement Division Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, California 94105

Re: Reportable Compliance Activity (RCA) Notification
Guadalupe Recycling & Disposal Facility, San Jose, CA, Facility Number A3294

Guadalupe Rubbish Disposal Co., Inc d/b/a Guadalupe Recycling & Disposal Facility ("GRDF") is submitting the attached Reportable Compliance Activity (RCA) Form for temporary flare shutdown event caused by unplanned utility power interruption on October 20, 2021, ~ 5:40 PM. A breakdown report was submitted to Bay Area Air Quality Management District (BAAQMD) on October 20, 2021 at ~9:15 PM via the afterhours phone line by GRDF about the PG&E's power outage.

Although GRDF disagrees that Breakdown Relief is the appropriate methodology for compliance with Rule 8-34 during an unplanned power outage, due to direction from BAAQMD staff, this letter is to request Breakdown Relief from BAAQMD for the PG&E power outage. BAAQMD's RCA notification form, as modified, is enclosed. The frequency and duration of weather or utility-related electrical interruptions are outside of GRDF's control and GRDF asserts that it did not violate any applicable regulations and limits.

Breakdown Relief should be granted as GRDF complied with administrative requirements despite its objections to the re-interpretation of Rule 8-34 and:

- 1. The breakdown is not the result of intent, negligence or disregard of air pollution control regulations;
- 2. The breakdown is not the result of improper maintenance;
- 3. The breakdown does not create a public nuisance;
- 4. The breakdown was not caused by an excessively recurrent breakdown of the same equipment; and
- 5. The breakdown did not occur, and any emissions did not interfere with attainment or maintenance of any National or California air quality standard.

On October 21, 2021 at ~11:50 AM the GCCS was back online. The shutdown event was unforeseeable & unpreventable at GRDF. The flare was temporarily shut down and did not result in emission nor nuisance.

Sincerely,

Guadalupe Recycling & Disposal Facility

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: RCA Form GRDF Facility A3294



COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable Compliance Activity (RCA)

See back of form for instructions →						
1. X BREAKDOWN RELIEF: District Use OnlyBREAKDOWN REFERENCE #:						
2. NA MONITOR E	EXCESS EMISSION or EXCURSION: Dist	trict Use Only RE	FERENCE#:			
3. NA MONITOR IS	S INOPERATIVE: District Use Only REFE	ERENCE#:				
4. NA PRESSURE	RELIEF DEVICE (PRD): District Use Or	nly PRD REFERE	NCE#:			
SITE INF	ORMATION AND DESCRIPTION INFORM	MATION (REQUIR	RED)			
Company	Guadalupe Rubbish Disposal Co., Inc	Site #	A3294			
Address	15999 Guadalupe Mines Road, San Jose 95120	Source #	S-9			
Reported by	R Phadnis	Phone #	510.875.9338			
Indicated Excess	-NA	Fax#	-			
Allowable Limit	-NA	Averaging Time	-			
Start Time/Date	~5:40 PM on 10/20/2021	Clear Time	10/21/2021~11:50 AM			
Monitor/device type(s)	►CEM ►GLM ►Paramet	tric PRD	► Non-monitor			
Monitor description(s)						
Parameter(s) exceeded	or not functioning due to inoperation					
►NO _x ►SO ₂	2	H ₂ S ►TR	S			
▶O ₂ ►H ₂ C	D	Gauge Pressure	Flow			
► Hydrocarbon Brea	akthrough (VOC) ► Temperature	► Wind Spee	ed			
► Wind Direction Steam X ► Other (describe) Power outage						
Unit(s) of Measurement						
▶ppm ▶ppb	►min/hr > 20%	►inches H ₂ O	▶mmHg			
▶psig ▶pH		Other (describe) P	ower outage			
event Description:						
A breakdown report was submitted on 10/20/2021 at~ 9:15 PM via afterhours phone line by Guadalupe Recycling & Disposal						
Facility (GRDF) because the GCCS was temporarily shut down due to the PG&E power outage. During the PG&E power						
outage, the GCCS was potentially out of compliance with BAAQMD regulation 8-34-301.1. Please also see objections and liscussion in the attached cover letter dated 10/21/2021.						
iscussion in the attached cover letter dated 10/21/2021.						
District Los Only						
District Use Only Page 1 Date Time						

- ✓ Check the Box numbers 1-4 that apply to the RCA you are trying to report or request and read the detailed instructions.
- You will receive an ID # for each RCA you submit. In the case of a request for Breakdown Relief where multiple monitors are affected, you do not need to submit multiple forms, as long as all necessary information is given on one form. RCA reported during other than core business hours will be assigned an ID # the following working day. If you do not receive an ID #, it is your responsibility to contact the BAAQMD to get one.
- ✓ You may submit only one request for breakdown relief per form. However, you may submit multiple indicated excess, inoperative monitors and PRD reports on one form, provided that the start and end times given for the events in the required information section is inclusive of all events. Information on parameters exceeded, units of measurement and allowable limits can be provided in the event description box or when contacted by District staff with questions.
- ✓ Fill out the "Site Information and Description Information Required" areas of this form and email to <u>rca@baagmd.gov</u>
- ✓ A 30-day written follow-up report is required for Breakdown Requests and PRD Releases. Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference Breakdown Admissions Advisory dated 12/3/04. Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: You may have additional report requirements under Title V.

Detailed Instructions

Box 1: To Request Breakdown Relief (Regulations 1-112, 1-113, 1-208, 1-431, 1-432)

If you have an equipment malfunction (e.g.; breakdown) that leads to the release of air pollutants above the regulatory or your permitted levels, you may request relief from BAAQMD enforcement action.

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- □ NOTE: Start and end times given for these events in the required information section must be inclusive of all events.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Requests for breakdown relief may not be withdrawn and must be called in or faxed to the BAAQMD <u>immediately upon</u> discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

Box 2: Monitor Indicates Excess Emission or Excursion (Regulation 1-522.7, 1-523.3, 1-542)

When a BAAQMD-required monitor indicates an excess or excursion, you must report it to the BAAQMD.

- Check Box #2.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Any excess emission indicated by a CEM or excursion of a parametric monitor, shall be reported to the BAAQMD within 96 hours.
- Area concentration excesses over the limits prescribed in District regulations shall be reported to the BAAQMD within the next normal working day following the examination of data.

Box 3: Monitor Is Inoperative (Regulations 1-522, 1-523, 1-530)

When a BAAQMD-required monitor is inoperative for greater than 24 hours, you must report it to the BAAQMD.

- ☐ Check Box #3 only if inoperative for greater than 24 hours.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All reports of inoperative monitors must be reported by the following BAAQMD working day and additionally be cleared by a notification of resumption of monitoring. To notify the BAAQMD regarding the resumption of monitoring, do not send in a separate RCA form; call (415) 749-4979 and give the RCA ID #, date, and the time of resumption.
- Inoperative monitors (except parametric monitors) with downtime greater than 15 days must furnish proof of expedited repair in a follow-up report.

Box 4: Pressure Relief Device (PRD) Is Released (Regulation 8-28-401)

When a PRD at your refinery/chemical plant vents to the atmosphere, you must report it to the BAAQMD.

- Check Box #4 only if a pressure relief device is released.
- Separate RCA ID #'s can be applied to monitor(s) affected by a PRD by also checking Box #2 if other monitors record an
 excess or excursion.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All PRD release reports must be reported by the following BAAQMD working day.





910 Coyote Creek Golf Drive P.O. Box 1870 Morgan Hill, CA 95037 (408) 779-2206 (408) 779-5165 Fax

October 22, 2021 (via email rca@baaqmd.gov)

Compliance & Enforcement Division Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, California 94105

Re: Addendum to Reportable Compliance Activity (RCA 08C52) Notification Guadalupe Recycling & Disposal Facility, San Jose, CA, Facility Number A3294

Guadalupe Rubbish Disposal Co., Inc d/b/a Guadalupe Recycling & Disposal Facility ("GRDF") is submitting the attached Addendum Reportable Compliance Activity (RCA) to the previously submitted RCA Form (BAAQMD assigned RCA Number 08C52) for temporary flare shutdown event caused by unplanned utility power interruption on October 20, 2021, ~ 5:40 PM and on October 22, 2021 ~6:00 AM. A breakdown report was submitted to Bay Area Air Quality Management District (BAAQMD) on October 20, 2021 at ~9:15 PM via the afterhours phone line by GRDF about the PG&E's power outage.

Although GRDF disagrees that Breakdown Relief is the appropriate methodology for compliance with Rule 8-34 during an unplanned power outage, due to direction from BAAQMD staff, this letter is to request Breakdown Relief from BAAQMD for the PG&E power outage. BAAQMD's RCA notification form, as modified, is enclosed. The frequency and duration of weather or utility-related electrical interruptions are outside of GRDF's control and GRDF asserts that it did not violate any applicable regulations and limits.

Breakdown Relief should be granted as GRDF complied with administrative requirements despite its objections to the re-interpretation of Rule 8-34 and:

- 1. The breakdown is not the result of intent, negligence or disregard of air pollution control regulations;
- 2. The breakdown is not the result of improper maintenance;
- 3. The breakdown does not create a public nuisance;
- 4. The breakdown was not caused by an excessively recurrent breakdown of the same equipment; and
- 5. The breakdown did not occur, and any emissions did not interfere with attainment or maintenance of any National or California air quality standard.

The power to the site was restored on October 21, 2021 at ~11:50 AM and on October 22, 2021 at ~1:30 PM and the GCCS was online. The shutdown events were unforeseeable & unpreventable at GRDF. The flare was temporarily shut down and did not result in emission nor nuisance.

Sincerely,

Guadalupe Recycling & Disposal Facility

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: Addendum to RCA Form GRDF Facility A3294



Received by

COMPLIANCE & ENFORCEMENT DIVISION

ADDENDUM to RCA Number 08C52 (10/21/2021)-Submittal 10/22/2021

Notification Form

Reportable Compliance Activity (RCA)

			S	ee back of form	for instructions →
1. X BREAKDOWN RELIEF: District Use OnlyBREAKDOWN REFERENCE #:					
2. NA MONITOR E	EXCESS EMISS	SION or EXCUI	RSION: <i>Dis</i> i	trict Use Only RE	FERENCE#:
3. NA MONITOR I	S INOPERATIV	E: District Us	e Only REF	ERENCE#:	
4. NA PRESSURE RELIEF DEVICE (PRD): District Use Only PRD REFERENCE#:					
SITE INF	ORMATION A	ND DESCRIPT	ON INFORI	MATION (REQUI	RED)
Company	Guadalupe Rub	bish Disposal C	o., Inc	Site #	A3294
Address	15999 Guadalupe N	⁄lines Road, San Jo	se 95120	Source #	S-9
Reported by	R Phadnis			Phone #	510.875.9338
Indicated Excess	-NA			Fax #	-
Allowable Limit	-NA		Averaging Time	-	
Start Time/Date	~5:40 PM on 10/20/2021; and ~ 6:00 AM on 10/22/2021			Clear Time	10/21/2021~11:50 AM; and 10/22/2021~1:30 PM
Monitor/device type(s)	►CEM	▶GLM	▶Parame	etric PRD	► Non-monitor
Monitor description(s)					
Parameter(s) exceeded	or not functioni				
NO _x SO	_		_	H ₂ S TR	S ►NH ₃
\longrightarrow O ₂ \longrightarrow H ₂ (ad 🔽 🕨	Gauge Pressure	□ Flow
► Hydrocarbon Breakthrough (VOC) ► Temperature ► Wind Speed					
▶Wind Direction ▶Steam X ▶Other (describe) Power outage					
Unit(s) of Measurement					
▶ppm ▶ppb		hr > 20%		▶inches H ₂ O	— ►mmHg
▶ psig ▶ pH	▶ºFah	renheit		Other (describe) F	ower outage
Event Description: A breakdown report was submitted on 10/20/2021 at~ 9:15 PM via afterhours phone line by Guadalupe Recycling & Disposal Facility (GRDF) because the GCCS was temporarily shut down due to the PG&E power outage. During the PG&E power utage, the GCCS was potentially out of compliance with BAAQMD regulation 8-34-301.1. Please also see objections and iscussion in the attached cover letter dated 10/22/2021.					
District Use Only					

Date

Time

- ✓ Check the Box numbers 1-4 that apply to the RCA you are trying to report or request and read the detailed instructions.
- ✓ You will receive an ID # for each RCA you submit. In the case of a request for Breakdown Relief where multiple monitors are affected, you do not need to submit multiple forms, as long as all necessary information is given on one form. RCA reported during other than core business hours will be assigned an ID # the following working day. If you do not receive an ID #, it is your responsibility to contact the BAAQMD to get one.
- ✓ You may submit only one request for breakdown relief per form. However, you may submit multiple indicated excess, inoperative monitors and PRD reports on one form, provided that the start and end times given for the events in the required information section is inclusive of all events. Information on parameters exceeded, units of measurement and allowable limits can be provided in the event description box or when contacted by District staff with questions.
- ✓ Fill out the "Site Information and Description Information Required" areas of this form and email to <u>rca@baagmd.gov</u>
- ✓ A 30-day written follow-up report is required for Breakdown Requests and PRD Releases. Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference Breakdown Admissions Advisory dated 12/3/04. Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: You may have additional report requirements under Title V.

Detailed Instructions

Box 1: To Request Breakdown Relief (Regulations 1-112, 1-113, 1-208, 1-431, 1-432)

If you have an equipment malfunction (e.g.; breakdown) that leads to the release of air pollutants above the regulatory or your permitted levels, you may request relief from BAAQMD enforcement action.

7	Check	D	шл

- □ NOTE: Start and end times given for these events in the required information section must be inclusive of all events.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Requests for breakdown relief may not be withdrawn and must be called in or faxed to the BAAQMD <u>immediately upon</u> discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

Box 2: Monitor Indicates Excess Emission or Excursion (Regulation 1-522.7, 1-523.3, 1-542)

When a BAAQMD-required monitor indicates an excess or excursion, you must report it to the BAAQMD.

- Check Box #2.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Any excess emission indicated by a CEM or excursion of a parametric monitor, shall be reported to the BAAQMD within 96 hours.
- Area concentration excesses over the limits prescribed in District regulations shall be reported to the BAAQMD within the next normal working day following the examination of data.

Box 3: Monitor Is Inoperative (Regulations 1-522, 1-523, 1-530)

When a BAAQMD-required monitor is inoperative for greater than 24 hours, you must report it to the BAAQMD.

- Check Box #3 only if inoperative for greater than 24 hours.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All reports of inoperative monitors must be reported by the following BAAQMD working day and additionally be cleared by a notification of resumption of monitoring. To notify the BAAQMD regarding the resumption of monitoring, do not send in a separate RCA form; call (415) 749-4979 and give the RCA ID #, date, and the time of resumption.
- Inoperative monitors (except parametric monitors) with downtime greater than 15 days must furnish proof of expedited repair in a follow-up report.

Box 4: Pressure Relief Device (PRD) Is Released (Regulation 8-28-401)

When a PRD at your refinery/chemical plant vents to the atmosphere, you must report it to the BAAQMD.

- ☐ Check Box #4 only if a pressure relief device is released.
- Separate RCA ID #'s can be applied to monitor(s) affected by a PRD by also checking Box #2 if other monitors record an
 excess or excursion.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All PRD release reports must be reported by the following BAAQMD working day.



Guadalupe Rubbish
Disposal Co., Inc.
15999 Guadalupe Mines Road

15999 Guadalupe Mines Road P.O. Box 20957 San Jose, CA 95160

October 29, 2021 (via email: compliance@baaqmd.gov)

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

Attn: Title V Reports

Re: Guadalupe Recycling & Disposal Facility, San Jose, CA, Facility Number A3294

Section I.F Title V, 10 and 30-Day written report

RCA Numbers 08C52 and 08C55

Dear Sir or Madam:

Guadalupe Rubbish Disposal Co., Inc d/b/a Guadalupe Recycling & Disposal Facility ("GRDF") is submitting this 10 and 30-day Title V written report to the Bay Area Air Quality Management District (BAAQMD) as required under Title V Permit Condition Section I.F for GRDF.

A breakdown report was submitted on October 20, 2021, at around 9:15 PM via afterhours phone line by GRDF because the landfill gas collection and control system (GCCS) was temporarily shut down due to the PG&E power outage. The flare was online on Thursday, October 21, 2021 around 11:50 AM (see Attachment A for flare data). Although GRDF disagrees that Breakdown Relief is the appropriate methodology for compliance with Rule 8-34 during an unplanned power outage, due to direction from BAAQMD staff, GRDF submitted the request for Breakdown Relief from BAAQMD for the October 20, 2021 PG&E power outage via BAAQMD's Reportable Compliance Activity (RCA) notification form submitted on October 21 and amended on October 22, 2021 and were assigned RCA numbers 08C52 and 08CC55 (see Attachment B for copies of RCA and submittals).

The unplanned power outage shutdown events noted in original and amended RCA forms submitted on October 21 and 22, 2021, did not result in emissions and do not qualify as non-compliance. GRDF believes that it complied with the Title V permit conditions and safety protocols. GRDF followed all measures to ensure gas movers and valves were closed during the shutdown events. GRDF's downtime events were not the result of equipment malfunction, knowing, willful, intentional, chronic nor committed by a recalcitrant, and did not benefit KCRDF economically nor result in a nuisance. The frequency and duration of weather or utility-related electrical interruptions are outside of GRDF's control.

GRDF is committed to operating its landfill in compliance with applicable regulations and will ensure that compliance is achieved. However, GRDF disagrees with the BAAQMD that temporary shutdowns resulting from unplanned power outages are violations of any BAAQMD regulation.

GRDF has placed the purchase order for a permanent generator (delayed due to the COVID-19 emergency and related supply chain disruptions) and the suppliers anticipate the unit to be delivered by the fourth quarter of 2022. Currently, GRDF is working on permit applications as required for the BAAQMD and the City of San Jose.

If you have any questions or need any additional information, please do not hesitate to contact me at (408) 779-2206.

Sincerely,

Guadalupe Recycling & Disposal Facility

Enrique Perez District Manager

cc: Erin Phillips, BAAQMD

Attachments:

Attachment A- GRDF flare data

Attachment B- Copy of GRDF RCA Forms for RCA Numbers 08C52 and 08C55

Attachment A GRDF flare data

Guadalupe Landfill Flare A17

		Flare		Flare	
		°F		SCFM	
Date	Time	MIN	MAX	MIN	MAX
2021/10/20	15:00:00	1563	1608	1592	1647
2021/10/20	15:02:00	1549	1570	1606	1644
2021/10/20	15:04:00	1570	1611	1597	1648
2021/10/20	15:06:00	1565	1606	1604	1653
2021/10/20	15:08:00	1561	1577	1595	1644
2021/10/20	15:10:00	1577	1602	1600	1645
2021/10/20	15:12:00	1556	1601	1588	1645
2021/10/20	15:14:00	1548	1592	1601	1647
2021/10/20	15:16:00	1584	1611	1600	1647
2021/10/20	15:18:00	1548	1584	1588	1637
2021/10/20	15:20:00	1550	1623	1593	1647
2021/10/20	15:22:00	1548	1624	1595	1648
2021/10/20	15:24:00	1544	1594	1582	1644
2021/10/20	15:26:00	1572	1613	1597	1642
2021/10/20	15:28:00	1558	1572	1595	1641
2021/10/20	15:30:00	1570	1584	1595	1642
2021/10/20	15:32:00	1584	1592	1597	1642
2021/10/20	15:34:00	1572	1589	1592	1647
2021/10/20	15:36:00	1568	1572	1594	1644
2021/10/20	15:38:00	1565	1575	1594	1639
2021/10/20	15:40:00	1575	1587	1594	1645
2021/10/20	15:42:00	1580	1584	1591	1644
2021/10/20	15:44:00	1584	1587	1591	1642
2021/10/20	15:46:00	1575	1584	1594	1645
2021/10/20	15:48:00	1568	1577	1588	1637
2021/10/20	15:50:00	1568	1580	1601	1650
2021/10/20	15:52:00	1580	1590	1591	1642
2021/10/20	15:54:00	1578	1589	1597	1641
2021/10/20	15:56:00	1565	1578	1586	1642
2021/10/20	15:58:00	1568	1575	1597	1639
2021/10/20	16:00:00	1575	1587	1597	1642
2021/10/20	16:02:00	1584	1592	1591	1639
2021/10/20	16:04:00	1566	1584	1588	1650
2021/10/20	16:06:00	1568	1575	1594	1644
2021/10/20	16:08:00	1575	1590	1591	1653
2021/10/20	16:10:00	1575	1594	1592	1645
2021/10/20	16:12:00	1565	1575	1589	1654
2021/10/20	16:14:00	1563	1587	1582	1637
2021/10/20	16:16:00	1587	1597	1597	1642
2021/10/20	16:18:00	1566	1592	1594	1639
2021/10/20	16:20:00	1563	1573	1601	1639
2021/10/20	16:22:00	1572	1587	1597	1642
2021/10/20	16:24:00	1587	1592	1583	1636
2021/10/20	16:26:00	1573	1587	1594	1638
2021/10/20	16:28:00	1568	1573	1591	1639
2021/10/20	16:30:00	1568	1575	1592	1641

2021/10/20	16:32:00	1575	1590	1592	1641
2021/10/20	16:34:00	1584	1589	1589	1645
2021/10/20	16:36:00	1575	1585	1594	1641
2021/10/20	16:38:00	1568	1575	1595	1639
2021/10/20	16:40:00	1568	1573	1583	1637
2021/10/20	16:42:00	1573	1590	1594	1639
2021/10/20	16:44:00	1582	1594	1594	1639
2021/10/20	16:46:00	1565	1582	1584	1641
2021/10/20	16:48:00	1561	1587	1594	1645
2021/10/20	16:50:00	1587	1607	1598	1641
2021/10/20	16:52:00	1551	1595	1591	1641
2021/10/20	16:54:00	1551	1589	1587	1636
2021/10/20	16:56:00	1589	1603	1591	1637
2021/10/20	16:58:00	1565	1590	1586	1642
2021/10/20	17:00:00	1563	1580	1591	1636
2021/10/20	17:02:00	1580	1597	1586	1642
2021/10/20	17:04:00	1561	1598	1592	1636
2021/10/20	17:06:00	1549	1573	1597	1639
2021/10/20	17:08:00	1573	1606	1592	1634
2021/10/20	17:10:00	1559	1604	1589	1636
2021/10/20	17:12:00	1551	1578	1594	1637
2021/10/20	17:14:00	1578	1606	1584	1641
2021/10/20	17:16:00	1561	1602	1586	1639
2021/10/20	17:18:00	1559	1580	1594	1639
2021/10/20	17:20:00	1580	1599	1588	1634
2021/10/20	17:22:00	1572	1600	1591	1641
2021/10/20	17:24:00	1555	1572	1591	1637
2021/10/20	17:26:00	1559	1590	1586	1639
2021/10/20	17:28:00	1589	1602	1589	1637
2021/10/20	17:30:00	1560	1589	1587	1637
2021/10/20	17:32:00	1559	1582	1584	1637
2021/10/20	17:34:00	1582	1597	1592	1639
2021/10/20	17:36:00	1561	1596	1589	1637
2021/10/20	17:38:00	1366	1631	0	1633
2021/10/20	17:40:00	1041	1366	0	1
2021/10/20	17:42:00	832	1041	0	1
2021/10/20	17:44:00	684	832	-1	2
2021/10/20	17:46:00	579	684	-1	1
2021/10/20	17:48:00	501	579	0	1
2021/10/20	17:50:00	440	501	0	1
2021/10/20	17:52:00	390	440	-1	1
2021/10/20	17:54:00	349	391	-1	1
2021/10/20	17:56:00	314	349	-1	1
2021/10/20	17:58:00	284	314	-1	1
2021/10/20	18:00:00	259	284	-1	1
2021/10/20	18:02:00	237	259	-1	1
2021/10/20	18:04:00	218	237	-1	1
2021/10/20	18:06:00	202	218	-1	1
2021/10/20	18:08:00	188	202	-1	1
2021/10/20	18:10:00	176	188	-1	1
2021/10/20	18:12:00	165	176	-1	1
2021/10/20	18:14:00	155	165	-1	1
2021/10/20	18:16:00	147	155	-1	1

2021/10/20	18:18:00	139	147	-1	1	
2021/10/20	18:20:00	133	139	-1	1	
2021/10/20	18:22:00	127	133	-1	1	
2021/10/20	18:24:00	121	127	-1	1	
2021/10/20	18:26:00	116	121	-1	1	
2021/10/20	18:28:00	111	116	-1	1	
2021/10/20	18:30:00	107	111	-1	1	
2021/10/20	18:32:00	104	107	-1	1	
2021/10/20	18:34:00	101	104	-1	1	
2021/10/20	18:36:00	98	101	-1	1	
2021/10/20	18:38:00	95	98	-1 -1	1	
2021/10/20	18:40:00	93	95	-1 -1	1	
2021/10/20	18:42:00	91	93	-1 -1	1	
2021/10/20	18:44:00	89	93 91	-1 -1	1	
2021/10/20	18:46:00	87	89	-1 -1	1	
2021/10/20	18:48:00	85	87	-1 -1	1	
					1	
2021/10/20	18:50:00	84	85	-1		
2021/10/20	18:52:00	83	84	-1	0	
2021/10/20	18:54:00	81	83	-1	1	
2021/10/20	18:56:00	80	81	-1	1	
2021/10/20	18:58:00	79	80	-1	1	
2021/10/20	19:00:00	78	79	-1	0	
2021/10/20	19:02:00	77	78	-1	1	
2021/10/20	19:04:00	77	77	-1	1	
2021/10/20	19:06:00	76	77	-1	1	
2021/10/20	19:08:00	75	76	-1	1	
2021/10/20	19:10:00	75	75	-1	1	
2021/10/20	19:12:00	74	75	-1	0	
2021/10/20	19:14:00	74	74	-1	0	
2021/10/20	19:16:00	73	74	-1	1	
2021/10/20	19:18:00	73	73	-1	0	
2021/10/20	19:20:00	72	73	-1	1	
2021/10/20	19:22:00	72	72	-1	1	
2021/10/20	19:24:00	71	72	-1	0	
2021/10/20	19:26:00	71	71	-1	0	
2021/10/20	19:28:00	70	71	-1	1	
2021/10/20	19:30:00	70	70	-1	0	
2021/10/20	19:32:00	70	70	-1	1	
2021/10/20	19:34:00	69	70	-1	1	
2021/10/20	19:36:00	69	70	-1	0	
2021/10/20	19:38:00	69	70	-2	0	
2021/10/20	19:40:00	68	70	-1	0	
2021/10/20	19:42:00	68	69	-1	0	
2021/10/20	19:44:00	68	68	-1	0	
2021/10/20	19:46:00	68	68	-1	0	
2021/10/20	19:48:00	67	68	-1	0	
2021/10/20	19:50:00	67	68	-1 -1	0	
2021/10/20	19:52:00	67	67	-1 -1	0	
2021/10/20	19:54:00	67	67	-1 -1	0	
2021/10/20	19:56:00	66	67	-1 -1	1	
2021/10/20	19:58:00	66	67	-1 -1	0	
2021/10/20		66	66	-1 -1	1	
2021/10/20	20:00:00 20:02:00	66	66	-1 -1	0	
2021/10/20	20.02.00	00	00	-1	U	

2021/10/20	20:04:00	66	66	-1	0
2021/10/20	20:06:00	66	66	-1	0
2021/10/20	20:08:00	65	66	-1	1
2021/10/20	20:10:00	65	66	-1	1
2021/10/20	20:12:00	65	65	-1	1
2021/10/20	20:14:00	65	65	-1	0
2021/10/20	20:16:00	65	65	-1	1
2021/10/20	20:18:00	65	65	-1	0
2021/10/20	20:20:00	65	65	-1	1
2021/10/20	20:22:00	64	65	-1	0
2021/10/20	20:24:00	64	65	-1	1
2021/10/20	20:26:00	64	65	-1	0
2021/10/20	20:28:00	64	65	-1	1
2021/10/20	20:30:00	64	65	-1	0
2021/10/20	20:32:00	64	65	-1	1
2021/10/20	20:34:00	63	65	-1	0
2021/10/20	20:36:00	63	65	-1	0
2021/10/20	20:38:00	63	63	-1	1
2021/10/20	20:40:00	63	63	-1	1
2021/10/20	20:42:00	63	63	-1	0
2021/10/20	20:44:00	63	63	-1	0
2021/10/20	20:46:00	62	63	-1	0
2021/10/20	20:48:00	62	63	-1	0
2021/10/20	20:50:00	62	63	-1	0
2021/10/20	20:52:00	62	63	-1	0
2021/10/20	20:54:00	62	63	-1	0
2021/10/20	20:56:00	62	63	-1	0
2021/10/20	20:58:00	62	63	-1	0
2021/10/20	21:00:00	62	63	-1	0
2021/10/20	21:02:00	62	63	-1	0
2021/10/20	21:04:00	62	63	-1	0
2021/10/20	21:06:00	62	63	-1	0
2021/10/20	21:08:00	62	63	-2	0
2021/10/20	21:10:00	62	63	-1	0
2021/10/20	21:12:00	62	63	-1	0
2021/10/20	21:14:00	62	63	-1	1
2021/10/20	21:16:00	62	63	-1	0
2021/10/20	21:18:00	62	63	-1	0
2021/10/20	21:20:00	62	63	-1	0
2021/10/20	21:22:00	62	63	-1	0
2021/10/20	21:24:00	62	63	-1	0
2021/10/20	21:26:00	62	63	-1	0
2021/10/20	21:28:00	62	63	-1	1
2021/10/20	21:30:00	62	63	-1	1
2021/10/20	21:32:00	61	63	-1	0
2021/10/20	21:34:00	61	63	-1	0
2021/10/20	21:36:00	61	63	-1	0
2021/10/20	21:38:00	61	63	-1	0
2021/10/20	21:40:00	61	63	-1	0
2021/10/20	21:42:00	61	62	-1	0
2021/10/20	21:44:00	61	62	-1	0
2021/10/20	21:46:00	61	61	-1	0
2021/10/20	21:48:00	61	61	-1	0

2021/10/20	21:50:00	61	61	-1	0
2021/10/20	21:52:00	61	61	-1	0
2021/10/20	21:54:00	61	61	-1	0
2021/10/20	21:56:00	61	61	-1	0
2021/10/20	21:58:00	61	61	-1	0
2021/10/20	22:00:00	61	61	-1	0
2021/10/20	22:02:00	61	61	-1	0
2021/10/20	22:04:00	61	61	-1	0
2021/10/20	22:06:00	61	61	-1	1
2021/10/20	22:08:00	61	61	-1	0
2021/10/20	22:10:00	61	61	-1	0
2021/10/20	22:12:00	61	61	-2	0
2021/10/20	22:14:00	61	61	-1	0
2021/10/20	22:16:00	61	61	-1	0
2021/10/20	22:18:00	61	61	-1	0
2021/10/20	22:20:00	61	61	-1	1
2021/10/20	22:22:00	61	61	-1	0
2021/10/20	22:24:00	-OVER	61	-OVER	0
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2021/10/20	22:28:00	-OVER	61	-OVER	0
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2021/10/20	22:34:00	-OVER	61	-OVER	0
2021/10/20	22:36:00	61	61	-1	0
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2021/10/20	23:00:00	-326	61	-1	0
2021/10/20	23:02:00	61	61	-1	0
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2021/10/20	23:18:00	61	61	-1	0
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202 1/10/20	20.04.00	01	01	- <u>-</u> _	J

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2021/10/21	03:36:00	-0VER	61	-0VER	0
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	03:40:00				0
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2021/10/21	03:50:00	-OVER	61	-OVER	0
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2021/10/21	04:18:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	04:20:00	-OVER	-OVER	-OVER	-OVER
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2021/10/21	04:58:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	05:00:00	-OVER	-OVER	-OVER	-OVER
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2021/10/21	05:52:00	-OVER	63	-OVER	0
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2021/10/21	30.00.00	00	00	_	ı

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2021/10/21	08:24:00	-OVER	-OVER	-OVER	-OVER

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2021/10/21	09:24:00	65	65	-1 -1	1
2021/10/21	09:26:00		65	-1 -1	1
		65 65			
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2021/10/21	09:32:00	65	65	-1	1
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2021/10/21	09:38:00	65	87	0	1370
2021/10/21	09:40:00	87	143	0	1
2021/10/21	09:42:00	143	155	0	0
2021/10/21	09:44:00	151	155	0	0
2021/10/21	09:46:00	142	152	0	0
2021/10/21	09:48:00	133	142	0	0
2021/10/21	09:50:00	128	169	0	1366
2021/10/21	09:52:00	169	253	0	0
2021/10/21	09:54:00	253		0	1
			266		
2021/10/21	09:56:00	251	265	0	1
2021/10/21	09:58:00	232	251	0	0
2021/10/21	10:00:00	213	232	0	1
2021/10/21	10:02:00	196	213	0	0
2021/10/21	10:04:00	181	196	0	0
2021/10/21	10:06:00	168	181	0	1337
2021/10/21	10:08:00	171	295	0	1358
2021/10/21	10:10:00	295	321	0	0

2021/10/21 2021/10/21 2021/10/21 2021/10/21 2021/10/21 2021/10/21 2021/10/21 2021/10/21 2021/10/21 2021/10/21 2021/10/21	10:12:00 10:14:00 10:16:00 10:18:00 10:20:00 10:22:00 10:24:00 10:26:00 10:28:00 10:30:00 10:32:00	298	319	0	1
2021/10/21	10:34:00				
2021/10/21	10:36:00	116	120	-2	-1
2021/10/21	10:38:00	110	116	-1	0
2021/10/21	10:40:00	105	111	0	0
2021/10/21	10:42:00				
2021/10/21	10:44:00				
2021/10/21	10:46:00	96	97	-1	0
2021/10/21	10:48:00	94	96	0	0
2021/10/21	10:50:00	92	94	0	0
2021/10/21	10:52:00	90	92	0	1
2021/10/21	10:54:00	90	131	0	1364
2021/10/21	10:56:00	131	238	0	1
2021/10/21	10:58:00	238	261	1	1
2021/10/21	11:00:00	249	261	1	1
2021/10/21	11:02:00	229	232	-183	-183
2021/10/21	11:04:00	212	229	-186	41
2021/10/21	11:06:00	195	212	1	1 1
2021/10/21 2021/10/21	11:08:00 11:10:00	180 167	195 180	1	1
2021/10/21	11:10:00	155	167	1	1
2021/10/21	11:14:00	145	155	1	1
2021/10/21	11:14:00	136	145	1	1
2021/10/21	11:18:00	128	136	1	1
2021/10/21	11:20:00	121	128	1	1
2021/10/21	11:22:00	116	121	1	1
2021/10/21	11:24:00	112	121	1	1373
2021/10/21	11:26:00	121	1921	1372	2606
2021/10/21	11:28:00	1538	1920	1869	2327
2021/10/21	11:30:00	1522	1601	1811	1880
2021/10/21	11:32:00	1560	1610	1817	1858
2021/10/21	11:34:00	1545	1560	1799	1847
2021/10/21	11:36:00	1553	1616	1779	1838
2021/10/21	11:38:00	1559	1615	1768	1830
2021/10/21	11:40:00	1544	1572	1764	1809
2021/10/21	11:42:00	1572	1587	1758	1800
2021/10/21	11:44:00	1566	1585	1752	1802
2021/10/21	11:46:00	1558	1585	1755	1796
2021/10/21	11:48:00	1585	1602	1747	1799
2021/10/21	11:50:00	1566	1597	1728	1794
2021/10/21	11:52:00	1561	1575	1735	1787
2021/10/21	11:54:00	1575	1587	1729	1791
2021/10/21	11:56:00	1577	1585	1731	1781

2021/10/21	11:58:00	1566	1582	1729	1779
2021/10/21	12:00:00	1582	1587	1729	1775
2021/10/21	12:02:00	1572	1582	1717	1767
2021/10/21	12:04:00	1566	1577	1707	1763
2021/10/21	12:06:00	1566	1597	1714	1762
2021/10/21	12:08:00	1589	1600	1714	1756
2021/10/21	12:10:00	1575	1589	1705	1755
2021/10/21	12:10:00	1568	1575	1714	1763
2021/10/21	12:14:00	1567	1577	1710	1766
2021/10/21	12:14:00	1577	1585	1710	1767
2021/10/21	12:18:00	1585	1592	1703	1767
2021/10/21	12:10:00	1578	1589	1710	1757
2021/10/21	12:20:00			1711	1757
		1555	1578		
2021/10/21	12:24:00	1555	1594	1704	1744
2021/10/21	12:26:00	1587	1621	1704	1744
2021/10/21	12:28:00	1552	1587	1704	1756
2021/10/21	12:30:00	1565	1599	1697	1742
2021/10/21	12:32:00	1575	1604	1704	1749
2021/10/21	12:34:00	1561	1575	1705	1756
2021/10/21	12:36:00	1560	1593	1701	1744
2021/10/21	12:38:00	1589	1599	1691	1740
2021/10/21	12:40:00	1566	1589	1690	1753
2021/10/21	12:42:00	1565	1570	1688	1748
2021/10/21	12:44:00	1570	1598	1698	1752
2021/10/21	12:46:00	1585	1603	1692	1753
2021/10/21	12:48:00	1567	1585	1692	1741
2021/10/21	12:50:00	1567	1569	1691	1737
2021/10/21	12:52:00	1568	1590	1692	1752
2021/10/21	12:54:00	1590	1595	1698	1741
2021/10/21	12:56:00	1557	1590	1692	1740
2021/10/21	12:58:00	1553	1586	1693	1731
2021/10/21	13:00:00	1586	1606	1699	1747
2021/10/21	13:02:00	1561	1597	1690	1746
2021/10/21	13:04:00	1557	1576	1686	1742
2021/10/21	13:06:00	1576	1591	1683	1736
2021/10/21	13:08:00	1583	1591	1683	1734
2021/10/21	13:10:00	1574	1583	1692	1733
2021/10/21	13:12:00	1574	1579	1689	1743
2021/10/21	13:14:00	1572	1577	1690	1737
2021/10/21	13:16:00	1575	1579	1689	1732
2021/10/21	13:18:00	1568	1578	1683	1725
2021/10/21	13:20:00	1570	1583	1683	1737
2021/10/21	13:22:00	1580	1598	1686	1731
2021/10/21	13:24:00	1556	1596	1688	1731
2021/10/21	13:26:00	1553	1575	1680	1736
2021/10/21	13:28:00	1575	1605	1680	1730
2021/10/21	13:26:00	1575	1600	1680	1723
2021/10/21	13:30:00	1572	1572	1677	1723
2021/10/21					
	13:34:00	1565	1583	1675 1677	1721
2021/10/21	13:36:00	1583	1594	1677	1727

2021/10/21	13:38:00	1576	1591	1678	1725
2021/10/21	13:40:00	1569	1576	1676	1725
2021/10/21	13:42:00	1574	1579	1672	1734
2021/10/21	13:44:00	1572	1577	1675	1728
2021/10/21	13:46:00	1576	1581	1680	1717
2021/10/21	13:48:00	1577	1584	1677	1730
2021/10/21	13:50:00	1577	1582	1677	1722
2021/10/21	13:52:00	1579	1584	1683	1734
2021/10/21	13:54:00	1579	1584	1674	1713
2021/10/21	13:56:00	1569	1583	1671	1722
2021/10/21	13:58:00	1571	1578	1678	1727
2021/10/21	14:00:00	1577	1583	1681	1733

Note:"-OVER" :Anamalous data was recored during part of the time when the flare was offline due to PG&E power outage.

Guadalupe Landfill Flare A17

		Flare		Flare	
Date	Time	°F MIN	MAX	SCFM MIN	MAX
2021/10/22	05:00:00	1581	1588	1539	1592
2021/10/22	05:02:00	1561	1581	1547	1586
2021/10/22	05:02:00	1559	1568	1545	1596
2021/10/22	05:04:00	1562	1597	1545	1596
2021/10/22	05:08:00	1502	1601	1550	1593
2021/10/22	05:00:00	1566	1595	1542	1589
2021/10/22	05:10:00	1571	1587	1539	1587
2021/10/22	05:12:00	1571	1587	1534	1586
2021/10/22	05:14:00	1572	1586	1536	1583
2021/10/22	05:18:00	1553	1575	1527	1581
2021/10/22	05:20:00	1575	1588	1533	1578
2021/10/22	05:22:00	1584	1589	1535	1580
2021/10/22	05:24:00	1575	1586	1528	1573
2021/10/22	05:26:00	1574	1578	1531	1584
2021/10/22	05:28:00	1572	1577	1533	1573
2021/10/22	05:30:00	1576	1581	1531	1583
2021/10/22	05:32:00	1572	1576	1537	1584
2021/10/22	05:34:00	1575	1604	1533	1583
2021/10/22	05:36:00	1543	1601	1528	1576
2021/10/22	05:38:00	1538	1582	1533	1575
2021/10/22	05:40:00	1582	1613	1527	1575
2021/10/22	05:42:00	1569	1609	1536	1578
2021/10/22	05:44:00	1566	1573	1528	1577
2021/10/22	05:46:00	1559	1571	1522	1576
2021/10/22	05:48:00	1557	1634	1522	1566
2021/10/22	05:50:00	1548	1639	1524	1567
2021/10/22	05:52:00	1542	1617	1517	1566
2021/10/22	05:54:00	1573	1630	1524	1572
2021/10/22	05:56:00	1551	1573	1527	1570
2021/10/22	05:58:00	-OVER	1584	-OVER	1573
2021/10/22	06:00:00	-OVER	-OVER	-OVER	-OVER
2021/10/22	06:02:00	-OVER	-OVER	-OVER	-OVER
2021/10/22	06:04:00	-OVER	-326	-OVER	0
2021/10/22	06:06:00	-OVER	-326	-OVER	0
2021/10/22	06:08:00	-OVER	581	-OVER	0
2021/10/22	06:10:00	-OVER	-OVER	-OVER	-OVER
2021/10/22	06:12:00	-OVER	-OVER	-OVER	-OVER
2021/10/22	06:14:00	-OVER	-OVER	-OVER	-OVER
2021/10/22	06:16:00	-OVER	-OVER	-OVER	-OVER
2021/10/22	06:18:00	-OVER	280	-OVER	-1 0
2021/10/22 2021/10/22	06:20:00 06:22:00	-OVER -OVER	278 -326	-OVER -OVER	0 1
2021/10/22	06:24:00	-OVER -OVER	-320 228	-OVER -OVER	3174
2021/10/22	06:24:00	-OVER -OVER	-OVER	-OVER -OVER	-OVER
2021/10/22	06:28:00	-OVER	-OVER -OVER	-OVER	-OVER
2021/10/22	06:30:00	-OVER	-OVER	-OVER	-OVER
2021/10/22	06:32:00	-OVER	-OVER	-OVER	-OVER
2021/10/22	06:34:00	-OVER	-OVER	-OVER	-OVER
_02 1/ 10/22	30.0 r.00	O V L I V	O V L I V	O V L I V	OVEIX

2021/10/22 06:38:00 -OVE 2021/10/22 06:40:00 -OVE 2021/10/22 06:42:00 -OVE 2021/10/22 06:44:00 -OVE 2021/10/22 06:46:00 -OVE 2021/10/22 06:50:00 -OVE 2021/10/22 06:52:00 -OVE 2021/10/22 06:54:00 -OVE 2021/10/22 06:56:00 -OVE 2021/10/22 07:00:00 -OVE 2021/10/22 07:10:00 -OVE 2021/10/22 07:14:00 -OVE 2021/10/22 07:14:00 -OVE 2021/10/22 07:24:00 -OVE 2021/10/22	-OVER	-OVER -OVER -OVER -OVER -OVER -OVER -OVER -OVER -OVER -OVER -OVER -OVER -OVER -OVER -OVER -OVER -OVER -OVER -OVER -OVER	-OVER -OVER -OVER -OVER -OVER -1 0 43 41 0 3622 0 0 0 -OVER 0 0 -1 -1 0 -1
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2021/10/22 08:26:00
2021/10/22 08:28:00
2021/10/22 08:30:00
2021/10/22 08:32:00
2021/10/22 08:34:00
2021/10/22 08:36:00
2021/10/22 08:38:00
2021/10/22 08:40:00
2021/10/22 08:42:00
2021/10/22 08:44:00
2021/10/22 08:46:00
2021/10/22 08:48:00
2021/10/22 08:50:00
2021/10/22 08:52:00
2021/10/22 08:54:00
2021/10/22 08:56:00
2021/10/22 08:58:00
2021/10/22 09:00:00
2021/10/22 09:02:00
2021/10/22 09:04:00
2021/10/22 09:06:00
2021/10/22 09:08:00
2021/10/22 09:10:00
2021/10/22 09:12:00
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2021/10/22 09:32:00
2021/10/22 09:34:00
2021/10/22 09:36:00
2021/10/22 09:38:00
2021/10/22 09:40:00
2021/10/22 09:42:00
2021/10/22 09:44:00
2021/10/22 09:46:00
2021/10/22 09:48:00
2021/10/22 09:50:00
2021/10/22 09:52:00
2021/10/22 09:54:00
2021/10/22 09:56:00
2021/10/22 09:58:00
2021/10/22 10:00:00
2021/10/22 10:02:00
2021/10/22 10:04:00
2021/10/22 10:06:00
2021/10/22 10:08:00
2021/10/22 10:10:00
2021/10/22 10:12:00
2021/10/22 10:14:00
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2021/10/22 10:16:00
2021/10/22 10:18:00
2021/10/22 10:20:00
2021/10/22 10:22:00
2021/10/22 10:24:00
2021/10/22 10:26:00
2021/10/22 10:28:00
2021/10/22 10:30:00
2021/10/22 10:32:00
2021/10/22 10:34:00
2021/10/22 10:36:00
2021/10/22 10:38:00
2021/10/22 10:40:00
2021/10/22 10:42:00
2021/10/22 10:44:00
2021/10/22 10:46:00
2021/10/22 10:48:00
2021/10/22 10:50:00
2021/10/22 10:52:00
2021/10/22 10:54:00
2021/10/22 10:56:00
2021/10/22 10:58:00
2021/10/22 11:00:00
2021/10/22 11:02:00
2021/10/22 11:04:00
2021/10/22 11:06:00
2021/10/22 11:08:00
2021/10/22 11:10:00
2021/10/22 11:12:00
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2021/10/22 11:32:00
2021/10/22 11:34:00
2021/10/22 11:36:00
2021/10/22 11:38:00
2021/10/22 11:40:00
2021/10/22 11:42:00
2021/10/22 11:44:00
2021/10/22 11:46:00
2021/10/22 11:48:00
2021/10/22 11:50:00
2021/10/22 11:52:00
                                   66
                                               -1
                                                           0
                       66
2021/10/22 11:54:00
                       66
                                   68
                                               0
                                                           1
2021/10/22 11:56:00
                       67
                                   70
                                               0
                                                           140
2021/10/22 11:58:00
                       70
                                   71
                                               0
                                                           1
2021/10/22 12:00:00
                       70
                                   71
                                               0
                                                           1
2021/10/22 12:02:00
                       70
                                   71
                                               1
                                                           1
2021/10/22 12:04:00
                       70
                                   71
                                               1
                                                           1
```

2021/10/22	12:06:00	70	71	1	1
2021/10/22	12:08:00	70	70	1	1
2021/10/22	12:10:00				
2021/10/22	12:12:00	70	70	-188	38
2021/10/22	12:14:00	70	70	1	1
2021/10/22	12:14:00	69	70	1	2
		09	70	1	2
2021/10/22	12:18:00				
2021/10/22	12:20:00				
2021/10/22	12:22:00	70	70	0	1
2021/10/22	12:24:00	70	70	1	1
2021/10/22	12:26:00	70	70	1	2
2021/10/22	12:28:00	70	70	1	2
2021/10/22	12:30:00	69	70	1	2
2021/10/22	12:32:00	69	70	1	2
2021/10/22	12:34:00	69	70	2	2
2021/10/22	12:36:00	69	70	2	2
2021/10/22	12:38:00			_	_
2021/10/22	12:40:00				
2021/10/22	12:42:00				
2021/10/22	12:44:00	70	71	1	4
				1	1
2021/10/22	12:46:00	71	71	1	2
2021/10/22	12:48:00	71	71	1	2
2021/10/22	12:50:00	71	71	2	2
2021/10/22	12:52:00	71	72	2	2
2021/10/22	12:54:00	72	74	2	2
2021/10/22	12:56:00	73	75	1	2
2021/10/22	12:58:00	74	75	2	2
2021/10/22	13:00:00	75	75	2	2
2021/10/22	13:02:00				
2021/10/22	13:04:00				
2021/10/22	13:06:00	75	76	1	1
2021/10/22	13:08:00	73	75	1	2
2021/10/22	13:10:00	73	84	1	1431
2021/10/22	13:12:00	84	1910	1411	2606
2021/10/22	13:14:00	1527	1908	2019	2379
2021/10/22	13:16:00	1519	1623	1981	2057
2021/10/22	13:18:00	1541	1614	1961	2020
2021/10/22	13:20:00	1546	1609	1934	2008
2021/10/22	13:22:00	1575	1609	1921	1980
2021/10/22	13:24:00	1561	1576	1910	1966
2021/10/22	13:26:00	1561	1578	1901	1960
2021/10/22	13:28:00	1578	1589	1895	1947
2021/10/22	13:30:00	1584	1592	1883	1933
2021/10/22	13:32:00	1562	1585	1882	1937
2021/10/22	13:34:00	1555	1575	1873	1930
2021/10/22	13:36:00	1575	1603	1871	1925
2021/10/22	13:38:00	1570	1603	1865	1916
2021/10/22	13:40:00	1565	1570	1863	1913
2021/10/22	13:42:00	1568	1578	1858	1915
2021/10/22	13:44:00	1577	1580	1862	1909
2021/10/22	13:46:00	1580	1586	1857	1900
2021/10/22	13:48:00	1569	1585	1857	1913
2021/10/22	13:50:00	1572	1594	1854	1904
2021/10/22	13:52:00	1579	1594	1857	1907
2021/10/22	13:54:00	1572	1579	1854	1910
 		- -	- -		•

2021/10/22	13:56:00	1548	1573	1846	1901
2021/10/22	13:58:00	1552	1625	1835	1880
2021/10/22	14:00:00	1551	1615	1839	1891
2021/10/22	14:02:00	1548	1594	1833	1886
2021/10/22	14:04:00	1589	1605	1830	1882
2021/10/22	14:06:00	1567	1589	1836	1891
2021/10/22	14:08:00	1562	1574	1835	1891
2021/10/22	14:10:00	1571	1607	1837	1886
2021/10/22	14:12:00	1571	1609	1830	1883
2021/10/22	14:14:00	1560	1571	1832	1888
2021/10/22	14:16:00	1568	1601	1835	1883
2021/10/22	14:18:00	1580	1602	1834	1878
2021/10/22	14:20:00	1562	1580	1827	1877
2021/10/22	14:22:00	1567	1581	1821	1874
2021/10/22	14:24:00	1581	1598	1822	1869
2021/10/22	14:26:00	1571	1598	1821	1877
2021/10/22	14:28:00	1565	1571	1821	1866
2021/10/22	14:30:00	1565	1597	1820	1875
2021/10/22	14:32:00	1586	1606	1827	1872
2021/10/22	14:34:00	1564	1587	1815	1882
2021/10/22	14:36:00	1564	1577	1829	1880
2021/10/22	14:38:00	1577	1589	1820	1877
2021/10/22	14:40:00	1586	1595	1809	1871
2021/10/22	14:42:00	1565	1586	1818	1864
2021/10/22	14:44:00	1560	1579	1817	1860
2021/10/22	14:46:00	1579	1607	1814	1859
2021/10/22	14:48:00	1574	1606	1806	1859
2021/10/22	14:50:00	1560	1574	1811	1867
2021/10/22	14:52:00	1565	1589	1817	1874
2021/10/22	14:54:00	1589	1599	1802	1869
2021/10/22	14:56:00	1572	1594	1808	1861
2021/10/22	14:58:00	1576	1605	1803	1859
2021/10/22	15:00:00	1543	1579	1812	1871
2021/10/22	15:02:00	1543	1606	1812	1871
2021/10/22	15:04:00	1577	1612	1811	1862
2021/10/22	15:06:00	1553	1578	1808	1859
2021/10/22	15:08:00	1558	1578	1808	1861
2021/10/22	15:10:00	1576	1586	1806	1855
2021/10/22	15:12:00	1582	1589	1802	1855
2021/10/22	15:14:00	1583	1587	1802	1850
2021/10/22	15:16:00	1560	1585	1808	1866
2021/10/22	15:18:00	1558	1573	1809	1851
2021/10/22	15:20:00	1573	1588	1802	1858
2021/10/22	15:22:00	1584	1594	1806	1855
2021/10/22	15:24:00	1565	1584	1812	1865
2021/10/22	15:26:00	1563	1579	1799	1862
2021/10/22	15:28:00	1579	1587	1808	1859
2021/10/22	15:30:00	1585	1589	1803	1856
2021/10/22	15:32:00	1577	1589	1799	1858
2021/10/22	15:34:00	1569	1579	1800	1858
2021/10/22	15:36:00	1571	1577	1797	1852
2021/10/22	15:38:00	1562	1576	1800	1850
2021/10/22	15:40:00	1572	1594	1800	1850
2021/10/22	15:42:00	1578	1597	1791	1850

2021/10/22	15:44:00	1577	1580	1791	1848
2021/10/22	15:46:00	1572	1578	1794	1839
2021/10/22	15:48:00	1565	1574	1790	1851
2021/10/22	15:50:00	1569	1586	1792	1844
2021/10/22	15:52:00	1584	1589	1792	1845
2021/10/22	15:54:00	1584	1589	1787	1842
2021/10/22	15:56:00	1572	1586	1786	1836
2021/10/22	15:58:00	1562	1572	1794	1847
2021/10/22	16:00:00	1564	1589	1779	1841

Note:"-OVER" :Anamalous data was recored during part of the time when the flare was offline due to PG&E power outage. Power to the flare equipment was switched off for some time as a safety measure and to avoid potential damage to the equipment.

Attachment B Copy of GRDF RCA Forms for RCA Numbers 08C52 and 08C55





910 Coyote Creek Golf Drive P.O. Box 1870 Morgan Hill, CA 95037 (408) 779-2206 (408) 779-5165 Fax

October 21, 2021 (via email rca@baaqmd.gov)

Compliance & Enforcement Division Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, California 94105

Re: Reportable Compliance Activity (RCA) Notification
Guadalupe Recycling & Disposal Facility, San Jose, CA, Facility Number A3294

Guadalupe Rubbish Disposal Co., Inc d/b/a Guadalupe Recycling & Disposal Facility ("GRDF") is submitting the attached Reportable Compliance Activity (RCA) Form for temporary flare shutdown event caused by unplanned utility power interruption on October 20, 2021, ~ 5:40 PM. A breakdown report was submitted to Bay Area Air Quality Management District (BAAQMD) on October 20, 2021 at ~9:15 PM via the afterhours phone line by GRDF about the PG&E's power outage.

Although GRDF disagrees that Breakdown Relief is the appropriate methodology for compliance with Rule 8-34 during an unplanned power outage, due to direction from BAAQMD staff, this letter is to request Breakdown Relief from BAAQMD for the PG&E power outage. BAAQMD's RCA notification form, as modified, is enclosed. The frequency and duration of weather or utility-related electrical interruptions are outside of GRDF's control and GRDF asserts that it did not violate any applicable regulations and limits.

Breakdown Relief should be granted as GRDF complied with administrative requirements despite its objections to the re-interpretation of Rule 8-34 and:

- 1. The breakdown is not the result of intent, negligence or disregard of air pollution control regulations;
- 2. The breakdown is not the result of improper maintenance;
- 3. The breakdown does not create a public nuisance;
- 4. The breakdown was not caused by an excessively recurrent breakdown of the same equipment; and
- 5. The breakdown did not occur, and any emissions did not interfere with attainment or maintenance of any National or California air quality standard.

On October 21, 2021 at ~11:50 AM the GCCS was back online. The shutdown event was unforeseeable & unpreventable at GRDF. The flare was temporarily shut down and did not result in emission nor nuisance.

Sincerely,

Guadalupe Recycling & Disposal Facility

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: RCA Form GRDF Facility A3294



COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable Compliance Activity (RCA)

	S	See back of form t	for instructions →
1. X BREAKDO	WN RELIEF: District Use OnlyBREAKD	OWN REFERENC	E #:
2. NA MONITOR E	XCESS EMISSION or EXCURSION: <i>Dis</i>	trict Use Only RE	FERENCE#:
3. NA MONITOR IS	S INOPERATIVE: District Use Only REF	ERENCE#:	
4. NA PRESSURE	RELIEF DEVICE (PRD): District Use O	nly PRD REFERE	NCE#:
SITE INF	ORMATION AND DESCRIPTION INFOR	MATION (REQUIR	RED)
Company	Guadalupe Rubbish Disposal Co., Inc	Site #	A3294
Address	15999 Guadalupe Mines Road, San Jose 95120	Source #	S-9
Reported by	R Phadnis	Phone #	510.875.9338
Indicated Excess	-NA	Fax #	-
Allowable Limit	-NA	Averaging Time	-
Start Time/Date	~5:40 PM on 10/20/2021	Clear Time	10/21/2021~11:50 AM
Monitor/device type(s)	▶ CEM ▶ GLM ▶ Parame	etric PRD	► Non-monitor
Monitor description(s)			
Parameter(s) exceeded NO _x SO ₂ Hydrocarbon Brea Wind Direction Unit(s) of Measurement ppm ppb psig pH	Opacity Lead	H ₂ S	► Flow ed hibe) Power outage ► mmHg
Facility (GRDF) because the G		power outage. During	g the PG&E power
Received by	District Use Only	late	Time

- ✓ Check the Box numbers 1-4 that apply to the RCA you are trying to report or request and read the detailed instructions.
- You will receive an ID # for each RCA you submit. In the case of a request for Breakdown Relief where multiple monitors are affected, you do not need to submit multiple forms, as long as all necessary information is given on one form. RCA reported during other than core business hours will be assigned an ID # the following working day. If you do not receive an ID #, it is your responsibility to contact the BAAQMD to get one.
- ✓ You may submit only one request for breakdown relief per form. However, you may submit multiple indicated excess, inoperative monitors and PRD reports on one form, provided that the start and end times given for the events in the required information section is inclusive of all events. Information on parameters exceeded, units of measurement and allowable limits can be provided in the event description box or when contacted by District staff with questions.
- ✓ Fill out the "Site Information and Description Information Required" areas of this form and email to <u>rca@baagmd.gov</u>
- ✓ A 30-day written follow-up report is required for Breakdown Requests and PRD Releases. Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference Breakdown Admissions Advisory dated 12/3/04. Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: You may have additional report requirements under Title V.

Detailed Instructions

Box 1: To Request Breakdown Relief (Regulations 1-112, 1-113, 1-208, 1-431, 1-432)

If you have an equipment malfunction (e.g.; breakdown) that leads to the release of air pollutants above the regulatory or your permitted levels, you may request relief from BAAQMD enforcement action.

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- □ NOTE: Start and end times given for these events in the required information section must be inclusive of all events.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Requests for breakdown relief may not be withdrawn and must be called in or faxed to the BAAQMD <u>immediately upon</u> discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

Box 2: Monitor Indicates Excess Emission or Excursion (Regulation 1-522.7, 1-523.3, 1-542)

When a BAAQMD-required monitor indicates an excess or excursion, you must report it to the BAAQMD.

- Check Box #2.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Any excess emission indicated by a CEM or excursion of a parametric monitor, shall be reported to the BAAQMD within 96 hours.
- Area concentration excesses over the limits prescribed in District regulations shall be reported to the BAAQMD within the next normal working day following the examination of data.

Box 3: Monitor Is Inoperative (Regulations 1-522, 1-523, 1-530)

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- ☐ Check Box #3 only if inoperative for greater than 24 hours.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All reports of inoperative monitors must be reported by the following BAAQMD working day and additionally be cleared by a notification of resumption of monitoring. To notify the BAAQMD regarding the resumption of monitoring, do not send in a separate RCA form; call (415) 749-4979 and give the RCA ID #, date, and the time of resumption.
- Inoperative monitors (except parametric monitors) with downtime greater than 15 days must furnish proof of expedited repair in a follow-up report.

Box 4: Pressure Relief Device (PRD) Is Released (Regulation 8-28-401)

When a PRD at your refinery/chemical plant vents to the atmosphere, you must report it to the BAAQMD.

- Check Box #4 only if a pressure relief device is released.
- Separate RCA ID #'s can be applied to monitor(s) affected by a PRD by also checking Box #2 if other monitors record an
 excess or excursion.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- □ All PRD release reports must be reported by the following BAAQMD working day.

From: RCA Notification
To: Phadnis, Rajan
Cc: Erin Phillips

Subject: [EXTERNAL] Re: GRDF A3294-RCA for PG&E power outage

Date: Thursday, October 21, 2021 2:01:14 PM

Good afternoon, I am confirming receipt and letting you know the RCA number for your notification is 08C52

Thanks!

From: Phadnis, Rajan <rphadnis@wm.com> **Sent:** Thursday, October 21, 2021 8:08 PM **To:** RCA Notification <rca@baaqmd.gov>

Cc: Phadnis, Rajan <rphadnis@wm.com>; Perez, Enrique <pperez3@wm.com>; Erin Phillips

<ephillips@baaqmd.gov>; Azevedo, Becky <Razevedo@wm.com>

Subject: GRDF A3294-RCA for PG&E power outage

CAUTION: This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am attaching the RCA notification form for unplanned PG&E power outage on 10/20/2021, at Guadalupe Recycling and Disposal Facility in San Jose, CA (Facility A3294).

Thank you, Rajan Phadnis EP Specialist Guadalupe Recycling and Disposal Facility

Recycling is a good thing. Please recycle any printed emails.





910 Coyote Creek Golf Drive P.O. Box 1870 Morgan Hill, CA 95037 (408) 779-2206 (408) 779-5165 Fax

October 22, 2021 (via email rca@baaqmd.gov)

Compliance & Enforcement Division Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, California 94105

Re: Addendum to Reportable Compliance Activity (RCA 08C52) Notification Guadalupe Recycling & Disposal Facility, San Jose, CA, Facility Number A3294

Guadalupe Rubbish Disposal Co., Inc d/b/a Guadalupe Recycling & Disposal Facility ("GRDF") is submitting the attached Addendum Reportable Compliance Activity (RCA) to the previously submitted RCA Form (BAAQMD assigned RCA Number 08C52) for temporary flare shutdown event caused by unplanned utility power interruption on October 20, 2021, ~ 5:40 PM and on October 22, 2021 ~6:00 AM. A breakdown report was submitted to Bay Area Air Quality Management District (BAAQMD) on October 20, 2021 at ~9:15 PM via the afterhours phone line by GRDF about the PG&E's power outage.

Although GRDF disagrees that Breakdown Relief is the appropriate methodology for compliance with Rule 8-34 during an unplanned power outage, due to direction from BAAQMD staff, this letter is to request Breakdown Relief from BAAQMD for the PG&E power outage. BAAQMD's RCA notification form, as modified, is enclosed. The frequency and duration of weather or utility-related electrical interruptions are outside of GRDF's control and GRDF asserts that it did not violate any applicable regulations and limits.

Breakdown Relief should be granted as GRDF complied with administrative requirements despite its objections to the re-interpretation of Rule 8-34 and:

- 1. The breakdown is not the result of intent, negligence or disregard of air pollution control regulations;
- 2. The breakdown is not the result of improper maintenance;
- 3. The breakdown does not create a public nuisance;
- 4. The breakdown was not caused by an excessively recurrent breakdown of the same equipment; and
- 5. The breakdown did not occur, and any emissions did not interfere with attainment or maintenance of any National or California air quality standard.

The power to the site was restored on October 21, 2021 at ~11:50 AM and on October 22, 2021 at ~1:30 PM and the GCCS was online. The shutdown events were unforeseeable & unpreventable at GRDF. The flare was temporarily shut down and did not result in emission nor nuisance.

Sincerely,

Guadalupe Recycling & Disposal Facility

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: Addendum to RCA Form GRDF Facility A3294



Received by

COMPLIANCE & ENFORCEMENT DIVISION

ADDENDUM to RCA Number 08C52 (10/21/2021)-Submittal 10/22/2021

Notification Form

Reportable Compliance Activity (RCA)

			C	on back of form	for instructions →
1. X BREAKDO	WN RELIEF: <i>Dis</i>	strict Use OnlyBRE			
2. NA MONITOR E	XCESS EMISSI	ON or EXCURSION	N: <i>Di</i> s	trict Use Only RE	FERENCE#:
3. NA MONITOR IS	S INOPERATIVE	: District Use Only	/ REF	ERENCE#:	
4. NA PRESSURE	RELIEF DEVIC	E (PRD): District U	Jse O	nly PRD REFERE	NCE#:
SITE INF	ORMATION ANI	DESCRIPTION IN	IFORI	MATION (REQUIR	RED)
Company	Guadalupe Rubb	ish Disposal Co., In	С	Site #	A3294
Address	15999 Guadalupe Mir	nes Road, San Jose 951	20	Source #	S-9
Reported by	R Phadnis			Phone #	510.875.9338
Indicated Excess	-NA			Fax #	-
Allowable Limit	-NA			Averaging Time	-
Start Time/Date	~5:40 PM on 10/20/2021; ~ 6:00 AM on 10/22/2021	and		Clear Time	10/21/2021~11:50 AM; and 10/22/2021~1:30 PM
Monitor/device type(s)	►CEM	►GLM ►P	arame	tric PRD	► Non-monitor
Monitor description(s)					
Parameter(s) exceeded or not functioning due to inoperation NO _x SO ₂ CO CO ₂ H ₂ S TRS O ₂ H ₂ O Opacity Lead Gauge Pressure Hydrocarbon Breakthrough (VOC) Temperature Wind Speed					
► Wind Direction Unit(s) of Measurement		►Steam		X ► Other (descri	ribe) Power outage
	► min/h	r > 20%		►inches H ₂ O	— ▶mmHg
▶ppm ▶psig ▶pH	▶ºFahr			► Other (describe) P	
vent Description: breakdown report was submitted on 10/20/2021 at~ 9:15 PM via afterhours phone line by Guadalupe Recycling & Disposal acility (GRDF) because the GCCS was temporarily shut down due to the PG&E power outage. During the PG&E power utage, the GCCS was potentially out of compliance with BAAQMD regulation 8-34-301.1. Please also see objections and iscussion in the attached cover letter dated 10/22/2021.					

District Use Only

Date

Time

- ✓ Check the Box numbers 1-4 that apply to the RCA you are trying to report or request and read the detailed instructions.
- You will receive an ID # for each RCA you submit. In the case of a request for Breakdown Relief where multiple monitors are affected, you do not need to submit multiple forms, as long as all necessary information is given on one form. RCA reported during other than core business hours will be assigned an ID # the following working day. If you do not receive an ID #, it is your responsibility to contact the BAAQMD to get one.
- ✓ You may submit only one request for breakdown relief per form. However, you may submit multiple indicated excess, inoperative monitors and PRD reports on one form, provided that the start and end times given for the events in the required information section is inclusive of all events. Information on parameters exceeded, units of measurement and allowable limits can be provided in the event description box or when contacted by District staff with questions.
- ✓ Fill out the "Site Information and Description Information Required" areas of this form and email to <u>rca@baagmd.gov</u>
- ✓ A 30-day written follow-up report is required for Breakdown Requests and PRD Releases. Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference Breakdown Admissions Advisory dated 12/3/04. Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: You may have additional report requirements under Title V.

Detailed Instructions

Box 1: To Request Breakdown Relief (Regulations 1-112, 1-113, 1-208, 1-431, 1-432)

If you have an equipment malfunction (e.g.; breakdown) that leads to the release of air pollutants above the regulatory or your permitted levels, you may request relief from BAAQMD enforcement action.

Che		

- □ NOTE: Start and end times given for these events in the required information section must be inclusive of all events.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Requests for breakdown relief may not be withdrawn and must be called in or faxed to the BAAQMD <u>immediately upon</u> discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

Box 2: Monitor Indicates Excess Emission or Excursion (Regulation 1-522.7, 1-523.3, 1-542)

When a BAAQMD-required monitor indicates an excess or excursion, you must report it to the BAAQMD.

- Check Box #2.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Any excess emission indicated by a CEM or excursion of a parametric monitor, shall be reported to the BAAQMD within 96 hours.
- Area concentration excesses over the limits prescribed in District regulations shall be reported to the BAAQMD within the next normal working day following the examination of data.

Box 3: Monitor Is Inoperative (Regulations 1-522, 1-523, 1-530)

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- ☐ Check Box #3 only if inoperative for greater than 24 hours.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All reports of inoperative monitors must be reported by the following BAAQMD working day and additionally be cleared by a notification of resumption of monitoring. To notify the BAAQMD regarding the resumption of monitoring, do not send in a separate RCA form; call (415) 749-4979 and give the RCA ID #, date, and the time of resumption.
- Inoperative monitors (except parametric monitors) with downtime greater than 15 days must furnish proof of expedited repair in a follow-up report.

Box 4: Pressure Relief Device (PRD) Is Released (Regulation 8-28-401)

When a PRD at your refinery/chemical plant vents to the atmosphere, you must report it to the BAAQMD.

- Check Box #4 only if a pressure relief device is released.
- Separate RCA ID #'s can be applied to monitor(s) affected by a PRD by also checking Box #2 if other monitors record an
 excess or excursion.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- □ All PRD release reports must be reported by the following BAAQMD working day.

From: RCA Notification
To: Phadnis, Rajan

Subject: [EXTERNAL] RE: GRDF A3294-RCA for PG&E power outages

Date: Friday, October 22, 2021 2:21:31 PM

ID# 08C55

From: Phadnis, Rajan <rphadnis@wm.com> **Sent:** Friday, October 22, 2021 2:04 PM **To:** RCA Notification <rca@baaqmd.gov>

Cc: Azevedo, Becky <Razevedo@wm.com>; Perez, Enrique <pperez3@wm.com>; Phadnis, Rajan

<rphadnis@wm.com>; Erin Phillips <ephillips@baaqmd.gov>

Subject: GRDF A3294-RCA for PG&E power outages

CAUTION: This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am attaching the addendum RCA notification form for unplanned PG&E power outages on 10/20/21 and 10/22/2021, at Guadalupe Recycling and Disposal Facility in San Jose, CA (Facility A3294).

Thank you, Rajan Phadnis EP Specialist Guadalupe Recycling and Disposal Facility

Recycling is a good thing. Please recycle any printed emails.



Guadalupe Rubbish Disposal Co., Inc. 15999 Guadalupe Mines Road P.O. Box 20957

San Jose, CA 95160

November 12, 2021 (via email: compliance@baaqmd.gov)

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

Attn: RCA 30-Day Report

Re: Guadalupe Recycling & Disposal Facility, San Jose, CA, Facility Number A3294 Request for Breakdown Relief for RCA Numbers 08C52 and 08C55 30-Day Written Follow-up Report (Per Regulation 1, Section 432)

Dear Sir or Madam:

Guadalupe Rubbish Disposal Co., Inc d/b/a Guadalupe Recycling & Disposal Facility ("GRDF") is submitting this 30-Day follow-up report to the Bay Area Air Quality Management District (BAAQMD) for the PG&E power outage on October 20 and 22, 2021 report.

A breakdown report (Per Regulation 1, Section 431) was submitted on October 20, 2021, at around 9:15 PM via afterhours phone line by GRDF because the landfill gas collection and control system (GCCS) was temporarily shut down due to the PG&E power outage. The flare was online on Thursday, October 21, 2021 around 11:50 AM (see Attachment A for flare data). Although GRDF disagrees that Breakdown Relief is the appropriate methodology for compliance with Rule 8-34 during an unplanned power outage, due to direction from BAAQMD staff, GRDF submitted the request for Breakdown Relief from BAAQMD for the October 20 and 22, 2021 PG&E power outage via BAAQMD's Reportable Compliance Activity (RCA) notification form submitted on October 21 and amended on October 22, 2021 and were assigned RCA numbers 08C52 and 08C55 (see Attachment B for copies of RCA submittals).

The unplanned power outage shutdown events noted in original and amended RCA forms submitted on October 21 and 22, 2021, did not result in emissions and do not qualify as non-compliance. GRDF believes that it complied with the Title V permit conditions and safety protocols. GRDF followed all measures to ensure gas movers and valves were closed during the shutdown events. GRDF's downtime events were not the result of equipment malfunction, knowing, willful, intentional, chronic nor committed by a recalcitrant, and did not benefit KCRDF economically nor result in a nuisance. The frequency and duration of weather or utility-related electrical interruptions are outside of GRDF's control.

GRDF is committed to operating its landfill in compliance with applicable regulations and will ensure that compliance is achieved. However, GRDF disagrees with the BAAQMD that temporary shutdowns resulting from unplanned power outages are violations of any BAAQMD regulation.

GRDF has placed the purchase order for a permanent generator (delayed due to the COVID-19 emergency and related supply chain disruptions) and the suppliers anticipate the unit to be delivered by the fourth quarter of 2022. Currently, GRDF is working on BAAQMD permit application for the generator and Automatic Transfer Switch (ATS) electrical permit as required by the City of San Jose.

If you have any questions or need any additional information, please do not hesitate to contact me at (408) 779-2206.

Sincerely,

Guadalupe Recycling & Disposal Facility

Enrique Perez District Manager

cc: Erin Phillips, BAAQMD

Attachments:

Attachment A- GRDF flare data Attachment B- Copy of GRDF RCA Forms -Numbers 08C52 and 08C55

Attachment A GRDF flare data

Guadalupe Landfill Flare A17

		Flare		Flare	
		°F		SCFM	
Date	Time	MIN	MAX	MIN	MAX
2021/10/20	15:00:00	1563	1608	1592	1647
2021/10/20	15:02:00	1549	1570	1606	1644
2021/10/20	15:04:00	1570	1611	1597	1648
2021/10/20	15:06:00	1565	1606	1604	1653
2021/10/20	15:08:00	1561	1577	1595	1644
2021/10/20	15:10:00	1577	1602	1600	1645
2021/10/20	15:12:00	1556	1601	1588	1645
2021/10/20	15:14:00	1548	1592	1601	1647
2021/10/20	15:16:00	1584	1611	1600	1647
2021/10/20	15:18:00	1548	1584	1588	1637
2021/10/20	15:20:00	1550	1623	1593	1647
2021/10/20	15:22:00	1548	1624	1595	1648
2021/10/20	15:24:00	1544	1594	1582	1644
2021/10/20	15:26:00	1572	1613	1597	1642
2021/10/20	15:28:00	1558	1572	1595	1641
2021/10/20	15:30:00	1570	1584	1595	1642
2021/10/20	15:32:00	1584	1592	1597	1642
2021/10/20	15:34:00	1572	1589	1592	1647
2021/10/20	15:36:00	1568	1572	1594	1644
2021/10/20	15:38:00	1565	1575	1594	1639
2021/10/20	15:40:00	1575	1587	1594	1645
2021/10/20	15:42:00	1580	1584	1591	1644
2021/10/20	15:44:00	1584	1587	1591	1642
2021/10/20	15:46:00	1575	1584	1594	1645
2021/10/20	15:48:00	1568	1577	1588	1637
2021/10/20	15:50:00	1568	1580	1601	1650
2021/10/20	15:52:00	1580	1590	1591	1642
2021/10/20	15:54:00	1578	1589	1597	1641
2021/10/20	15:56:00	1565	1578	1586	1642
2021/10/20	15:58:00	1568	1575	1597	1639
2021/10/20	16:00:00	1575	1587	1597	1642
2021/10/20	16:02:00	1584	1592	1591	1639
2021/10/20	16:04:00	1566	1584	1588	1650
2021/10/20	16:06:00	1568	1575	1594	1644
2021/10/20	16:08:00	1575	1590	1591	1653
2021/10/20	16:10:00	1575	1594	1592	1645
2021/10/20	16:12:00	1565	1575	1589	1654
2021/10/20	16:14:00	1563	1587	1582	1637
2021/10/20	16:16:00	1587	1597	1597	1642
2021/10/20	16:18:00	1566	1592	1594	1639
2021/10/20	16:20:00	1563	1573	1601	1639
2021/10/20	16:22:00	1572	1587	1597	1642
2021/10/20	16:24:00	1587	1592	1583	1636
2021/10/20	16:26:00	1573	1587	1594	1638
2021/10/20	16:28:00	1568	1573	1591	1639
2021/10/20	16:30:00	1568	1575	1592	1641

2021/10/20	16:32:00	1575	1590	1592	1641
2021/10/20	16:34:00	1584	1589	1589	1645
2021/10/20	16:36:00	1575	1585	1594	1641
2021/10/20	16:38:00	1568	1575	1595	1639
2021/10/20	16:40:00	1568	1573	1583	1637
2021/10/20	16:42:00	1573	1590	1594	1639
2021/10/20	16:44:00	1582	1594	1594	1639
2021/10/20	16:46:00	1565	1582	1584	1641
2021/10/20	16:48:00	1561	1587	1594	1645
2021/10/20	16:50:00	1587	1607	1598	1641
2021/10/20	16:52:00	1551	1595	1591	1641
2021/10/20	16:54:00	1551	1589	1587	1636
2021/10/20	16:56:00	1589	1603	1591	1637
2021/10/20	16:58:00	1565	1590	1586	1642
2021/10/20	17:00:00	1563	1580	1591	1636
2021/10/20	17:02:00	1580	1597	1586	1642
2021/10/20	17:04:00	1561	1598	1592	1636
2021/10/20	17:06:00	1549	1573	1597	1639
2021/10/20	17:08:00	1573	1606	1592	1634
2021/10/20	17:10:00	1559	1604	1589	1636
2021/10/20	17:12:00	1551	1578	1594	1637
2021/10/20	17:14:00	1578	1606	1584	1641
2021/10/20	17:16:00	1561	1602	1586	1639
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2021/10/20	17:24:00	1555	1572	1591	1637
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2021/10/20	17:28:00	1589	1602	1589	1637
2021/10/20	17:30:00	1560	1589	1587	1637
2021/10/20	17:32:00	1559	1582	1584	1637
2021/10/20	17:34:00	1582	1597	1592	1639
2021/10/20	17:36:00	1561	1596	1589	1637
2021/10/20	17:38:00	1366	1631	0	1633
2021/10/20	17:40:00	1041	1366	0	1
2021/10/20	17:42:00	832	1041	0	1
2021/10/20	17:44:00	684	832	-1	2
2021/10/20	17:46:00	579	684	-1	1
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2021/10/20	18:46:00	87	89	-1 -1	1	
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2021/10/20	21:30:00	62	63	-1	1
2021/10/20	21:32:00	61	63	-1	0
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2021/10/20	21:36:00	61	63	-1	0
2021/10/20	21:38:00	61	63	-1	0
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2021/10/20	23:08:00	61	61	-1	0
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2021/10/20	23:18:00	61	61	-1	0
2021/10/20	23:20:00	61	61	- 2	0
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2021/10/20	23:26:00	61	61	-0 VER	0
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2021/10/20	23:34:00	61	61	-2	0
202 1/10/20	20.04.00	01	01	- <u>-</u> _	J

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2021/10/20	23:38:00	61	61	-1	0
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2021/10/20	23:46:00	-OVER	61	-OVER	0
2021/10/20	23:48:00	-OVER	61	-OVER	0
2021/10/20	23:50:00	-OVER	61	-OVER	0
2021/10/20	23:52:00	-OVER	61	-OVER	1
2021/10/20	23:54:00	60	60	-1	0
2021/10/20	23:56:00	60	60	-2	0
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2021/10/21	00:00:00	60	60	-2	0
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2021/10/21	00:06:00	60	61	-1	0
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2021/10/21	00:18:00	61	61	-2	0
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2021/10/21	00:38:00	61	61	-1 -1	0
2021/10/21	00:40:00	61	61	-2	0
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2021/10/21	01:04:00	61	61	-1	0
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2021/10/21	02:46:00	-OVER	61	-OVER	0
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2021/10/21	02:50:00	-OVER	63	-OVER	0
2021/10/21	02:52:00	-OVER	63	-OVER	4
2021/10/21	02:54:00	61	63	-1	0
2021/10/21	02:56:00	-OVER	63	-OVER	0
2021/10/21	02:58:00	-326	63	-1	3
2021/10/21	03:00:00	61	63	-1	0
2021/10/21	03:02:00	61	63	-1	0
2021/10/21	03:04:00	-OVER	63	-OVER	0
2021/10/21	03:06:00	61	63	-180	-178

2021/10/21	03:08:00	61	63	-180	-178
2021/10/21	03:10:00	61	63	-180	-178
2021/10/21	03:12:00	61	63	-180	-178
2021/10/21	03:14:00	61	63	-180	-178
2021/10/21	03:16:00	61	63	-180	-178
2021/10/21	03:18:00	61	61	-180	-178
2021/10/21	03:20:00	61	61	-180	-178
2021/10/21	03:22:00	61	61	-179	-178
2021/10/21	03:24:00	61	61	-180	-178
2021/10/21	03:26:00	-OVER	61	-OVER	0
2021/10/21	03:28:00	-OVER	61	-OVER	0
2021/10/21	03:30:00	61	61	-0 VLIX	0
2021/10/21	03:32:00	-OVER	61	-0VER	0
2021/10/21	03:34:00	-326	61	-0 V L IX	0
2021/10/21	03:36:00	-0VER	61	-0VER	0
2021/10/21	03:38:00	-OVER	61	-OVER	0
2021/10/21	03:40:00	-OVER	61	-OVER	0
	03:40:00				0
2021/10/21		-OVER	61	-OVER	
2021/10/21	03:44:00	-OVER	61	-OVER	0
2021/10/21	03:46:00	-OVER	61	-OVER	0
2021/10/21	03:48:00	-OVER	61	-OVER	0
2021/10/21	03:50:00	-OVER	61	-OVER	0
2021/10/21	03:52:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	03:54:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	03:56:00	-OVER	-326	-OVER	4287
2021/10/21	03:58:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	04:00:00	-OVER	61	-OVER	0
2021/10/21	04:02:00	-OVER	61	-OVER	182
2021/10/21	04:04:00	-OVER	61	-OVER	3585
2021/10/21	04:06:00	61	61	-1	0
2021/10/21	04:08:00	-OVER	61	-OVER	0
2021/10/21	04:10:00	-OVER	61	-OVER	4
2021/10/21	04:12:00	-OVER	61	-OVER	4
2021/10/21	04:14:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	04:16:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	04:18:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	04:20:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	04:22:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	04:24:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	04:26:00	-OVER	-326	-OVER	-1
2021/10/21	04:28:00	-OVER	63	-OVER	0
2021/10/21	04:30:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	04:32:00	-OVER	63	-OVER	-1
2021/10/21	04:34:00	-OVER	63	-OVER	0
2021/10/21	04:36:00	-OVER	63	-OVER	0
2021/10/21	04:38:00	-OVER	63	-OVER	0
2021/10/21	04:40:00	-OVER	-326	-OVER	0
2021/10/21	04:42:00	-OVER	63	-OVER	0
2021/10/21	04:44:00	-OVER	63	-OVER	0
2021/10/21	04:46:00	63	63	-2	0
2021/10/21	04:48:00	-OVER	63	-OVER	0
2021/10/21	04:50:00	63	63	-1	0
2021/10/21	04:52:00	-OVER	63	-OVER	0

2021/10/21	04:54:00	-OVER	-326	-OVER	0
2021/10/21	04:56:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	04:58:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	05:00:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	05:02:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	05:04:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	05:06:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	05:08:00	-OVER	63	-OVER	0
2021/10/21	05:10:00	63	63	-1	0
2021/10/21	05:12:00	-OVER	63	-OVER	0
2021/10/21	05:14:00	63	63	-1	0
2021/10/21	05:16:00	-OVER	63	-OVER	1
2021/10/21	05:18:00	-326	63	- 2	1
2021/10/21	05:20:00	-OVER	63	-OVER	1
2021/10/21	05:22:00	-OVER	63	-OVER	0
2021/10/21	05:24:00	63	63	-1	0
2021/10/21	05:26:00	-OVER	63	-OVER	0
2021/10/21	05:28:00	63	63	-1	0
2021/10/21	05:30:00	-OVER	63	-OVER	0
2021/10/21	05:32:00	-326	63	-1	0
2021/10/21	05:34:00	63	63	-1	0
2021/10/21	05:36:00	-OVER	63	-OVER	0
2021/10/21	05:38:00	-OVER	63	-OVER	0
2021/10/21	05:40:00	63	63	-2	0
2021/10/21	05:42:00	-OVER	63	-OVER	0
2021/10/21	05:44:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	05:46:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	05:48:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	05:50:00	-OVER	63	-OVER	0
2021/10/21	05:52:00	-OVER	63	-OVER	0
2021/10/21	05:54:00	-OVER	63	-OVER	0
2021/10/21	05:56:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	05:58:00	-OVER	63	-OVER	0
2021/10/21	06:00:00	-OVER	63	-OVER	0
2021/10/21	06:02:00	-OVER	63	-OVER	2051
2021/10/21	06:04:00	-OVER	63	-OVER	0
2021/10/21	06:06:00	-OVER	63	-OVER	2
2021/10/21	06:08:00	-OVER	64	-OVER	0
2021/10/21	06:10:00	-OVER	64	-OVER	2
2021/10/21	06:12:00	-OVER	64	-OVER	0
2021/10/21	06:14:00	-OVER	64	-OVER	4
2021/10/21	06:16:00	-OVER	64	-OVER	0
2021/10/21	06:18:00	-OVER	64	-OVER	3
2021/10/21	06:20:00	-OVER	64	-OVER	0
2021/10/21	06:22:00	63	64	-1	1
2021/10/21	06:24:00	-OVER	63	-OVER	0
2021/10/21	06:26:00	-OVER	63	-OVER	0
2021/10/21	06:28:00	63	63	-0 VLIX	0
2021/10/21	06:30:00	-OVER	63	-OVER	0
2021/10/21	06:30:00	-OVER	63	-OVER	0
2021/10/21	06:34:00	-OVER	63	-OVER	1
2021/10/21	06:36:00	-OVER	63	-OVER	4
2021/10/21	06:38:00	63	63	-0 V L I X	1
2021/10/21	30.00.00	00	00	_	ı

2021/10/21	06:40:00	63	63	-1	1
2021/10/21	06:42:00	-OVER	63	-OVER	3683
2021/10/21	06:44:00	-326	63	-1	0
2021/10/21	06:46:00	63	63	-1	0
2021/10/21	06:48:00	63	63	-1	0
2021/10/21	06:50:00	63	63	-1	1
2021/10/21	06:52:00	-OVER	63	-OVER	0
2021/10/21	06:54:00	-OVER	63	-OVER	0
2021/10/21	06:56:00	-OVER	63	-OVER	0
2021/10/21	06:58:00	-OVER	63	-OVER	6
2021/10/21	07:00:00	-326	63	-1	1
2021/10/21	07:02:00	63	63	-1	0
2021/10/21	07:04:00	63	63	-1	1
2021/10/21	07:06:00	63	63	-1	1
2021/10/21	07:08:00	63	63	-1	1
2021/10/21	07:10:00	63	63	-1	1
2021/10/21	07:12:00	63	63	-1	1
2021/10/21	07:12:00	63	63	-1 -1	1
2021/10/21	07:14:00	63	63	-1 -1	1
2021/10/21	07:18:00	63	63	-1 -1	1
2021/10/21	07:10:00	63	63	-1 -1	1
2021/10/21	07:20:00	63	63	-1 -1	1
2021/10/21	07:22:00	-OVER	63	-0VER	1
2021/10/21	07:24:00	-OVER	63	-OVER	2
2021/10/21	07:28:00	63	63	-0 VER	1
					1
2021/10/21	07:30:00	63	63	-1	
2021/10/21	07:32:00	63	63	-1	1
2021/10/21	07:34:00	63	63	-1	0
2021/10/21	07:36:00	63	63	-1	1
2021/10/21	07:38:00	63	63	-1	0
2021/10/21	07:40:00	63	63	-1	1
2021/10/21	07:42:00	63	63	-1	0
2021/10/21	07:44:00	63	63	-1	1
2021/10/21	07:46:00	63	63	-1	0
2021/10/21	07:48:00	63	63	-1	1
2021/10/21	07:50:00	63	63	-1	0
2021/10/21	07:52:00	-OVER	63	-OVER	1
2021/10/21	07:54:00	-326	63	-1	1
2021/10/21	07:56:00	63	63	-1	1
2021/10/21	07:58:00	63	63	-1	0
2021/10/21	08:00:00	63	63	-1	1
2021/10/21	08:02:00	63	63	-1	1
2021/10/21	08:04:00	63	63	-1	1
2021/10/21	08:06:00	63	63	-1	1
2021/10/21	08:08:00	63	63	-1	1
2021/10/21	08:10:00	63	63	-1	1
2021/10/21	08:12:00	63	63	-1	1
2021/10/21	08:14:00	63	63	-1	0
2021/10/21	08:16:00	63	63	-1	1
2021/10/21	08:18:00	63	63	-1	0
2021/10/21	08:20:00	-OVER	65	-OVER	1
2021/10/21	08:22:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	08:24:00	-OVER	-OVER	-OVER	-OVER

2021/10/21	08:26:00	-OVER	-OVER	-OVER	-OVER
2021/10/21	08:28:00	-OVER	65	-OVER	1
2021/10/21	08:30:00	63	65	-1	1
2021/10/21	08:32:00	65	65	-1	1
2021/10/21	08:34:00	64	65	-1 -1	1
2021/10/21	08:36:00	64	65	-1	1
2021/10/21	08:38:00	64	65	-1	1
2021/10/21	08:40:00	64	65	-1	1
2021/10/21	08:42:00	64	65	-1	1
2021/10/21	08:44:00	64	65	-1	1
2021/10/21	08:46:00	64	65	-1	1
2021/10/21	08:48:00	64	65	-1	1
2021/10/21	08:50:00	64	65	-1	1
2021/10/21	08:52:00	64	65	-1	1
2021/10/21	08:54:00	64	65	-1	1
2021/10/21	08:56:00	64	65	-1	1
2021/10/21	08:58:00	64	65	-1 -1	1
					1
2021/10/21	09:00:00	64	65	-1	
2021/10/21	09:02:00	64	65	-1	1
2021/10/21	09:04:00	64	65	-1	1
2021/10/21	09:06:00	64	65	-1	1
2021/10/21	09:08:00	64	65	-1	1
2021/10/21	09:10:00	64	65	-1	1
2021/10/21	09:12:00	64	65	-1	1
2021/10/21	09:14:00	64	65	-1	1
2021/10/21	09:16:00	64	65	-1	1
2021/10/21	09:18:00	65	65	-1	1
2021/10/21	09:20:00	65	65	-1	1
2021/10/21	09:22:00	65	65	-1	1
2021/10/21	09:24:00	65	65	-1 -1	1
2021/10/21	09:26:00		65	-1 -1	1
		65 65			
2021/10/21	09:28:00	65	65	-1	1
2021/10/21	09:30:00	65	65	-1	1
2021/10/21	09:32:00	65	65	-1	1
2021/10/21	09:34:00	65	65	-1	1
2021/10/21	09:36:00	64	65	0	0
2021/10/21	09:38:00	65	87	0	1370
2021/10/21	09:40:00	87	143	0	1
2021/10/21	09:42:00	143	155	0	0
2021/10/21	09:44:00	151	155	0	0
2021/10/21	09:46:00	142	152	0	0
2021/10/21	09:48:00	133	142	0	0
2021/10/21	09:50:00	128	169	0	1366
2021/10/21	09:52:00	169	253	0	0
2021/10/21	09:54:00	253		0	1
			266		
2021/10/21	09:56:00	251	265	0	1
2021/10/21	09:58:00	232	251	0	0
2021/10/21	10:00:00	213	232	0	1
2021/10/21	10:02:00	196	213	0	0
2021/10/21	10:04:00	181	196	0	0
2021/10/21	10:06:00	168	181	0	1337
2021/10/21	10:08:00	171	295	0	1358
2021/10/21	10:10:00	295	321	0	0

2021/10/21 2021/10/21 2021/10/21 2021/10/21 2021/10/21 2021/10/21 2021/10/21 2021/10/21 2021/10/21 2021/10/21 2021/10/21	10:12:00 10:14:00 10:16:00 10:18:00 10:20:00 10:22:00 10:24:00 10:26:00 10:28:00 10:30:00 10:32:00	298	319	0	1
2021/10/21	10:34:00				
2021/10/21	10:36:00	116	120	-2	-1
2021/10/21	10:38:00	110	116	-1	0
2021/10/21	10:40:00	105	111	0	0
2021/10/21	10:42:00				
2021/10/21	10:44:00				
2021/10/21	10:46:00	96	97	-1	0
2021/10/21	10:48:00	94	96	0	0
2021/10/21	10:50:00	92	94	0	0
2021/10/21	10:52:00	90	92	0	1
2021/10/21	10:54:00	90	131	0	1364
2021/10/21	10:56:00	131	238	0	1
2021/10/21	10:58:00	238	261	1	1
2021/10/21	11:00:00	249	261	1	1
2021/10/21	11:02:00	229	232	-183	-183
2021/10/21	11:04:00	212	229	-186	41
2021/10/21	11:06:00	195	212	1 1	1 1
2021/10/21 2021/10/21	11:08:00 11:10:00	180 167	195 180	1	1
2021/10/21	11:10:00	155	167	1	1
2021/10/21	11:12:00	145	155	1	1
2021/10/21	11:14:00	136	145	1	1
2021/10/21	11:18:00	128	136	1	1
2021/10/21	11:20:00	121	128	1	1
2021/10/21	11:22:00	116	121	1	1
2021/10/21	11:24:00	112	121	1	1373
2021/10/21	11:26:00	121	1921	1372	2606
2021/10/21	11:28:00	1538	1920	1869	2327
2021/10/21	11:30:00	1522	1601	1811	1880
2021/10/21	11:32:00	1560	1610	1817	1858
2021/10/21	11:34:00	1545	1560	1799	1847
2021/10/21	11:36:00	1553	1616	1779	1838
2021/10/21	11:38:00	1559	1615	1768	1830
2021/10/21	11:40:00	1544	1572	1764	1809
2021/10/21	11:42:00	1572	1587	1758	1800
2021/10/21	11:44:00	1566	1585	1752	1802
2021/10/21	11:46:00	1558	1585	1755	1796
2021/10/21	11:48:00	1585	1602	1747	1799
2021/10/21	11:50:00	1566	1597	1728	1794
2021/10/21	11:52:00	1561	1575	1735	1787
2021/10/21	11:54:00	1575	1587	1729	1791
2021/10/21	11:56:00	1577	1585	1731	1781

2021/10/21	11:58:00	1566	1582	1729	1779
2021/10/21	12:00:00	1582	1587	1729	1775
2021/10/21	12:02:00	1572	1582	1717	1767
2021/10/21	12:04:00	1566	1577	1707	1763
2021/10/21	12:06:00	1566	1597	1714	1762
2021/10/21	12:08:00	1589	1600	1714	1756
2021/10/21	12:10:00	1575	1589	1705	1755
2021/10/21	12:10:00	1568	1575	1714	1763
2021/10/21	12:14:00	1567	1577	1710	1766
2021/10/21	12:14:00	1577	1585	1710	1767
2021/10/21	12:18:00	1585	1592	1710	1767
2021/10/21	12:10:00	1578	1589	1710	1757
2021/10/21	12:20:00			1711	1757
		1555	1578		
2021/10/21	12:24:00	1555	1594	1704	1744
2021/10/21	12:26:00	1587	1621	1704	1744
2021/10/21	12:28:00	1552	1587	1704	1756
2021/10/21	12:30:00	1565	1599	1697	1742
2021/10/21	12:32:00	1575	1604	1704	1749
2021/10/21	12:34:00	1561	1575	1705	1756
2021/10/21	12:36:00	1560	1593	1701	1744
2021/10/21	12:38:00	1589	1599	1691	1740
2021/10/21	12:40:00	1566	1589	1690	1753
2021/10/21	12:42:00	1565	1570	1688	1748
2021/10/21	12:44:00	1570	1598	1698	1752
2021/10/21	12:46:00	1585	1603	1692	1753
2021/10/21	12:48:00	1567	1585	1692	1741
2021/10/21	12:50:00	1567	1569	1691	1737
2021/10/21	12:52:00	1568	1590	1692	1752
2021/10/21	12:54:00	1590	1595	1698	1741
2021/10/21	12:56:00	1557	1590	1692	1740
2021/10/21	12:58:00	1553	1586	1693	1731
2021/10/21	13:00:00	1586	1606	1699	1747
2021/10/21	13:02:00	1561	1597	1690	1746
2021/10/21	13:04:00	1557	1576	1686	1742
2021/10/21	13:06:00	1576	1591	1683	1736
2021/10/21	13:08:00	1583	1591	1683	1734
2021/10/21	13:10:00	1574	1583	1692	1733
2021/10/21	13:12:00	1574	1579	1689	1743
2021/10/21	13:14:00	1572	1577	1690	1737
2021/10/21	13:16:00	1575	1579	1689	1732
2021/10/21	13:18:00	1568	1578	1683	1725
2021/10/21	13:20:00	1570	1583	1683	1737
2021/10/21	13:22:00	1580	1598	1686	1731
2021/10/21	13:24:00	1556	1596	1688	1731
2021/10/21	13:26:00	1553	1575	1680	1736
2021/10/21	13:28:00	1575	1605	1680	1730
2021/10/21	13:26:00	1575	1600	1680	1723
2021/10/21	13:30:00	1572	1572	1677	1723
2021/10/21					
	13:34:00	1565	1583	1675 1677	1721
2021/10/21	13:36:00	1583	1594	1677	1727

2021/10/21	13:38:00	1576	1591	1678	1725
2021/10/21	13:40:00	1569	1576	1676	1725
2021/10/21	13:42:00	1574	1579	1672	1734
2021/10/21	13:44:00	1572	1577	1675	1728
2021/10/21	13:46:00	1576	1581	1680	1717
2021/10/21	13:48:00	1577	1584	1677	1730
2021/10/21	13:50:00	1577	1582	1677	1722
2021/10/21	13:52:00	1579	1584	1683	1734
2021/10/21	13:54:00	1579	1584	1674	1713
2021/10/21	13:56:00	1569	1583	1671	1722
2021/10/21	13:58:00	1571	1578	1678	1727
2021/10/21	14:00:00	1577	1583	1681	1733

Note:"-OVER" :Anamalous data was recored during part of the time when the flare was offline due to PG&E power outage.

Guadalupe Landfill Flare A17

		Flare		Flare	
Date	Time	°F MIN	MAX	SCFM MIN	MAX
2021/10/22	05:00:00	1581	1588	1539	1592
2021/10/22	05:02:00	1561	1581	1547	1586
2021/10/22	05:02:00	1559	1568	1545	1596
2021/10/22	05:04:00	1562	1597	1545	1596
2021/10/22	05:08:00	1502	1601	1550	1593
2021/10/22	05:00:00	1566	1595	1542	1589
2021/10/22	05:10:00	1571	1587	1539	1587
2021/10/22	05:12:00	1571	1587	1534	1586
2021/10/22	05:14:00	1572	1586	1536	1583
2021/10/22	05:18:00	1553	1575	1527	1581
2021/10/22	05:20:00	1575	1588	1533	1578
2021/10/22	05:22:00	1584	1589	1535	1580
2021/10/22	05:24:00	1575	1586	1528	1573
2021/10/22	05:26:00	1574	1578	1531	1584
2021/10/22	05:28:00	1572	1577	1533	1573
2021/10/22	05:30:00	1576	1581	1531	1583
2021/10/22	05:32:00	1572	1576	1537	1584
2021/10/22	05:34:00	1575	1604	1533	1583
2021/10/22	05:36:00	1543	1601	1528	1576
2021/10/22	05:38:00	1538	1582	1533	1575
2021/10/22	05:40:00	1582	1613	1527	1575
2021/10/22	05:42:00	1569	1609	1536	1578
2021/10/22	05:44:00	1566	1573	1528	1577
2021/10/22	05:46:00	1559	1571	1522	1576
2021/10/22	05:48:00	1557	1634	1522	1566
2021/10/22	05:50:00	1548	1639	1524	1567
2021/10/22	05:52:00	1542	1617	1517	1566
2021/10/22	05:54:00	1573	1630	1524	1572
2021/10/22	05:56:00	1551	1573	1527	1570
2021/10/22	05:58:00	-OVER	1584	-OVER	1573
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2021/10/22	06:06:00	-OVER	-326	-OVER	0
2021/10/22	06:08:00	-OVER	581	-OVER	0
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2021/10/22	06:14:00	-OVER	-OVER	-OVER	-OVER
2021/10/22	06:16:00	-OVER	-OVER	-OVER	-OVER
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2021/10/22	12:20:00				
2021/10/22	12:22:00	70	70	0	1
2021/10/22	12:24:00	70	70	1	1
2021/10/22	12:26:00	70	70	1	2
2021/10/22	12:28:00	70	70	1	2
2021/10/22	12:30:00	69	70	1	2
2021/10/22	12:32:00	69	70	1	2
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2021/10/22	12:48:00	71	71	1	2
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2021/10/22	12:52:00	71	72	2	2
2021/10/22	12:54:00	72	74	2	2
2021/10/22	12:56:00	73	75	1	2
2021/10/22	12:58:00	74	75	2	2
2021/10/22	13:00:00	75	75	2	2
2021/10/22	13:02:00				
2021/10/22	13:04:00				
2021/10/22	13:06:00	75	76	1	1
2021/10/22	13:08:00	73	75	1	2
2021/10/22	13:10:00	73	84	1	1431
2021/10/22	13:12:00	84	1910	1411	2606
2021/10/22	13:14:00	1527	1908	2019	2379
2021/10/22	13:16:00	1519	1623	1981	2057
2021/10/22	13:18:00	1541	1614	1961	2020
2021/10/22	13:20:00	1546	1609	1934	2008
2021/10/22	13:22:00	1575	1609	1921	1980
2021/10/22	13:24:00	1561	1576	1910	1966
2021/10/22	13:26:00	1561	1578	1901	1960
2021/10/22	13:28:00	1578	1589	1895	1947
2021/10/22	13:30:00	1584	1592	1883	1933
2021/10/22	13:32:00	1562	1585	1882	1937
2021/10/22	13:34:00	1555	1575	1873	1930
2021/10/22	13:36:00	1575	1603	1871	1925
2021/10/22	13:38:00	1570	1603	1865	1916
2021/10/22	13:40:00	1565	1570	1863	1913
2021/10/22	13:42:00	1568	1578	1858	1915
2021/10/22	13:44:00	1577	1580	1862	1909
2021/10/22	13:46:00	1580	1586	1857	1900
2021/10/22	13:48:00	1569	1585	1857	1913
2021/10/22	13:50:00	1572	1594	1854	1904
2021/10/22	13:52:00	1579	1594	1857	1907
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2021/10/22	13:56:00	1548	1573	1846	1901
2021/10/22	13:58:00	1552	1625	1835	1880
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2021/10/22	14:02:00	1548	1594	1833	1886
2021/10/22	14:04:00	1589	1605	1830	1882
2021/10/22	14:06:00	1567	1589	1836	1891
2021/10/22	14:08:00	1562	1574	1835	1891
2021/10/22	14:10:00	1571	1607	1837	1886
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2021/10/22	14:16:00	1568	1601	1835	1883
2021/10/22	14:18:00	1580	1602	1834	1878
2021/10/22	14:20:00	1562	1580	1827	1877
2021/10/22	14:22:00	1567	1581	1821	1874
2021/10/22	14:24:00	1581	1598	1822	1869
2021/10/22	14:26:00	1571	1598	1821	1877
2021/10/22	14:28:00	1565	1571	1821	1866
2021/10/22	14:30:00	1565	1597	1820	1875
2021/10/22	14:32:00	1586	1606	1827	1872
2021/10/22	14:34:00	1564	1587	1815	1882
2021/10/22	14:36:00	1564	1577	1829	1880
2021/10/22	14:38:00	1577	1589	1820	1877
2021/10/22	14:40:00	1586	1595	1809	1871
2021/10/22	14:42:00	1565	1586	1818	1864
2021/10/22	14:44:00	1560	1579	1817	1860
2021/10/22	14:46:00	1579	1607	1814	1859
2021/10/22	14:48:00	1574	1606	1806	1859
2021/10/22	14:50:00	1560	1574	1811	1867
2021/10/22	14:52:00	1565	1589	1817	1874
2021/10/22	14:54:00	1589	1599	1802	1869
2021/10/22	14:56:00	1572	1594	1808	1861
2021/10/22	14:58:00	1576	1605	1803	1859
2021/10/22	15:00:00	1543	1579	1812	1871
2021/10/22	15:02:00	1543	1606	1812	1871
2021/10/22	15:04:00	1577	1612	1811	1862
2021/10/22	15:06:00	1553	1578	1808	1859
2021/10/22	15:08:00	1558	1578	1808	1861
2021/10/22	15:10:00	1576	1586	1806	1855
2021/10/22	15:12:00	1582	1589	1802	1855
2021/10/22	15:14:00	1583	1587	1802	1850
2021/10/22	15:16:00	1560	1585	1808	1866
2021/10/22	15:18:00	1558	1573	1809	1851
2021/10/22	15:20:00	1573	1588	1802	1858
2021/10/22	15:22:00	1584	1594	1806	1855
2021/10/22	15:24:00	1565	1584	1812	1865
2021/10/22	15:26:00	1563	1579	1799	1862
2021/10/22	15:28:00	1579	1587	1808	1859
2021/10/22	15:30:00	1585	1589	1803	1856
2021/10/22	15:32:00	1577	1589	1799	1858
2021/10/22	15:34:00	1569	1579	1800	1858
2021/10/22	15:36:00	1571	1577	1797	1852
2021/10/22	15:38:00	1562	1576	1800	1850
2021/10/22	15:40:00	1572	1594	1800	1850
2021/10/22	15:42:00	1578	1597	1791	1850

2021/10/22	15:44:00	1577	1580	1791	1848
2021/10/22	15:46:00	1572	1578	1794	1839
2021/10/22	15:48:00	1565	1574	1790	1851
2021/10/22	15:50:00	1569	1586	1792	1844
2021/10/22	15:52:00	1584	1589	1792	1845
2021/10/22	15:54:00	1584	1589	1787	1842
2021/10/22	15:56:00	1572	1586	1786	1836
2021/10/22	15:58:00	1562	1572	1794	1847
2021/10/22	16:00:00	1564	1589	1779	1841

Note:"-OVER" :Anamalous data was recored during part of the time when the flare was offline due to PG&E power outage. Power to the flare equipment was switched off for some time as a safety measure and to avoid potential damage to the equipment.

Attachment B Copy of GRDF RCA Forms for RCA Numbers 08C52 and 08C55





910 Coyote Creek Golf Drive P.O. Box 1870 Morgan Hill, CA 95037 (408) 779-2206 (408) 779-5165 Fax

October 21, 2021 (via email rca@baaqmd.gov)

Compliance & Enforcement Division Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, California 94105

Re: Reportable Compliance Activity (RCA) Notification
Guadalupe Recycling & Disposal Facility, San Jose, CA, Facility Number A3294

Guadalupe Rubbish Disposal Co., Inc d/b/a Guadalupe Recycling & Disposal Facility ("GRDF") is submitting the attached Reportable Compliance Activity (RCA) Form for temporary flare shutdown event caused by unplanned utility power interruption on October 20, 2021, ~ 5:40 PM. A breakdown report was submitted to Bay Area Air Quality Management District (BAAQMD) on October 20, 2021 at ~9:15 PM via the afterhours phone line by GRDF about the PG&E's power outage.

Although GRDF disagrees that Breakdown Relief is the appropriate methodology for compliance with Rule 8-34 during an unplanned power outage, due to direction from BAAQMD staff, this letter is to request Breakdown Relief from BAAQMD for the PG&E power outage. BAAQMD's RCA notification form, as modified, is enclosed. The frequency and duration of weather or utility-related electrical interruptions are outside of GRDF's control and GRDF asserts that it did not violate any applicable regulations and limits.

Breakdown Relief should be granted as GRDF complied with administrative requirements despite its objections to the re-interpretation of Rule 8-34 and:

- 1. The breakdown is not the result of intent, negligence or disregard of air pollution control regulations;
- 2. The breakdown is not the result of improper maintenance;
- 3. The breakdown does not create a public nuisance;
- 4. The breakdown was not caused by an excessively recurrent breakdown of the same equipment; and
- 5. The breakdown did not occur, and any emissions did not interfere with attainment or maintenance of any National or California air quality standard.

On October 21, 2021 at ~11:50 AM the GCCS was back online. The shutdown event was unforeseeable & unpreventable at GRDF. The flare was temporarily shut down and did not result in emission nor nuisance.

Sincerely,

Guadalupe Recycling & Disposal Facility

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: RCA Form GRDF Facility A3294



COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable Compliance Activity (RCA)

) I I	
	<u> </u>	ee back of form t	for instructions →
1. X BREAKDON	WN RELIEF: District Use OnlyBREAKD	OWN REFERENC	E #:
2. NA MONITOR E	XCESS EMISSION or EXCURSION: <i>Dis</i>	trict Use Only RE	FERENCE#:
3. NA MONITOR IS	S INOPERATIVE: District Use Only REF	ERENCE#:	
4. NA PRESSURE	RELIEF DEVICE (PRD): District Use O	nly PRD REFERE	NCE#:
SITE INF	ORMATION AND DESCRIPTION INFOR	MATION (REQUIR	RED)
Company	Guadalupe Rubbish Disposal Co., Inc	Site #	A3294
Address	15999 Guadalupe Mines Road, San Jose 95120	Source #	S-9
Reported by	R Phadnis	Phone #	510.875.9338
Indicated Excess	-NA	Fax #	-
Allowable Limit	-NA	Averaging Time	-
Start Time/Date	~5:40 PM on 10/20/2021	Clear Time	10/21/2021~11:50 AM
Monitor/device type(s)	►CEM ►GLM ►Parame	tric PRD	► Non-monitor
Monitor description(s)			
	or not functioning due to inoperation		
NO _x SO ₂ ► NO ₂ ► H ₂ C ► Hydrocarbon Brea	CO	H ₂ S	►Flow
► Wind Direction	▶Steam	X ► Other (descr	_{ibe}) Power outage
Unit(s) of Measurement ▶ppm ▶psig ▶pH	►min/hr > 20%	inches H₂OOther (describe) P	►mmHg ower outage
facility (GRDF) because the G	tted on 10/20/2021 at~ 9:15 PM via afterhours photoccs was temporarily shut down due to the PG&E lly out of compliance with BAAQMD regulation for letter dated 10/21/2021.	power outage. During	g the PG&E power
	District Use Only		
Received by)ate	Time

- ✓ Check the Box numbers 1-4 that apply to the RCA you are trying to report or request and read the detailed instructions.
- You will receive an ID # for each RCA you submit. In the case of a request for Breakdown Relief where multiple monitors are affected, you do not need to submit multiple forms, as long as all necessary information is given on one form. RCA reported during other than core business hours will be assigned an ID # the following working day. If you do not receive an ID #, it is your responsibility to contact the BAAQMD to get one.
- ✓ You may submit only one request for breakdown relief per form. However, you may submit multiple indicated excess, inoperative monitors and PRD reports on one form, provided that the start and end times given for the events in the required information section is inclusive of all events. Information on parameters exceeded, units of measurement and allowable limits can be provided in the event description box or when contacted by District staff with questions.
- ✓ Fill out the "Site Information and Description Information Required" areas of this form and email to <u>rca@baagmd.gov</u>
- ✓ A 30-day written follow-up report is required for Breakdown Requests and PRD Releases. Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference Breakdown Admissions Advisory dated 12/3/04. Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: You may have additional report requirements under Title V.

Detailed Instructions

Box 1: To Request Breakdown Relief (Regulations 1-112, 1-113, 1-208, 1-431, 1-432)

If you have an equipment malfunction (e.g.; breakdown) that leads to the release of air pollutants above the regulatory or your permitted levels, you may request relief from BAAQMD enforcement action.

Che		

- □ NOTE: Start and end times given for these events in the required information section must be inclusive of all events.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Requests for breakdown relief may not be withdrawn and must be called in or faxed to the BAAQMD <u>immediately upon</u> discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

Box 2: Monitor Indicates Excess Emission or Excursion (Regulation 1-522.7, 1-523.3, 1-542)

When a BAAQMD-required monitor indicates an excess or excursion, you must report it to the BAAQMD.

- Check Box #2.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Any excess emission indicated by a CEM or excursion of a parametric monitor, shall be reported to the BAAQMD within 96 hours.
- Area concentration excesses over the limits prescribed in District regulations shall be reported to the BAAQMD within the next normal working day following the examination of data.

Box 3: Monitor Is Inoperative (Regulations 1-522, 1-523, 1-530)

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- ☐ Check Box #3 only if inoperative for greater than 24 hours.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All reports of inoperative monitors must be reported by the following BAAQMD working day and additionally be cleared by a notification of resumption of monitoring. To notify the BAAQMD regarding the resumption of monitoring, do not send in a separate RCA form; call (415) 749-4979 and give the RCA ID #, date, and the time of resumption.
- Inoperative monitors (except parametric monitors) with downtime greater than 15 days must furnish proof of expedited repair in a follow-up report.

Box 4: Pressure Relief Device (PRD) Is Released (Regulation 8-28-401)

When a PRD at your refinery/chemical plant vents to the atmosphere, you must report it to the BAAQMD.

- Check Box #4 only if a pressure relief device is released.
- Separate RCA ID #'s can be applied to monitor(s) affected by a PRD by also checking Box #2 if other monitors record an
 excess or excursion.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- □ All PRD release reports must be reported by the following BAAQMD working day.

From: RCA Notification
To: Phadnis, Rajan
Cc: Erin Phillips

Subject: [EXTERNAL] Re: GRDF A3294-RCA for PG&E power outage

Date: Thursday, October 21, 2021 2:01:14 PM

Good afternoon, I am confirming receipt and letting you know the RCA number for your notification is 08C52

Thanks!

From: Phadnis, Rajan <rphadnis@wm.com> **Sent:** Thursday, October 21, 2021 8:08 PM **To:** RCA Notification <rca@baaqmd.gov>

Cc: Phadnis, Rajan <rphadnis@wm.com>; Perez, Enrique <pperez3@wm.com>; Erin Phillips

<ephillips@baaqmd.gov>; Azevedo, Becky <Razevedo@wm.com>

Subject: GRDF A3294-RCA for PG&E power outage

CAUTION: This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am attaching the RCA notification form for unplanned PG&E power outage on 10/20/2021, at Guadalupe Recycling and Disposal Facility in San Jose, CA (Facility A3294).

Thank you, Rajan Phadnis EP Specialist Guadalupe Recycling and Disposal Facility

Recycling is a good thing. Please recycle any printed emails.





910 Coyote Creek Golf Drive P.O. Box 1870 Morgan Hill, CA 95037 (408) 779-2206 (408) 779-5165 Fax

October 22, 2021 (via email rca@baaqmd.gov)

Compliance & Enforcement Division Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, California 94105

Re: Addendum to Reportable Compliance Activity (RCA 08C52) Notification Guadalupe Recycling & Disposal Facility, San Jose, CA, Facility Number A3294

Guadalupe Rubbish Disposal Co., Inc d/b/a Guadalupe Recycling & Disposal Facility ("GRDF") is submitting the attached Addendum Reportable Compliance Activity (RCA) to the previously submitted RCA Form (BAAQMD assigned RCA Number 08C52) for temporary flare shutdown event caused by unplanned utility power interruption on October 20, 2021, ~ 5:40 PM and on October 22, 2021 ~6:00 AM. A breakdown report was submitted to Bay Area Air Quality Management District (BAAQMD) on October 20, 2021 at ~9:15 PM via the afterhours phone line by GRDF about the PG&E's power outage.

Although GRDF disagrees that Breakdown Relief is the appropriate methodology for compliance with Rule 8-34 during an unplanned power outage, due to direction from BAAQMD staff, this letter is to request Breakdown Relief from BAAQMD for the PG&E power outage. BAAQMD's RCA notification form, as modified, is enclosed. The frequency and duration of weather or utility-related electrical interruptions are outside of GRDF's control and GRDF asserts that it did not violate any applicable regulations and limits.

Breakdown Relief should be granted as GRDF complied with administrative requirements despite its objections to the re-interpretation of Rule 8-34 and:

- 1. The breakdown is not the result of intent, negligence or disregard of air pollution control regulations;
- 2. The breakdown is not the result of improper maintenance;
- 3. The breakdown does not create a public nuisance;
- 4. The breakdown was not caused by an excessively recurrent breakdown of the same equipment; and
- 5. The breakdown did not occur, and any emissions did not interfere with attainment or maintenance of any National or California air quality standard.

The power to the site was restored on October 21, 2021 at ~11:50 AM and on October 22, 2021 at ~1:30 PM and the GCCS was online. The shutdown events were unforeseeable & unpreventable at GRDF. The flare was temporarily shut down and did not result in emission nor nuisance.

Sincerely,

Guadalupe Recycling & Disposal Facility

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: Addendum to RCA Form GRDF Facility A3294



Received by

COMPLIANCE & ENFORCEMENT DIVISION

ADDENDUM to RCA Number 08C52 (10/21/2021)-Submittal 10/22/2021

Notification Form

Reportable Compliance Activity (RCA)

			0	on back of form	for instructions →
1. X BREAKDO	WN RELIEF: <i>Dis</i>	strict Use OnlyBRE			
2. NA MONITOR E	XCESS EMISSI	ON or EXCURSION	N: <i>Di</i> s	trict Use Only RE	FERENCE#:
3. NA MONITOR IS	S INOPERATIVE	: District Use Only	/ REF	ERENCE#:	
4. NA PRESSURE	RELIEF DEVIC	E (PRD): District U	Jse O	nly PRD REFERE	NCE#:
SITE INF	ORMATION ANI	DESCRIPTION IN	IFORI	MATION (REQUIR	RED)
Company	Guadalupe Rubb	ish Disposal Co., In	С	Site #	A3294
Address	15999 Guadalupe Mir	nes Road, San Jose 951	20	Source #	S-9
Reported by	R Phadnis			Phone #	510.875.9338
Indicated Excess	-NA			Fax #	-
Allowable Limit	-NA			Averaging Time	-
Start Time/Date	~5:40 PM on 10/20/2021; ~ 6:00 AM on 10/22/2021	and		Clear Time	10/21/2021~11:50 AM; and 10/22/2021~1:30 PM
Monitor/device type(s)	►CEM	►GLM ►P	arame	tric PRD	► Non-monitor
Monitor description(s)					
Parameter(s) exceeded or not functioning due to inoperation NO _x SO ₂ CO CO ₂ H ₂ S TRS O ₂ H ₂ O Opacity Lead Gauge Pressure Hydrocarbon Breakthrough (VOC) Temperature Wind Speed					
► Wind Direction Unit(s) of Measurement		►Steam		X ► Other (descri	ribe) Power outage
	► min/h	r > 20%		►inches H ₂ O	— ▶mmHg
▶ppm ▶psig ▶pH	▶ºFahr			► Other (describe) P	
vent Description: breakdown report was submitted on 10/20/2021 at~ 9:15 PM via afterhours phone line by Guadalupe Recycling & Disposal acility (GRDF) because the GCCS was temporarily shut down due to the PG&E power outage. During the PG&E power utage, the GCCS was potentially out of compliance with BAAQMD regulation 8-34-301.1. Please also see objections and iscussion in the attached cover letter dated 10/22/2021.					

District Use Only

Date

Time

- ✓ Check the Box numbers 1-4 that apply to the RCA you are trying to report or request and read the detailed instructions.
- You will receive an ID # for each RCA you submit. In the case of a request for Breakdown Relief where multiple monitors are affected, you do not need to submit multiple forms, as long as all necessary information is given on one form. RCA reported during other than core business hours will be assigned an ID # the following working day. If you do not receive an ID #, it is your responsibility to contact the BAAQMD to get one.
- ✓ You may submit only one request for breakdown relief per form. However, you may submit multiple indicated excess, inoperative monitors and PRD reports on one form, provided that the start and end times given for the events in the required information section is inclusive of all events. Information on parameters exceeded, units of measurement and allowable limits can be provided in the event description box or when contacted by District staff with questions.
- ✓ Fill out the "Site Information and Description Information Required" areas of this form and email to <u>rca@baagmd.gov</u>
- ✓ A 30-day written follow-up report is required for Breakdown Requests and PRD Releases. Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference Breakdown Admissions Advisory dated 12/3/04. Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: You may have additional report requirements under Title V.

Detailed Instructions

Box 1: To Request Breakdown Relief (Regulations 1-112, 1-113, 1-208, 1-431, 1-432)

If you have an equipment malfunction (e.g.; breakdown) that leads to the release of air pollutants above the regulatory or your permitted levels, you may request relief from BAAQMD enforcement action.

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- □ NOTE: Start and end times given for these events in the required information section must be inclusive of all events.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Requests for breakdown relief may not be withdrawn and must be called in or faxed to the BAAQMD <u>immediately upon</u> discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

Box 2: Monitor Indicates Excess Emission or Excursion (Regulation 1-522.7, 1-523.3, 1-542)

When a BAAQMD-required monitor indicates an excess or excursion, you must report it to the BAAQMD.

- Check Box #2.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Any excess emission indicated by a CEM or excursion of a parametric monitor, shall be reported to the BAAQMD within 96 hours.
- Area concentration excesses over the limits prescribed in District regulations shall be reported to the BAAQMD within the next normal working day following the examination of data.

Box 3: Monitor Is Inoperative (Regulations 1-522, 1-523, 1-530)

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- ☐ Check Box #3 only if inoperative for greater than 24 hours.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All reports of inoperative monitors must be reported by the following BAAQMD working day and additionally be cleared by a notification of resumption of monitoring. To notify the BAAQMD regarding the resumption of monitoring, do not send in a separate RCA form; call (415) 749-4979 and give the RCA ID #, date, and the time of resumption.
- Inoperative monitors (except parametric monitors) with downtime greater than 15 days must furnish proof of expedited repair in a follow-up report.

Box 4: Pressure Relief Device (PRD) Is Released (Regulation 8-28-401)

When a PRD at your refinery/chemical plant vents to the atmosphere, you must report it to the BAAQMD.

- Check Box #4 only if a pressure relief device is released.
- Separate RCA ID #'s can be applied to monitor(s) affected by a PRD by also checking Box #2 if other monitors record an
 excess or excursion.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- □ All PRD release reports must be reported by the following BAAQMD working day.

From: RCA Notification
To: Phadnis, Rajan

Subject: [EXTERNAL] RE: GRDF A3294-RCA for PG&E power outages

Date: Friday, October 22, 2021 2:21:31 PM

ID# 08C55

From: Phadnis, Rajan <rphadnis@wm.com> **Sent:** Friday, October 22, 2021 2:04 PM **To:** RCA Notification <rca@baaqmd.gov>

Cc: Azevedo, Becky <Razevedo@wm.com>; Perez, Enrique <pperez3@wm.com>; Phadnis, Rajan

<rphadnis@wm.com>; Erin Phillips <ephillips@baaqmd.gov>

Subject: GRDF A3294-RCA for PG&E power outages

CAUTION: This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am attaching the addendum RCA notification form for unplanned PG&E power outages on 10/20/21 and 10/22/2021, at Guadalupe Recycling and Disposal Facility in San Jose, CA (Facility A3294).

Thank you, Rajan Phadnis EP Specialist Guadalupe Recycling and Disposal Facility

Recycling is a good thing. Please recycle any printed emails.



Guadalupe Rubbish
Disposal Co., Inc.
1999 Guadalupe Mines Road

15999 Guadalupe Mines Road P.O. Box 20957 San Jose, CA 95160

December 14, 2021(via email: compliance@baaqmd.gov)

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

Attn: Title V Reports

Re: Guadalupe Recycling & Disposal Facility, San Jose, CA, Facility Number A3294

10-Day NOV Response to BAAQMD Notice of Violation A-59781 Dated December 8,

2021

Dear Sir or Madam:

Guadalupe Rubbish Disposal Co., Inc d/b/a Guadalupe Recycling & Disposal Facility ("GRDF") is submitting this 10-day response letter to Notice of Violation ("NOV") Number A-59781 dated December 8, 2021, (see attachment) for alleged temporary flare shutdown events caused by unplanned utility power outages on October 20 and 22, 2021. A signed copy of the NOV is attached. The NOV alleges violation of *Regulation 8 Section 34-301.1* "... gas collection and emission control systems are operated continuously..." ("8-34-301.1"). GRDF believes that the site was not in violation of Regulation 8-34-301.1.

Although GRDF disagreed that Breakdown Relief is the appropriate methodology for compliance with Rule 8-34 during an unplanned power outage, due to direction from BAAQMD staff, GRDF submitted the request for Breakdown Relief from BAAQMD for temporary power outages on October 20 and 22, 2021 via afterhours phone line and RCA forms (RCA numbers 08C52 and 08C55 were assigned). GRDF submitted the 10 and 30-day written report letter to BAAQMD on October 29, 2021, under Title V Permit Condition Section I.F and the 30-day follow-up report on November 12, 2021.

The GRDF power outage events were caused by inclement weather conditions and were unforeseeable and unpreventable. The frequency and duration of weather or utility-related electrical interruptions are outside of GRDF's control. The unplanned power outage shutdowns noted in RCA 08C52 and 08C55 did not result in emissions and do not qualify as non-compliance. GRDF believes that it complied with the Title V permit conditions and safety protocols. GRDF followed all measures to ensure gas movers and valves were closed during the shutdown events. GRDF's downtime events were not the result of equipment malfunction, knowing, willful, intentional, chronic nor committed by a recalcitrant, and did not benefit GRDF economically nor result in a nuisance. As soon as the power was restored, the flare was inspected and restarted. The shutdown was temporary, only a few hours, and did not result in any emissions.

GRDF has placed the purchase order (on October 27, 2021) for a permanent generator (delivery will be delayed due to the COVID-19 emergency and related supply chain disruptions) and the suppliers anticipate the unit to be delivered by the fourth quarter of 2022. Currently, GRDF is working on BAAQMD permit application for the generator and Automatic Transfer Switch (ATS) electrical permit as required by the City of San Jose.

No corrective action was necessary nor applicable. GRDF believes that the exemption in 8-34-113 applies to its site operation as GRDF met the requirement that the "gas collection and emission control systems are not shut down for more than 240 hours in any calendar year." Regulation 8, Rule 34, Section 113 ("8-34-113") Limited Exemption, Inspection and Maintenance, states that "requirements of Sections 8-34-301...shall not apply to solid waste sites during inspection and maintenance of the landfill gas collection or emission control system...". GRDF appropriately documents flare downtime event under 8-34-113, as each event requires inspection and maintenance during the downtime and prior to startup. These events are reported in GRDF's startup and shutdown logs in its semi-annual reports. Startup could begin only after the restoration of normal power by the PG&E and GRDF's safety and environmental inspection and maintenance process for flare startup and emission minimization.

GRDF additionally asserts that the downtime events did not: 1) interfere with attainment of the BAAQMD, federal, or state standards; 2) endanger health, safety, or welfare of any person; 3) endanger the environment; 4) increase emissions of toxic air contaminants; 5) cause or contribute to a violation of a SAAQS or NAAQS; 6) interfere with the BAAQMD's compliance work; nor 7) result in emissions exceeding de minimis levels. The flare was temporarily shut down solely because of an unplanned power outage and not the result of an intentional or negligent failure to maintain and operate, or an equipment malfunction. For the above reasons, GRDF asserts that it did not violate 8-34-301.1 and respectfully requests the NOV be rescinded.

GRDF is committed to operating its landfill in compliance with applicable regulations. If you have any questions or need any additional information, please do not hesitate to contact me at (408) 779-2206.

Sincerely,

Guadalupe Recycling & Disposal Facility

Enrique Perez District Manager

cc: Erin Phillips, BAAQMD

Paul Inrigue Perez

Attachment: Copy of BAAQMD Notice of Violation A-59781

Attachment

Copy of BAAQMD Notice of Violation A-59781



BAY AREA BAY AREA AIR QUALITY MANAGEMENT DISTRICT

AIR QUALITY 375 Beale Street, Suite 600, San Francisco, CA 94105
MANAGEMENT (415) 749-5000

NOTICE OF VIOLATIC	No. A59781
ISSUED TO: Guadalupe Rubbish Disposal	P G N# A3294
ADDRESS: 15999 Guadalupe Mines Rd	
CITY: San Jose	STATE: CA ZIP: 95120
PHONE: (408) <u>268-1670</u>	
✓ N# Mailing Address on F61	
OCCURRENCE	
NAME:	
ADDRESS:	Same As Above
	ZIP
SOURCE: S# 9 NAME: Landfill with	
EMISSION PT: P# NAME:	
DATE: 10/20/21-10/22/21	TIME: 1740 HRS
REG 2 RULE 1 SEC 301	REG 2 RULE 1 SEC 302
No Authority to Construct	No Permit to Operate
REG 1 SEC 301	REG 2 RULE SEC 307
H & S CODE - 41700 Public Nuisance	Failure to Meet Permit Condition
REG 5 SEC 301	REG 6 RULE 1 SEC 301
Prohibited Open Burning	Excessive Visible Emissions
▼ REG 8 RULE 34 SECTI	ON 301.1 CODE
REG RULE SECTION	ONCODE
Details: GCCS not operated continuously, PG8	ιE power outages
RECIPIENT NAME: Enrique Perez	
TITLE: District Manager	
	David Finiana Para
AN ADMISSION OF GUILT X	aul Enrique Perez
	OPY OF THIS NOTICE WITH A WRITTEN
DESCRIPTION OF THE IMMEDIATE TAKEN TO PREVENT CONTINUED	TE CORRECTIVE ACTION YOU HAVE OUT OF RECURRENT VIOLATION. THIS
VIOLATION IS SUBJECT TO SUBS	TANTIAL PENALTY, YOUR RESPONSE
DOES NOT PRECLUDE FURTHER L	EGALACTION.
ISSUED BY; Erin Phillips	INSP #
DATE: 12/8/21	TIME: 1520 HRS MAILED
	- I IIVO LIIVO LII

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligiblity for, or filing of, a variance, call (415) 749-5073.





910 Coyote Creek Golf Drive P.O. Box 1870 Morgan Hill, CA 95037 (408) 779-2206 (408) 779-5165 Fax

December 23, 2021 (via email rca@baaqmd.gov)

Compliance & Enforcement Division Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, California 94105

Re: Reportable Compliance Activity (RCA) Notification
Guadalupe Recycling & Disposal Facility, San Jose, CA, Facility Number A3294

Guadalupe Rubbish Disposal Co., Inc d/b/a Guadalupe Recycling & Disposal Facility ("GRDF") is submitting the attached Reportable Compliance Activity (RCA) Form for temporary flare shutdown event caused by unplanned utility power interruption on December 23, 2021, ~ 9:35 AM. GRDF is submitting the breakdown report to Bay Area Air Quality Management District (BAAQMD) on December 23, 2021 at ~2:10 PM about the PG&E's power outage.

Although GRDF disagrees that Breakdown Relief is the appropriate methodology for compliance with Rule 8-34 during an unplanned power outage, due to direction from BAAQMD staff, this letter is to request Breakdown Relief from BAAQMD for the PG&E power outage. BAAQMD's RCA notification form, as modified, is enclosed. The frequency and duration of weather or utility-related electrical interruptions are outside of GRDF's control and GRDF asserts that it did not violate any applicable regulations and limits.

Breakdown Relief should be granted as GRDF complied with administrative requirements despite its objections to the re-interpretation of Rule 8-34 and:

- 1. The breakdown is not the result of intent, negligence or disregard of air pollution control regulations;
- 2. The breakdown is not the result of improper maintenance;
- 3. The breakdown does not create a public nuisance;
- 4. The breakdown was not caused by an excessively recurrent breakdown of the same equipment; and
- 5. The breakdown did not occur, and any emissions did not interfere with attainment or maintenance of any National or California air quality standard.

On December 23, 2021 at \sim 10:45 AM the GCCS was back online. The shutdown event was unforeseeable & unpreventable at GRDF. The flare was temporarily shut down and did not result in emission nor nuisance.

Sincerely,

Guadalupe Recycling & Disposal Facility

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: RCA Form GRDF Facility A3294 Dated 12.23.2021



COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable Compliance Activity (RCA)

		See back of form	for instructions →
1. X BREAKDO	WN RELIEF: District Use OnlyBREAKD	OWN REFERENC	E#:
2. NA MONITOR E	XCESS EMISSION or EXCURSION: <i>Dis</i>	trict Use Only RE	FERENCE#:
3. NA MONITOR IS	S INOPERATIVE: District Use Only REF	ERENCE#:	
4. NA PRESSURE	RELIEF DEVICE (PRD): District Use O	nly PRD REFERE	NCE#:
SITE INF	ORMATION AND DESCRIPTION INFOR	MATION (REQUIF	RED)
Company	Guadalupe Rubbish Disposal Co., Inc	Site #	A3294
Address	15999 Guadalupe Mines Road, San Jose 95120	Source #	S-9
Reported by	R Phadnis	Phone #	510.875.9338
Indicated Excess	-NA	Fax #	-
Allowable Limit	-NA	Averaging Time	-
Start Time/Date	~ 9:35 AM on 12/23/2021	Clear Time	12/23/2021~10:45 AM
Monitor/device type(s)	▶ CEM ▶ GLM ▶ Parame	etric PRD	► Non-monitor
Monitor description(s)			
Parameter(s) exceeded NO _x SO ₂ Hydrocarbon Brea Wind Direction	O Descity Lead Descity ►Lead Descity ►	H ₂ S	►Flow
Unit(s) of Measurement			
▶ppm▶psig▶pH	min/hr > 20%▶ ⁰Fahrenheit	inches H₂OOther (describe)	►mmHg
ecause the GCCS was tempora	submitted on 12/23/2021 at ~14:10 PM by Guada arily shut down due to the PG&E power outage. Downth BAAQMD regulation 8-34-301.1. Please also	ouring the PG&E power	er outage, the GCCS was
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Received by	L)ate	Time

- ✓ Check the Box numbers 1-4 that apply to the RCA you are trying to report or request and read the detailed instructions.
- ✓ You will receive an ID # for each RCA you submit. In the case of a request for Breakdown Relief where multiple monitors are affected, you do <u>not need</u> to submit multiple forms, <u>as long as</u> all necessary information is given on one form. RCA reported during other than core business hours will be assigned an ID # the following working day. If you do not receive an ID #, it is your responsibility to contact the BAAQMD to get one.
- ✓ You may submit only one request for breakdown relief per form. However, you may submit multiple indicated excess, inoperative monitors and PRD reports on one form, provided that the start and end times given for the events in the required information section is inclusive of all events. Information on parameters exceeded, units of measurement and allowable limits can be provided in the event description box or when contacted by District staff with questions.
- ✓ Fill out the "Site Information and Description Information Required" areas of this form and email to <u>rca@baagmd.gov</u>
- ✓ A 30-day written follow-up report is required for Breakdown Requests and PRD Releases. Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference Breakdown Admissions Advisory dated 12/3/04. Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: You may have additional report requirements under Title V.

Detailed Instructions

Box 1: To Request Breakdown Relief (Regulations 1-112, 1-113, 1-208, 1-431, 1-432)

If you have an equipment malfunction (e.g.; breakdown) that leads to the release of air pollutants above the regulatory or your permitted levels, you may request relief from BAAQMD enforcement action.

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- □ NOTE: Start and end times given for these events in the required information section must be inclusive of all events.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Requests for breakdown relief may not be withdrawn and must be called in or faxed to the BAAQMD <u>immediately upon</u> discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

Box 2: Monitor Indicates Excess Emission or Excursion (Regulation 1-522.7, 1-523.3, 1-542)

When a BAAQMD-required monitor indicates an excess or excursion, you must report it to the BAAQMD.

- Check Box #2.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Any excess emission indicated by a CEM or excursion of a parametric monitor, shall be reported to the BAAQMD within 96 hours.
- Area concentration excesses over the limits prescribed in District regulations shall be reported to the BAAQMD within the next normal working day following the examination of data.

Box 3: Monitor Is Inoperative (Regulations 1-522, 1-523, 1-530)

When a BAAQMD-required monitor is inoperative for greater than 24 hours, you must report it to the BAAQMD.

- Check Box #3 only if inoperative for greater than 24 hours.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All reports of inoperative monitors must be reported by the following BAAQMD working day and additionally be cleared by a notification of resumption of monitoring. To notify the BAAQMD regarding the resumption of monitoring, do not send in a separate RCA form; call (415) 749-4979 and give the RCA ID #, date, and the time of resumption.
- Inoperative monitors (except parametric monitors) with downtime greater than 15 days must furnish proof of expedited repair in a follow-up report.

Box 4: Pressure Relief Device (PRD) Is Released (Regulation 8-28-401)

When a PRD at your refinery/chemical plant vents to the atmosphere, you must report it to the BAAQMD.

- ☐ Check Box #4 only if a pressure relief device is released.
- Separate RCA ID #'s can be applied to monitor(s) affected by a PRD by also checking Box #2 if other monitors record an
 excess or excursion.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- □ All PRD release reports must be reported by the following BAAQMD working day.



Guadalupe Rubbish Disposal Co., Inc. 15999 Guadalupe Mines Road

P.O. Box 20957 San Jose, CA 95160

December 29, 2021 (via email: compliance@baaqmd.gov)

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

Attn: Title V Reports

Re: Guadalupe Recycling & Disposal Facility, San Jose, CA, Facility Number A3294

Section I.F Title V, 10 and 30-Day written report

RCA Number 08E36

Dear Sir or Madam:

Guadalupe Rubbish Disposal Co., Inc d/b/a Guadalupe Recycling & Disposal Facility ("GRDF") is submitting this 10 and 30-day Title V written report to the Bay Area Air Quality Management District (BAAQMD) as required under Title V Permit Condition Section I.F for GRDF.

A breakdown report was submitted on December 23, 2021, at around 2:10 PM because the landfill gas collection and control system (GCCS) was temporarily shut down due to the PG&E power outage. The flare was online on the December 23, 2021, around ~11:10 AM (see Attachment A for flare data). Although GRDF disagrees that Breakdown Relief is the appropriate methodology for compliance with Rule 8-34 during an unplanned power outage, due to direction from BAAQMD staff, GRDF submitted the request for Breakdown Relief from BAAQMD for the December 23, 2021, PG&E power outage via BAAQMD's Reportable Compliance Activity (RCA) notification form submitted on December 21, 2021 ~ 2:10 PM and was assigned RCA numbers 08E36 (see Attachment B for copy of RCA and submittal).

The unplanned power outage shutdown events noted in RCA form submitted on December 23, 2021, did not result in emissions and do not qualify as non-compliance. GRDF believes that it complied with the Title V permit conditions and safety protocols. GRDF followed all measures to ensure gas movers and valves were closed during the shutdown events. GRDF's downtime events were not the result of equipment malfunction, knowing, willful, intentional, chronic nor committed by a recalcitrant, and did not benefit KCRDF economically nor result in a nuisance. The frequency and duration of weather or utility-related electrical interruptions are outside of GRDF's control.

GRDF is committed to operating its landfill in compliance with applicable regulations and will ensure that compliance is achieved. However, GRDF disagrees with the BAAQMD that temporary shutdowns resulting from unplanned power outages are violations of any BAAQMD regulation.

GRDF has placed the purchase order for a permanent generator (delayed due to the COVID-19 emergency and related supply chain disruptions) and the suppliers anticipate the unit to be delivered by the fourth quarter of 2022. Currently, GRDF is working on permit applications as required for the BAAQMD and the City of San Jose.

If you have any questions or need any additional information, please do not hesitate to contact me at (408) 779-2206.

Sincerely,

Guadalupe Recycling & Disposal Facility

Enrique Perez

District Manager

cc: Erin Phillips, BAAQMD

Paul Enrique Perez

Attachments:

Attachment A- GRDF flare data

Attachment B- Copy of GRDF RCA Form (RCA Number 08E36)

Attachment A GRDF flare data

Guadalupe Recycling and Disposal Facility-A3294

Flare Data

		FLARE	TEMP	LFG F	LOW
	Ì	F		SCI	-M
	F	MIN	MAX	MIN	MAX
2021/12/23	08:30:00	1619	1627	1370	1419
2021/12/23	08:32:00	1619	1623	1377	1424
2021/12/23	08:34:00	1623	1627	1371	1424
2021/12/23	08:36:00	1627	1654	1374	1421
2021/12/23	08:38:00	1621	1648	1379	1418
2021/12/23	08:40:00	1619	1622	1373	1419
2021/12/23	08:42:00	1607	1621	1374	1418
2021/12/23	08:44:00	1606	1618	1379	1421
2021/12/23	08:46:00	1600	1617	1379	1418
2021/12/23	08:48:00	1599	1618	1371	1425
2021/12/23	08:50:00	1578	1617	1371	1407
2021/12/23	08:52:00	1578	1665	1361	1406
2021/12/23	08:54:00	1665	1694	1361	1403
2021/12/23	08:56:00	1674	1679	1359	1407
2021/12/23	08:58:00	1674	1681	1368	1415
2021/12/23	09:00:00	1664	1678	1365	1409
2021/12/23	09:02:00	1669	1715	1368	1409
2021/12/23	09:04:00	1678	1696	1365	1410
2021/12/23	09:06:00	1679	1700	1366	1403
2021/12/23	09:08:00	1676	1700	1362	1409
2021/12/23	09:10:00	1675	1694	1371	1404
2021/12/23	09:12:00	1683	1693	1371	1416
2021/12/23	09:14:00	1678	1705	1368	1410
2021/12/23	09:16:00	1672	1706	1361	1410
2021/12/23	09:18:00	1669	1701	1368	1404
2021/12/23	09:20:00	1679	1699	1366	1411
2021/12/23	09:22:00	1672	1698	1372	1408
2021/12/23	09:24:00	1667	1694	1374	1412
2021/12/23	09:26:00	1691	1711	1365	1419
2021/12/23	09:28:00	1686	1711	1365	1411
2021/12/23	09:30:00	1683	1702	1368	1416
2021/12/23	09:32:00	1681	1718	1375	1417
2021/12/23	09:34:00	1667	1683	1378	1422
2021/12/23	09:36:00				
2021/12/23	09:38:00				
2021/12/23	09:40:00	744	802	-3	-2
2021/12/23	09:42:00	599	744	-2	-1
2021/12/23	09:44:00				
2021/12/23	09:46:00				
2021/12/23	09:48:00	342	390	-183	-182
2021/12/23	09:50:00	329	460	-182	-182
2021/12/23	09:52:00	460	1541	-183	-182
2021/12/23	09:54:00	984	1527	-183	-181
2021/12/23	09:56:00	709	984	-182	-181
2021/12/23	09:58:00	559	709	-182	-182
2021/12/23	10:00:00				
2021/12/23	10:02:00				
2021/12/23	10:04:00				
2021/12/23	10:06:00				
2021/12/23	10:08:00				

2024/12/22	10.10.00 I		ı	1	
2021/12/23	10:10:00				
2021/12/23	10:12:00				
2021/12/23	10:14:00				
2021/12/23	10:16:00				
2021/12/23	10:18:00				
2021/12/23	10:20:00				
2021/12/23	10:22:00				
2021/12/23	10:24:00				
2021/12/23	10:26:00				
2021/12/23	10:28:00				
2021/12/23	10:30:00				
2021/12/23	10:32:00				
2021/12/23	10:34:00				
2021/12/23	10:36:00				
2021/12/23	10:38:00				
2021/12/23	10:40:00				
2021/12/23	10:42:00				
2021/12/23	10:44:00				
2021/12/23	10:46:00				
2021/12/23	10:48:00	71	72	-4	-2
2021/12/23	10:50:00	70	71	-183	-182
2021/12/23	10:52:00	70	71	-183	-181
2021/12/23	10:54:00	70	71	-182	-182
2021/12/23	10:56:00		, -		
2021/12/23	10:58:00	75	76	-3	-2
2021/12/23	11:00:00	76	77	-3	-1
2021/12/23	11:02:00	77	78	-3	-1
2021/12/23	11:04:00	78	79	-2	-1
2021/12/23	11:04:00	79	79	-2	-1
2021/12/23	11:08:00	79	84	-2	1489
2021/12/23		84	1265	1489	1920
	11:10:00	1265	1755	1666	
2021/12/23	11:12:00		1574		1935
2021/12/23	11:14:00	1528		1623	1688
2021/12/23	11:16:00	1538	1564	1609	1666
2021/12/23	11:18:00	1528	1571	1579	1641
2021/12/23	11:20:00	1528	1607	1573	1630
2021/12/23	11:22:00	1552	1607	1587	1635
2021/12/23	11:24:00	1539	1552	1582	1624
2021/12/23	11:26:00	1551	1569	1573	1616
2021/12/23	11:28:00	1547	1570	1581	1623
2021/12/23	11:30:00	1562	1664	1585	1624
2021/12/23	11:32:00	1568	1604	1578	1617
2021/12/23	11:34:00	1556	1568	1567	1614
2021/12/23	11:36:00	1555	1567	1564	1606
2021/12/23	11:38:00	1555	1565	1553	1605
2021/12/23	11:40:00	1546	1556	1557	1597
2021/12/23			4564	1556	1591
	11:42:00	1553	1564		
2021/12/23	11:42:00 11:44:00	1562	1573	1560	1596
2021/12/23	11:42:00	1562 1560	1573 1569	1560 1562	
	11:42:00 11:44:00	1562	1573	1560	1596
2021/12/23	11:42:00 11:44:00 11:46:00	1562 1560	1573 1569	1560 1562	1596 1606
2021/12/23 2021/12/23	11:42:00 11:44:00 11:46:00 11:48:00	1562 1560 1547	1573 1569 1566	1560 1562 1563	1596 1606 1606
2021/12/23 2021/12/23 2021/12/23	11:42:00 11:44:00 11:46:00 11:48:00 11:50:00	1562 1560 1547 1555	1573 1569 1566 1569	1560 1562 1563 1558	1596 1606 1606 1600
2021/12/23 2021/12/23 2021/12/23 2021/12/23	11:42:00 11:44:00 11:46:00 11:48:00 11:50:00 11:52:00	1562 1560 1547 1555 1558	1573 1569 1566 1569 1587	1560 1562 1563 1558 1555	1596 1606 1606 1600 1597
2021/12/23 2021/12/23 2021/12/23 2021/12/23 2021/12/23 2021/12/23	11:42:00 11:44:00 11:46:00 11:48:00 11:50:00 11:52:00 11:54:00 11:56:00	1562 1560 1547 1555 1558 1553	1573 1569 1566 1569 1587 1584 1581	1560 1562 1563 1558 1555 1550 1556	1596 1606 1606 1600 1597 1599
2021/12/23 2021/12/23 2021/12/23 2021/12/23 2021/12/23	11:42:00 11:44:00 11:46:00 11:48:00 11:50:00 11:52:00 11:54:00	1562 1560 1547 1555 1558 1553 1554	1573 1569 1566 1569 1587 1584	1560 1562 1563 1558 1555 1550	1596 1606 1606 1600 1597 1599 1591

2021/12/23	12:02:00	1567	1586	1557	1594
	12.02.00	1567	1300	1557	1594
2021/12/23	12:04:00	1556	1586	1546	1587
2021/12/23	12:06:00	1559	1582	1555	1598
2021/12/23	12:08:00	1553	1564	1546	1590
2021/12/23	12:10:00	1553	1585	1547	1591
2021/12/23	12:12:00	1556	1588	1550	1585
2021/12/23	12:14:00	1558	1580	1541	1582
2021/12/23	12:16:00	1555	1578	1547	1588
2021/12/23	12:18:00	1568	1606	1543	1585
2021/12/23	12:20:00	1561	1596	1544	1582

Attachment B Copy of GRDF RCA Form for RCA Number 08E36

From: RCA Notification
To: Phadnis, Rajan

Subject: [EXTERNAL] RE: GRDF A3294-RCA for PG&E power outage 12.23.2021

Date: Thursday, December 23, 2021 2:15:41 PM

ID# 08E36

From: Phadnis, Rajan <rphadnis@wm.com> **Sent:** Thursday, December 23, 2021 2:09 PM **To:** RCA Notification <rca@baaqmd.gov>

Cc: Phadnis, Rajan <rphadnis@wm.com>; Perez, Enrique <pperez3@wm.com>; Azevedo, Becky

<Razevedo@wm.com>; Erin Phillips <ephillips@baaqmd.gov>
Subject: GRDF A3294-RCA for PG&E power outage 12.23.2021

CAUTION: This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am attaching the RCA notification form for unplanned PG&E power outage on 12.23.2021, at Guadalupe Recycling and Disposal Facility in San Jose, CA (Facility A3294).

Thank you, Rajan Phadnis EP Specialist For Guadalupe Recycling and Disposal Facility





910 Coyote Creek Golf Drive P.O. Box 1870 Morgan Hill, CA 95037 (408) 779-2206 (408) 779-5165 Fax

December 23, 2021 (via email rca@baaqmd.gov)

Compliance & Enforcement Division Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, California 94105

Re: Reportable Compliance Activity (RCA) Notification
Guadalupe Recycling & Disposal Facility, San Jose, CA, Facility Number A3294

Guadalupe Rubbish Disposal Co., Inc d/b/a Guadalupe Recycling & Disposal Facility ("GRDF") is submitting the attached Reportable Compliance Activity (RCA) Form for temporary flare shutdown event caused by unplanned utility power interruption on December 23, 2021, ~ 9:35 AM. GRDF is submitting the breakdown report to Bay Area Air Quality Management District (BAAQMD) on December 23, 2021 at ~2:10 PM about the PG&E's power outage.

Although GRDF disagrees that Breakdown Relief is the appropriate methodology for compliance with Rule 8-34 during an unplanned power outage, due to direction from BAAQMD staff, this letter is to request Breakdown Relief from BAAQMD for the PG&E power outage. BAAQMD's RCA notification form, as modified, is enclosed. The frequency and duration of weather or utility-related electrical interruptions are outside of GRDF's control and GRDF asserts that it did not violate any applicable regulations and limits.

Breakdown Relief should be granted as GRDF complied with administrative requirements despite its objections to the re-interpretation of Rule 8-34 and:

- 1. The breakdown is not the result of intent, negligence or disregard of air pollution control regulations;
- 2. The breakdown is not the result of improper maintenance;
- 3. The breakdown does not create a public nuisance;
- 4. The breakdown was not caused by an excessively recurrent breakdown of the same equipment; and
- 5. The breakdown did not occur, and any emissions did not interfere with attainment or maintenance of any National or California air quality standard.

On December 23, 2021 at \sim 10:45 AM the GCCS was back online. The shutdown event was unforeseeable & unpreventable at GRDF. The flare was temporarily shut down and did not result in emission nor nuisance.

Sincerely,

Guadalupe Recycling & Disposal Facility

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: RCA Form GRDF Facility A3294 Dated 12.23.2021



COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable Compliance Activity (RCA)

		See back of form	for instructions →
1. X BREAKDO	WN RELIEF: District Use OnlyBREAKD	OWN REFERENC	E#:
2. NA MONITOR E	XCESS EMISSION or EXCURSION: <i>Dis</i>	trict Use Only RE	FERENCE#:
3. NA MONITOR IS	S INOPERATIVE: District Use Only REF	ERENCE#:	
4. NA PRESSURE	RELIEF DEVICE (PRD): District Use O	nly PRD REFERE	NCE#:
SITE INF	ORMATION AND DESCRIPTION INFOR	MATION (REQUIF	RED)
Company	Guadalupe Rubbish Disposal Co., Inc	Site #	A3294
Address	15999 Guadalupe Mines Road, San Jose 95120	Source #	S-9
Reported by	R Phadnis	Phone #	510.875.9338
Indicated Excess	-NA	Fax #	-
Allowable Limit	-NA	Averaging Time	-
Start Time/Date	~ 9:35 AM on 12/23/2021	Clear Time	12/23/2021~10:45 AM
Monitor/device type(s)	▶ CEM ▶ GLM ▶ Parame	etric PRD	► Non-monitor
Monitor description(s)			
Parameter(s) exceeded NO _x SO ₂ Hydrocarbon Brea Wind Direction	O Descity Lead Descity ►Lead Descity ►	H ₂ S	►Flow
Unit(s) of Measurement			
▶ppm▶psig▶pH	min/hr > 20%▶ ⁰Fahrenheit	inches H₂OOther (describe)	►mmHg
ecause the GCCS was tempora	submitted on 12/23/2021 at ~14:10 PM by Guada arily shut down due to the PG&E power outage. Downth BAAQMD regulation 8-34-301.1. Please also	ouring the PG&E power	er outage, the GCCS was
Descived by	District Use Only) o f o	Time
Received by	L)ate	Time

- ✓ Check the Box numbers 1-4 that apply to the RCA you are trying to report or request and read the detailed instructions.
- ✓ You will receive an ID # for each RCA you submit. In the case of a request for Breakdown Relief where multiple monitors are affected, you do <u>not need</u> to submit multiple forms, <u>as long as</u> all necessary information is given on one form. RCA reported during other than core business hours will be assigned an ID # the following working day. If you do not receive an ID #, it is your responsibility to contact the BAAQMD to get one.
- ✓ You may submit only one request for breakdown relief per form. However, you may submit multiple indicated excess, inoperative monitors and PRD reports on one form, provided that the start and end times given for the events in the required information section is inclusive of all events. Information on parameters exceeded, units of measurement and allowable limits can be provided in the event description box or when contacted by District staff with questions.
- ✓ Fill out the "Site Information and Description Information Required" areas of this form and email to <u>rca@baagmd.gov</u>
- ✓ A 30-day written follow-up report is required for Breakdown Requests and PRD Releases. Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference Breakdown Admissions Advisory dated 12/3/04. Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: You may have additional report requirements under Title V.

Detailed Instructions

Box 1: To Request Breakdown Relief (Regulations 1-112, 1-113, 1-208, 1-431, 1-432)

If you have an equipment malfunction (e.g.; breakdown) that leads to the release of air pollutants above the regulatory or your permitted levels, you may request relief from BAAQMD enforcement action.

7	Check	D	шл

- □ NOTE: Start and end times given for these events in the required information section must be inclusive of all events.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Requests for breakdown relief may not be withdrawn and must be called in or faxed to the BAAQMD <u>immediately upon</u> discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

Box 2: Monitor Indicates Excess Emission or Excursion (Regulation 1-522.7, 1-523.3, 1-542)

When a BAAQMD-required monitor indicates an excess or excursion, you must report it to the BAAQMD.

- Check Box #2.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Any excess emission indicated by a CEM or excursion of a parametric monitor, shall be reported to the BAAQMD within 96 hours.
- Area concentration excesses over the limits prescribed in District regulations shall be reported to the BAAQMD within the next normal working day following the examination of data.

Box 3: Monitor Is Inoperative (Regulations 1-522, 1-523, 1-530)

When a BAAQMD-required monitor is inoperative for greater than 24 hours, you must report it to the BAAQMD.

- Check Box #3 only if inoperative for greater than 24 hours.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All reports of inoperative monitors must be reported by the following BAAQMD working day and additionally be cleared by a notification of resumption of monitoring. To notify the BAAQMD regarding the resumption of monitoring, do not send in a separate RCA form; call (415) 749-4979 and give the RCA ID #, date, and the time of resumption.
- Inoperative monitors (except parametric monitors) with downtime greater than 15 days must furnish proof of expedited repair in a follow-up report.

Box 4: Pressure Relief Device (PRD) Is Released (Regulation 8-28-401)

When a PRD at your refinery/chemical plant vents to the atmosphere, you must report it to the BAAQMD.

- ☐ Check Box #4 only if a pressure relief device is released.
- Separate RCA ID #'s can be applied to monitor(s) affected by a PRD by also checking Box #2 if other monitors record an
 excess or excursion.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- □ All PRD release reports must be reported by the following BAAQMD working day.



Guadalupe Rubbish
Disposal Co., Inc.
15999 Guadalupe Mines Road

15999 Guadalupe Mines Road P.O. Box 20957 San Jose, CA 95160

January 5, 2022 (via email: compliance@baaqmd.gov)

Director of Compliance and Enforcement Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, California 94105 Attn: RCA 30-Day Report

Re: Guadalupe Recycling & Disposal Facility, San Jose, CA, Facility Number A3294 Request for Breakdown Relief for RCA Numbers 08E36 30-Day Written Follow-up Report (Per Regulation 1, Section 432)

Dear Sir or Madam:

Guadalupe Rubbish Disposal Co., Inc d/b/a Guadalupe Recycling & Disposal Facility ("GRDF") is submitting this 30-Day follow-up report to the Bay Area Air Quality Management District (BAAQMD) for the PG&E power outage on December 23, 2021.

A breakdown report (Per Regulation 1, Section 431) was submitted by GRDF at~2:10 PM on December 23, 2021 because the landfill gas collection and control system (GCCS) was temporarily shut down due a PG&E power outage caused by a fallen tree branch. The flare was back online at ~11:10 AM (see Attachment A for flare data). Although GRDF disagrees that Breakdown Relief is the appropriate methodology for compliance with Rule 8-34 during an unplanned power outage, due to direction from BAAQMD staff, GRDF submitted the request for Breakdown Relief to the BAAQMD for the December 23, 2021 PG&E power outage and was assigned RCA numbers 08E36 (see Attachment B for copy of RCA submittal).

The unplanned power outage shutdown event noted in RCA form December 23, 2021, did not result in emissions and do not qualify as non-compliance. GRDF believes that it complied with the Title V permit conditions and safety protocols. GRDF followed all measures to ensure gas movers and valves were closed during the shutdown events. GRDF's downtime events were not the result of equipment malfunction, knowing, willful, intentional, chronic nor committed by a recalcitrant, and did not benefit KCRDF economically nor result in a nuisance. The frequency and duration of weather or utility-related electrical interruptions are outside of GRDF's control.

GRDF is committed to operating its landfill in compliance with applicable regulations and will ensure that compliance is achieved. However, GRDF disagrees with the BAAQMD that temporary shutdowns resulting from unplanned power outages are violations of any BAAQMD regulation.

GRDF has placed the purchase order for a permanent generator (delayed due to the COVID-19 emergency and related supply chain disruptions) and the suppliers anticipate the unit to be delivered by the fourth quarter of 2022. Currently, GRDF is working on BAAQMD permit application for the generator and Automatic Transfer Switch (ATS) electrical permit as required by the City of San Jose.

If you have any questions or need any additional information, please do not hesitate to contact me at (408) 779-2206.

Sincerely,

Guadalupe Recycling & Disposal Facility

Enrique Perez

District Manager

cc: Erin Phillips, BAAQMD

Paul Inrigue Perez

Attachments:

Attachment A- GRDF flare data

Attachment B- Copy of GRDF RCA Form -Number 08E36

Attachment A GRDF flare data

Guadalupe Recycling and Disposal Facility-A3294

Flare Data

		FLARE	TEMP	LFG F	LOW
	Ì	F		SCI	-M
	F	MIN	MAX	MIN	MAX
2021/12/23	08:30:00	1619	1627	1370	1419
2021/12/23	08:32:00	1619	1623	1377	1424
2021/12/23	08:34:00	1623	1627	1371	1424
2021/12/23	08:36:00	1627	1654	1374	1421
2021/12/23	08:38:00	1621	1648	1379	1418
2021/12/23	08:40:00	1619	1622	1373	1419
2021/12/23	08:42:00	1607	1621	1374	1418
2021/12/23	08:44:00	1606	1618	1379	1421
2021/12/23	08:46:00	1600	1617	1379	1418
2021/12/23	08:48:00	1599	1618	1371	1425
2021/12/23	08:50:00	1578	1617	1371	1407
2021/12/23	08:52:00	1578	1665	1361	1406
2021/12/23	08:54:00	1665	1694	1361	1403
2021/12/23	08:56:00	1674	1679	1359	1407
2021/12/23	08:58:00	1674	1681	1368	1415
2021/12/23	09:00:00	1664	1678	1365	1409
2021/12/23	09:02:00	1669	1715	1368	1409
2021/12/23	09:04:00	1678	1696	1365	1410
2021/12/23	09:06:00	1679	1700	1366	1403
2021/12/23	09:08:00	1676	1700	1362	1409
2021/12/23	09:10:00	1675	1694	1371	1404
2021/12/23	09:12:00	1683	1693	1371	1416
2021/12/23	09:14:00	1678	1705	1368	1410
2021/12/23	09:16:00	1672	1706	1361	1410
2021/12/23	09:18:00	1669	1701	1368	1404
2021/12/23	09:20:00	1679	1699	1366	1411
2021/12/23	09:22:00	1672	1698	1372	1408
2021/12/23	09:24:00	1667	1694	1374	1412
2021/12/23	09:26:00	1691	1711	1365	1419
2021/12/23	09:28:00	1686	1711	1365	1411
2021/12/23	09:30:00	1683	1702	1368	1416
2021/12/23	09:32:00	1681	1718	1375	1417
2021/12/23	09:34:00	1667	1683	1378	1422
2021/12/23	09:36:00				
2021/12/23	09:38:00				
2021/12/23	09:40:00	744	802	-3	-2
2021/12/23	09:42:00	599	744	-2	-1
2021/12/23	09:44:00				
2021/12/23	09:46:00				
2021/12/23	09:48:00	342	390	-183	-182
2021/12/23	09:50:00	329	460	-182	-182
2021/12/23	09:52:00	460	1541	-183	-182
2021/12/23	09:54:00	984	1527	-183	-181
2021/12/23	09:56:00	709	984	-182	-181
2021/12/23	09:58:00	559	709	-182	-182
2021/12/23	10:00:00				
2021/12/23	10:02:00				
2021/12/23	10:04:00				
2021/12/23	10:06:00				
2021/12/23	10:08:00				

2024/12/22	10.10.00 I		ı	1	
2021/12/23	10:10:00				
2021/12/23	10:12:00				
2021/12/23	10:14:00				
2021/12/23	10:16:00				
2021/12/23	10:18:00				
2021/12/23	10:20:00				
2021/12/23	10:22:00				
2021/12/23	10:24:00				
2021/12/23	10:26:00				
2021/12/23	10:28:00				
2021/12/23	10:30:00				
2021/12/23	10:32:00				
2021/12/23	10:34:00				
2021/12/23	10:36:00				
2021/12/23	10:38:00				
2021/12/23	10:40:00				
2021/12/23	10:42:00				
2021/12/23	10:44:00				
2021/12/23	10:46:00				
2021/12/23	10:48:00	71	72	-4	-2
2021/12/23	10:50:00	70	71	-183	-182
2021/12/23	10:52:00	70	71	-183	-181
2021/12/23	10:54:00	70	71	-182	-182
2021/12/23	10:56:00		, -		
2021/12/23	10:58:00	75	76	-3	-2
2021/12/23	11:00:00	76	77	-3	-1
2021/12/23	11:02:00	77	78	-3	-1
2021/12/23	11:04:00	78	79	-2	-1
2021/12/23	11:04:00	79	79	-2	-1
2021/12/23	11:08:00	79	84	-2	1489
2021/12/23		84	1265	1489	1920
	11:10:00	1265	1755	1666	
2021/12/23	11:12:00		1574		1935
2021/12/23	11:14:00	1528		1623	1688
2021/12/23	11:16:00	1538	1564	1609	1666
2021/12/23	11:18:00	1528	1571	1579	1641
2021/12/23	11:20:00	1528	1607	1573	1630
2021/12/23	11:22:00	1552	1607	1587	1635
2021/12/23	11:24:00	1539	1552	1582	1624
2021/12/23	11:26:00	1551	1569	1573	1616
2021/12/23	11:28:00	1547	1570	1581	1623
2021/12/23	11:30:00	1562	1664	1585	1624
2021/12/23	11:32:00	1568	1604	1578	1617
2021/12/23	11:34:00	1556	1568	1567	1614
2021/12/23	11:36:00	1555	1567	1564	1606
2021/12/23	11:38:00	1555	1565	1553	1605
2021/12/23	11:40:00	1546	1556	1557	1597
2021/12/23			4564	1556	1591
	11:42:00	1553	1564		
2021/12/23	11:42:00 11:44:00	1562	1573	1560	1596
2021/12/23	11:42:00	1562 1560	1573 1569	1560 1562	
	11:42:00 11:44:00	1562	1573	1560	1596
2021/12/23	11:42:00 11:44:00 11:46:00	1562 1560	1573 1569	1560 1562	1596 1606
2021/12/23 2021/12/23	11:42:00 11:44:00 11:46:00 11:48:00	1562 1560 1547	1573 1569 1566	1560 1562 1563	1596 1606 1606
2021/12/23 2021/12/23 2021/12/23	11:42:00 11:44:00 11:46:00 11:48:00 11:50:00	1562 1560 1547 1555	1573 1569 1566 1569	1560 1562 1563 1558	1596 1606 1606 1600
2021/12/23 2021/12/23 2021/12/23 2021/12/23	11:42:00 11:44:00 11:46:00 11:48:00 11:50:00 11:52:00	1562 1560 1547 1555 1558	1573 1569 1566 1569 1587	1560 1562 1563 1558 1555	1596 1606 1606 1600 1597
2021/12/23 2021/12/23 2021/12/23 2021/12/23 2021/12/23 2021/12/23	11:42:00 11:44:00 11:46:00 11:48:00 11:50:00 11:52:00 11:54:00 11:56:00	1562 1560 1547 1555 1558 1553	1573 1569 1566 1569 1587 1584 1581	1560 1562 1563 1558 1555 1550 1556	1596 1606 1606 1600 1597 1599
2021/12/23 2021/12/23 2021/12/23 2021/12/23 2021/12/23	11:42:00 11:44:00 11:46:00 11:48:00 11:50:00 11:52:00 11:54:00	1562 1560 1547 1555 1558 1553 1554	1573 1569 1566 1569 1587 1584	1560 1562 1563 1558 1555 1550	1596 1606 1606 1600 1597 1599 1591

2021/12/23	12:02:00	1567	1586	1557	1594
	12.02.00	1567	1300	1557	1594
2021/12/23	12:04:00	1556	1586	1546	1587
2021/12/23	12:06:00	1559	1582	1555	1598
2021/12/23	12:08:00	1553	1564	1546	1590
2021/12/23	12:10:00	1553	1585	1547	1591
2021/12/23	12:12:00	1556	1588	1550	1585
2021/12/23	12:14:00	1558	1580	1541	1582
2021/12/23	12:16:00	1555	1578	1547	1588
2021/12/23	12:18:00	1568	1606	1543	1585
2021/12/23	12:20:00	1561	1596	1544	1582

Attachment B Copy of GRDF RCA Form-Numbers 08E36

From: RCA Notification
To: Phadnis, Rajan

Subject: [EXTERNAL] RE: GRDF A3294-RCA for PG&E power outage 12.23.2021

Date: Thursday, December 23, 2021 2:15:41 PM

ID# 08E36

From: Phadnis, Rajan <rphadnis@wm.com> **Sent:** Thursday, December 23, 2021 2:09 PM **To:** RCA Notification <rca@baaqmd.gov>

Cc: Phadnis, Rajan <rphadnis@wm.com>; Perez, Enrique <pperez3@wm.com>; Azevedo, Becky

<Razevedo@wm.com>; Erin Phillips <ephillips@baaqmd.gov>
Subject: GRDF A3294-RCA for PG&E power outage 12.23.2021

CAUTION: This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am attaching the RCA notification form for unplanned PG&E power outage on 12.23.2021, at Guadalupe Recycling and Disposal Facility in San Jose, CA (Facility A3294).

Thank you, Rajan Phadnis EP Specialist For Guadalupe Recycling and Disposal Facility





910 Coyote Creek Golf Drive P.O. Box 1870 Morgan Hill, CA 95037 (408) 779-2206 (408) 779-5165 Fax

December 23, 2021 (via email rca@baaqmd.gov)

Compliance & Enforcement Division Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, California 94105

Re: Reportable Compliance Activity (RCA) Notification
Guadalupe Recycling & Disposal Facility, San Jose, CA, Facility Number A3294

Guadalupe Rubbish Disposal Co., Inc d/b/a Guadalupe Recycling & Disposal Facility ("GRDF") is submitting the attached Reportable Compliance Activity (RCA) Form for temporary flare shutdown event caused by unplanned utility power interruption on December 23, 2021, ~ 9:35 AM. GRDF is submitting the breakdown report to Bay Area Air Quality Management District (BAAQMD) on December 23, 2021 at ~2:10 PM about the PG&E's power outage.

Although GRDF disagrees that Breakdown Relief is the appropriate methodology for compliance with Rule 8-34 during an unplanned power outage, due to direction from BAAQMD staff, this letter is to request Breakdown Relief from BAAQMD for the PG&E power outage. BAAQMD's RCA notification form, as modified, is enclosed. The frequency and duration of weather or utility-related electrical interruptions are outside of GRDF's control and GRDF asserts that it did not violate any applicable regulations and limits.

Breakdown Relief should be granted as GRDF complied with administrative requirements despite its objections to the re-interpretation of Rule 8-34 and:

- 1. The breakdown is not the result of intent, negligence or disregard of air pollution control regulations;
- 2. The breakdown is not the result of improper maintenance;
- 3. The breakdown does not create a public nuisance;
- 4. The breakdown was not caused by an excessively recurrent breakdown of the same equipment; and
- 5. The breakdown did not occur, and any emissions did not interfere with attainment or maintenance of any National or California air quality standard.

On December 23, 2021 at \sim 10:45 AM the GCCS was back online. The shutdown event was unforeseeable & unpreventable at GRDF. The flare was temporarily shut down and did not result in emission nor nuisance.

Sincerely,

Guadalupe Recycling & Disposal Facility

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: RCA Form GRDF Facility A3294 Dated 12.23.2021



COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable Compliance Activity (RCA)

		See back of form	for instructions →
1. X BREAKDO	WN RELIEF: District Use OnlyBREAKD	OWN REFERENC	E#:
2. NA MONITOR E	XCESS EMISSION or EXCURSION: <i>Dis</i>	trict Use Only RE	FERENCE#:
3. NA MONITOR IS	S INOPERATIVE: District Use Only REF	ERENCE#:	
4. NA PRESSURE	RELIEF DEVICE (PRD): District Use O	nly PRD REFERE	NCE#:
SITE INF	ORMATION AND DESCRIPTION INFOR	MATION (REQUIF	RED)
Company	Guadalupe Rubbish Disposal Co., Inc	Site #	A3294
Address	15999 Guadalupe Mines Road, San Jose 95120	Source #	S-9
Reported by	R Phadnis	Phone #	510.875.9338
Indicated Excess	-NA	Fax #	-
Allowable Limit	-NA	Averaging Time	-
Start Time/Date	~ 9:35 AM on 12/23/2021	Clear Time	12/23/2021~10:45 AM
Monitor/device type(s)	▶ CEM ▶ GLM ▶ Parame	etric PRD	► Non-monitor
Monitor description(s)			
Parameter(s) exceeded NO _x SO ₂ Hydrocarbon Brea Wind Direction	O Descity Lead Descity ►Lead Descity ►	H ₂ S	►Flow
Unit(s) of Measurement			
▶ppm▶psig▶pH	min/hr > 20%▶ ⁰Fahrenheit	inches H₂OOther (describe)	►mmHg
ecause the GCCS was tempora	submitted on 12/23/2021 at ~14:10 PM by Guada arily shut down due to the PG&E power outage. Downth BAAQMD regulation 8-34-301.1. Please also	ouring the PG&E power	er outage, the GCCS was
Descived by	District Use Only) o f o	Time
Received by	L)ate	Time

- ✓ Check the Box numbers 1-4 that apply to the RCA you are trying to report or request and read the detailed instructions.
- ✓ You will receive an ID # for each RCA you submit. In the case of a request for Breakdown Relief where multiple monitors are affected, you do <u>not need</u> to submit multiple forms, <u>as long as</u> all necessary information is given on one form. RCA reported during other than core business hours will be assigned an ID # the following working day. If you do not receive an ID #, it is your responsibility to contact the BAAQMD to get one.
- ✓ You may submit only one request for breakdown relief per form. However, you may submit multiple indicated excess, inoperative monitors and PRD reports on one form, provided that the start and end times given for the events in the required information section is inclusive of all events. Information on parameters exceeded, units of measurement and allowable limits can be provided in the event description box or when contacted by District staff with questions.
- ✓ Fill out the "Site Information and Description Information Required" areas of this form and email to <u>rca@baagmd.gov</u>
- ✓ A 30-day written follow-up report is required for Breakdown Requests and PRD Releases. Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference Breakdown Admissions Advisory dated 12/3/04. Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: You may have additional report requirements under Title V.

Detailed Instructions

Box 1: To Request Breakdown Relief (Regulations 1-112, 1-113, 1-208, 1-431, 1-432)

If you have an equipment malfunction (e.g.; breakdown) that leads to the release of air pollutants above the regulatory or your permitted levels, you may request relief from BAAQMD enforcement action.

7	Check	D	шл

- □ NOTE: Start and end times given for these events in the required information section must be inclusive of all events.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Requests for breakdown relief may not be withdrawn and must be called in or faxed to the BAAQMD <u>immediately upon</u> discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

Box 2: Monitor Indicates Excess Emission or Excursion (Regulation 1-522.7, 1-523.3, 1-542)

When a BAAQMD-required monitor indicates an excess or excursion, you must report it to the BAAQMD.

- Check Box #2.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Any excess emission indicated by a CEM or excursion of a parametric monitor, shall be reported to the BAAQMD within 96 hours.
- Area concentration excesses over the limits prescribed in District regulations shall be reported to the BAAQMD within the next normal working day following the examination of data.

Box 3: Monitor Is Inoperative (Regulations 1-522, 1-523, 1-530)

When a BAAQMD-required monitor is inoperative for greater than 24 hours, you must report it to the BAAQMD.

- Check Box #3 only if inoperative for greater than 24 hours.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All reports of inoperative monitors must be reported by the following BAAQMD working day and additionally be cleared by a notification of resumption of monitoring. To notify the BAAQMD regarding the resumption of monitoring, do not send in a separate RCA form; call (415) 749-4979 and give the RCA ID #, date, and the time of resumption.
- Inoperative monitors (except parametric monitors) with downtime greater than 15 days must furnish proof of expedited repair in a follow-up report.

Box 4: Pressure Relief Device (PRD) Is Released (Regulation 8-28-401)

When a PRD at your refinery/chemical plant vents to the atmosphere, you must report it to the BAAQMD.

- ☐ Check Box #4 only if a pressure relief device is released.
- Separate RCA ID #'s can be applied to monitor(s) affected by a PRD by also checking Box #2 if other monitors record an
 excess or excursion.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- □ All PRD release reports must be reported by the following BAAQMD working day.



Guadalupe Rubbish Disposal Company, Inc. 15999 Guadalupe Mines Road, San Jose, CA 95120

October 28, 2021

Mr. Raymond Salalila Air Quality Specialist Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, California 94105

Re: Guadalupe Recycling and Disposal Facility

Facility Number A3294

Request for Limited Exemption (for construction activities) from Regulation 8, Rule 34 (Solid Waste Disposal Sites), Section 303 (Landfill Surface Requirements)

Dear Mr. Salalila:

This letter requests a limited exemption from the requirements of Bay Area Air Quality Management District (BAAQMD) Regulation 8, Rule 34, Section 303 (Landfill Surface Requirements) during construction, repairs and installation of piping and laterals to be connected to the existing gas collection and control system (GCCS) from November 8, 2021 through December 31, 2021, at the Guadalupe Rubbish Disposal Company, Inc. (GRDC). This notification is submitted pursuant to the BAAQMD Regulation 8, Rule 34, Section 118, "Limited Exemptions for Construction Activities." The work consists of repairs and installation of piping and laterals that will connect to the existing gas collection and control system (GCCS) to maintain compliance with the BAAQMD Regulation 8, Rule 34, and is to be performed during the period of November 8, 2021 through December 31, 2021.

GRDC will conduct repairs and installation of piping and laterals that will connect to the existing GCCS. This letter also transmits the BAAQMD-required construction plan (work plan) for the proposed work. The work plan contains information required pursuant to Regulation 8, Rule 34, Section 118.1 and AB-32 §95470(a)(1)(I) and (J) and includes:

- Description of actions being taken;
- Description of landfill areas affected;
- Description of LFG components affected;
- Map showing the above areas and components;
- Reason requiring the action;
- Construction schedule;
- Description of air quality mitigation measures planned; and
- Recordkeeping requirements.

No significant interruption of the current site LFG extraction and control operations is anticipated due to the work. The construction will begin on or around November 8, 2021. We anticipate construction activities to conclude by December 31, 2021.

Unless notified otherwise, GRDC will proceed in accordance with the attached work plan. We deem submittal of this plan as approval by the BAAQMD to take necessary action to ensure compliance with regulations, which may include taking additional LFG extraction wells offline for an extended period of time pursuant to Regulation 8, Rule 34, Section 118.

In case of any questions, please do not hesitate to contact me at (408) 960-0770.

Sincerely,

Guadalupe Rubbish Disposal Company, Inc.

Michael L. Winter District Engineer

Cc: Enrique Perez, GRDC Bill Louis, WM

Michael L. Winter

BAAQMD REGULATION 8, RULE 34 CONSTRUCTION PLAN

GUADALUPE RUBBISH DISPOSAL COMPANY, INC.

CONSTRUCTION FOR INSTALLATION AND REPAIR OF LFG PIPING

November 8, 2021 through December 31, 2021

INTRODUCTION

This Construction Work Plan is submitted pursuant to Bay Area Air Quality Management District (BAAQMD) Regulation 8, Rule 34, Section 118: Limited Exemptions for Construction Activities. To obtain an exemption from BAAQMD Regulation 8, Rule 34, Section 303: Landfill Surface Requirements, the operator shall submit a construction plan in writing to the Air Pollution Control Officer (APCO) prior to beginning any construction activities. In addition, this plan also includes information required by the AB-32 Sections §95470(a)(1)(I) and (J).

BAAQMD Section 303 requires maintaining the concentration of organic compounds and methane below 500 parts per million by volume (ppm_v) at all points on the landfill surface. Section 118 provides an exemption from the surface emission standard for "....areas of the landfill surface where the landfill cover material has been removed and refuse has been exposed for the express purpose of installing, expanding, replacing, or repairing components of the landfill gas, leachate, or gas condensate collection and removal systems."

Pursuant to Regulation 8, Rule 34, Section 118 and AB-32 Sections §95470(a)(1)(I) and (J), this work plan includes:

- Description of actions being taken;
- Description of landfill areas affected;
- Description of landfill gas (LFG) components affected;
- Map showing the affected areas and components;
- Reason requiring the action;
- Construction schedule:
- Description of air quality mitigation measures planned; and
- Recordkeeping requirements.

ACTIONS BEING TAKEN

The work consists of excavation, repair of existing pipes and installation of new piping and laterals that will connect to existing LFG extraction wells and to the GCCS.

AFFECTED LANDFILL AREAS

The construction activities will occur in the area shown on the attached figure.

AFFECTED LFG COMPONENTS

GRDC will conduct landfill GCCS construction activities in compliance with to maintain compliance with the Rule 8-34-116 and 8-34-117.

Please see below for list of proposed GCCS repairs and installations:

- Installation, repair and tie-ins of piping at wells 151, 186 and 188
- Any additional piping that may be required at existing pipes and wells; and
- Cut and cap below grade few surface penetrations that are not active

Pursuant to Rule 8-34-117, GRDC will take the GCCS wells offline, as necessary. GRDC will ensure that no more than 5 gas wells are shut down at any time, and that no gas collection well may be down for more than 24 hours.

It is anticipated that the construction will have no significant impact on the routine operation of the existing GCCS. Installation of new LFG extraction laterals is independent of the ongoing operations of the GCCS. When connecting LFG extraction wells, isolation valves installed within the existing GCCS piping network will be used to minimize the number of existing LFG extraction wells offline at any given time while the newly installed LFG laterals are connected to the GCCS.

REASONS FOR ACTIONS

The proposed construction work is intended to:

- Increase LFG collection efficiency by repairing and installation of LFG laterals and piping on existing wells;
- Increase LFG collection efficiency to further reduce the potential surface emissions;

CONSTRUCTION SCHEDULE

The anticipated construction period will be between November 8, 2021 through December 31, 2021. The anticipated schedule for the construction activities is summarized in the table below:

Table 1 - Preliminary Construction Schedule

Task	Project Week and Duration	
Mobilize crew, equipment, and materials to site	1 week	
Repair and installation of piping and laterals	Up to 7 weeks	
Clean-up and demobilize crew and materials	1 week	

AIR QUALITY MITIGATION MEASURES

Emission of raw LFG will be minimized during construction. We anticipate minimal interruption of the overall site LFG extraction and control operations during the work. Installation and repair

of piping is independent of ongoing operations of the existing GCCS. Air quality mitigation will be provided during the installation of wells and connection of wells to existing GCCS piping network. These mitigation measures are presented below and are designed to meet both the requirements of 8-34 Section 118 and §95470(a)(1)(I).

Due to the minimal amount of excavation planned for this work, air quality impacts are also anticipated to be minimal. Air quality mitigation will be provided during the following work tasks:

- Excavation for installation piping;
- Excavation and backfill of pipe trenches; and
- Connection of new piping and laterals to existing piping and GCCS

During construction and excavation through waste and soil cover, air emission will be controlled by implementing the following measures:

- Minimizing the installation time for each component;
- Minimizing the quantity of trench excavations at any one time;
- Relocating excavated refuse to the designated waste disposal area immediately and covering the relocated waste daily by no later than the end of each day; and
- Well borings will not be left open overnight or for periods greater than 8 hours

During connection of wells to the existing LFG piping, and installation of laterals and piping, air emissions will be controlled by implementing the following measures:

- Capping or blind flanging of all pipes and collector openings, which will remain sealed until time of connection to a vacuum source;
- Using isolation valves;
- Minimizing installation time for making each connection; and
- Minimizing the amount of open pipe during each installation, by using flange joints and flexible couplings.

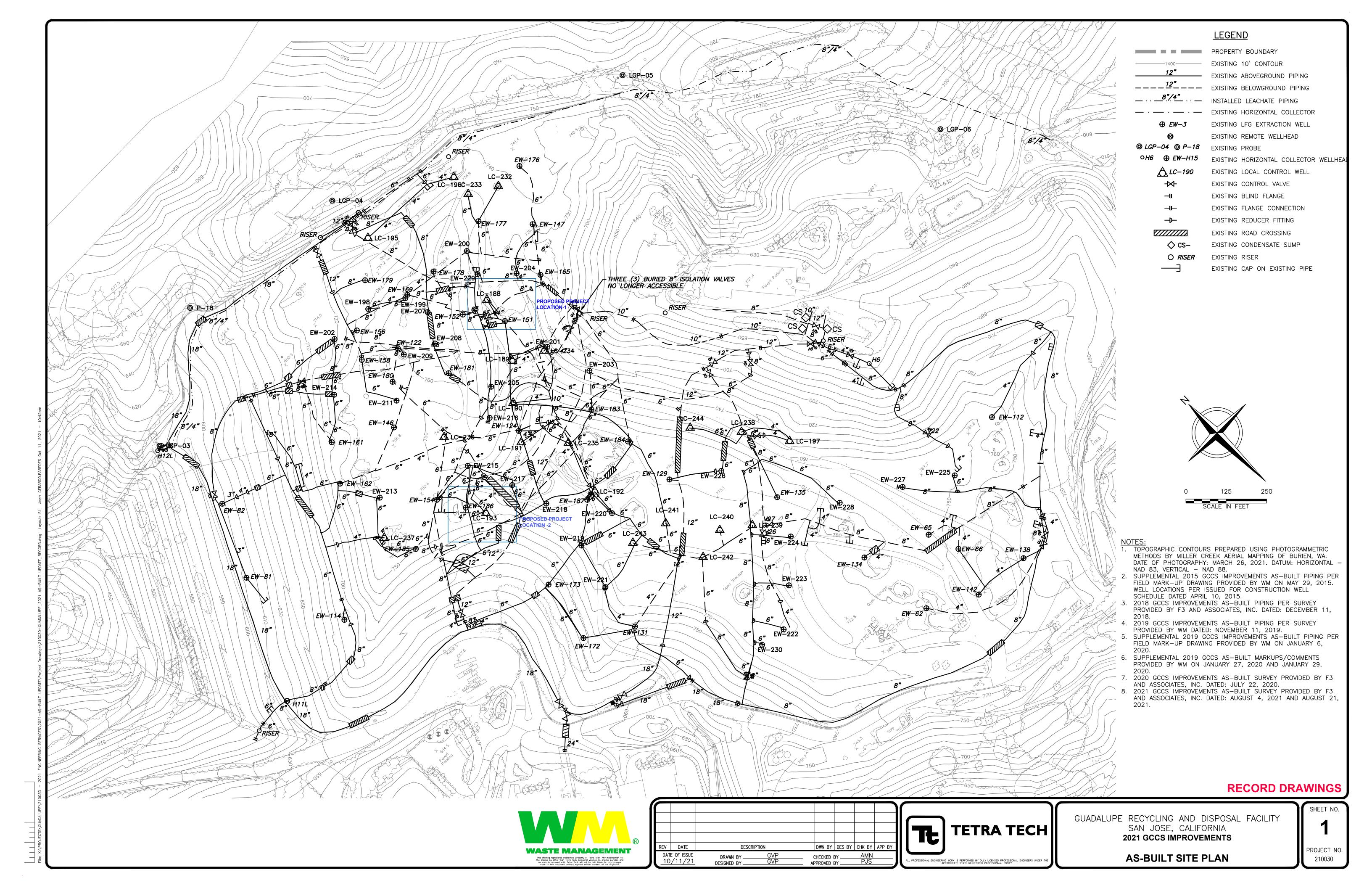
RECORDKEEPING

The following records will be retained during the project:

- Construction start and end dates, projected and actual installation dates, and projected shut down times for individual gas collection system components.
- GCCS downtime and individual well shutdown times will be documented in accordance with the GRDC's Startup, Shutdown, and Malfunction (SSM) Plan.

• Mitigation measures taken to minimize methane emissions and other potential air quality impacts will be documented.

Attachments: Figure 1 - GCCS Map





Guadalupe Rubbish
Disposal Co., Inc.
15999 Guadalupe Mines Road

P.O. Box 20957 San Jose, CA 95160

November 23, 2021

Ms. Tamiko Endow Permit Service Division Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, CA 94105

Re: Facility No. A3294– Guadalupe Recycling and Disposal Facility Notification of the Addition of Landfill Gas Collection Wells 200, 217, and 218 to Higher

Operating Value List

Dear Ms. Endow:

The Guadalupe Recycling and Disposal Facility (GRDF), owned by Guadalupe Rubbish Disposal Co., Inc., (GRDC) is subject to the Federal New Source Performance Standards/Emission Guidelines (NSPS/EG) for municipal solid waste (MSW) landfills (40 Code of Federal Regulations [CFR], Part 60) and the Bay Area Air Quality Management District (BAAQMD) Regulation 8, Rule 34. In accordance with Title V Permit Condition Number 6188, Part 3b(vi), the GRDF is submitting this letter as notification to the BAAQMD for the addition of landfill gas (LFG) Wells 200, 217, and 218 to the higher operating value (HOV) list of wells at the GRDF.

The GRDF has installed and operates a landfill gas collection and control system (GCCS) at the facility in accordance with the NSPS/EG and BAAQMD Regulation 8, Rule 34. These regulations require that the LFG wells that make up the GCCS be operated with wellhead temperatures below 131 degrees Fahrenheit (°F) (BAAQMD 8-34-305).

In October 2021, the GRDF investigated the LFG temperatures at Wells 200, 217, and 218. The intent of the investigation was to determine if the elevated temperature readings were due to excess air infiltration, damage to the well, or if the well simply operates at a higher normal temperature.

The review of monitoring data for Wells 200, 217, and 218 indicates that the well had elevated operating temperatures, and oxygen data shows negligible oxygen has been detected at the well. Upon first discovering the elevated temperatures, GRDF personnel monitored the wells for carbon monoxide (CO), which is an early indicator of subsurface fire. Typically, CO concentrations of greater than 1,000 parts per million by volume (ppmv) will indicate a subsurface fire, with CO concentrations greater than 500 ppmv being of concern. The initial two readings at Well 200 indicated CO readings of 0 and 5 ppmv. Subsequent monitoring at Well 217 indicated CO readings of 10 and 0 ppmv. Subsequent monitoring at Well 217 indicated that CO concentrations at 5 and 0 ppmv. The initial two readings at Well 218 indicated CO readings of 0 and 5 ppmv. Subsequent

monitoring at Well 218 indicated that CO concentrations remained at 0 ppmv. The wellhead temperatures for each CO monitoring event was less than 140°F. Methane concentrations at Well 200, 217, and 218 do not appear to be affected by operation at the higher temperatures. See attached table for historical monitoring data and CO monitoring results. Wells 200, 217, and 218 did not have well exceedances within the last 120 days.

GRDF considers Wells 200, 217, and 218 added to the HOV list for a temperature of 145°F as of November 23, 2021. Should the temperature measured at Wells 200, 217, and 218 during routine monitoring exceed 145°F, GRDF will consider it an exceedance and will track the deviation in accordance with the NSPS/EG and BAAQMD requirements.

If you have any questions or need any additional information, please do not hesitate to contact me at rphadnis@wm.com.

Sincerely,

Guadalupe Recycling and Disposal Facility

Rajan Phadnis EP Specialist

Enclosures: Attachment A- Wellfield Monitoring Data for Wells 200, 217, and 218

Figure 1. – Gas Collection and Control System Map

cc: Enrique Perez, GRDF Bill Louis, GRDF Mike Winter, GRDF

Attachment A

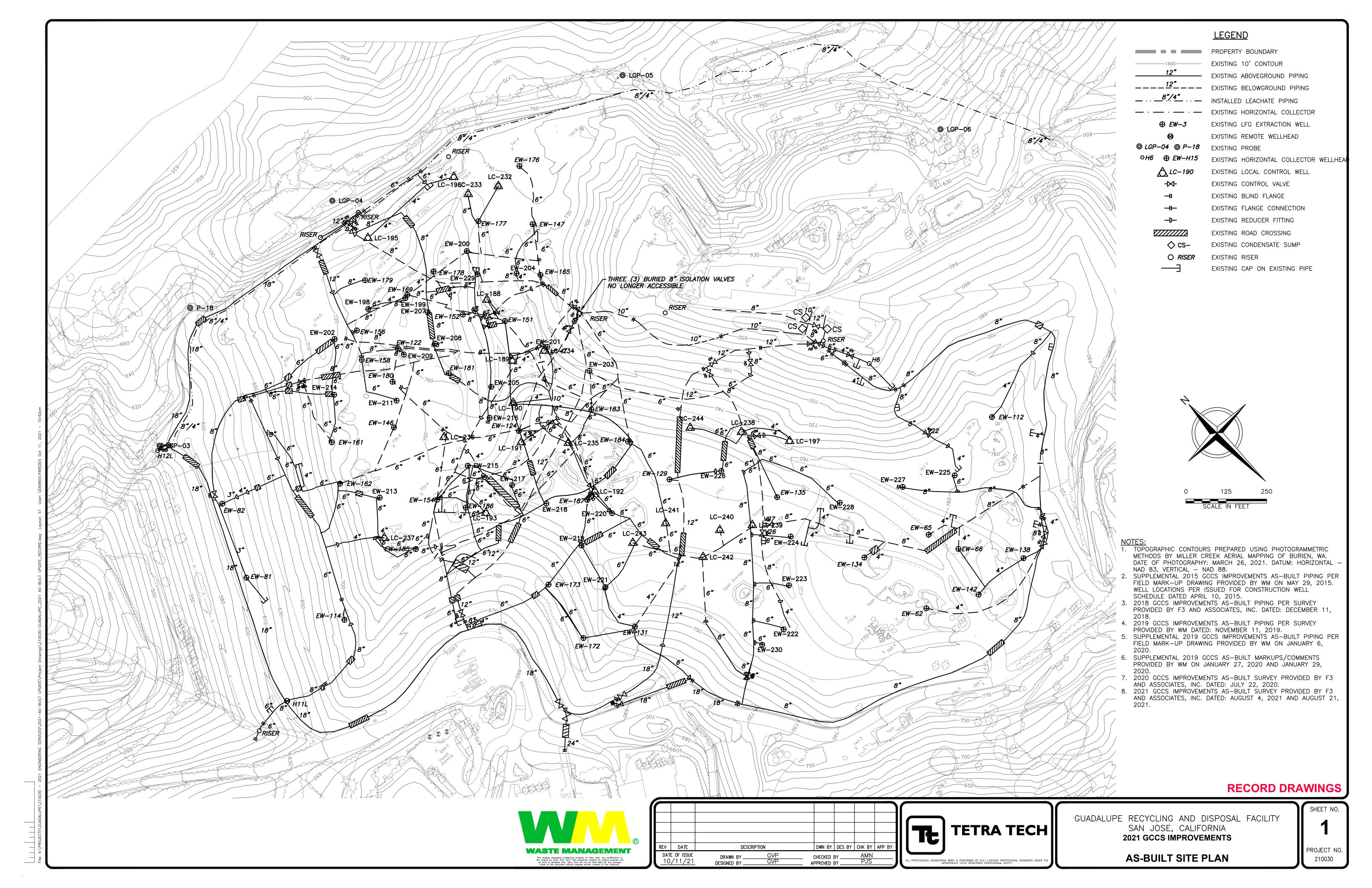
 $Well field\ Monitoring\ and\ CO\ Data\ for\ Wells\ 200,\ 217,\ and\ 218$

Table 1. GRDF Historical Wellfield Data For Wells 200, 217 and 218

								<u> </u>	
Device Name	Date Time	CH4 (Methane)(%)	CO2 (Carbon Dioxide)(%)	O2 (Oxygen)(%)	Balance Gas(%)	Initial Temperature(oF)	Adjusted Temperature(oF)	Initial Static Pressure("H2O)	Adjusted Static Pressure("H2O)
GUAD0200	6/16/2021 14:35	52.7	40.8	0.2	6.3	126.0	127.0	-36.4	-37.7
GUAD0200	7/7/2021 14:33	47.8	43.8	0.2	8.2	124.0	124.1	-29.1	-29.2
GUAD0200	7/28/2021 21:11	49.7	39.4	0.5	10.4	124.0	124.0	-33.4	-27.3
GUAD0200	8/12/2021 12:45	55.3	43.0	1.6	0.1	125.0	123.0	-29.4	-29.4
GUAD0200	9/3/2021 9:13	58.4	41.5	0.0	0.1	129.1	129.1	-27.7	-27.4
GUAD0200	9/11/2021 13:26	57.6	42.3	0.0	0.1	129.0	128.0	-34.1	-34.4
GUAD0200	10/7/2021 15:29	57.5	39.9	0.0	2.6	134.1	134.1	-15.3	-15.3
GUAD0200	10/12/2021 16:24	58.6	39.5	0.0	1.9	130.5	132.3	-5.9	-5.9
GUAD0200	10/12/2021 16:26		-			CO was 0 p	ppm		
GUAD0200	10/19/2021 13:02	59.00	39.20	0.20	1.60	128.80	128.90	-1.13	-1.23
GUAD0200	10/19/2021 13:04					CO was 5 p	ppm		
GUAD0200	11/4/2021 14:15	58.5	41.5	0.0	0.0	128.4	128.5	-0.3	-0.5
GUAD0200	11/18/2021 12:45	56.8	43.2	0.1	-0.1	125.5	126.8	-11.86	-12.6
GUAD0200	11/18/2021 12:50					CO was 5 p	ppm		
GUAD0217	6/11/2021 13:19	44.0	40.9	0.0	15.1	129.0	129.0	-0.3	-0.3
GUAD0217	7/19/2021 18:54	27.3	32.1	0.2	40.4	127.0	126.0	-12.1	-1.6
GUAD0217	8/9/2021 14:32	30.8	32.7	0.3	36.2	124.0	124.0	-0.6	-0.5
GUAD0217	9/10/2021 15:45	31.2	35.9	0.0	32.9	127.0	127.0	-3.3	-2.9
GUAD0217	10/5/2021 13:50	45.3	41.1	0.8	12.8	131.3	131.3	-2.5	-2.5
GUAD0217	10/5/2021 14:50	34.7	37.0	0.0	28.3	128.5	128.5	-5.1	-5.1
GUAD0217	10/5/2021 14:52					CO was 10	ppm		
GUAD0217	10/8/2021 16:13	49.6	42.4	0	8	129.8	129.9	-0.74	-0.79
GUAD0217	10/8/2021 16:15					CO was 0 p	ppm		
GUAD0217	10/19/2021 12:13	41.8	40	0	18.2	123.6	123.8	-0.98	-0.98
GUAD0217	10/19/2021 12:15					CO was 5 p	ppm		
GUAD0217	11/1/2021 13:20					CO was 0 p	ppm		
GUAD0217	11/1/2021 13:23	48.5	44.4	0.0	7.1	126.3	126.2	-0.5	-0.5
GUAD0218	6/11/2021 13:24	38.4	38.1	0.1	23.4	118.0	118.0	-0.3	-0.3
GUAD0218	7/19/2021 18:57	33.3	34.4	0.0	32.3	121.0	121.0	-8.4	-0.4
GUAD0218	8/9/2021 14:38	26.1	30.6	0.0	43.3	125.0	126.0	-5.9	-3.5
GUAD0218	9/10/2021 15:49	24.1	31.4	0.0	44.5	126.0	126.0	-6.2	-3.4
GUAD0218	10/5/2021 13:54	30.2	34.3	0.0	35.5	127.8	127.7	-1.0	-1.0
GUAD0218	10/6/2021 14:12	46.0	40.4	0.1	13.5	132.3	132.3	-0.7	-0.7
GUAD0218	10/8/2021 16:07	44.8	41.1	0.0	14.1	111.7	111.5	-0.2	-0.2
GUAD0218	10/8/2021 16:08					CO was 0 p	ppm		
GUAD0218	10/19/2021 11:46	43.7	37.6	0.0	18.7	108.0	107.8	-0.2	-0.2
GUAD0218	10/19/2021 11:49					CO was 5 p			
GUAD0218	11/1/2021 13:11	50.1	42.6	0.0	7.3	126.5	126.5	-1.1	-1.1
GUAD0218	11/1/2021 13:14					CO was 0 p	opm		

Figure 1

Gas Collection and Control System Map



APPENDIX D WELL SSM LOG

AFFECTED EQUIPMENT: Wellfield

Completed By: Tino Robles/Rajan Phadnis

Guadalupe Recyclin															
	(1) Start of Event	(2) End of Event	(3) Duration	(4) Duration		_			_	(8) Type of Event		_			
Identify Well & Check Applicable Event	Date and Time	Date and Time	of Event (Hours)	Shutdown (Hours)	(5) Cause or Reason		(6) Applicable 8-34 Exemption	(7) Date Form Completed		(Startup and Shutdown Events Only)	(9) Procedures Used	(10)	Did Steps Taken Vary From Section 9?	(11) Did Event Cause Any Emission Limit Exceedance	(12) Describe Emission Standard(s) Exceeded
Well ID Number:122 Startup Event	10/4/21 10:54	10/4/21 10:56	0.03				113: Inspection and Maintenance 116: Well Raising	10/4/2021	х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	10/4/21 10:54	10/4/21 10:30	0.00	196 hours	Well Located in Active Filling Area.		117: Gas Collection 118: Construction Activities	10/4/2021		Automatic (Go to Section 11)	1 to 3	х	No (Stop)	No (Stop)	
Well ID Number:122 X Startup Event	10/12/21 14:25	10/12/21 14:27	0.03	(8 days)	Well Raised.	Х	113: Inspection and Maintenance 116: Well Raising	10/12/2021	х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
Shutdown Event Malfunction Event							117: Gas Collection 118: Construction Activities	10.122		Automatic (Go to Section 11)	1 to 4	х	No (Stop)	No (Stop)	
Well ID Number:209 Startup Event	10/4/21 11:32	10/4/21 11:34	0.03			Х	113: Inspection and Maintenance 116: Well Raising	10/4/2021	х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
X Shutdown Event Malfunction Event Well ID Number:209				195 hours	Well Located in Active Filling Area. Well Raised.		117: Gas Collection 118: Construction Activities 113: Inspection and Maintenance			Automatic (Go to Section 11)	1 to 3	Х	No (Stop)	No (Stop)	
X Startup Event Shutdown Event	10/12/21 14:20	10/12/21 14:22	0.03	(8 days)	Well Raised.	Х	113: Inspection and Maintenance 116: Well Raising 117: Gas Collection	10/12/2021	X	Manual (Go to Section 9)	Procedure No. 1 to 4		Yes (Go to Section 11)	Yes (Go to Section 12)	
Malfunction Event Well ID Number:114							118: Construction Activities 113: Inspection and Maintenance			Automatic (Go to Section 11)	1 10 4	Х	No (Stop)	No (Stop)	
Startup Event X Shutdown Event	10/4/21 13:30	10/4/21 13:32	0.03				113: Inspection and Maintenance 116: Well Raising 117: Gas Collection	10/4/2021	×	Manual (Go to Section 9)	Procedure No. 1 to 3		Yes (Go to Section 11)	Yes (Go to Section 12)	
Malfunction Event Well ID Number:114				214 hours (9 days)	Well Located in Active Filling Area. Well Raised.		118: Construction Activities 113: Inspection and Maintenance			Automatic (Go to Section 11)	1 10 3	Х	No (Stop)	No (Stop)	
X Startup Event Shutdown Event	10/13/21 11:30	10/13/21 11:32	0.03	(3 days)	Wolf Actions.	Х	116: Well Raising 117: Gas Collection	10/13/2021	X	Manual (Go to Section 9)	Procedure No. 1 to 4	L.	Yes (Go to Section 11)	Yes (Go to Section 12)	
Malfunction Event Well ID Number:186							118: Construction Activities 113: Inspection and Maintenance			Automatic (Go to Section 11)		Х	No (Stop)	No (Stop)	
Startup Event X Shutdown Event	10/25/21 7:55	10/25/21 7:57	0.03			Х	116: Well Raising 117: Gas Collection	10/25/2021	_×	Manual (Go to Section 9)	Procedure No. 1 to 3	×	Yes (Go to Section 11)	Yes (Go to Section 12)	
Malfunction Event Well ID Number:186				408 hours (17 days)	Well Located in Active Filling Area. Well Raised.		118: Construction Activities 113: Inspection and Maintenance		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Automatic (Go to Section 11)		×	No (Stop)	No (Stop)	
X Startup Event Shutdown Event	11/11/21 7:30	11/11/21 7:32	0.03	, ==,-,			116: Well Raising 117: Gas Collection	11/11/2021	<u> </u>	Manual (Go to Section 9)	Procedure No. 1 to 4	×	Yes (Go to Section 11)	Yes (Go to Section 12)	
Malfunction Event Well ID Number:114							118: Construction Activities 113: Inspection and Maintenance		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Automatic (Go to Section 11)		^	No (Stop)	No (Stop)	
Startup Event X Shutdown Event	10/13/21 11:40	10/13/21 11:42	0.03				116: Well Raising 117: Gas Collection	10/13/2021	<u> ^</u>	Manual (Go to Section 9)	Procedure No. 1 to 3	×	Yes (Go to Section 11)	Yes (Go to Section 12)	
Malfunction Event Well ID Number:114				500 hours (21 days)	Well Located in Active Filling Area. Well Raised.		118: Construction Activities 113: Inspection and Maintenance		-	Automatic (Go to Section 11) Manual (Go to Section 9)		^	No (Stop) Yes (Go to Section 11)	No (Stop) Yes (Go to Section 12)	
X Startup Event Shutdown Event	11/3/21 8:00	11/3/21 8:02	0.03				116: Well Raising 117: Gas Collection	11/3/2021	Ĥ	Automatic (Go to Section 11)	Procedure No. 1 to 4	Y	No (Stop)	No (Stop)	
Malfunction Event Well ID Number:62							118: Construction Activities 113: Inspection and Maintenance		×	Manual (Go to Section 9)			Yes (Go to Section 11)	Yes (Go to Section 12)	
X Shutdown Event	1/13/22 11:30	1/13/22 11:32	0.03				116: Well Raising 117: Gas Collection	1/13/2022		Automatic (Go to Section 11)	Procedure No. 1 to 3	x	No (Stop)	No (Stop)	
Malfunction Event Well ID Number:62				480 hours (20 days)	Well Located in Active Filling Area. Well Raised.		118: Construction Activities 113: Inspection and Maintenance		х	Manual (Go to Section 9)	December N		Yes (Go to Section 11)	Yes (Go to Section 12)	
X Startup Event Shutdown Event	2/2/22 11:00	2/2/22 11:02	0.03				116: Well Raising 117: Gas Collection	2/2/2022		Automatic (Go to Section 11)	Procedure No. 1 to 4	х	No (Stop)	No (Stop)	
Malfunction Event Well ID Number: 134							118: Construction Activities 113: Inspection and Maintenance		Х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	2/14/22 10:50	2/14/22 10:52	0.03	1,093 hours	Well Located in Active Filling Area.	П	116: Well Raising 117: Gas Collection 118: Construction Activities	2/14/2022		Automatic (Go to Section 11)	1 to 3	х	No (Stop)	No (Stop)	
Well ID Number:134 Startup Event				(46 days)	Well Raised.		118: Construction Activities 113: Inspection and Maintenance 116: Well Raising		х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
Shutdown Event Malfunction Event	3/31/22 23:59	4/1/22 0:01	0.03			Ĥ	117: Gas Collection 118: Construction Activities	3/31/2022		Automatic (Go to Section 11)	1 to 4	х	No (Stop)	No (Stop)	
Well ID Number:176 Startup Event	0/00/00 45 05	0/00/00 45 55	0.02				113: Inspection and Maintenance 116: Well Raising	2/22/2002	х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	2/22/22 15:00	2/22/22 15:02	0.03	897 hours	Well Located in Active Filling Area.		117: Gas Collection 118: Construction Activities	2/22/2022		Automatic (Go to Section 11)	1 to 3	х	No (Stop)	No (Stop)	
Well ID Number:176 Startup Event	2/24/22 22-52	4/4/00 0:04	0.02	(37 days)	Well Raised.		113: Inspection and Maintenance 116: Well Raising	2/24/2022	х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
Shutdown Event Malfunction Event	3/31/22 23:59	4/1/22 0:01	0.03				117: Gas Collection 118: Construction Activities	3/31/2022		Automatic (Go to Section 11)	1 to 4	х	No (Stop)	No (Stop)	
N/A = Not Applicable									_		•			•	

Malfunction Event
N/A = Not Applicable
Offline Wells

GRDF 2022.04 SAR Appendix submittal 4.27.22

(a) STANDARD OPERATING PROCEDURES

Shutdown

Procedure No.

<u>Procedure</u>
Ensure that there is no unsafe conditions present, contact manager immediately
Initiate shutdown sequence below by one or more of the following (Note date and time in Section 1 of form above)

a. Press Emergency Stop if necessary b. Close On/Off switch(es) or Push On/Off button(s)

c. Close adjacent valves if necessary

Observe that system achieves normal shutdown ranges for levels, pressures, and temperatures (Note date and time in Section 2 of form above)

Startup Procedure No.

3.

Procedure

Ensure that there is no unsafe conditions present
Ensure that the system is ready to start by one of the following:

a. Valves are in correct position
b. Levels, pressures, and temperatures are within normal starting range
c. Alarms are cleared
d. Power is on and available to control panel and ready to energized equipment.

3. 4.

e. Emergency stop is de-energized
Initiate start sequence (Note time and date in section 1 of form above)
Observe that system achieves normal shutdown ranges for levels, pressures, and temperatures (Note time and date in Section 2 of form above)

Malfunction

EQUIPMENT	PURPOSE	MALFUNCTION	COMMON CAUSES	PROCEDURE NOTYPICAL RESPONSE ACTIONS
1500 11 11 10 11	<u> </u>	EVENT		
LFG Collection and Control S Blower or Other Gas Mover	Applies vacuum to	Loss of LFG Flow/Blower	-Flame arrestor fouling/deterioration	Repair breakages in extraction piping
Blower of Other Gas Mover Equipment	Applies vacuum to wellfield to extract LFG and transport to control device	Loss of LFG Flowisiower Malfunction	- Hame arrestor fouling/detenoration - Automatic valve problems - Blower failure (e.g., belt, motor, impeller, coupling, seizing, etc.) - Loss of power - Extraction piping failure - Condensate knock-out problems - Extraction piping blockages	1. Repair breakages in extraction piping 2. Clean flame arrestor 3. Repair blockages in extraction piping 4. Verify automatic valve operation, compressed air/introgen supply 5. Notify power utility, if appropriate 6. Provide/utilize auxiliary power source, if necessary 7. Repair Settlement in Collection Piping 8. Repair Blower 9. Activate back-up blower, if available 10. Clean knock-up pot/demister 11. Drain knock-out pot
Extraction Wells and Collection Piping	Conduits for extractions and movement of LFG flow	Collection well and pipe failures	-Break/crack in header or lateral piping -Leaks at wellheads, valves, flanges, Test ports, seals, couplings, etcCollection piping blockages -Problems due to settlement (e.g. pipe separation, deformation, development of low points)	Repair leaks or breaks in lines or wellheads S. Follow procedures for loss of LFG flow/blower malfunction Repair blockages in collection piping Repair settlement in collection piping
Blower or Other Gas Mover	Collection and control of	Loss of electrical power	- Force majeure/Act of God (e.g., lightning, flood,	17. Check/reset breaker
Equipment And Control Device	LFG		earthquake, etc.) -Area-wide or local blackout or brown-out -Interruption in service (e.g. blown service fuse) -Electrical line failure -Breaker trip -Transformer failure -Motor starter failure/trip -Overdraw of power -Problems in electrical panel -Damage to electrical equipment from on-site operations	18. Check/repair electrical panel components 19. Check/repair transformer 20. Check/repair in transformer 21. Check/repair electrical line 22. Test amperage to various equipment 23. Contact electricity supplier 24. Contact/contract electrician 25.Provide auxiliary power (if necessary)
LFG Control Device	Combusts LFG	Low temperature	-Problems with temperature -monitoring	26. Check/repair temperature monitoring equipment
		conditions at control device	equipment -Problems/failure of -thermocouple and/or thermocouple wiring -Change of LFG flow -Change of LFG quality -Problems with air louvers -Problems with air louvers -Problems with air louvers	Check/repair thermocouple and/or wiring Rollow procedures for loss of flow/blower malfunction Check/adjust louvers Check/adjust air/fuel controls
LFG Control Device	Combusts LFG	Loss of Flame	-Change in atmospheric conditions -Problems/failure of thermocouple -Loss/change of LFG flow -Loss/change of LFG quality -Problems with air/fuel controls -Problems/failure of flame sensor	31. Check/repair temperature monitoring equipment 32. Check/repair thermocouple 33. Follow procedures for loss of flow/blower malfunction 34. Check/adjust air/fuel controls 35. Check/adjust/repair flame sensor
Flow Monitoring/	Measures and records	Malfunctions of Flow	-Problems with temperature monitoring	36. Check/adjust LFG collectors
Recording Device	gas flow from collection system to control	Monitoring/Recording Device	-Problems with orifice plate, pitot tube, or other in line flow measuring device -Problems with device controls and/or wiring -Problems with chart recorder	37. Check/adjust/repair flow measuring device and/or wiring 38. Check/repair chart recorder 39. Replace paper in chart recorder
Temperature Monitoring/ Recording Device	Monitors and records combustion temperature of enclosed combustion device	Malfunctions of Temperature Monitoring/Recording Device	-Problems with thermocouple -Problems with device controls and/or wiring -Problems with chart recorder	Check/adjust/repair thermocouple 1. Check/adjust/repair controller and/or wiring 42. Check/adjust/repair electrical panel components 43. Check/repair chart recorder 44. Replace paper in chart recorder
Control Device	Combusts LFG	Other Control Device Malfunctions	-Control device smoking (i.e. visible emissions) -Problems with flare insulation -Problems with plot light system -Problems with air louvers -Problems with air louvers -Problems with thermocouple -Problems with thermocouple -Problems with burners -Problems with flame arrester -Alarmed malfunction conditions not covered above -Unalarmed conditions discovered during inspection not covered above	45. Site-specific diagnosis procedures 46. Site-specific responses actions based on diagnos 47. Open manual louvers 48. Clean pitot orifice 49. Clean/drain flame arrestor 50. Refill propane supply 51. Check/repair pilot sparking system

(b) For each permit limit exceedance complete an "SSM Plan Departure Form".

GRDF 2022.04 SAR Appendix submittal 4.27.22 Well Procedures 4/27/2022

APPENDIX E FLARE SSM LOG

AFFECTED EQUIPMENT: A-9 Flare

Guadalupe Recyclin SSMP REPORT - Fro												
Identify Flare & Check Applicable Event	(1) Start of Event Date and Time	(2) End of Event Date and Time	(3) Duration of Event (Hours)	(4) Duration Shutdown (Hours)	(5) Cause or Reason	(6) Applicable 8-34 Exemption	(7) Date Form Completed	(8) Type of Event (Startup and Shutdown Events Only)	(9) Procedures Used	(10) Did Steps Taken Vary From Section 9?	(11) Did Event Cause Any Emission Limit Exceedance	(12) Describe Emission Standard(s) Exceeded
Component: A-9 Flare Startup Event						113: Inspection and Maintenance 116: Well Raising	1/0/1900	Manual (Go to Section 8)	Procedure	Yes (Go to Section 10)	Yes (Go to Section 11)	
Shutdown Event Malfunction Event				4.368.0	Flare remains shutdown. Flare A9 not required to operate in conjunction with		170/1500	Automatic (Go to Section 10)	1 to 3	No (Stop)	No (Stop)	
Component: A-9 Flare Startup Event				4,300.0	flare A17.	113: Inspection and Maintenance 116: Well Raising	1/0/1900	Manual (Go to Section 8)	Procedure	Yes (Go to Section 10)	Yes (Go to Section 11)	
Shutdown Event Malfunction Event						117: Gas Collection 118: Construction Activities	170/1500	Automatic (Go to Section 10)	1 to 4	No (Stop)	No (Stop)	

Completed By: Tino Robles/Rajan Phadnis

TOTAL DOWNTIME October 1, 2021 Through March 31, 2022	4368.0
TOTAL RUNTIME October 1, 2021 Through March 31, 2022 (HOURS):	0.0
TOTAL HOURS April 1, 2021 Through September 30, 2021 (HOURS):	4368.0

AFFECTED EQUIPMENT: A-17 Flare (Based on the correspondence with the BAAQMD, flare A-14 is now designated as flare A-17)

Completed By: Tino Robles/Rajan Phadnis

Guadalupe Recycling & SSMP REPORT - From A			021													
Identify Flare & Check Applicable Event	(1) Start of Event Date and Time	(2) End of Event Date and Time	(3) Duration of Event (Hours)	(4) Duration Shutdown (Hours)	(5) Cause or Reason	(6	6) Applicable 8-34 Exemption	(7) Date Form Completed		(8) Type of Event (Startup and Shutdown Events Only)	(9) Procedures Used	(10	0) Did Steps Taken Vary From Section 9?) Did Event Cause Any ission Limit Exceedance	(12) Describe Emission Standard(s) Exceeded
Component: A-17 Flare						Х	113: Inspection and Maintenance			Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
Startup Event X Shutdown Event Malfunction Event	10/20/21 17:40	10/20/21 17:44	0.07		Flare shutdown during PG&E power outage. RCA was filed and RCA No.		116: Well Raising 117: Gas Collection 118: Construction Activities	10/20/2021	x	Automatic (Go to Section 11)	1		No (Stop)	х	No (Stop)	1
Component: A-14 Flare X Startup Event				17.73	08C52 was assigned. Flare was inspected and restarted.	Х	113: Inspection and Maintenance 116: Well Raising		х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	\exists	Yes (Go to Section 12)	
Shutdown Event Malfunction Event	10/21/21 11:24	10/21/21 11:28	0.07		mapacieu anu resianeu.		117: Gas Collection 118: Construction Activities	10/21/2021		Automatic (Go to Section 11)	1 to 4	х	No (Stop)	1	No (Stop)	1
Component: A-17 Flare Startup Event						Х	113: Inspection and Maintenance 116: Well Raising			Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	10/22/21 05:58	10/22/21 06:02	0.07		Flare shutdown during PG&E power outage. Amended RCA was filed and		117: Gas Collection 118: Construction Activities	10/22/2021	х	Automatic (Go to Section 11)	1		No (Stop)	х	No (Stop)	1
Component: A-14 Flare X Startup Event				7.20	RCA No. 08C55 was assigned. Flare was inspected and restarted.	Х	113: Inspection and Maintenance 116: Well Raising		х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	T	Yes (Go to Section 12)	
Shutdown Event Malfunction Event	10/22/21 13:10	10/22/21 13:14	0.07			Н	117: Gas Collection 118: Construction Activities	10/22/2021		Automatic (Go to Section 11)	1 to 4	х	No (Stop)		No (Stop)	1
Component: A-17 Flare Startup Event						Х	113: Inspection and Maintenance 116: Well Raising			Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	10/25/21 04:24	10/25/21 04:28	0.07		Flare shutdown due to blower VFD	Н	117: Gas Collection 118: Construction Activities	10/25/2021	х	Automatic (Go to Section 11)	1		No (Stop)	х	No (Stop)	
Component: A-14 Flare X Startup Event	40/05/04 05:00	40/05/04 05:40	0.07	1.20	malfunction. Flare was inspected and restarted.	Х	113: Inspection and Maintenance 116: Well Raising	10/25/2021	х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
Shutdown Event Malfunction Event	10/25/21 05:36	10/25/21 05:40	0.07				117: Gas Collection 118: Construction Activities	10/23/2021		Automatic (Go to Section 11)	1 to 4	Х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event	10/25/21 05:42	10/25/21 05:46	0.07			Х	113: Inspection and Maintenance 116: Well Raising	10/25/2021		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	10/23/21 03:42	10/25/21 05:40	0.07	0.30	Flare shutdown due to blower VFD malfunction. Flare was inspected and		117: Gas Collection 118: Construction Activities	10/23/2021	х	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)	
Component: A-14 Flare X Startup Event	10/25/21 06:00	10/25/21 06:04	0.07	0.50	restarted.	Х	113: Inspection and Maintenance 116: Well Raising	10/25/2021	х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
Shutdown Event Malfunction Event	10/20/21 00:00	10/20/21 00:04				Н	117: Gas Collection 118: Construction Activities	10.000		Automatic (Go to Section 11)	1 to 4	х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event	10/25/21 06:02	10/25/21 06:06	0.07			Х	113: Inspection and Maintenance 116: Well Raising	10/25/2021		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event				0.37	Flare shutdown due to blower VFD malfunction. Flare was inspected and		117: Gas Collection 118: Construction Activities		х	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)	
Component: A-14 Flare X Startup Event	10/25/21 06:24	10/25/21 06:28	0.07		restarted.	X	113: Inspection and Maintenance 116: Well Raising	10/25/2021	х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	<u> </u>
Shutdown Event Malfunction Event							117: Gas Collection 118: Construction Activities			Automatic (Go to Section 11)	1 to 4	Х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event X Shutdown Event	10/25/21 06:26	10/25/21 06:30	0.07			×	113: Inspection and Maintenance 116: Well Raising 117: Gas Collection	10/25/2021		Manual (Go to Section 9)			Yes (Go to Section 11)	_	Yes (Go to Section 12)	
Malfunction Event				0.30	Flare shutdown due to blower VFD malfunction. Flare was inspected and	V	118: Construction Activities		x	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)	
Component: A-14 Flare X Startup Event Shutdown Event	10/25/21 06:44	10/25/21 06:48	0.07		restarted.	Ĥ	113: Inspection and Maintenance 116: Well Raising 117: Gas Collection	10/25/2021	х	Manual (Go to Section 9)	Procedure No. 1 to 4		Yes (Go to Section 11)	_	Yes (Go to Section 12)	ļ
Malfunction Event Component: A-17 Flare							117: Gas Collection 118: Construction Activities 113: Inspection and Maintenance			Automatic (Go to Section 11)	1 to 4	Х	No (Stop)	_	No (Stop)	
Startup Event X Shutdown Event	10/25/21 06:48	10/25/21 06:52	0.07			Ĥ	113: Inspection and Maintenance 116: Well Raising 117: Gas Collection	10/25/2021		Manual (Go to Section 9)	1		Yes (Go to Section 11)		Yes (Go to Section 12)	ļ I
Malfunction Event Component: A-14 Flare				2.40	Flare shutdown due to blower VFD malfunction. Flare was inspected and	×	118: Construction Activities 113: Inspection and Maintenance		Х	Automatic (Go to Section 11)			No (Stop)	X	No (Stop)	
X Startup Event Shutdown Event	10/25/21 09:12	10/25/21 09:16	0.07		restarted.	Ĥ	116: Well Raising	10/25/2021	x	Manual (Go to Section 9)	Procedure No. 1 to 4	_	Yes (Go to Section 11)	4	Yes (Go to Section 12)	, I
Malfunction Event Component: A-17 Flare						¥	118: Construction Activities 113: Inspection and Maintenance			Automatic (Go to Section 11)	1 10 4	Х	No (Stop)	_	No (Stop)	
Startup Event X Shutdown Event	10/25/21 09:16	10/25/21 09:20	0.07			Ĥ	116: Well Raising 117: Gas Collection	10/25/2021	L.	Manual (Go to Section 9)	-		Yes (Go to Section 11)		Yes (Go to Section 12)	, I
Malfunction Event Component: A-14 Flare				0.47	Flare shutdown due to blower VFD malfunction. Flare was inspected and	×	118: Construction Activities 113: Inspection and Maintenance		Х	Automatic (Go to Section 11)			No (Stop)	<u> </u>	No (Stop)	
X Startup Event Shutdown Event	10/25/21 09:44	10/25/21 09:48	0.07		restarted.	Ĥ	116: Well Raising 117: Gas Collection	10/25/2021	<u> </u>	Manual (Go to Section 9)	Procedure No. 1 to 4	Ļ	Yes (Go to Section 11)	\dashv	Yes (Go to Section 12)	
Malfunction Event Component: A-17 Flare						X	118: Construction Activities 113: Inspection and Maintenance			Automatic (Go to Section 11)	1	Х	No (Stop)	_	No (Stop)	
Startup Event X Shutdown Event	10/25/21 09:46	10/25/21 09:50	0.07			Ë	116: Well Raising 117: Gas Collection	10/25/2021	×	Manual (Go to Section 9)	1	_	Yes (Go to Section 11)	v	Yes (Go to Section 12)	
Malfunction Event Component: A-14 Flare				1.43	Flare shutdown due to blower VFD malfunction. Flare was inspected and	X	118: Construction Activities 113: Inspection and Maintenance		×	Automatic (Go to Section 11)	-		No (Stop)	Х	No (Stop)	
X Startup Event Shutdown Event	10/25/21 11:12	10/25/21 11:16	0.07		restarted.	Ë	116: Well Raising 117: Gas Collection	10/25/2021	<u> </u>	Manual (Go to Section 9)	Procedure No. 1 to 4	×	Yes (Go to Section 11)	4	Yes (Go to Section 12)	
Malfunction Event							118: Construction Activities			Automatic (Go to Section 11)		×	No (Stop)		No (Stop)	

AFFECTED EQUIPMENT: A-17 Flare (Based on the correspondence with the BAAQMD, flare A-14 is now designated as flare A-17)

Completed By: Tino Robles/Rajan Phadnis

Guadalupe Recycling & SSMP REPORT - From A			2021													
Identify Flare & Check Applicable Event	(1) Start of Event Date and Time	(2) End of Event Date and Time	(3) Duration of Event (Hours)	(4) Duration Shutdown (Hours)	(5) Cause or Reason	(6) Applicable 8-34 Exemption	(7) Date Form Completed		(8) Type of Event (Startup and Shutdown Events Only)	(9) Procedures Used	(10) Did Steps Taken Vary From Section 9?		Did Event Cause Any hission Limit Exceedance	(12) Describe Emission Standard(s) Exceeded
Component: A-17 Flare	Date and Time	Date and Time	or Event (riodio)	Chataown (Hours)		Х	113: Inspection and Maintenance			Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event	10/25/21 11:14	10/25/21 11:18	0.07		Flare shutdown due to blower VFD		116: Well Raising 117: Gas Collection	10/25/2021	×	Automatic (Go to Section 11)		\vdash	No (Stop)	x	No (Stop)	1
Malfunction Event Component: A-14 Flare				0.50	malfunction. Flare was inspected and	X	118: Construction Activities 113: Inspection and Maintenance		×	Manual (Go to Section 9)		\vdash	Yes (Go to Section 11)	H.,	Yes (Go to Section 12)	
X Startup Event Shutdown Event	10/25/21 11:44	10/25/21 11:48	0.07		restarted.		116: Well Raising 117: Gas Collection	10/25/2021	Ë	Automatic (Go to Section 11)	Procedure No. 1 to 4	Ļ	No (Stop)	Н	No (Stop)	-
Malfunction Event Component: A-17 Flare							118: Construction Activities 113: Inspection and Maintenance		-	Manual (Go to Section 9)		<u> </u>	Yes (Go to Section 11)	Н	Yes (Go to Section 12)	
Startup Event X Shutdown Event	10/25/21 11:46	10/25/21 11:50	0.07				116: Well Raising 117: Gas Collection	10/25/2021	×	, , ,		_	, ,		` '	-
Malfunction Event Component: A-14 Flare				2.27	Flare shutdown due to blower VFD malfunction. Flare was inspected and	×	118: Construction Activities 113: Inspection and Maintenance		X	Automatic (Go to Section 11)			No (Stop)	X	No (Stop)	
X Startup Event Shutdown Event	10/25/21 14:02	10/25/21 14:06	0.07		restarted.	Ê	116: Well Raising 117: Gas Collection	10/25/2021	×	Manual (Go to Section 9)	Procedure No. 1 to 4	L	Yes (Go to Section 11)		Yes (Go to Section 12)	-
Malfunction Event Component: A-17 Flare							118: Construction Activities 113: Inspection and Maintenance			Automatic (Go to Section 11)	1 10 4	Х	No (Stop)		No (Stop)	
Startup Event	10/25/21 14:10	10/25/21 14:14	0.07			Ê	113: Inspection and Maintenance 116: Well Raising 117: Gas Collection	10/25/2021		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	<u> </u>
X Shutdown Event Malfunction Event				0.13	Flare shutdown due to blower VFD malfunction. Flare was inspected and		118: Construction Activities		Х	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)	
Component: A-14 Flare X Startup Event	10/25/21 14:18	10/25/21 14:22	0.07		restarted.	X	113: Inspection and Maintenance 116: Well Raising	10/25/2021	Х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
Shutdown Event Malfunction Event	10/20/21 14:10	10/20/21 14:22					117: Gas Collection 118: Construction Activities			Automatic (Go to Section 11)	1 to 4	х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event	10/25/21 14:24	10/25/21 14:28	0.07			X	113: Inspection and Maintenance 116: Well Raising	10/25/2021		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	10/25/21 14.24	10/23/21 14.26	0.07		Flare shutdown due to blower VFD		117: Gas Collection 118: Construction Activities	10/23/2021	Х	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)	
Component: A-14 Flare X Startup Event				0.20	malfunction. Flare was inspected and restarted.	Х	113: Inspection and Maintenance 116: Well Raising		х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
Shutdown Event	10/25/21 14:36	10/25/21 14:40	0.07				117: Gas Collection 118: Construction Activities	10/25/2021		Automatic (Go to Section 11)	1 to 4	Х	No (Stop)		No (Stop)	1
Component: A-17 Flare Startup Event						Х	113: Inspection and Maintenance			Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	10/25/21 14:42	10/25/21 14:46	0.07		Flare shutdown due to blower VFD		117: Gas Collection 118: Construction Activities	10/25/2021	x	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)	1
Component: A-14 Flare				0.27	malfunction. Flare was inspected and restarted.	Х	118: Construction Activities 113: Inspection and Maintenance 116: Well Raising		х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
X Startup Event Shutdown Event	10/25/21 14:58	10/25/21 15:02	0.07				117: Gas Collection	10/25/2021		Automatic (Go to Section 11)	1 to 4	x	No (Stop)	Н	No (Stop)	1
Malfunction Event Component: A-17 Flare						X	118: Construction Activities 113: Inspection and Maintenance			Manual (Go to Section 9)			Yes (Go to Section 11)	Н	Yes (Go to Section 12)	
X Shutdown Event	10/25/21 15:04	10/25/21 15:08	0.07		Flare shutdown due to blower VFD		116: Well Raising 117: Gas Collection	10/25/2021	×	Automatic (Go to Section 11)		H	No (Stop)	x	No (Stop)	†
Malfunction Event Component: A-14 Flare				0.17	malfunction. Flare was inspected and restarted.	X	118: Construction Activities 113: Inspection and Maintenance		X	Manual (Go to Section 9)			Yes (Go to Section 11)	<u> </u>	Yes (Go to Section 12)	
X Startup Event Shutdown Event	10/25/21 15:14	10/25/21 15:18	0.07		restarted.		116: Well Raising 117: Gas Collection	10/25/2021	F	Automatic (Go to Section 11)	Procedure No. 1 to 4	_	No (Stop)		No (Stop)	- I
Malfunction Event Component: A-17 Flare						X	118: Construction Activities 113: Inspection and Maintenance					^		Н		
Startup Event X Shutdown Event	10/25/21 15:20	10/25/21 15:24	0.07				116: Well Raising 117: Gas Collection	10/25/2021	_	Manual (Go to Section 9)		_	Yes (Go to Section 11)		Yes (Go to Section 12)	-
Malfunction Event Component: A-14 Flare				0.23	Flare shutdown due to blower VFD malfunction. Flare was inspected and	×	118: Construction Activities 113: Inspection and Maintenance		X	Automatic (Go to Section 11)			No (Stop)	×	No (Stop)	
X Startup Event	10/25/21 15:34	10/25/21 15:38	0.07		restarted.	Ê	116: Well Raising 117: Gas Collection	10/25/2021	×	Manual (Go to Section 9)	Procedure No. 1 to 4	_	Yes (Go to Section 11)		Yes (Go to Section 12)	-
Malfunction Event Component: A-17 Flare							118: Construction Activities			Automatic (Go to Section 11)	1 10 4	Х	No (Stop)		No (Stop)	
Startup Event	10/25/21 15:56	10/25/21 16:00	0.07			Ê	113: Inspection and Maintenance 116: Well Raising	10/25/2021		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	<u> </u>
X Shutdown Event Malfunction Event				0.23	Flare shutdown due to blower VFD malfunction. Flare was inspected and		117: Gas Collection 118: Construction Activities		Х	Automatic (Go to Section 11)			No (Stop)	Х	No (Stop)	
Component: A-14 Flare X Startup Event	10/25/21 16:10	10/25/21 16:14	0.07		restarted.	×	113: Inspection and Maintenance 116: Well Raising	10/25/2021	Х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	<u> </u>
Shutdown Event Malfunction Event	10,20,2110110						117: Gas Collection 118: Construction Activities			Automatic (Go to Section 11)	1 to 4	Х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event	10/25/21 16:16	10/25/21 16:20	0.07			Х	113: Inspection and Maintenance 116: Well Raising	10/25/2021		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	10/25/21 16:16	10/25/21 16:20	0.07		Flare shutdown due to blower VFD		117: Gas Collection 118: Construction Activities	10/23/2021	х	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)	1
Component: A-14 Flare X Startup Event				0.20	malfunction. Flare was inspected and restarted.	Х	113: Inspection and Maintenance		х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	П	Yes (Go to Section 12)	
Shutdown Event Malfunction Event	10/25/21 16:28	10/25/21 16:32	0.07				117: Gas Collection 118: Construction Activities	10/25/2021		Automatic (Go to Section 11)	1 to 4	х	No (Stop)	П	No (Stop)	1
Component: A-17 Flare							118: Construction Activities 113: Inspection and Maintenance 116: Well Raising			Manual (Go to Section 9)		Т	Yes (Go to Section 11)	П	Yes (Go to Section 12)	
X Shutdown Event	10/25/21 16:34	10/25/21 16:38	0.07		Flare shutdown due to blower VFD		117: Gas Collection	10/25/2021	x	Automatic (Go to Section 11)		\vdash	No (Stop)	x	No (Stop)	† I
Malfunction Event Component: A-14 Flare				0.50	malfunction. Flare was inspected and restarted.	X	118: Construction Activities 113: Inspection and Maintenance		x	Manual (Go to Section 9)	B		Yes (Go to Section 11)	H	Yes (Go to Section 12)	
X Startup Event Shutdown Event	10/25/21 17:04	10/25/21 17:08	0.07		Toolarioo.	E	116: Well Raising 117: Gas Collection	10/25/2021	H	Automatic (Go to Section 11)	Procedure No. 1 to 4	×	No (Stop)	H	No (Stop)	† I
Malfunction Event			<u> </u>		1		118: Construction Activities			, a.c. natic (GO to GocalOff 11)		_^	No (Glop)		140 (010p)	

AFFECTED EQUIPMENT: A-17 Flare (Based on the correspondence with the BAAQMD, flare A-14 is now designated as flare A-17)

Completed By: Tino Robles/Rajan Phadnis

Guadalupe Recycling & SSMP REPORT - From A			021													
Identify Flare & Check Applicable Event	(1) Start of Event Date and Time	(2) End of Event Date and Time	(3) Duration of Event (Hours)	(4) Duration Shutdown (Hours)	(5) Cause or Reason	(6) Applicable 8-34 Exemption	(7) Date Form Completed		(8) Type of Event (Startup and Shutdown Events Only)	(9) Procedures Used	(10	0) Did Steps Taken Vary From Section 92) Did Event Cause Any ssion Limit Exceedance	(12) Describe Emission Standard(s) Exceeded
Component: A-17 Flare	Date and Time	Date and Time	or Event (Flours)	Oriataowii (Flours)		Х	113: Inspection and Maintenance	Completed	\vdash	Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
Startup Event X Shutdown Event	10/25/21 17:10	10/25/21 17:14	0.07		Flare shutdown due to blower VFD		116: Well Raising 117: Gas Collection	10/25/2021	_	Automatic (Go to Section 11)	+		No (Stop)	x	No (Stop)	
Malfunction Event Component: A-14 Flare				0.37	malfunction. Flare was inspected and	X	118: Construction Activities 113: Inspection and Maintenance		\ \ \	Manual (Go to Section 9)		\vdash	Yes (Go to Section 11)	^	Yes (Go to Section 12)	
X Startup Event Shutdown Event	10/25/21 17:32	10/25/21 17:36	0.07		restatteu.		116: Well Raising 117: Gas Collection	10/25/2021	Ĥ	Automatic (Go to Section 11)	Procedure No. 1 to 4	×	, ,	+	No (Stop)	-
Malfunction Event Component: A-17 Flare						X	118: Construction Activities 113: Inspection and Maintenance			, ,		<u> ^</u>	No (Stop)	+	,	
Startup Event X Shutdown Event	10/25/21 17:40	10/25/21 17:44	0.07				116: Well Raising 117: Gas Collection	10/25/2021		Manual (Go to Section 9)	4		Yes (Go to Section 11)	4	Yes (Go to Section 12)	
Malfunction Event Component: A-14 Flare				0.23	Flare shutdown due to blower VFD malfunction. Flare was inspected and		118: Construction Activities		Х	Automatic (Go to Section 11)			No (Stop)	×	No (Stop)	
X Startup Event	10/25/21 17:54	10/25/21 17:58	0.07		restarted.	_	113: Inspection and Maintenance 116: Well Raising	10/25/2021	Х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	_	Yes (Go to Section 12)	
Shutdown Event Malfunction Event							117: Gas Collection 118: Construction Activities			Automatic (Go to Section 11)	1 to 4	Х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event	10/25/21 18:00	10/25/21 18:04	0.07			X	113: Inspection and Maintenance 116: Well Raising	10/25/2021		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	10/23/21 16.00	10/23/21 16:04	0.07		Flare shutdown due to blower VFD		117: Gas Collection 118: Construction Activities	10/23/2021	Х	Automatic (Go to Section 11)	1		No (Stop)	х	No (Stop)	
Component: A-14 Flare X Startup Event				0.43	malfunction. Flare was inspected and restarted.	Х	113: Inspection and Maintenance 116: Well Raising		х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	T	Yes (Go to Section 12)	
Shutdown Event Malfunction Event	10/25/21 18:26	10/25/21 18:30	0.07				117: Gas Collection 118: Construction Activities	10/25/2021		Automatic (Go to Section 11)	1 to 4	х	No (Stop)	T	No (Stop)	
Component: A-17 Flare						Х	113: Inspection and Maintenance 116: Well Raising		Т	Manual (Go to Section 9)			Yes (Go to Section 11)	\forall	Yes (Go to Section 12)	
X Shutdown Event	10/25/21 18:32	10/25/21 18:36	0.07		Flare shutdown due to blower VFD		117: Gas Collection	10/25/2021	х	Automatic (Go to Section 11)	†		No (Stop)	х	No (Stop)	
Malfunction Event Component: A-14 Flare				0.10	malfunction. Flare was inspected and restarted.	Х	118: Construction Activities 113: Inspection and Maintenance		x	Manual (Go to Section 9)			Yes (Go to Section 11)	+	Yes (Go to Section 12)	
X Startup Event Shutdown Event	10/25/21 18:38	10/25/21 18:42	0.07				116: Well Raising 117: Gas Collection	10/25/2021		Automatic (Go to Section 11)	Procedure No. 1 to 4	x	No (Stop)	+	No (Stop)	
Malfunction Event Component: A-17 Flare						Х	118: Construction Activities 113: Inspection and Maintenance			Manual (Go to Section 9)		ļ^	Yes (Go to Section 11)	+	(17	
Startup Event X Shutdown Event	10/25/21 18:44	10/25/21 18:48	0.07				116: Well Raising 117: Gas Collection	10/25/2021	L	· · · · · · · · · · · · · · · · · · ·	-		, ,	,,	Yes (Go to Section 12)	
Malfunction Event Component: A-14 Flare				0.70	Flare shutdown due to blower VFD malfunction. Flare was inspected and	×	118: Construction Activities 113: Inspection and Maintenance		X	Automatic (Go to Section 11)			No (Stop)	<u>*</u>	No (Stop)	
X Startup Event Shutdown Event	10/25/21 19:26	10/25/21 19:30	0.07		restarted.	Ê	116: Well Raising 117: Gas Collection	10/25/2021	X	Manual (Go to Section 9)	Procedure No. 1 to 4	L	Yes (Go to Section 11)	4	Yes (Go to Section 12)	.
Malfunction Event						L	118: Construction Activities			Automatic (Go to Section 11)	1 to 4	Х	No (Stop)	_	No (Stop)	
Component: A-17 Flare Startup Event	10/25/21 19:32	10/25/21 19:36	0.07			<u> </u>	113: Inspection and Maintenance 116: Well Raising	10/25/2021		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event				0.10	Flare shutdown due to blower VFD malfunction. Flare was inspected and		117: Gas Collection 118: Construction Activities		Х	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)	
Component: A-14 Flare X Startup Event	10/25/21 19:38	10/25/21 19:42	0.07	0.10	restarted.	X	113: Inspection and Maintenance 116: Well Raising	10/25/2021	х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
Shutdown Event Malfunction Event	10/25/21 19:36	10/25/21 19:42	0.07				117: Gas Collection 118: Construction Activities	10/23/2021		Automatic (Go to Section 11)	1 to 4	х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event						Х	113: Inspection and Maintenance 116: Well Raising			Manual (Go to Section 9)			Yes (Go to Section 11)	T	Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	10/25/21 19:44	10/25/21 19:48	0.07		Flare shutdown due to blower VFD		117: Gas Collection 118: Construction Activities	10/25/2021	х	Automatic (Go to Section 11)	1		No (Stop)	х	No (Stop)	
Component: A-14 Flare X Startup Event				0.13	malfunction. Flare was inspected and restarted.	Х	113: Inspection and Maintenance 116: Well Raising		х	Manual (Go to Section 9)	Procedure No.	\vdash	Yes (Go to Section 11)	\forall	Yes (Go to Section 12)	
Shutdown Event	10/25/21 19:52	10/25/21 19:56	0.07				117: Gas Collection	10/25/2021		Automatic (Go to Section 11)	1 to 4	x	No (Stop)	\forall	No (Stop)	·
Malfunction Event Component: A-17 Flare						Х	118: Construction Activities 113: Inspection and Maintenance		\vdash	Manual (Go to Section 9)		\vdash	Yes (Go to Section 11)	\dashv	Yes (Go to Section 12)	
Startup Event X Shutdown Event	10/25/21 19:58	10/25/21 20:02	0.07		Flare shutdown due to blower VFD		116: Well Raising 117: Gas Collection	10/25/2021	Y	Automatic (Go to Section 11)	+	-	No (Stop)	x	No (Stop)	1
Malfunction Event Component: A-14 Flare				1.07	malfunction. Flare was inspected and restarted.	Х	118: Construction Activities 113: Inspection and Maintenance		· ·	Manual (Go to Section 9)		-	Yes (Go to Section 11)	+	Yes (Go to Section 12)	
X Startup Event Shutdown Event	10/25/21 21:02	10/25/21 21:06	0.07		restatteu.		116: Well Raising 117: Gas Collection	10/25/2021	Ĥ	, ,	Procedure No. 1 to 4	x	, ,	+		
Malfunction Event Component: A-17 Flare						V	118: Construction Activities 113: Inspection and Maintenance			Automatic (Go to Section 11)		_^	No (Stop)	+	No (Stop)	
Startup Event	10/25/21 21:10	10/25/21 21:14	0.07			Ê	116: Well Raising 117: Gas Collection	10/25/2021		Manual (Go to Section 9)	1		Yes (Go to Section 11)	4	Yes (Go to Section 12)	.
X Shutdown Event Malfunction Event				0.20	Flare shutdown due to blower VFD malfunction. Flare was inspected and		118: Construction Activities		×	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)	
Component: A-14 Flare X Startup Event	10/25/21 21:22	10/25/21 21:26	0.07		restarted.	Ľ	113: Inspection and Maintenance 116: Well Raising	10/25/2021	Х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)]
Shutdown Event Malfunction Event	.5,25,21,21,22	.0,20,21,21,20				E	117: Gas Collection 118: Construction Activities			Automatic (Go to Section 11)	1 to 4	Х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event	40/05/04 04:55	10/05/01 01 0	0.07			Х	113: Inspection and Maintenance 116: Well Raising	40/05/002		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	10/25/21 21:30	10/25/21 21:34	0.07		Flare shutdown due to blower VFD		117: Gas Collection 118: Construction Activities	10/25/2021	х	Automatic (Go to Section 11)	1		No (Stop)	х	No (Stop)	
Component: A-14 Flare				0.13	malfunction. Flare was inspected and restarted.	Х	113: Inspection and Maintenance 116: Well Raising		х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	\forall	Yes (Go to Section 12)	
X Startup Event Shutdown Event	10/25/21 21:38	10/25/21 21:42	0.07				117: Gas Collection	10/25/2021	H	Automatic (Go to Section 11)	1 to 4	X	No (Stop)	+	No (Stop)	†
Malfunction Event					l .		118: Construction Activities			(== := ===========================		١.,	· (F/		(/	

AFFECTED EQUIPMENT: A-17 Flare (Based on the correspondence with the BAAQMD, flare A-14 is now designated as flare A-17)

Completed By: Tino Robles/Rajan Phadnis

Guadalupe Recycling & SSMP REPORT - From A			1021													
Identify Flare & Check	(1) Start of Event	(2) End of Event	(3) Duration	(4) Duration	(5) Cause or Reason	(6	Applicable 8-34 Exemption	(7) Date Form		(8) Type of Event	(9) Procedures Used	(10) Did Steps Taken Vary	(11	1) Did Event Cause Any	(12) Describe Emission Standard(s) Exceeded
Applicable Event	Date and Time	Date and Time	of Event (Hours)	Shutdown (Hours)	(5) Cause of Reason	<u> </u>		Completed		(Startup and Shutdown Events Only)	(9) Procedures Osed	Ľ.	From Section 9?	Ém	ission Limit Exceedance	(12) Describe Emission Standard(s) Exceeded
Component: A-17 Flare Startup Event	10/25/21 21:44	10/25/21 21:48	0.07				13: Inspection and Maintenance 16: Well Raising	10/25/2021		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	10/25/21 21:44	10/25/21 21:48	0.07		Flare shutdown due to blower VFD		17: Gas Collection 18: Construction Activities	10/23/2021	х	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)	1
Component: A-14 Flare				0.43	malfunction. Flare was inspected and restarted.	X 1	13: Inspection and Maintenance		l x	Manual (Go to Section 9)			Yes (Go to Section 11)	\neg	Yes (Go to Section 12)	
X Startup Event Shutdown Event	10/25/21 22:10	10/25/21 22:14	0.07		Toolarios.		16: Well Raising 17: Gas Collection	10/25/2021	<u> </u>		Procedure No. 1 to 4	L.		\dashv		-
Malfunction Event Component: A-17 Flare							18: Construction Activities 13: Inspection and Maintenance			Automatic (Go to Section 11)		_^	No (Stop)		No (Stop)	
Startup Event	10/25/21 22:18	10/25/21 22:22	0.07			П	16: Well Raising	10/25/2021		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	10/20/21 22:10	TO/LOTE I LE.LE	0.07		Flare shutdown due to blower VFD		17: Gas Collection 18: Construction Activities	10/20/2021	х	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)	
Component: A-14 Flare				0.20	malfunction. Flare was inspected and restarted.	X 1	13: Inspection and Maintenance		х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
X Startup Event Shutdown Event	10/25/21 22:30	10/25/21 22:34	0.07			Η,	16: Well Raising 17: Gas Collection	10/25/2021	\vdash	Automatic (Go to Section 11)	1 to 4	×	No (Stop)	-	No (Stop)	-
Malfunction Event Component: A-17 Flare							18: Construction Activities 13: Inspection and Maintenance		_	,		^		_		
Startup Event	10/25/21 22:36	10/25/21 22:40	0.07				16: Well Raising	10/25/2021		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event				11.90	Flare shutdown due to blower VFD malfunction. Flare was inspected and		17: Gas Collection 18: Construction Activities		X	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)	
Component: A-14 Flare X Startup Event				11.90	restarted.	X 1	13: Inspection and Maintenance 16: Well Raising		х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
Shutdown Event	10/26/21 10:30	10/26/21 10:34	0.07				17: Gas Collection	10/26/2021	\vdash	Automatic (Go to Section 11)	1 to 4	×	No (Stop)		No (Stop)	1
Malfunction Event Component: A-17 Flare				 			18: Construction Activities 13: Inspection and Maintenance		\vdash			 		\dashv		
Startup Event X Shutdown Event	10/26/21 10:44	10/26/21 10:48	0.07	1		\Box	16: Well Raising	10/26/2021	Ш	Manual (Go to Section 9)		L	Yes (Go to Section 11)	_	Yes (Go to Section 12)	<u> </u>
Malfunction Event				0.13	Flare shutdown due to blower VFD malfunction. Flare was inspected and		18: Construction Activities		X	Automatic (Go to Section 11)			No (Stop)	Х	No (Stop)	
Component: A-14 Flare X Startup Event				0.13	restarted.		13: Inspection and Maintenance 16: Well Raising		x	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
Shutdown Event	10/26/21 10:52	10/26/21 10:56	0.07				17: Gas Collection 18: Construction Activities	10/26/2021		Automatic (Go to Section 11)	1 to 4	х	No (Stop)		No (Stop)	
Component: A-17 Flare							18: Construction Activities 13: Inspection and Maintenance		\vdash	Manual (Go to Section 9)		-	Yes (Go to Section 11)	\dashv	Yes (Go to Section 12)	
Startup Event X Shutdown Event	10/26/21 10:58	10/26/21 11:02	0.07				16: Well Raising 17: Gas Collection	10/26/2021	\vdash	, , ,		_	, ,	_	` ′	
Malfunction Event				0.23	Flare shutdown due to blower VFD malfunction. Flare was inspected and		18: Construction Activities		Х	Automatic (Go to Section 11)			No (Stop)	X	No (Stop)	
Component: A-14 Flare X Startup Event	10/26/21 11:12	10/26/21 11:16	0.07		restarted.		13: Inspection and Maintenance 16: Well Raising	10/26/2021	X	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
Shutdown Event Malfunction Event	10/26/21 11:12	10/20/21 11:16	0.07				17: Gas Collection 18: Construction Activities	10/20/2021		Automatic (Go to Section 11)	1 to 4	х	No (Stop)		No (Stop)	1
Component: A-17 Flare						X 1	13: Inspection and Maintenance		x	Manual (Go to Section 8)			Yes (Go to Section 10)		Yes (Go to Section 11)	
X Shutdown Event	11/24/21 11:40	11/24/21 11:44	0.07		Flore was about down to control VED		16: Well Raising 17: Gas Collection	11/24/2021	\vdash	Automatic (Go to Section 10)	Procedure 1 to 3	l-		\dashv	No (Stop)	-
Malfunction Event Component: A-14 Flare				0.53	Flare was shutdown to replace VFD and switch blowers. Flare was		18: Construction Activities 13: Inspection and Maintenance			, ,		_^	No (Stop)	\dashv		
X Startup Event	11/24/21 12:12	11/24/21 12:16	0.07		inspected and restarted.	П	16: Well Raising	11/24/2021	X	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
Shutdown Event Malfunction Event							17: Gas Collection 18: Construction Activities			Automatic (Go to Section 10)	1 to 4	Х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event							13: Inspection and Maintenance 16: Well Raising			Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event	11/24/21 12:22	11/24/21 12:26	0.07		Flare shutdown during startup		17: Gas Collection	11/24/2021	×	Automatic (Go to Section 11)		_	No (Stop)	x	No (Stop)	-
Malfunction Event Component: A-14 Flare				0.30	sequence. Flare was inspected and		18: Construction Activities 13: Inspection and Maintenance		- ·				` .,	_	\ ''	
X Startup Event	11/24/21 12:40	11/24/21 12:44	0.07		restarted.		16: Well Raising 17: Gas Collection	11/24/2021	_ ×	Manual (Go to Section 9)	Procedure No.	_	Yes (Go to Section 11)	_	Yes (Go to Section 12)	
Shutdown Event Malfunction Event							18: Construction Activities			Automatic (Go to Section 11)	1 to 4	X	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event	44/04/07 : 2 = 2	44/04/01 10 51	0.00				13: Inspection and Maintenance 16: Well Raising	44/01/200		Manual (Go to Section 9)			Yes (Go to Section 11)	\neg	Yes (Go to Section 12)	
X Shutdown Event	11/24/21 12:50	11/24/21 12:54	0.07	1	Flare shutdown during startup		17: Gas Collection	11/24/2021	х	Automatic (Go to Section 11)	1		No (Stop)	х	No (Stop)	†
Malfunction Event Component: A-14 Flare	-			0.10	sequence. Flare was inspected and restarted.	X 1	18: Construction Activities 13: Inspection and Maintenance		×	Manual (Go to Section 9)			Yes (Go to Section 11)	\dashv	Yes (Go to Section 12)	
X Startup Event Shutdown Event	11/24/21 12:56	11/24/21 13:00	0.07	1	restatieu.		16: Well Raising 17: Gas Collection	11/24/2021	L^		Procedure No. 1 to 4	L,		-		- I
Malfunction Event						H	18: Construction Activities		\perp	Automatic (Go to Section 11)		×	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event	11/24/21 13:06	11/24/21 13:10	0.07				13: Inspection and Maintenance 16: Well Raising	11/24/2021		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	11/24/21 13:06	11/24/21 13:10	0.07	1	Flare shutdown during startup		17: Gas Collection 18: Construction Activities	11/24/2021	Х	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)]
Component: A-14 Flare				0.13	sequence. Flare was inspected and restarted.	X 1	13: Inspection and Maintenance		T _X	Manual (Go to Section 9)		\vdash	Yes (Go to Section 11)	\dashv	Yes (Go to Section 12)	
X Startup Event Shutdown Event	11/24/21 13:14	11/24/21 13:18	0.07	1			16: Well Raising 17: Gas Collection	11/24/2021	H		Procedure No. 1 to 4	Ļ		\dashv	` ′	- I
Malfunction Event							18: Construction Activities		\vdash	Automatic (Go to Section 11)		^	No (Stop)	_	No (Stop)	
Component: A-17 Flare Startup Event	11/24/21 13:18	11/24/21 13:22	0.07			П,	13: Inspection and Maintenance 16: Well Raising	11/24/2021		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)]
X Shutdown Event Malfunction Event			0.07		Flare shutdown during startup		17: Gas Collection 18: Construction Activities	102-02021	Х	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)	
Component: A-14 Flare				0.17	sequence. Flare was inspected and restarted.	X 1	13: Inspection and Maintenance		х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
X Startup Event Shutdown Event	11/24/21 13:28	11/24/21 13:32	0.07	1		\Box	16: Well Raising 17: Gas Collection	11/24/2021	H	Automatic (Go to Section 11)	Procedure No. 1 to 4	×	No (Stop)	-	No (Stop)	- I
Malfunction Event				<u> </u>			18: Construction Activities			, attended (GO to GoodOff 11)		_^	140 (010))		140 (010p)	

AFFECTED EQUIPMENT: A-17 Flare (Based on the correspondence with the BAAQMD, flare A-14 is now designated as flare A-17)

Completed By: Tino Robles/Rajan Phadnis

Guadalupe Recycling & SSMP REPORT - From A			021													
Identify Flare & Check	(1) Start of Event	(2) End of Event	(3) Duration	(4) Duration				(7) Date Form		(8) Type of Event	I	(10	0) Did Steps Taken Vary	(11) Did Event Cause Any	//
Applicable Event	Date and Time	Date and Time	of Event (Hours)	Shutdown (Hours)	(5) Cause or Reason	<u> </u>	Applicable 8-34 Exemption	Completed		(Startup and Shutdown Events Only)	(9) Procedures Used	(,,	From Section 9?	Emi	ssion Limit Exceedance	(12) Describe Emission Standard(s) Exceeded
Component: A-17 Flare						Х	113: Inspection and Maintenance 116: Well Raising			Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event	12/09/21 09:20	12/09/21 09:24	0.07		Flare shutdown due to low temperature		117: Gas Collection	12/9/2021	x	Automatic (Go to Section 11)	1		No (Stop)	х	No (Stop)	
Malfunction Event Component: A-14 Flare				0.13	alarm during maintenance and inspection on louver. Flare was	X	118: Construction Activities 113: Inspection and Maintenance		x	Manual (Go to Section 9)			Yes (Go to Section 11)	\dashv	Yes (Go to Section 12)	
X Startup Event	12/09/21 09:28	12/09/21 09:32	0.07		inspected and restarted.		116: Well Raising 117: Gas Collection	12/9/2021	<u> </u>	, ,	Procedure No.	_				
Shutdown Event Malfunction Event						H	117: Gas Collection 118: Construction Activities			Automatic (Go to Section 11)	1 to 4	Х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event						Х	113: Inspection and Maintenance 116: Well Raising			Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event	12/09/21 09:30	12/09/21 09:34	0.07		Flare shutdown due to low temperature		117: Gas Collection	12/9/2021	×	Automatic (Go to Section 11)	†		No (Stop)	x	No (Stop)	
Malfunction Event Component: A-14 Flare				0.73	alarm during maintenance and inspection on louver. Flare was	×	118: Construction Activities 113: Inspection and Maintenance			, ,						
X Startup Event	12/09/21 10:14	12/09/21 10:18	0.07		inspected and restarted.		116: Well Raising	12/9/2021	_ ×	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
Shutdown Event Malfunction Event						\vdash	117: Gas Collection 118: Construction Activities			Automatic (Go to Section 11)	1 to 4	Х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event						Х	113: Inspection and Maintenance 116: Well Raising			Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event	12/09/21 10:18	12/09/21 10:22	0.07		Flare shutdown due to low temperature		117: Gas Collection	12/9/2021	×	Automatic (Go to Section 11)	1	\vdash	No (Stop)	×	No (Stop)	
Malfunction Event Component: A-14 Flare				0.17	alarm during maintenance and inspection on louver. Flare was	×	118: Construction Activities 113: Inspection and Maintenance		ļ ^							
X Startup Event	12/09/21 10:28	12/09/21 10:32	0.07		inspected and restarted.		116: Well Raising	12/9/2021	Х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
Shutdown Event Malfunction Event						H	117: Gas Collection 118: Construction Activities			Automatic (Go to Section 11)	1 to 4	Х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event						Х	113: Inspection and Maintenance 116: Well Raising			Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event	12/09/21 10:32	12/09/21 10:36	0.07		Flare shutdown due to low temperature		117: Gas Collection	12/9/2021	x	Automatic (Go to Section 11)	1		No (Stop)	x	No (Stop)	
Malfunction Event Component: A-14 Flare				0.13	alarm during maintenance and inspection on louver. Flare was	Х	118: Construction Activities 113: Inspection and Maintenance		-	Manual (Go to Section 9)		\vdash		\dashv	Yes (Go to Section 12)	
X Startup Event Shutdown Event	12/09/21 10:40	12/09/21 10:44	0.07		inspected and restarted.		116: Well Raising 117: Gas Collection	12/9/2021	<u> </u>	(-	Procedure No. 1 to 4	L	Yes (Go to Section 11)			
Malfunction Event							118: Construction Activities			Automatic (Go to Section 11)	1 10 4	Х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event						Х	113: Inspection and Maintenance 116: Well Raising			Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	12/09/21 10:54	12/09/21 10:58	0.07		Flare shutdown due to low temperature		117: Gas Collection	12/9/2021	x	Automatic (Go to Section 11)	1		No (Stop)	х	No (Stop)	
Component: A-14 Flare				0.07	alarm during maintenance and inspection on louver. Flare was	X	118: Construction Activities 113: Inspection and Maintenance		-	Manual (Go to Section 9)		\vdash	Yes (Go to Section 11)	\vdash	Yes (Go to Section 12)	
X Startup Event Shutdown Event	12/09/21 10:58	12/09/21 11:02	0.07		inspected and restarted.		116: Well Raising 117: Gas Collection	12/9/2021	Ļ		Procedure No. 1 to 4	_		\vdash		
Malfunction Event							118: Construction Activities			Automatic (Go to Section 11)	1 10 4	Х	No (Stop)		No (Stop)	
Component: A-17 Flare						X	113: Inspection and Maintenance 116: Well Raising			Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event	12/23/21 09:36	12/23/21 09:40	0.07		Flare was shutdown due to PG&E		117: Gas Collection	12/23/2021	х	Automatic (Go to Section 11)	1		No (Stop)	х	No (Stop)	
Malfunction Event Component: A-14 Flare				1.57	power outage. RCA was filed and was RCA Number 08E36 was assigned.	Х	118: Construction Activities 113: Inspection and Maintenance		×	Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Startup Event Shutdown Event	12/23/21 11:10	12/23/21 11:14	0.07		Flare was inspected and restarted.		116: Well Raising 117: Gas Collection	12/23/2021		, ,	Procedure No. 1 to 4		, ,	-		
Malfunction Event							118: Construction Activities			Automatic (Go to Section 11)		Х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event	1/18/22 08:34	1/18/22 08:38	0.07			X	113: Inspection and Maintenance 116: Well Raising	1/18/2022	x	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
X Shutdown Event Malfunction Event	1/10/22 00.34	1/10/22 00.30	0.07		Flare was shutdown during annual flare		117: Gas Collection 118: Construction Activities	1710/2022		Automatic (Go to Section 10)	1 to 3	Х	No (Stop)		No (Stop)	
Component: A-17 Flare				0.90	inspection and maintenance. Flare was inspected and restarted.	X	113: Inspection and Maintenance		x	Manual (Go to Section 8)			Yes (Go to Section 10)		Yes (Go to Section 11)	
X Startup Event Shutdown Event	1/18/22 09:28	1/18/22 09:32	0.07			\vdash	116: Well Raising 117: Gas Collection	1/18/2022		Automatic (Go to Section 10)	Procedure 1 to 4	x	No (Stop)	\vdash	No (Stop)	
Malfunction Event Component: A-17 Flare						V	118: Construction Activities 113: Inspection and Maintenance					<u> ^</u>		\perp		
Startup Event	1/25/22 10:00	1/25/22 10:02	0.03			_	116: Well Raising	1/25/2022	X	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
X Shutdown Event Malfunction Event				2.60	Flare was shutdown during	\vdash	117: Gas Collection 118: Construction Activities			Automatic (Go to Section 10)	1 to 3	Х	No (Stop)		No (Stop)	
Component: A-17 Flare X Startup Event				2.00	maintenance and repair on Dry Vac. Flare was inspected and restarted.	Х	113: Inspection and Maintenance 116: Well Raising		х	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
Shutdown Event	1/25/22 12:36	1/25/22 12:42	0.10				117: Gas Collection	1/25/2022		Automatic (Go to Section 10)	1 to 4	х	No (Stop)		No (Stop)	
Malfunction Event Component: A-17 Flare						X	118: Construction Activities 113: Inspection and Maintenance			· · · · · · · · · · · · · · · · · · ·				\dashv		
Startup Event X Shutdown Event	2/15/22 07:38	2/15/22 07:42	0.07				116: Well Raising 117: Gas Collection	2/15/2022		Manual (Go to Section 9)		_	Yes (Go to Section 11)		Yes (Go to Section 12)	
Malfunction Event				0.20	Flare shutdown due to low temperature alarm. Flare was inspected and		118: Construction Activities		Х	Automatic (Go to Section 11)			No (Stop)	Х	No (Stop)	
Component: A-17 Flare X Startup Event			0.07	0.20	restarted.	X	113: Inspection and Maintenance 116: Well Raising	0.4510000	х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
Shutdown Event Malfunction Event	2/15/22 07:50	2/15/22 07:54	0.07				117: Gas Collection	2/15/2022		Automatic (Go to Section 11)	1 to 4	х	No (Stop)		No (Stop)	
Component: A-17 Flare						Х	113: Inspection and Maintenance	 	x	Manual (Go to Section 8)	L		Yes (Go to Section 10)	\vdash	Yes (Go to Section 11)	
Startup Event X Shutdown Event	2/24/22 07:16	2/24/22 07:18	0.03		Flare A-17 was shutdown during blower	F	116: Well Raising 117: Gas Collection	2/24/2022	Ë	, ,	Procedure 1 to 3	-		\vdash		
Malfunction Event				2.87	maintenance. Seal and bearings were		118: Construction Activities			Automatic (Go to Section 10)		Х	No (Stop)		No (Stop)	
Component: A-17 Flare X Startup Event	2/24/22 10:08	2/24/22 10:14	0.10		replaced. Flare was inspected and restarted.	Ľ	113: Inspection and Maintenance 116: Well Raising	2/24/2022	Х	Manual (Go to Section 8)	Procedure	L	Yes (Go to Section 10)		Yes (Go to Section 11)	
Shutdown Event Malfunction Event	224/22 10.00	2/24/22 10.14	0.10				117: Gas Collection 118: Construction Activities	212412022		Automatic (Go to Section 10)	1 to 4	Х	No (Stop)		No (Stop)	
I Manufiction Evellt			1	1	1	_		1	_	1	-	_		_		

AFFECTED EQUIPMENT: A-17 Flare (Based on the correspondence with the BAAQMD, flare A-14 is now designated as flare A-17)

Completed By: Tino Robles/Rajan Phadnis

Guadalupe Recycling & SSMP REPORT - From A			021													
Identify Flare & Check Applicable Event	(1) Start of Event Date and Time	(2) End of Event Date and Time	(3) Duration of Event (Hours)	(4) Duration Shutdown (Hours)	(5) Cause or Reason	(6) A	Applicable 8-34 Exemption	(7) Date Form Completed		(8) Type of Event (Startup and Shutdown Events Only)	(9) Procedures Used	(10	0) Did Steps Taken Vary From Section 9?		Did Event Cause Any ission Limit Exceedance	(12) Describe Emission Standard(s) Exceeded
Component: A-17 Flare Startup Event	2/24/22 10:22	2/24/22 10:24	0.03			116:	l: Inspection and Maintenance li: Well Raising	2/24/2022	х	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
X Shutdown Event Malfunction Event	2/2-1/22 10:22	2/24/22 10:24		1.30	Flare A-17 was shutdown during blower maintenance. Seal and bearings were	118:	: Gas Collection I: Construction Activities			Automatic (Go to Section 10)	1 to 3	Х	No (Stop)		No (Stop)	
Component: A-17 Flare X Startup Event	2/24/22 11:40	2/24/22 11:46	0.10		replaced. Flare was inspected and restarted.	116:	l: Inspection and Maintenance l: Well Raising	2/24/2022	x	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
Shutdown Event Malfunction Event						118:	: Gas Collection I: Construction Activities			Automatic (Go to Section 10)	1 to 4	Х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event	3/11/22 07:18	3/11/22 07:22	0.07			116:	l: Inspection and Maintenance l: Well Raising	3/11/2022	х	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
X Shutdown Event Malfunction Event				5.57	Flare A-17 was shutdown during repairs on condensate system part in	118:	: Gas Collection t: Construction Activities			Automatic (Go to Section 10)	1 to 3	Х	No (Stop)		No (Stop)	
Component: A-17 Flare X Startup Event	3/11/22 12:52	3/11/22 12:56	0.07		the stack. Flare was inspected and restarted.	116:	l: Inspection and Maintenance l: Well Raising	3/11/2022	х	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
Shutdown Event Malfunction Event						118:	: Gas Collection I: Construction Activities			Automatic (Go to Section 10)	1 to 4	Х	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event	3/11/22 12:54	3/11/22 12:56	0.03			116:	l: Inspection and Maintenance l: Well Raising	3/11/2022		Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	0/1/22 12:04	071722 12.00		0.20	Flare shutdown during startup sequence after repair and maintenance	118:	: Gas Collection : Construction Activities		х	Automatic (Go to Section 11)			No (Stop)	х	No (Stop)	
Component: A-17 Flare X Startup Event	3/11/22 13:06	3/11/22 13:12	0.10	3.20	on condensate system. Flare was inspected and restarted.	116:	l: Inspection and Maintenance l: Well Raising	3/11/2022	х	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
Shutdown Event Malfunction Event	0.11/22 10:00	011122 10:12					: Gas Collection I: Construction Activities			Automatic (Go to Section 11)	1 to 4	х	No (Stop)		No (Stop)	

| TOTAL DOWNTIME October 1, 2021 Through December 31, 2022 (HOURS): 70,13 | TOTAL RUNTIME October 1, 2021 Through December 31, 2022 (HOURS): 4297.9 | TOTAL HOURS October 1, 2021 Through December 31, 2022 (HOURS): 4366.0 |

(a) STANDARD OPERATING PROCEDURES

Shutdown

Procedure No.

<u>Procedure</u>
Ensure that there is no unsafe conditions present, contact manager immediately
Initiate shutdown sequence below by one or more of the following (Note date and time in Section 1 of form above)

a. Press Emergency Stop if necessary
 b. Close On/Off switch(es) or Push On/Off button(s)

c. Close adjacent valves if necessary

Observe that system achieves normal shutdown ranges for levels, pressures, and temperatures (Note date and time in Section 2 of form above)

3. Startup Procedure No.

Procedure

Ensure that there is no unsafe conditions present
Ensure that the system is ready to start by one of the following:

A. Valves are in correct position
 Levels, pressures, and temperatures are within normal starting range
 Alarms are cleared
 Power is on and available to control panel and ready to energized equipment.

e. Emergency stop is de-energized
Initiate start sequence (Note time and date in section 1 of form above)
Observe that system achieves normal shutdown ranges for levels, pressures, and temperatures (Note time and date in Section 2 of form above)

3. 4. Malfunction

EQUIPMENT	PURPOSE	MALFUNCTION	COMMON CAUSES	PROCEDURE NOTYPICAL RESPONSE ACTIONS
		EVENT		
LFG Collection and Control		li (I EO El/Dl	[A Bearinkerskerskin situation sining
Blower or Other Gas Mover Equipment	Applies vacuum to wellfield to extract LFG and transport to control device	Loss of LFG Flow/Blower Malfunction	-Flame arrestor fouling/deterioration -Automatic valve problems -Blower failure (e.g., belt, motor, impeller, coupling, seizing, etc.) -Loss of power -Extraction piping failure -Condensate knock-out problems -Extraction piping blockages	Repair breakages in extraction piping Clean flame arrestor Repair blockages in extraction piping Verify automatic valve operation, compressed air/nitrogen supply Notify power utility, if appropriate Provide/utilize auxiliary power source, if necessary Repair Settlement in Collection Piping Repair Blower Activate back-up blower, if available 10. Clean knock-up pot/demister 11. Drain knock-out pot
Extraction Wells and Collection Piping	Conduits for extractions and movement of LFG flow	Collection well and pipe failures	-Break/crack in header or lateral piping -Leaks at wellheads, valves, flanges, Test ports, seals, couplings, etcCollection piping blockages -Problems due to settlement (e.g. pipe separation, deformation, development of low points)	Repair leaks or breaks in lines or wellheads Follow procedures for loss of LFG flow/blower malfunction Repair blockages in collection piping Repair settlement in collection piping
Blower or Other Gas Mover	Collection and control of	Loss of electrical power	- Force majeure/Act of God (e.g., lightning, flood,	1 1 1 1 1
Equipment And Control Device	LFG		earthquake, etc.) -Area-wide or local blackout or brown-out -Interruption in service (e.g. blown service fuse) -Electrical line failure -Breaker trip -Transformer failure -Motor starter failure/trip -Overdraw of power -Problems in electrical panel -Damage to electrical equipment from on-site operations	18. Check/repair electrical panel components 19. Check/repair transformer 20. Check/repair electrical line 21. Check/repair electrical line 22. Test amperage to various equipment 23. Contact electricity supplier 24. Contact/contract electrician 25.Provide auxiliary power (if necessary)
LFG Control Device	Combusts LFG	Low temperature	-Problems with temperature -monitoring	26. Check/repair temperature monitoring equipment
		conditions at control device	equipment -Problems/failure of -thermocouple and/or thermocouple wiring -Change of LFG flow -Change of LFG quality -Problems with air louvers -Problems with air fuction to see the controls -Change in atmospheric conditions	Check/repair thermocouple and/or wiring Sellow procedures for loss of flow/blower malfunction Check/adjust louvers Check/adjust air/fuel controls
LFG Control Device	Combusts LFG	Loss of Flame	Problems/failure of thermocouple Loss/change of LFG flow Loss/change of LFG quality Problems with air/fuel controls Problems/failure of flame sensor	31. Check/repair temperature monitoring equipment 32. Check/repair thermocouple 33. Follow procedures for loss of flow/blower malfunction 34. Check/adjust air/fuel controls 35. Check/adjust/repair flame sensor
Flow Monitoring/	Measures and records	Malfunctions of Flow	-Problems with temperature monitoring -Problems with orifice plate, pitot tube, or other in	36. Check/adjust LFG collectors 37. Check/adjust/repair flow measuring device and/or
Recording Device	gas flow from collection system to control	Monitoring/Recording Device	Ine flow measuring device -Problems with device controls and/or wiring -Problems with chart recorder	Streetwaysusviepall flow measuring device and/or wiring 38. Check/repair chart recorder Streetwaysusviepall flow measuring device and/or wiring 38. Replace paper in chart recorder
Temperature Monitoring/ Recording Device	Monitors and records combustion temperature of enclosed combustion device	Malfunctions of Temperature Monitoring/Recording Device	-Problems with thermocouple -Problems with device controls and/or wiring -Problems with chart recorder	40. Check/adjust/repair thermocouple 41. Check/adjust/repair controller and/or wiring 42. Check/adjust/repair electrical panel components 43. Check/repair chart recorder 44. Replace paper in chart recorder
Control Device	Combusts LFG	Other Control Device Malfunctions	-Control device smoking (i.e. visible emissions) -Problems with flare insulation -Problems with plot light system -Problems with air louvers -Problems with air louvers -Problems with thermocouple -Problems with thermocouple -Problems with flame arrester -Alarmed malfunction conditions not covered above -Unalarmed conditions discovered during inspection not covered above	45. Site-specific diagnosis procedures 46. Site-specific responses actions based on 47. Open manual louvers 48. Clean pitot orifice 49. Clean/drain flame arrestor 50. Refili propane supply 51. Check/repair pilot sparking system

(b) For each permit limit exceedance complete an "SSM Plan Departure Form".

GRDF 2022.04 SAR Appendix submittal 4.27.22 4/27/2022

APPENDIX F

TEMPERATURE DEVIATION / INOPERATIVE MONITOR / MISSING DATA REPORT

Guadalupe Recycling & Disposal Facility, San Jose, CA TEMPERATURE DEVIATION/ INOPERATIVE MONITOR/MISSING DATA REPORT - From October 1, 2021 Through March 31, 2022						
Flare A-9						
REPORT PREPARED BY:		Rajan Phadnis			DATE:	April 1, 2022
TEMPERATURE SENSING DEVICE: Thermocouple		Thermocouple			MODEL:	Thermo-Electric
START DATE & TIME	END DATE & TIME	DURATION (HOURS)	TEMP (°F)/ FLOW (scfm)	CAUSE	EXPLANATION	ACTION TAKEN
No deviations, inoperative monitors, or missing data occurred in October 2021						•
	No deviations, inoperative monitors, or missing data occurred in November 2021					
No deviations, inoperative monitors, or missing data occurred in December 2021						
No deviations, inoperative monitors, or missing data occurred in January 2022						
	No deviations, inoperative monitors, or missing data occurred in February 2022					
			No deviations, inoperative monitors, or missing data	occurred in March 2022		

NOTES:

°F= degrees Fahrenheit

scfm= standard cubic feet per minute

COMMENTS:

The A-9 Flare combustion zone 3-hour average temperature did not drop below the 1,450 degrees Fahrenheit (°F) limit, as required by Title V Permit Condition Number 6188 Part 8, during the reporting period while the flare was in operation.

The A-9 Flare combustion zone 3-hour average temperature did not drop below the 1,593°F limit established in the April 29, 2020 Annual Source Test and , pursuant to Title V Permit A3294 Condition 6188 Part 8, during the reporting period while the flare was in operation.

GRDF 2022.04 SAR Appendix submittal 4.27.22 SAR Flare Deviation A9 GRDF Facility Number A3294

Guadalupe Recycling & Di	sposal Facility, San Jose, CA	1				
TEMPERATURE DEVIATION	N/ INOPERATIVE MONITOR/	MISSING DATA REPORT - From	October 1, 2021 Through March 31, 2022			
Flare A-17 (previously des	ignated as A-14)					
REPORT PREPARED BY:		Rajan Phadnis			DATE:	April 1, 2022
TEMPERATURE SENSING	DEVICE:	Thermocouple			MODEL:	Thermo-Electric
START DATE & TIME	END DATE & TIME	DURATION (HOURS)	TEMP (°F)/ FLOW (scfm)	CAUSE	EXPLANATION	ACTION TAKEN
			No deviations, inoperative monitors, or missing data	occurred in October 2021		•
			No deviations, inoperative monitors, or missing data o	ccurred in November 2021		
No deviations, inoperative monitors, or missing data occurred in December 2021						
No deviations, inoperative monitors, or missing data occurred in January 2022						
			No deviations, inoperative monitors, or missing data of	occurred in February 2022		
			No deviations, inoperative monitors, or missing data	occurred in March 2022	-	

NOTES:

°F= degrees Fahrenheit

scfm= standard cubic feet per minute

COMMENTS:

The A-17 Flare combustion zone 3-hour average temperature did not drop below the 1,450°F limit established in the February 18, 2021 Annual Source Test, pursuant to as required by Authority to Construct. The A-17 Flare combustion zone 3-hour average temperature did not drop below the 1,449°F limit established in the February 18, 2021 Annual Source Test

GRDF 2022.04 SAR Appendix submittal 4.27.22 SAR Flare Deviation A17 GRDF Facility Number A3294

APPENDIX G COVER INTEGRITY MONITORING REPORTS

LOCATION: Guadalupe Rubbish Disposal Company, Inc.

INSPECTION DATE: October 27, 2021

TECHNICIAN: Tino Robles

COVER & VEGETATION	YES	NO	COMMENTS
Settling of cap		Х	
Dead vegetation		Х	
Erosion on cap system		Х	
Erosion on side slopes		Х	
Ponding of water on cap		Х	
Surface cracking		Х	
Acceptable vegetation	Х		
Exposed waste		Х	

Location Description (cell and near-by wells)	Date of Repair	Description of Repair (add soil, water)
Note: Monthly cover integrity monitoring is perform	ed pursuant to BAAQMD Re	gulation 8-34-501.4

LOCATION: Guadalupe Rubbish Disposal Company, Inc.

INSPECTION DATE: November 26, 2021

TECHNICIAN: Tino Robles

COVER & VEGETATION	YES	NO	COMMENTS
Settling of cap		Х	
Dead vegetation		Х	
Erosion on cap system		Х	
Erosion on side slopes		Х	
Ponding of water on cap		Х	
Surface cracking		Х	
Acceptable vegetation	Х		
Exposed waste		Х	

Location Description (cell and near-by wells)	Date of Repair	Description of Repair (add soil, water)
Note: Monthly cover integrity monitoring is performed	ed pursuant to BAAQMD I	Regulation 8-34-501.4

LOCATION: Guadalupe Rubbish Disposal Company, Inc.

INSPECTION DATE: December 28, 2021

TECHNICIAN: Tino Robles

COVER & VEGETATION	YES	NO	COMMENTS
Settling of cap		Х	
Dead vegetation		Х	
Erosion on cap system		Х	
Erosion on side slopes		Х	
Ponding of water on cap		Х	
Surface cracking	Х		
Acceptable vegetation	Х		
Exposed waste		Х	

Location Description (cell and near-by wells)	Date of Repair	Description of Repair (add soil, water)
Surface cracking near Well 188	-	Will be repaired in January 2022
Surface cracking nearWell 160	-	Will be repaired in January 2022
Surface cracking nearWell 114	-	Will be repaired in January 2022
Surface cracking nearWell 244	-	Will be repaired in January 2022

LOCATION: Guadalupe Rubbish Disposal Company, Inc.

INSPECTION DATE: January 26, 2022

TECHNICIAN: Tino Robles

COVER & VEGETATION	YES	NO	COMMENTS
Settling of cap		Х	
Dead vegetation		Х	
Erosion on cap system		Х	
Erosion on side slopes		Х	
Ponding of water on cap		Х	
Surface cracking		Х	
Acceptable vegetation	Х		
Exposed waste		Х	

Date of Repair	Description of Repair (add soil, water)
1/20/2022	Soil was added and compacted
1/20/2022	Soil was added and compacted
1/20/2022	Soil was added and compacted
1/20/2022	Soil was added and compacted
	1/20/2022 1/20/2022 1/20/2022

LOCATION: Guadalupe Rubbish Disposal Company, Inc.

INSPECTION DATE: February 24, 2022

TECHNICIAN: Tino Robles

COVER & VEGETATION	YES	NO	COMMENTS
Settling of cap		Х	
Dead vegetation		Х	
Erosion on cap system		Х	
Erosion on side slopes		Х	
Ponding of water on cap		Х	
Surface cracking		Х	
Acceptable vegetation	Х		
Exposed waste		Х	

Location Description (cell and near-by wells)	Date of Repair	Description of Repair (add soil, water)
te: Monthly cover integrity monitoring is perfor		

LOCATION: Guadalupe Rubbish Disposal Company, Inc.

INSPECTION DATE: March 29, 2022

TECHNICIAN: Tino Robles

COVER & VEGETATION	YES	NO	COMMENTS
Settling of cap		Х	
Dead vegetation		Х	
Erosion on cap system		Х	
Erosion on side slopes		Х	
Ponding of water on cap		Х	
Surface cracking		Х	
Acceptable vegetation	Х		
Exposed waste		Х	

Location Description (cell and near-by wells)	Date of Repair	Description of Repair (add soil, water)
te: Monthly cover integrity monitoring is perfor		

APPENDIX H

SURFACE EMISSIONS AND COMPONENT LEAK MONITORING REPORTS



Guadalupe Rubbish Disposal Company, Inc. 15999 Guadalupe Mines Road PO Box 20957 San Jose, California 95160 T: 408.268.1670

April 7, 2022

Ms. Becky Azevedo Guadalupe Rubbish Disposal Co., Inc 15999 Guadalupe Mines Road San Jose, CA 95120

Re: First Quarter 2022 Surface Emissions and Component Leak Monitoring Report for Guadalupe Recycling & Disposal Facility

Dear Ms. Azevedo:

This monitoring report for "Guadalupe Rubbish Disposal Co., Inc. (GRDC)" contains the results of the First Quarter 2022 Integrated and Instantaneous Surface Emissions Monitoring (SEM) and Component Leak Monitoring. Initial surface emissions monitoring was performed by Roberts Environmental Services, LLC. (RES). Re-monitoring of surface emissions and component leak monitoring was conducted by RES and/or Waste Management (WM) personnel.

APPLICABLE REQUIREMENTS

The monitoring discussed in this report was conducted in accordance with the following requirements:

Surface Emission Monitoring (SEM)

- New Source Performance Standard (NSPS), Title 40 of the Code of Federal Regulations (CFR) §60.755 (c) and (d), 40 CFR 60, Appendix A Method 21, promulgated by the United States Environmental Protection Agency (USEPA).
- California Code of Regulations (CCR) Title 17, Subchapter 10, Article 4, Subarticle 6, §95460 to §95476, known as the Assembly Bill 32 (AB32) landfill methane rule (LMR).
- Bay Area Air Quality Management District (BAAQMD) Regulation 8, Rule 34, Section 303 (Landfill Surface Requirements) and Section 607 (Landfill Surface Inspection Procedures).
- United States Environmental Protection Agency's (USEPA) Standards of Performance for Municipal Solid Waste Landfills; 40 Code of Federal Regulations (CFR) Part 63, Subpart AAAA-National Emission Standards for Hazardous Air Pollutants (NESHAP).

Component Leak

- BAAQMD Regulation 8, Rule 34, Section 301 (Landfill Gas Collection and Emission Control System Requirements) and Section 602 (Collection and Control System Leak Inspection procedures).
- California Code of Regulations (CCR) Title 17, Subchapter 10, Article 4, Subarticle 6, §95464, known as the AB32 LMR.

GRDC Plan and Alternative Compliance Measures

An Alternative Compliance Option (ACO) Request was submitted to the California Air Resources Board (CARB) on May 16, 2011. After receipt of comments, this ACO was amended, restated, and submitted to BAAQMD on July 1, 2016. SEM and Component Leak monitoring was conducted per the methods outlined in the July 1, 2016 ACO.

PROCEDURES

General

The surface of the GRDC disposal area has been divided into one-hundred-and-five (105), approximately 50,000 square foot monitoring grids. Of these grids, eleven (11) currently have no waste in place. The entire landfill surface is monitored with the exception of active portions of the Landfill, slope areas, and as requested in the approved ACO, areas containing only asbestos-containing waste, inert waste and/or non-decomposable waste which are excluded for safety as allowed by CCR Title 17 §95466.

Field personnel walked the surface of the landfill following the walking pattern as depicted the 2011 GRDC AB-32 SEM Plan, which traverses each monitoring grid. Additionally, in accordance with the provisions of 40 CFR 60.753(d) and 60.755(c)(1-3), the entire perimeter of the landfill surface was monitored. During the event, special attention was given to monitoring unusual cover conditions (stressed vegetation, cracks, seeps, etc.) and any areas with unusual odors.

The monitoring probe was positioned 2 inches above the ground surface. While walking, the wand tip of the FID was held within 2 inches of the landfill surface while traversing the grid. Per the approved alternative request, the wand tip of the FID was held at 2 inches of vegetation in areas where the landfill surface is covered with low-lying vegetation such as grasses while traversing the grid.

Instantaneous Surface Emissions Monitoring

The Instantaneous and Integrated SEM was conducted using flame ionization detectors (FID), calibrated to 500 parts per million by volume (ppm $_{v}$) methane, which meets or exceeds all guidelines set forth in the CCR Title 17 \$95471(a) and NSPS. The FIDs were calibrated prior to use in accordance with the United States Environmental Protection Agency (USEPA) Method 21 requirements. The SEM procedures followed the requirements of 40 CFR 60.755 (c) and (d) and CCR Title 17 \$95471(c)(2).

Ms. Becky Azevedo April 7, 2022 Page 3

RES personnel walked the surface of the landfill on a grid by grid basis with the wand tip held at 2 inches from the landfill surface. While sampling the grid; the technicians also checked any surface impoundments (wells or otherwise) for leaks. Technicians also checked any surface cracks, seeps, or other areas that show evidence of surface emissions (odors or distressed vegetation). Active and sloped areas excluded for safety were documented on field data sheets and maps.

All instantaneous surface monitoring was performed in accordance with the applicable requirements referenced in this report. Any detections of methane above 200 ppm_v (areas of concern) or 500 ppm_v (exceedances) for instantaneous were recorded, flagged, and marked on an SEM Map, which, wherever required, is included in the Appendices of this report. Applicable corrective action and re-monitoring timelines are listed below:

- Corrective actions must be initiated within 5 days of the initial exceedance and remonitoring shall be conducted within 10 days of the initial exceedance.
 - o If the re-monitoring event shows the exceedance is corrected, the location shall be re-monitored within 1 month of the initial exceedance.
 - o If the 1-month re-monitoring event shows the location is still corrected, all remonitoring requirements have been completed.
- If either the first 10-day or 1-month re-monitoring events show a second exceedance, additional corrective actions shall be completed and a second re-monitoring event shall be conducted within 10 days of the second exceedance.
- If the second 10-day re-monitoring event shows the second exceedance is corrected, the location shall be re-monitored within 1 month of the initial exceedance. If the 1-month remonitoring event shows the area is still corrected, monitoring requirements have been completed.
- If any location shows three exceedances, an additional well shall be installed within 120 days of the initial exceedance.

Integrated Surface Emissions Monitoring

The Integrated surface monitoring was conducted using a TVA 1000 calibrated to 25 ppm_v for the integrated monitoring, which meets or exceeds all guidelines set forth in the CCR Title 17 §95471(a). The field technician traversed the grid walking path over a continuous 25-minute period using the TVA 1000 held within 2 inches above the landfill surface. The Integrated monitoring procedures followed the requirements of CCR Title 17 §95471(c)(2).

Grids with results greater than 25 ppm_v were recorded, marked on the SEM map, and flagged for remediation. Any grids with integrated concentrations greater than 25 ppm_v are subject to the following re-monitoring timeline:

• Re-monitoring shall be conducted within 10 days of the initial exceedance.

- If the 10-day re-monitoring event shows the exceedance is corrected, all re-monitoring requirements have been completed.
- If either the first 10-day re-monitoring event shows a second grid exceedance, additional corrective actions shall be completed and a second re-monitoring event shall be conducted within 10 days of the second exceedance.
- If the second 10-day re-monitoring event shows the second exceedance is corrected, all remonitoring requirements have been completed.
- The second 10-day re-monitoring event shows a third grid exceedance, an additional well shall be installed within 120 days of the third exceedance.

Component Leak Monitoring Procedures

WM personnel monitored the exposed LFG components under positive pressure (pipes, wellheads, valves, blowers, and other mechanical appurtenances) using a TVA 1000 calibrated to 500 ppm_v. All leaks measured one half inch or less from the component exceeding the compliance limit of 500 ppm_v per requirements outlined in pursuant to CARB Title 17 of California Code of Regulations Subchapter 10, Article 4, Subarticle 6, Section 95464(b)(1)(B) and 1,000 ppm_v per requirements outlined in BAAQMD 8-34-303 were recorded. Applicable corrective action and remonitoring timelines are listed below:

- Leaks between 500 and 999 ppm_v must be corrected and re-monitored within 10 days of the initial exceedance.
- Leaks at or above 1000 ppm_v must be corrected and re-monitored within 7 days of the initial exceedance.

FIRST QUARTER 2022 SEM AND COMPONENT LEAK RESULTS

The following is a summary of the SEM and component leak monitoring results completed for the First Quarter 2022.

Instantaneous Surface Emissions Monitoring Results

The Instantaneous surface monitoring was performed on February 9, 2022, in accordance with the NSPS, BAAQMD 8-34, NESHAP, and CCR Title 17 §95469 and ACO. Results and data from the monitoring are presented in Attachment A.

Initial Monitoring Event Exceedances of 500 ppm_v

There were 4 exceedances of 500 ppm_v as methane detected on February 9, 2022. Corrective actions to initiate repairs of the exceedances were completed within five days for all locations (February 9, 2022).

Ms. Becky Azevedo April 7, 2022 Page 5

Ten-Day Re-Monitoring Results

The 10-day re-monitoring event was completed on February 10, 2022. All locations were observed at less than 500 ppm_v .

One-Month Re-Monitoring Results

The 1-month re-monitoring event was completed on March 2, 2022. All locations were observed at less than 500 ppm_v.

Readings between 200 ppm_v and 499 ppm_v (Initial and Re-monitored)

There were no readings between 200 ppm_v and 499 ppm_v as methane detected during the initial monitoring event. Pursuant to CCR Title 17 §95471(c), instantaneous surface emissions exceeding 200 ppm_v but below 500 ppm_v are required to be recorded.

Integrated Surface Emissions Monitoring Results

The Integrated surface sampling (ISS) was performed on February 8 and 9, 2022, accordance with the ACO and requirements outlined in CCR Title 17 §95469.

Initial Monitoring Event Exceedances of 25 ppm_v

There were no grids with exceedances of 25 ppm $_{v}$ as methane detected during monitoring on February 8 and 9, 2022.

The average methane concentration of each grid was recorded during the monitoring event per applicable requirements. See Attachment B, Integrated SEM 25 ppm_v Exceedances and Monitoring Log, and SEM Map included in Attachment B, for details.

Component Leak Monitoring Results

Component leak monitoring was conducted per the applicable requirements on February 9, 2022. No leaks greater than 500 ppm_v were identified during this monitoring period. Please see Attachment C, for details.

WEATHER CONDITIONS

Wind Speed Conductions during the Surface Emission Monitoring Events

Wind speeds during initial monitoring were monitored using a portable weather station. The station has a strip chart that records the wind speed and direction. After completion of monitoring, the strip chart is reviewed by RES office staff to determine the average and maximum wind speeds during the monitoring and the average wind direction during each grid and ensure that the wind speed requirements are met (no gusts greater than 20 mph, average wind speed cannot exceed 10 mph). These values are documented in the field data sheets. The strip chart data is scanned and included in Attachment D.

Ms. Becky Azevedo April 7, 2022 Page 6

Precipitation Requirements

Per the GRDC's ACO, the initial monitoring event was carefully scheduled so that it could be conducted in compliance with the precipitation requirements (no measurable precipitation within 24 hours). Re-monitoring events are required to adhere to strict timelines. Any conflicts with precipitation requirements are discussed in the results section of this document.

EQUIPMENT CALIBRATION

The portable analyzers were calibrated to meet the instrument specifications requirements of U.S. EPA Method 21. The calibration gas used was methane, diluted to a nominal concentration of 25 ppm $_{v}$ in air for integrated sample analyses and 500 ppm $_{v}$ in air for instantaneous monitoring to comply with the requirements.

All analyzers were calibrated prior to use with required response time and precision related instrument checks. Calibration records include the following: One time response time test record; One time response factor determination for methane; Calibration Precision test records (test to be performed every 3 months); and Daily Instrument Calibration and Background test records for each gas meter that was used during the quarterly monitoring event. The calibration log records are included in Attachment E.

All monitoring was completed in accordance with the applicable regulatory requirements or approved alternatives. If you have any questions regarding this report, please do not hesitate to contact me at rphadnis@wm.com.

Thank you, Waste Management

Rajan Phadnis

Environmental Protection Specialist

Attachment A – Instantaneous Surface Emission Monitoring Event Records

- Monitoring Logs and Exceedances
- Surface Monitoring Weather Data
- SEM Map

Attachment B – Integrated Surface Emission Monitoring Event Records

- Monitoring Logs and Exceedances
- Surface Monitoring Weather Data
- SEM Map

Attachment C – Component Leak Monitoring Event Records

Ms. Becky Azevedo April 7, 2022 Page 7

• Component Leak Exceedances and Monitoring Logs

Attachment D – Weather Station Data

• Strip Chart Data

Attachment E – Calibration Records

• Instrument and Gas Calibration Records

Attachment A

Instantaneous Surface Emission Monitoring Event Records

Table A.1 Instantaneous Landfill Surface Emissions Monitoring Initial Monitoring Event Areas of Concern

2022 QUARTER: 1

PERFORMED BY: RES

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Grid Number	Date of Monitoring	Concentration of Emission (ppmv)	Comments
36	2/9/2022	1,300	185
67	2/9/2022	1,700	SUMP-2
43	2/9/2022	3,000	235
30	2/9/2022	500	237
	36 67 43	36 2/9/2022 67 2/9/2022 43 2/9/2022	Grid Number Date of Monitoring Emission (ppmv) 36 2/9/2022 1,300 67 2/9/2022 1,700 43 2/9/2022 3,000

Notes: Please refer to field data sheets for details

Instantaneous Landfill Surface Emissions Monitoring Exceedance and Monitoring Logs (NSPS/BAAQMD 8-34)

2022 QUARTER: Q1

INITIAL MONITORING PERFORMED BY RES FOLLOW-UP MONITORING PERFORMED BY: Tino Robles

LANDFILL NAME: Guadalupe Wind Direction: W Wind Direction: NW Wind Speed: 10 Wind Speed: 15

Initial	Monitorin	g Event	Co	rrective action within 5 days	1st 1	0-day Follow	r-Up	1st 30	-day Follo	ow-Up	Comments
Flag	Monitoring	Field	2/9/2022 Added water & fresh dirt pack it-fully open becs 2/9/2022 Added water & fresh dirt pack it 2/9/2022 Added water & fresh dirt pack it-fully open becs		Monitoring	No Exced.	Exced.	Monitoring	No Exced.	Exced.	
Number	Date	Reading	Repair Action taken to repair Date Exceedance 2/9/2022 Added water & fresh dirt pack it-fully open becs 2/9/2022 Added water & fresh dirt pack it 2/9/2022 Added water & fresh dirt pack it-fully open becs		Date	<500 ppm	>500 ppm	Date	<500 ppm	>500 ppm	WELL
31	2/9/2022	1,300	Repair Action taken to repair Date Exceedance 2/9/2022 Added water & fresh dirt pack it-fully open bec 2/9/2022 Added water & fresh dirt pack it 2/9/2022 Added water & fresh dirt pack it-fully open bec		2/10/2022	52		3/2/2022	3		185
32	2/9/2022	1,700	Repair Date 2/9/2022 Added water & fresh dirt pack it-fully open becs 2/9/2022 Added water & fresh dirt pack it 2/9/2022 Added water & fresh dirt pack it 2/9/2022 Added water & fresh dirt pack it-fully open becs		2/10/2022	37		3/2/2022	4		SUMP-2
21	2/9/2022	3,000	Repair Action taken to repair Date Exceedance 2/9/2022 Added water & fresh dirt pack it-fully open becs 2/9/2022 Added water & fresh dirt pack it 2/9/2022 Added water & fresh dirt pack it-fully open becs		2/10/2022	12		3/2/2022	7		235
11	2/9/2022	500	d Repair page Action taken to repair Exceedance 0 2/9/2022 Added water & fresh dirt pack it-fully open becs 0 2/9/2022 Added water & fresh dirt pack it 0 2/9/2022 Added water & fresh dirt pack it-fully open becs		2/10/2022	7		3/2/2022	2		237
_		·									

Table A.3 Instantaneous Landfill Surface Emissions Monitoring Exceedance and Monitoring Logs (AB-32)

2022 QUARTER: 1

INITIAL MONITORING PERFORMED BY: RES
FOLLOW-UP MONITORING PERFORMED BY: WM-Tino Robles

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Init	ial Monitoring Even	t	1st Re-mo	on Event - 10	Days	2nd Re-	mon Event -	10 Days	
Exceedance	Monitoring	Field	Monitoring	No Exced.	Exced.	Monitoring	No Exced.	Exced.	
Grid ID No.	Date	Reading	Date	<500 ppm	>500 ppm	Date	<500 ppm	>500 ppm	Comments
36	2/9/2022	1,300	2/10/2022	52					185
67	2/9/2022	1,700	2/10/2022	37					SUMP-2
43	2/9/2022	3,000	2/10/2022	12					235
30	2/9/2022	500	2/10/2022	7					237

Table A.4 Instantaneous Landfill Surface Emissions Monitoring Areas of Concern Greater than 200 ppmv

2022 QUARTER: 1

INITIAL MONITORING PERFORMED BY: RES
FOLLOW-UP MONITORING PERFORMED BY: NA

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

	Monitoring	Event	Re-mo	n Event	
Exceedance Grid ID No.	Monitoring	Field	Monitoring	Reading	Comments
Exceedance I Grid ID No.	Date	Reading	Date	ppm	
None					

GUADALUPE LANDFILL INSTANTANEOUS LANDFILL SURFACE MONITORING

Personnel: LESGNADT CLLVINGTHE

RICIE/EROS

DWISH ANDERDOW

CALVINDEN

CALVINDEN

CAL. Gas Exp. Date: 6-7-22

Date: 2-9-22 Instrument Used: 20A1000 Grid Spacing: 251

Temperature: 47 Precip: 0 Upwind BG: 2:6

GRID ID	STAFF	START	STOP	тос	WIN	ID INFORM	MATION	REMARKS
	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	KEMAKKS
1	LW	0600	0615	31	0	0	2	
2	RZ	0600	0615	26	0	0	2	
3	DA	06.0	0615	20	0	0	2	
4	CO	0600	8615	26	0	0	2	
5	NB	0600	0615	39	0	0	2	
6	LW	0615	0670	19	Ò	U	4	
)	RL	061-5	0620	51	0	0	4	
8	PA	0615	0630	49	0	0	4	
9	60	0615	0875	34	0	0	4	
10	WB	08/5	0630	31	0	0		
11	W	0630	0645	18		2	2 2	
12	R.L	0630	0645	31		2	2	
13	PR	083.0	0645	47		2	2	
15	-60	0670	064	45	1	2	2	
16	NR	0633	0645	35		2	2	
18	6	0645	0700	47	2	2	2.	
19	RL	0645	0000	11	2	2	2	
20	PB	0645	0707	50	2	2	2	
21	60	064	0700	40	2	2	2	
24	NB	0620	0705	26	2	2	2	
25	LW	6700	0715	24	3	3		
26	RL	0700	5715	10)	3	3	1	
29	DB	0)00	8715	48	3	3		
30	6-0	0701	0) \$5	500	3	3		66237
31	as	0)00	6715	4)	3	3		
35	LW	6715	0770	14	3	3	طا	
3-6	RL	210	در (۵	1300	3	3	16	WE3/185
3>	1B	0)15	0)70	46	3	3	16	
41	00	0)15	0)))	16	3	3	16	
42	NB	0)15	0)70	28	3	3	16	

Attach Calibration Sheet

Attach site map showing grid ID

Page 1 of 3

GUADALUPE LANDFILL INSTANTANEOUS LANDFILL SURFACE MONITORING

Personnel: Loishwn	or cst	VIN ORtiz		
P.CIC/ER		CBANKI		
Dwight,	PROENS		Cal. Gas Exp.	Date: 69-27
Date: 29-22	_ Instrument Used:	VA 10:0 Grid	Spacing:	251

Temperature: 56 Precip: 0 Upwind BG: 20 Downwind BG: 26

43 LV 47 RU 48 DA	STAFE	START	STOP	тос	WIN	ID INFORM	IATION	REMARKS
	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	KLMAKAS
43	LW	6773	0745	3,000	D	0	15	WE11235
	RL	6770	0745	29	0	0	15	
49	DA	6730	0745	40	0	0	15	
45	60	6770	0741	87	0	0	15	
50	ND	0730	0745	67	0	0	15	
54	W	0745	0810	75			14	
55	RL	0745	0860	88			14	
59	DA	8745	0860	3)			14	
60	CO	8745	0800	110	(14	
61	ND	8745	0800	35	(14	
64	W	8800	08/5	58			14	
65	KL	0802	086	35			14	
66	DA	0 500	0872	2 F		1	14	
67	-60	0800	0815	1700			14	54MDZ
69	NB	0800	08N	31			14	,
フロ	LV.	0815	0830	45	0	0	12	
71	P(081	2830	18	0	0	12	
72	DA	07/3	0870	36	0	0	12	
23	CD	0815	OPJI	29	0	0	12	
74	NB	08/5	8833	55	0	0	12	
75	2~	0877	084	41	8		12	4
7)	RL	ctio	0845	112	0		12	
78	DA	9830	074	35	0	T.	12	
フラ	00	8877	0845	32	0		12	
89	NB	6(80	OFFU	92	0	1	12	2
82	LW	0845	0900	39	2	2 2	15	
8.3	RL	084	0950	2)	2	2	15	
86	00	08.82	090)	57	2	2	15	
85	00	OPW	0900	25	2	2	15 15	
90	NB	0845	0900	46	2	2	15	

Attach Calibration Sheet

Attach site map showing grid ID

Page 2 of 3

GUADALUPE LANDFILL INSTANTANEOUS LANDFILL SURFACE MONITORING

Personnel: LEIS WACK	CELVIN ONFIZ	
DILICIENIS	NICK BANKS	
Dwight ANDERSON		Cal. Gas Exp. Date: 6910
Date: 2-9-22 Instrument Use	ed: LVA1000	Grid Spacing:
Temperature: 62 Precip: 6	Upwind BG:	2-2 Downwind BG: 2.6

GRID ID	STAFF	START	STOP	тос	WIN	ID INFORM	MATION	REMARKS
	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	NO. WIND
91	Lw	2910	0515	2)	2	3	12	
92	DA	0900	2715	18	2	3	12	
95	RI	0960	0515	45	2	3	12	
99	CO	0900	0915	2.8	2	3	12-	
100	NP	0910	0915	20	2	3	12	
101	LW	0913	0930	35	2	4	12	
102	PA	0515	0870	14	2	4	12	
103	RL	0515	0530	11	2	4	12	
104	C.D	0515	0530	16	2	4	12	
185	NB	0815	0930	2)	2	4	12	
					100			
	-							
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Attach Calibration Sheet Attach site map showing grid ID

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GUADALUPE LANDFILL INSTANTANEOUS LANDFILL SURFACE MONITORING

oate: _2	-9-22	Instrun	nent Used	f:		Gri		Exp. Date:	
								vind BG;	
GRID ID	STAFF	START	STOP	TOC	WIN	ID INFORM	MATION	REMAR	
	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	REMAR	KS
76								Active-t	Rrs
84								1	
85									
88									
89									
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94									
96			-						
97									
98									
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14								100	
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GUADALUPE LANDFILL INSTANTANEOUS LANDFILL SURFACE MONITORING

ate: <u>2</u>	-9-22	Instrur	nent Used	÷		Gri	d Spacing:	-
emperat	ure:	Pred	cip:	Upv	vind BG:		Downwi	nd BG:
SRID ID	STAFF	START	STOP	тос	WIN	ID INFORM	TATION	REMARKS
	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	KENAKKO
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READING (PPM)	27	7.0	2. C LCRS NORTH	19	5/	2.3	8	3%	2 0	2 3	1		×	(5)	3/	47	02	7-1	25	32	16 10	シゾ	18	S Pri	13	2.2	1/	2.5	12	77	14 4),	55	7.7	26	25		22	7.5	7.5	500	ウ	2 2 WAS 20
DATE	2-9-27				2									7						7				19								^	3									2	
SEMI GRID BLOCK NO.	1	3	4	9	7 - 2	7	6	6	10	10	10	10	11	12	12	13	13	13	13	13	14	15	16	16	16	16	16	16	16	17	17	19	20	20	21	21	21	21	25	25	26	26	26
LONGITUDE			-121.9013879	-121.8987819	-121.8971917		-121.8988572	-121.8994333	-121.896709	-121.8974175	-121.8970001	-121.8972595	-121.9015677	-121.8997801	-121.8997801	-121.8989765	-121.8981799	-121,8985607	-121.8984098	-121.8984098	-121.8982343	-121.899993	-121.897694	-121.899249	-121.8986408	-121.898995	-121.8986408	-121.898995	-121.8979523	-121.8974612	-121.8974352	-121.9016828	-121.8996248	-121.9004384	-121.8976265	-121.8981417	-121.899347	-121.899347	-121.9000587	-121.9000587	-121.8985607	-121.8981168	-121 8993035
LATITUDE			37.2175051	37.2172819	37.217485		37.217173	37.2171697	37.2171275	37.217047	37.2171237	37.2172233	37.216757	37.2168516	37.2168516	37.2167213	37.2170005	37.216939	37.2167973	37.2167973	37.2165278	37.2163602		37.2164993	37.2166558	37.2166911	37.2166558		8					7					37.2157313	37.2157313			37 21596NG
POINT TYPE			Leachate Riser or Sump (LR)		LFG Collector - Standard		LFG Collector - Standard	I EG Collector - Standard																																			
DESCRIPTION	Riser-1	Riser-2	H-12L	EW-179	LC-196	Riser-3	EW-198	EW-202	EW-176	EW-177	LC-232	LC-233	EW-82	EW-214	EW-214	EW-122	EW-178	EW-199	EW-207	EW-207	EW-200	EW-161	EW-152	EW-180	EW-208	EW-209	EW-208	EW-209	LC-188	EW-147	EW-204	EW-81	EW-146	EW-162	EW-151	EW-181	EW-211	EW-211	EW-213	EW-213	EW-205	LC-189	16-236
Point ID			39270	46004	49173		51829	51833	45884	45883	26009	86009	23223	54149	54149	38188	45881	51830	54142	54142	51831	39762	39753	49230	54143	54144	54143	54144	49165	39748	54139	23222	39766	39763	39752	45882	54146	54146	54148	54148	54140	49166	60101
No.	1	2	3	4	5	9	7	∞	6	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	76	77	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43

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LFG Collector - Standard	LFG Collector - Standard		LFG Collector - Standard
201 LFG Collector - Standard 37.2158282 116 LFG Collector - Standard 37.2157522	LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard
LFG Collector - Standard	LFG Collector - Standard		LFG Collector - Standard
34 LFG Collector - Standard 37.2158817	LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard
.14 LFG Collector - Standard 37.2156196	LFG Collector - Standard		LFG Collector - Standard
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LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard
LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard
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LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard
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LFG Collector - Standard	LFG Collector - Standard		LFG Collector - Standard
35 LFG Collector - Standard 37.2151227	LFG Collector - Standard		LFG Collector - Standard
-5	er-5	Riser-5	er-5
LFG Collector - Standard	LFG Collector - Standard		LFG Collector - Standard
LFG Collector - Standard	LFG Collector - Standard		LFG Collector - Standard
LFG Collector - Standard	LFG Collector - Standard		LFG Collector - Standard
LFG Collector - Standard	LFG Collector - Standard	7 LFG Collector - Standard	LFG Collector - Standard
LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard
	LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard
LFG Collector Standard	LFG Collector Standard		LFG Collector Standard
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LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard
LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard
	LFG Collector - Standard		LFG Collector - Standard
Condensate Sump or Drain (CS)	Condensate Sump or Drain (CS)	Condensate Sump or Drain (CS)	Condensate Sump or Drain (CS)
Condensate Sump or Drain (CS)	Condensate Sump or Drain (CS)	Condensate Sump or Drain (CS)	Condensate Sump or Drain (CS)
Condensate Sump or Drain (CS)	Condensate Sump or Drain (CS)	Condensate Sump or Drain (CS)	Condensate Sump or Drain (CS)
	LFG Collector - Standard	1 LFG Collector - Standard	LFG Collector - Standard
LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard
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LFG Collector - Standard	I G Collector - Standard	בוס כסווכמוס	בו ס כסווכרנסו סימווממו מ
		Ì	1 FG Collector - Standard

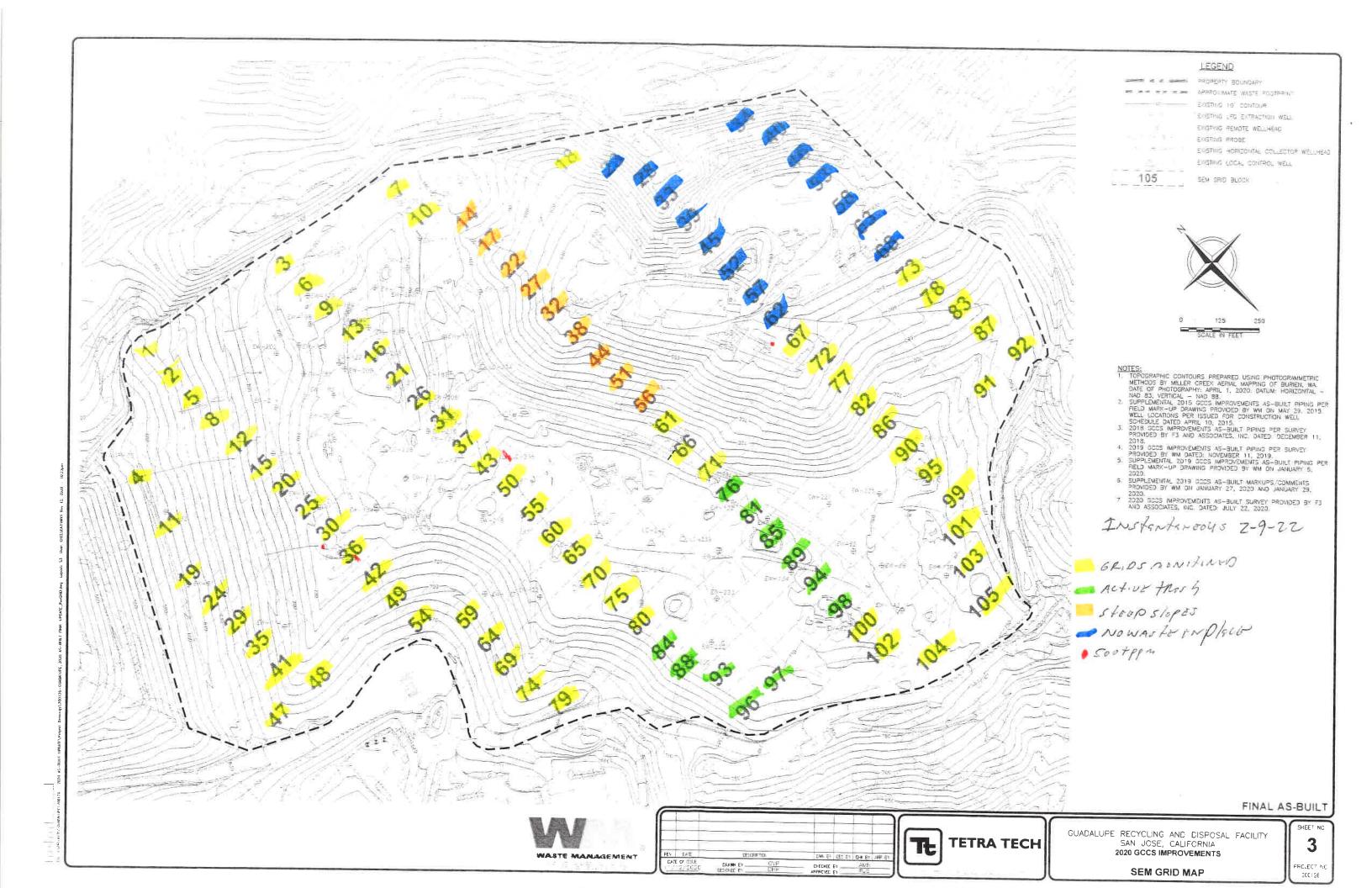
GUADALUPE LANDFILL - MONITORING POINTS FOR SEM - UPDATED ON 11-09-2021

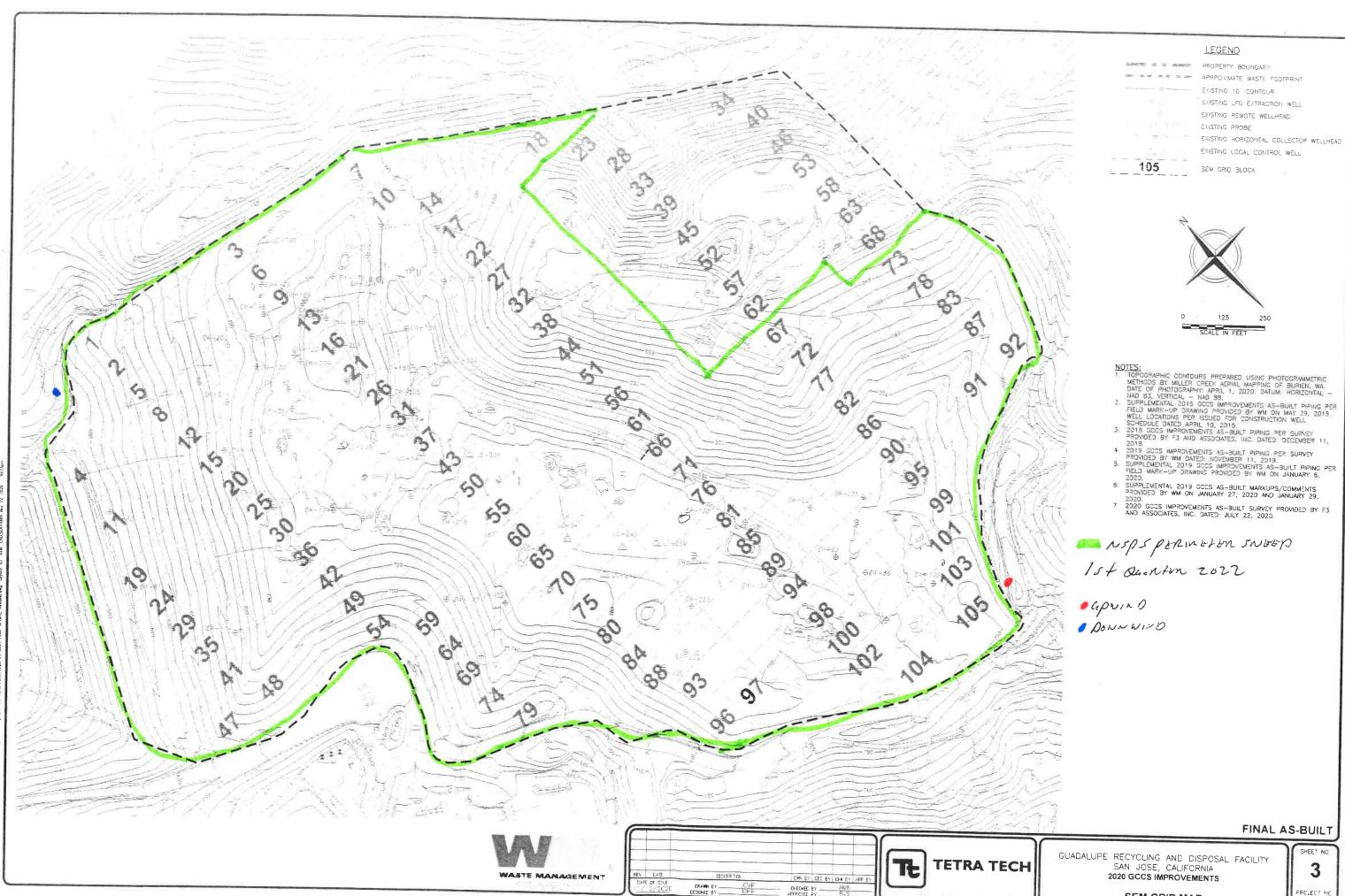
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NOTES		WAS 2019 PW11	5620 3.		WAS 2019 PW13			WAS 2019 PW14	Active-inrss	WAS 2019 PW239 みこよいい	DITINE FASS	マングナ ナジング	ACA: シャメルジス	みったいび さんじょく	ALTINA TROSS	11ch. US 11855	Action And	1)				Active parcel	ALLIUNINS			
READING (PPM)	24	14	1700	31	55	15	25	18																24	7-1	22			20	14	1/
DATE	29.22																														7
SEM GRID BLOCK NO.	99	99	29	69	70	71	75	75	76	9/	81	81	81	84	84	85	88	88	88	88	68	89	68	90	06	06	94	86	100	102	103
LONGITUDE	-121.8975753	-121.896996		-121,8996291	-121.8978297	-121.8967375	-121.8993258	-121.8983188	-121.897305	-121.897615	-121.8974548	-121.8969069	-121.8974548	-121.8977091	-121.8977091	-121.8969069	-121.8981113	-121.8980338	-121.8981113	-121.8980338	-121.8970899	-121.8961233	-121.8961233	-121.8949208	-121.8956942	-121.8956942	-121.896153	-121.8960039	-121.8968871	-121.8963646	-121.8959464
LATITUDE	37.2139737	37.2142127		37.21412	37.2138042	37.2138179	37.2136797	37.2138288	37.2136061	37.2134243	37.2132002	37.2132484	37.2132002	37.2129712	37.2129712	37.2132484	37.2127377	37.2126277	37.2127377	37.2126277	37.2129335	37.2129485	37.2129485	37.2127553	37.2126679	37.2126679	37.2123487	37.2119331			Ì
POINT TYPE	LFG Collector - Standard	LFG Collector - Standard		LFG Collector - Standard																											
DESCRIPTION	EW-226	LC-238	Riser-6	EW-172	LC-240	LC-197	EW-131	LC-242	EW-135	LC-239	EW-224	EW-228	EW-224	EW-223	EW-223	EW-228	EW-222	EW-230	EW-222	EW-230	EW-134	EW-227	EW-227	EW-112	EW-225	EW-225	EW-65	EW-66	EW-62	EW-142	EW-138
Point ID	54161	60103		42101	60105	49174	38197	60107	38201	60104	54159	54163	54159	54158	54158	54163	54157	54165	54157	54165	38200	54162	54162	23240	54160	54160	23214	23215	23211	38208	38204
No.	87	88	89	06	91	95	93	94	95	96	6	86	66	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117

Orange Flag Landfill Surface Emissions Monitoring Exceedances and Monitoring Log

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Technician:		LESS 6 W.10C	200										1	
Instrument:		444 1000												
Calibration Standard;	standard;	200000												
	Initial Mo	Initial Monitoring Event		First Re-M	First Re-Monitoring Event - 10 Days	- 10 Days	Second Re-	Second Re-Monitoring Event - 10 Days	nt - 10 Days	30-Day	30-Day Follow-up Monitoring	nitoring	Comments	
Flag	Grid	Field Reading	Date	Date	No Excd.	Excd.	Date	No Excd.	Excd.	Date	No Excd.	Sylv ppm		
	36	1300	22-6-2		1000	and one	200	iidd ooc	udd ooc	200	and oppor	200	18 1 / (*) X	
	63	1700											59402	
0-27	53	5,000											WEN 235	
0- //	30	500	>										6:23>	
<u>-</u>								8						
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SEM GRID MAP

PROJECT NO 200126

Attachment B

Integrated Surface Emission Monitoring Event Records

Table B.1 Integrated Landfill Surface Monitoring Exceedances and Monitoring Log

2022 QUARTER: 1

INITIAL MONITORING PERFORMED BY: RES
FOLLOW-UP MONITORING PERFORMED BY: NA

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Initial	Monitoring	Event	1st Re-m	on Event -	10 Days	
Exceedance	Monitoring	Field	Monitoring	No Exced.	No Exced.	_
Grid ID No.	Date	Reading	Date	<25 ppm	>25 ppm	Comments
None						

GUADALUPE LANDFILL INTEGRATED LANDFILL SURFACE MONITORING

Personnel: LEICH WADE	calvin ortiz	
ONISAL ANDERDA		Cal. Gas Exp. Date: 6-9-22
Date: 2-8-22 Instrument Use	ed:Grid Sp	pacing:
Temperature: 62 Precip: (2 Upwind BG: 7.0	Downwind RCL 7 6

GRID	STAFF	START	STOP	тос	WII	ID INFOR	MATION	REMARKS
ID	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	KLMARKS
1	a	1300	1325	4.75	0	1	6	
2	PL	1300	1325	5.60	0	1	6	
3	DA	1300	1325	5-38	0	-1	6	
4	CD	1300	1325	4117	0	(6	
5	ND	1310	1325	6,12	0		6	
6	W	1325	1350	5279	2	3	6	
7	R.L	1325	1350	6.81	2	3	G	
8	OA	132	1350	7.22	2	3	9	
9	(0	1321	1350	654	2	3	(
10	NB	1325	1370	6.97	2		6	
11	10	1350	1415	4.55	3	35555	b	
12	PL	1350	1415	5.82	3	5	6	
13	DA	1350	1415	8.65	3	5	6	
15	CD	1350	1415	6-72	3	5	6	
16	NB	1750	1915	6.58	3		6	
18	12	1415	1440	7-34	3	5	6	
19	RL	1415	1940	4.21	3	5	6	
20	DÀ	1415	1440	7-45	3	55	U	
2/	Cb	1415	1440	6.37	3	5	6	
24	NB	1415	1440	5-34	3	5	6	
			1					

Attach Calibration Sheet Attach site map showing grid ID

Page ____ of ____

GUADALUPE LANDFILL INTEGRATED LANDFILL SURFACE MONITORING

re: 2-8- Inperature: _ GRID STAINIT O 6 R 7 P 6 P 7 P 7 P 7 P 8 P 9 P 9 P 9 P 9 P 9 P 9 P 9	AFF ST			I BG:		Downwin	d BG:	
ID INIT				AVG	MAX.	DIRECTION		
26 31 34 85 88 37 24 26 27 27 27 27 28	IALS TI	IME						
31 34 85 88 37 76 77 77 77 77 8							Acti	18-4N5 B
34 85 87 37 94 96 97 77 77 72 8								
85 88 39 3 7 6 7 7 7 7								
88 39 37 96 96 97 7 7 7								
39 3 9 6 9 8 7 7 7 7								
7 7 7 7 7 7 8								
7 2 2 8								
7 7 7 7 7								
7 7 7 7 8								
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2								
8								
4				[1				
4				1				
7				4				
6							V	
3							NOWAL	strypled
8								1
3								
4								
9								
0								
.5	- 44 (1 = -							

Attach Calibration Sheet Attach site map showing grid ID

53

Page ________ of _______

GUADALUPE LANDFILL INTEGRATED LANDFILL SURFACE MONITORING

ate: <u>Z</u>	-8-22	_ Instrume						. Date:
							Downwind	
GRID	STAFF	START	STOP	тос	WII	ND INFOR	MATION	REMARKS
ID	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	KEHAKK
58								1
62								-
63								
68								V
-								
				T E				
7.								
					1			

Attach Calibration Sheet Attach site map showing grid ID

Page 2 of 2

GUADALUPE LANDFILL INTEGRATED LANDFILL SURFACE MONITORING

Personnel: Lugilwan-	celum onti	
RICKLIENS	NIELL BANIS	
DNISHL ANDWIN		Cal. Gas Exp. Date: _6~9~12
Date: 2-9-27 Instrument Us	ed:Gr	rid Spacing: Z S/
Temperature: 69 Precip:	D Unwind BG 7 4	Downwind BC 2 6

GRID	STAFF	START	STOP	тос	WIN	ID INFOR	MATION	REMARKS
ID	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	KLMAKKS
25	lu	0940	1005	6.8)		2	14	
26	RL	0940	1005	5.72	1	2	14	
29	DR	0540	1885	6.70	i	2	14	
30	00	0940	1001	8-51		2	14	
3/	NO	0740	1085	6.35		2	14	
35	1	1005	1070	7.22	D	1	12	
36	RI	1000	1070	6.77	U		12	
3)	DA	1835	1020	5-50	0		12	
41	(0	1015	1000	5-10	0	1	12	
47	NO	18=0	1630	5.98	٥		12	
43	1	1000	1055	6.13	3	4	16	
47	RL	1030	1050	6.42	3	4	ا	
48	DA	1070	1035	5.90	3	4	16	
49	62	1070	1051	5.88	3	4	16	
50	NB	1832	1055	6-13	3	4	14	
54	1	1015	1/20	6.2)	3	4		
53	RC	1055	1/20	5.40	3	4		
59	DR	1051	1/00	7-22	3	4		
60	Co	1050	1/2)	6.39	3	4		
61	NO	1050	1/20	5.27	3	4		
64	W	1120	1145	5-11	4	6	4	
65	RL	1720	1145	5.79	24	6	4	
66	02	1170	1145	7.13	4	6	4	
67	0	1170	1145	6.94	4	6	4	
69	NO	1120	1145	6-20	4	6	4	
70	1	1145	1210	5-49	5	7	5	
7/	Ri	1145	1210	7-36	5	7	5	
72	102	1145	1210	6-8-5	5	7	5	
73	00	1145	1210	6-30	5	7	5	
>4	NO	1145	1210	5-99	5	1	5	

Attach Calibration Sheet

Attach site map showing grid ID

Page _____ of _____

GUADALUPE LANDFILL INTEGRATED LANDFILL SURFACE MONITORING

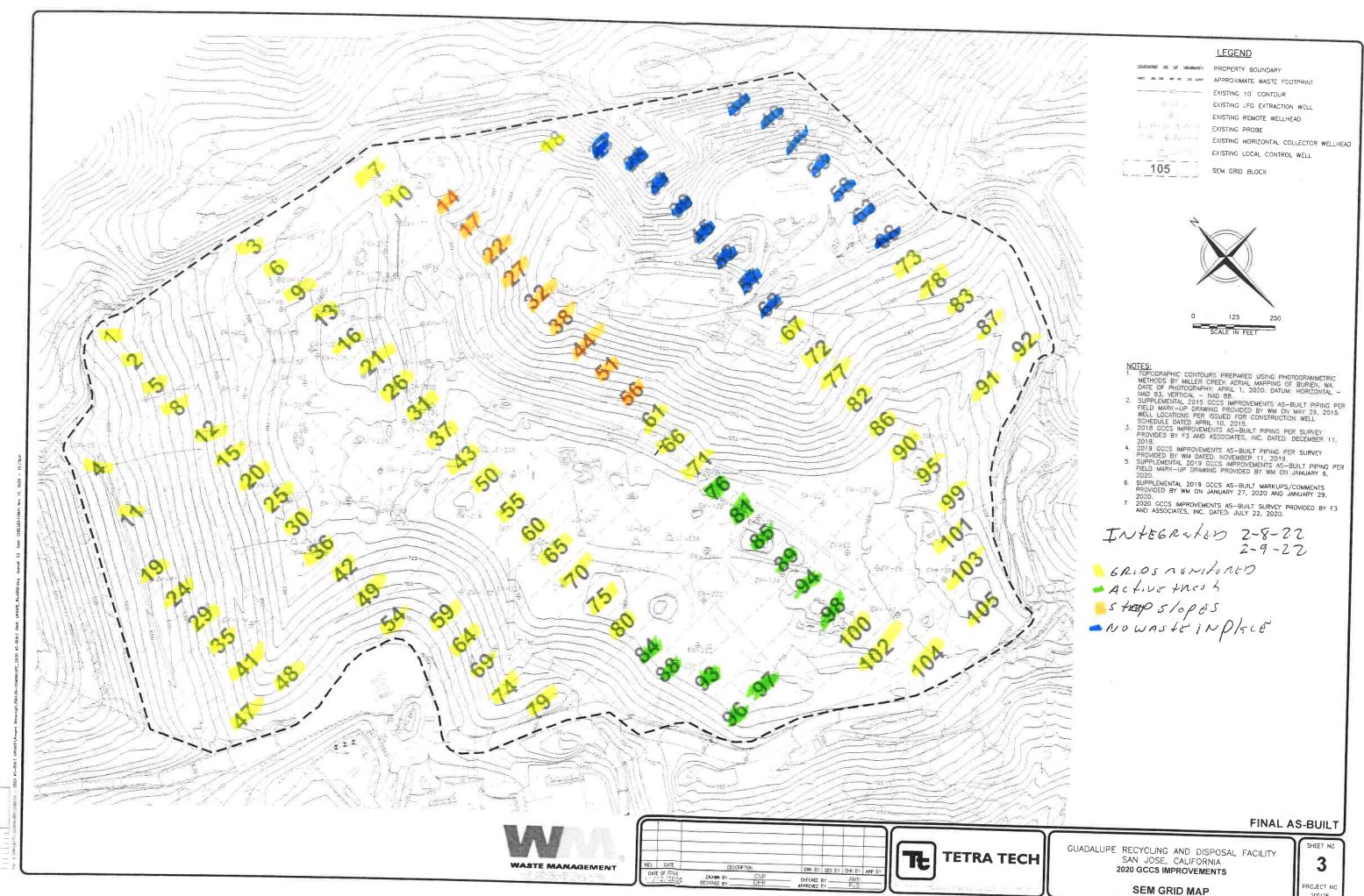
Personnel: (BIS/WADT RULL/FANT	Nick Danis
CILVINORAL	Cal. Gas Exp. Date: 6-9-22
Date: 7-9-72 Instrument Us	ed: +UAIDED Grid Spacing: 257
Temperature: 74 Precip: 4	Downwind BC: 7 5

GRID	STAFF	START	STOP	тос	WIN	ND INFOR	MATION	DEMARKS
ID	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	REMARKS
75	in	1210	1235	8.51	6	6	5	
フフ	RL	1210	1275	6.31	6	Č	5	
78	DA	1210	1271	6.40	6	8		
79	60	1210	1275	8.35	6	Č	5	
80	ND	1210	1275	7.92	6	4	555	
82	LW	1235	1300	6.11	6	4	4	
83	RL	1235	1300	6.41	1.	4	4	
86	DA	1731	1700	5.50	6	6	4	
87	60	1235	1300	5.39	6	Q	4	
90	NO	1235	1300	8.65	6	8	4	
21	LW	1300	1325	7.22	1	9	4	
92	RL	1700	132	6-40	1	9	4	
95	DA	1700	1325	5.79	7	9	4	
99	CO	1300	132	6-12	7	9	4	
100	NO	1300	132	6-55	7	9	4	
161	Lu	1325	1350	5.36	6	7		
102	RL	1325	1750	5.10	6	7		
103	PA	1321	1350	5.97	6	7		
109	CD	1325	1350	6.03	6	7		
105	NB	1375	1310	5.45	6	1		
				=				

Attach Calibration Sheet

Attach site map showing grid ID

Page _____ of ____



PROJECT NO 200126

Attachment C

Component Leak Monitoring Event Records

Table C.1

AB-32 Component Leak Monitoring Summary of Component Leaks Greater than 500 ppmv

2022 QUARTER: 1

INITIAL MONITORING PERFORMED BY: RES FOLLOW-UP MONITORING PERFORMED BY: NA

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Location	Initial Monitoring Corrective Action		corrective Action	10-Day Remonitoring				
Location	Date	TOC (ppmv)	Tech	Date	Description	Date	TOC (ppmv)	Tech
Flare Station A-9	2/9/2022	ND	RES	NA	NA	NA	NA	NA
Flare Station A-14	2/9/2022	ND	RES	NA	NA	NA	NA	NA

ND= Non Exceedances

Table C.2

BAAQMD Component Leak Monitoring Summary of Component Leaks Greater than 1,000 ppmv

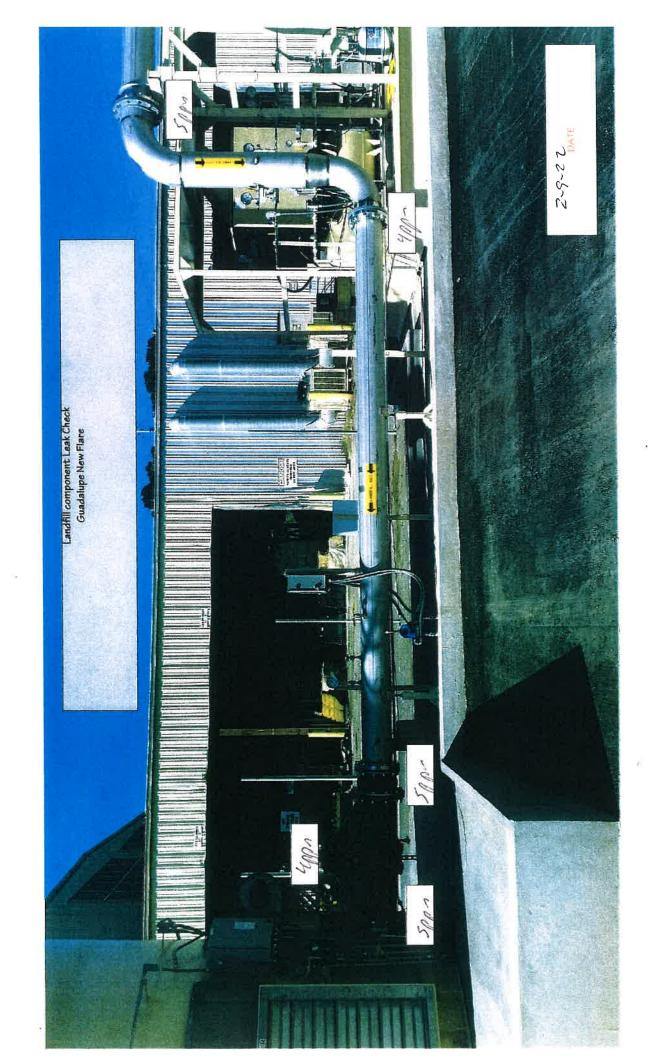
2022 QUARTER: 1

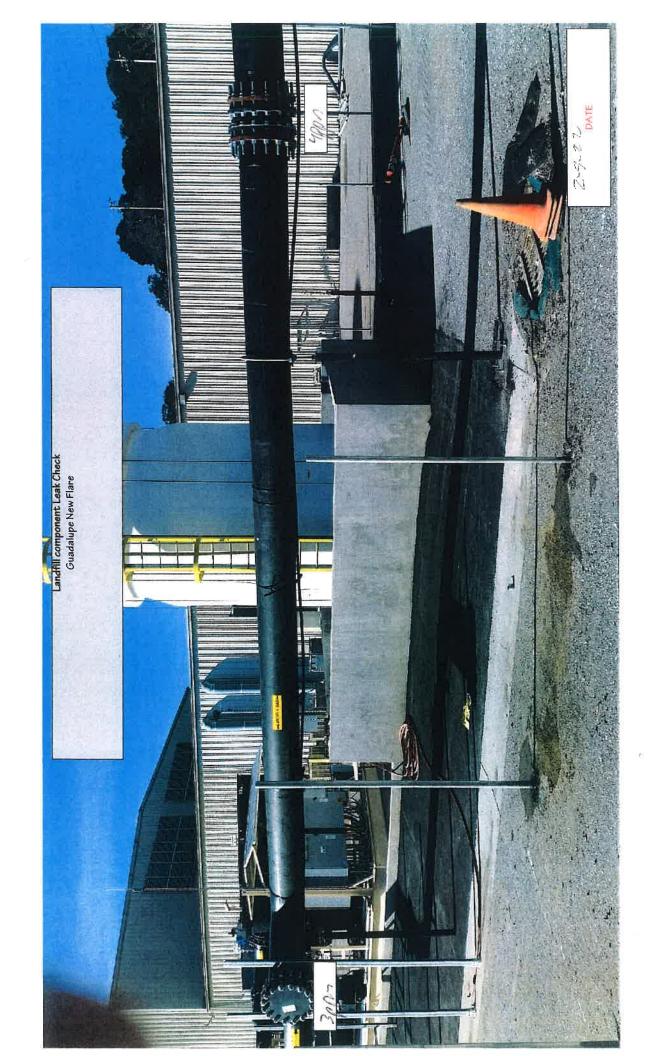
INITIAL MONITORING PERFORMED BY: RES FOLLOW-UP MONITORING PERFORMED BY: NA

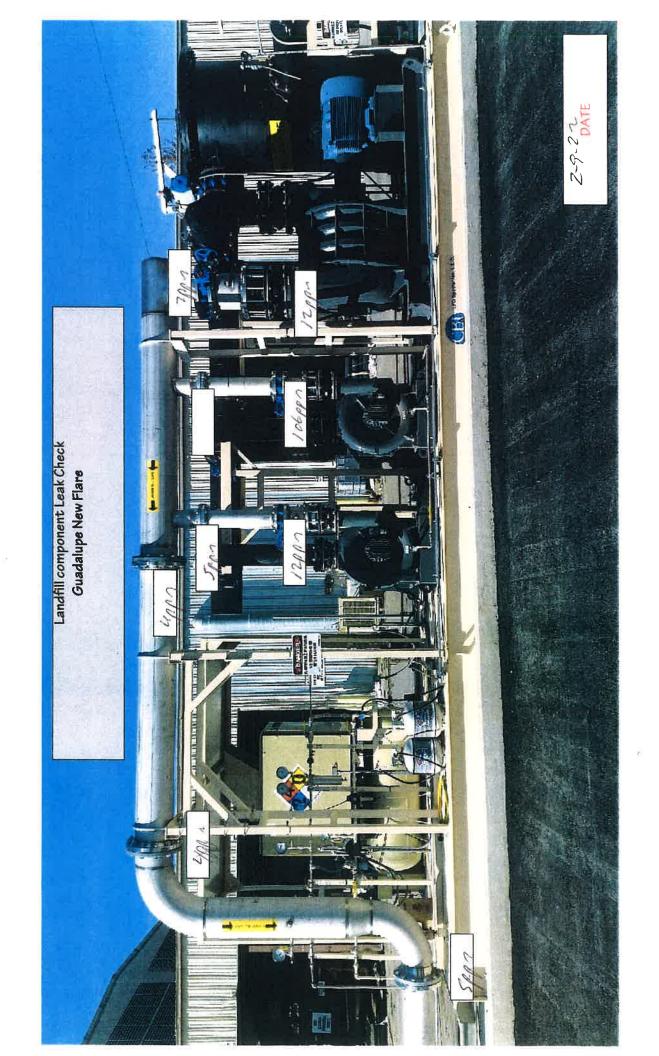
LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Location	Initial Monitoring		C	Corrective Action 7-Day Remonit		Day Remonitor	oring	
Location	Date	TOC (ppmv)	Tech	Date	Description	Date	TOC (ppmv)	Tech
Flare Station A-9	2/9/2022	ND	RES	NA	NA	NA	NA	NA
Flare Station A-14	2/9/2022	ND	RES	NA	NA	NA	NA	NA

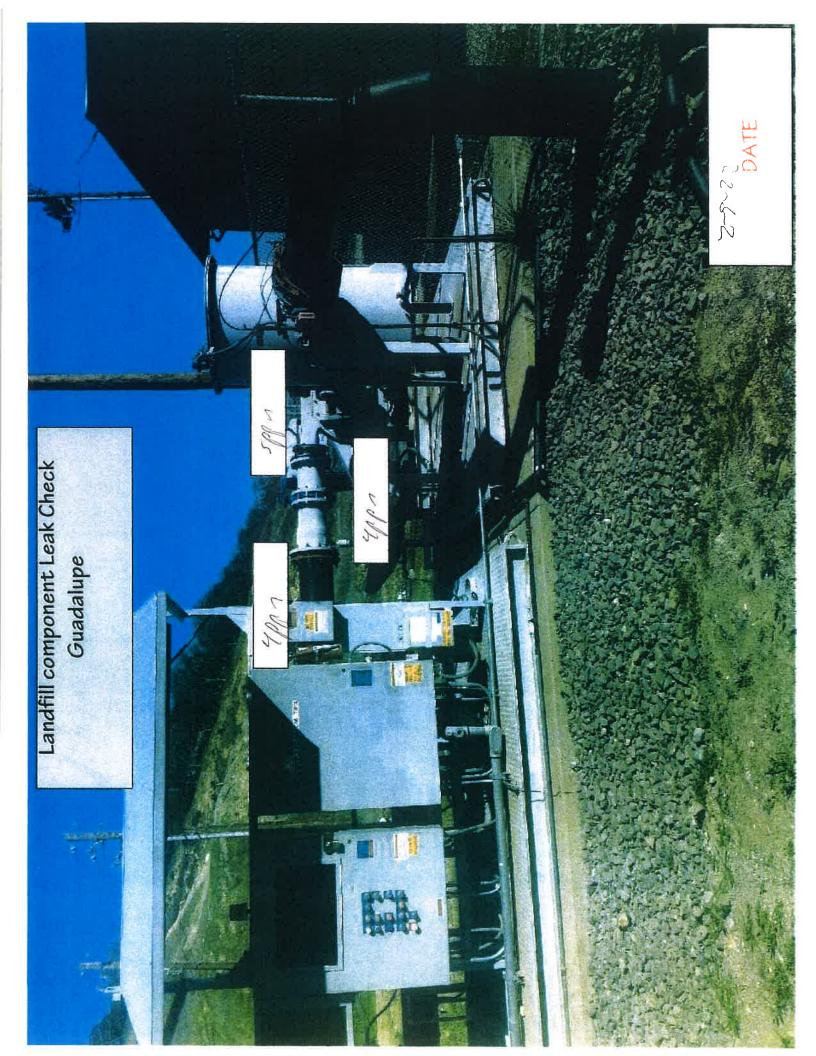
ND= Non Exceedances

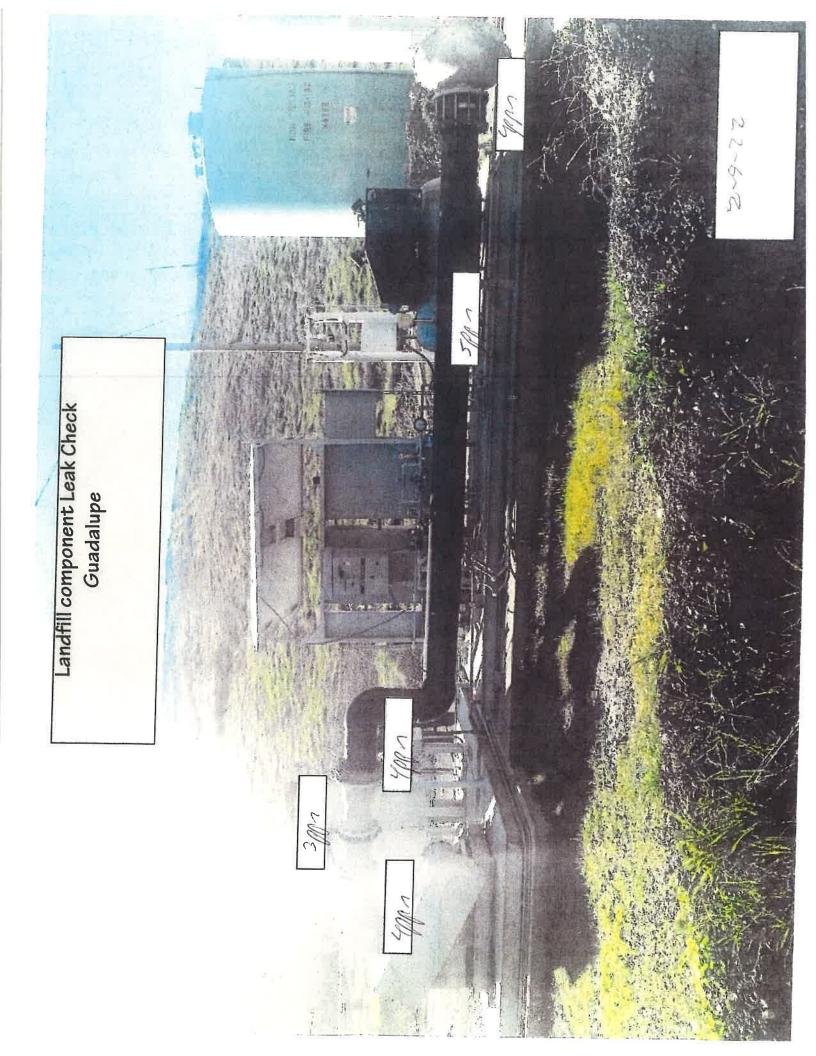












BAAQMD Component Leak Field Data Sheet Template 06052014

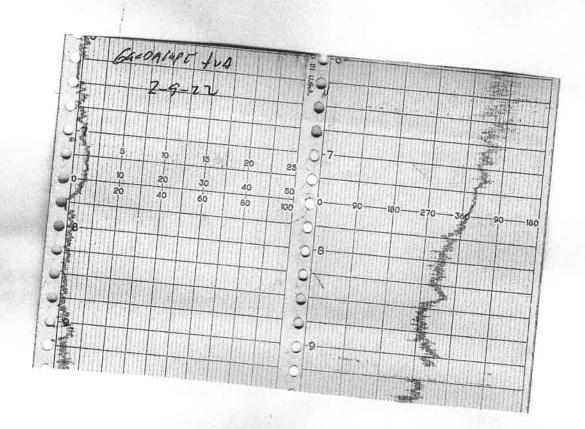
LANDFILL NAME: $\mathcal{G}_{\mathcal{U}^{\mathcal{C}}}\mathcal{O}_{\mathcal{C}}/^{\mathcal{A}}/^{\mathcal{S}}$ QUARTERLY LFG COMPONENT LEAK MONITORING

DATE OF SAMPLING: $2-9-2^{\circ}$ -TECHNICIAN: $\mathcal{L}_{\mathcal{E}/\mathcal{S}}\mathcal{A}_{\ \ M} \not\sim \mathcal{E}$

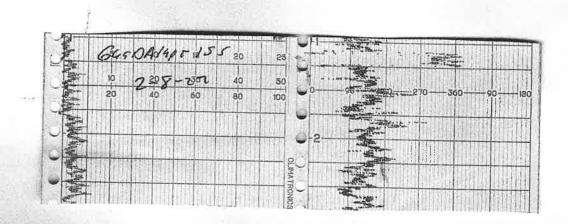
LOCATION OF LEAK	LEAK CONCENTRATION (ppmv)	DATE OF DISCOVERY	TECHNICIAN	ACTION TAKEN TO REPAIR LEAK	DATE OF REPAIR	DATE OF ANY REQUIRED RE- MONITORING	RE-MONITORED CONCENTRATION (ppmv)
Noby (+ 5 DONCKS							
In the event that an exce	I In the event that an exceedance is detected, please intiate corrective action and re-monitor the exceedance location within 7 days of the initial exceedance.	se intiate corrective act	tion and re-monitor	r the exceedance location	within 7 days of t	he initial exceedance.	
NOTE: Leaks over 500 ppmv methane 4, Subarticle 6, Section 95464(b)(1)(B)	NOTE: Leaks over 500 ppmv methane are exceedances at any 4, Subarticle 6, Section 95464(b)(1)(B).		nent containing lan	component containing landfill gas, pursuant to CARB Title 17 of California Code of Regulations Subchapter 10, Article	tB Title 17 of Calil	omia Code of Regulation	ns Subchapter 10, Article
NOTE: Leaks over 1,000	NOTE: Leaks over 1,000 ppmv methane are exceedances at an	edances at any comp	onent containing la	y component containing landfill gas, pursuant to BAAQMD Regulation 8-34-301.2.	AQMD Regulatio	n 8-34-301.2.	

Attachment DWeather Station Data

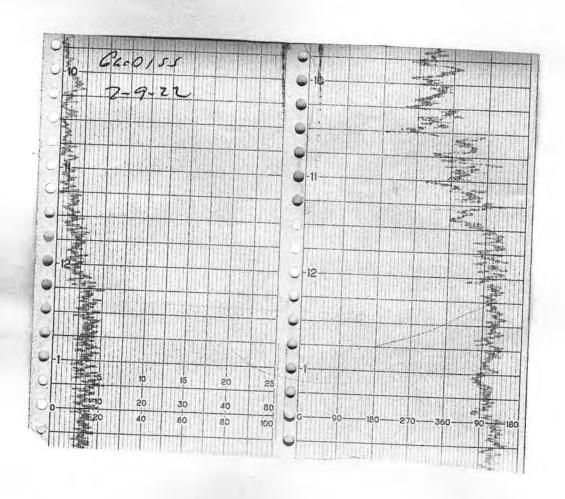
WIND SPEED & DIRECTION CHART ROLL



WIND SPEED & DIRECTION CHART ROLL



WIND SPEED & DIRECTION CHART ROLL





	16-POINT V	VIND DIRECTION	INDEX	
NO	DIRECTION		DEGREES	
		FROM	CENTER	<u>T0</u>
16	NORTH (N)	348.8	369.0	t,13
1	NORTH-NORTHEAST (NNE)	011.3	022.5	033.8
2	NORTHEAST (NE)	033,8	045.0	056.3
3	EAST-NORTHEAST (ENE)	056.3	067.5	078.8
1	EAST (E)	078.8	090.0	101,3
5	EAST-SOUTHEAST (ESE)	101.3	112.5	123.8
5	SOUTHEAST (SE)	123.8	135.0	146.3
7	SOUTH-SOUTHEAST (SSE)	146.3	<u>157.5</u>	168.8
3	SOUTH (S)	168.8	180.0	191.3
)	SOUTH-SOUTHWEST (SSW)	191.3	202.5	213.8
66	SOUTHWEST (SW)	213.8	225.0	236.5
1	WEST-SOUTHWEST (WSW)	236,3	<u>247.</u> 5	258.8
2	WEST (W)	258.8	270.0	281.3
3	WEST-NORTHWEST (WNW)	281.3	292.5	303.8
4	NORTHWEST (NW)	30.3.8	315.0	326.3
5	NORTH-NORTHWEST (NNW)	326.3	337.5	348.8

Attachment E

Calibration Records



CALIBRATION PROCEDURE AND BACKGROUND REPORT - INSTANTANEOUS

LANDFILL NAME: GOODS KUP &	INSTRUMENT MAKE _ + HEAR =
MODEL: LVA 1000 EQUIPMENT #:	10 SERIAL #: 1036346773
MONITORING DATE: 2-9-27	TIME 0555

- 1. Allow instrument to zero itself while introducing air.
- 2. Introduce calibration gas into the probe. Stabilized reading = 500 ppm
- 3 Adjust meter settings to read 500 ppm.

Background Determination Procedure

Upwind Background Reading: (Highest in 30 seconds	Reading:	Background Value: (Upwind + Downwind) 2
2.0 PF	m 2-6 ppm	2-3 ppm

Background Value = 7-3 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading Calibration Gas	g Using	90% of the Stabili Reading	zed	Time to Reach 9 Stabilized Readi switching from a Calibration Gas	ng after
#1	450	ppm	440	ppm	5	
#2	500	ppm	450	ppm	5	
#3	500	ppm	450	ppm	5	
	Calculate Response	Гіте (<u>1</u> - 3	+2+3)		Must be less than	#DIV/0!

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Ze	ro Air (A)	Meter Reading Calibration Ga		Calculate Precision [STD - (B)]
#1	01/2	ppm	450	ppm	10	
#2	0,10	ppm	500	ppm	0	
#3	0.08	ppm	500	ppm	d	
Calculate Precision	[STD-B1] + [ST	D-B2] + [5	STD-B3] X 1 X 500	<u>100</u>	0.68	#DIV/0!
					Must be less than	10%

Performed By:	Loishwape	Date/Time:	2-9-22	0555



CALIBRATION PROCEDURE AND BACKGROUND REPORT - INSTANTANEOUS

LANDFILL NAME _ GLODSlup	27	INSTRUMENT N	MAKE + HERMO
MODEL FUA 1000	EQUIPMENT #: //		SERIAL #: 1036746774
MONITORING DATE 7-9-	22	TIME:	8555

Calibration Procedure:

- 1. Allow instrument to zero itself while introducing air.
- 2. Introduce calibration gas into the probe. Stabilized reading = ______ ppm
- 3. Adjust meter settings to read 500 ppm

Background Determination Procedure

Upwind Background Reading: (Highest in 30 seconds)	Downwind Backgrou Reading: (Highest in 30 seconds		Background Valu (Upwind + Dow 2	
2-0 ppm	2.6	ppm	2.3	ppm

Background Value = 2-3 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading Usi Calibration Gas	ng	90% of the Stabili Reading	zed	Time to Reach 9 Stabilized Read switching from a Calibration Gas	ing after Zero Air to
#1	496	opm	446	ppm	5	
#2	504	opm	454	ppm	5	
#3	500	opm	450	ppm	5	
	Calculate Response Time	(<u>1</u> ·	+2+3)		5	#DIV/0!
					Must be less than	30 seconds

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Z	ero Air (A)	Meter Reading Calibration Ga		Calculate Precision [STD – (B)]
#1	0.16	ppm	486	ppm	4
#2	0-12	ppm	504	ppm	4
#3	0-08	ppm	500	ppm	O
Calculate Precision	STD-B1] + [S	3 3	STD-B3] X <u>1</u> X 500	1 <u>100</u> 1	の・ケン #DIV/0 Must be less than 10%

Performed By	RICIC /Emiss	Date/Time _ Z~9~27~ 0555
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CALIBRATION PROCEDURE AND BACKGROUND RE	EPORT - INSTANTANEOUS
---	-----------------------

LANDFILL NAME _ CLCPs/4/	8	INSTRUMENT N	IAKE +Acrino
MODEL FUATOUD	EQUIPMENT #:/	2	SERIAL #: 103624674/
MONITORING DATE: 2-9-	77	TIME	0155

- 1. Allow instrument to zero itself while introducing air.
- 2. Introduce calibration gas into the probe. Stabilized reading = ______ppm_
- 3. Adjust meter settings to read 500 ppm.

Background Determination Procedure

Upwind Backgr Reading: (Highest in 30 se		Downwind Back Reading: (Highest in 30 seco		Background Val	
2.0	ppm	2.6	ppm	2.3	ppm

Background Value = 2-3 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Readin Calibration Gas	g Using	90% of the Stabil Reading	ized	Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas
#1	506	ppm	456	ppm	4
#2	500	ppm	450	ppm	4
#3	500	ppm	450	ppm	4
	Calculate Response	Time (<u>1</u> -	+2+3)		9 #DIV/0!
				110	Must be less than 30 seconds

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Ze	leter Reading for Zero Air (A)		for s (B)	Calculate Precision [STD – (B)]
#1	0.20	ppm	506	ppm	6
#2	De 14	ppm	510	ppm	0
#3	0.06	ppm	5.00	ppm	0
Calculate Precision	on [STD-B1] + [S	TD-B2] + [\$	STD-B3] X <u>1</u> X 500	100	O - Y O #DIV/0! Must be less than 10%

2	
Performed By: Dusshanownin	Date/Time: 2~9~22~ 6555



CALIBRATION PROCEDURE AND BACKGROUND REPORT - INSTANTANEOUS

LANDFILL NAME GLC. DE luft	INSTRUMENT MAKE: +HERIS
MODEL JUA 1000 EQUIPMENT #: 15	SERIAL #: // 6774677
MONITORING DATE: 2-9-27	TIME OSS

Calibration Procedure:

- 1. Allow instrument to zero itself while introducing air.
- 2 Introduce calibration gas into the probe. Stabilized reading = Job ppm
- 3. Adjust meter settings to read 500 ppm.

Background Determination Procedure

Upwind Backgr Reading: (Highest in 30 se		Downwind Back Reading: (Highest in 30 sect		Background Val	
2.0	ppm	2.6	ppm	2.3	ppm

Background Value = Z ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading Calibration Gas	90% of the Stabilized Reading		Time to Reach Stabilized Reac switching from Calibration Ga	ding after Zero Air to	
#1	498	ppm	448	ppm	5	
#2	502	ppm	452	ppm	5	
#3	500	ppm	450	ppm	5	
	Calculate Response Ti	me (<u>1</u> -	+2+3)		~	#DIV/0!
					Must be less that	an 30 seconds

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Zero Air (A) Meter Reading for Calibration Gas (B)					[STD – (B)]
#1	0-11	ppm	428	ppm	2	
#2	0.07	ppm	862	ppm	1	
#3	0-05	ppm	80.0	ppm	ð	
Calculate Precision	[STD-B1] + [S	TD-B2] + [\$	STD-B3] X <u>1</u> X 500	1 <u>100</u>	0.26	#DIV/0!
					Must be less that	ก 10%

Performed By: CALVIV ONAIL	Date/Time:	2-9-22-0355
----------------------------	------------	-------------



CALIBRATION PROCEDURE AND BACKGROUND	REPORT	-INSTANTANEOUS
--------------------------------------	--------	----------------

LANDFILL NAME GGODGlypr		INSTRUMENT MAKE: + HOAM		
MODEL: 4VA 1000 EQUIPMENT #:	16		SERIAL #: 1/82746776	
MONITORING DATE: 2-9-22		TIME:	0855	

- 1. Allow instrument to zero itself while introducing air.
- 2. Introduce calibration gas into the probe. Stabilized reading = \sqrt{r} ppm
- 3. Adjust meter settings to read 500 ppm

Background Determination Procedure

Upwind Background Reading: (Highest in 30 seconds)		Downwind Back Reading: (Highest in 30 sec		Background Value: (Upwind + Downwind) 2		
2.0	ppm	2.6	ppm	23	ppm	

Background Value = 2.7 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading Using Calibration Gas		90% of the Stabil Reading	ized	Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas	
#1	500	ppm	41)	ppm	6	
#2	500	ppm	450	ppm	6	
#3	500	ppm	450	ppm	6	
	Calculate Response	Time (<u>1</u> ·	+2+3)		6	#DIV/0!
					Must be less that	n 30 seconds

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Ze	ero Air (A)	A) Meter Reading for Calibration Gas (B)		Calculate Precision [STD – (B)]
#1	0-09	ppm	507	ppm	7
#2	0.07	ppm	500	ppm	0
#3	0-04	ppm	500	ppm	۵
Calculate Precision	on [STD-B1] + [S	TD-B2] + [\$	STD-B3] X <u>1</u> X 500	100 1	6.86 #DIV/0! Must be less than 10%

Performed By:	NOCC BANKS	Date/Time:	2-9-22-0555	



CALI	BRATION	PROCEDURE	AND	BACK	GROUND	REPORT.	- INTEGRATE	D

LANDFILL NAME 66.	CD9/40E	NSTRUMEN	T MAKE:	Henno	
MODEL LUAIDO	EQUIPMENT#: 10		SERIAL#	1036346773	
MONITORING DATE	2-8-22	TIME	1300		

- Allow instrument to zero itself while introducing air
 Introduce calibration gas into the probe Stabilized reading = _______ppm
- 3. Adjust meter settings to read 25 ppm.

Background Determination Procedure

Upwind Background Reading: (Highest in 30 seconds) Downwind Background Reading: (Highest in 30 seconds)		Background Value: (Upwind + Downwind) 2
2.0 ppm	2-6 ppm	2.3 ppm

Background Value = 2-3 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading Using Calibration Gas		90% of the Stabili Reading	zed	Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas		
#1	24	ppm	21.6	ppm	6		
#2	25	ppm	22.5	ppm	6		
#3	25	ppm	27.5	ppm	6		
	Calculate Response	Time (<u>1</u>	+2+3)		۷	#DIV/0!	
					Must be less that	n 30 seconds	

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Zero Air (A)		Meter Reading for Calibration Gas (B)		Calculate Precision [STD – (B)	
#1	0.12	ppm	24	ppm	1	
#2	0-10	ppm	25	ppm	Ð	
#3	0-07	ppm	25	ppm	0	
Calculate Precision [STD-B1] + [STD-B2] + [STD-B3] X 1 X 100 25 1			1.3	#DIV/0!		
					Must be less tha	ın 10%

Performed By	Loishvoor	Date/Time	2-8-22 01300	



CALIBRATION PROCEDURE AND BACKGROUND	REPORT	-INTEGRATED
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LANDFILL NAME 6408/4	INSTRUMENT MAKE + HENR o			
MODEL LUAIDO	EQUIPMENT #:	//	SERIAL#	1036346774
MONITORING DATE: 2-8-	-77	TIME	1300	

- Allow instrument to zero itself while introducing air.
 Introduce calibration gas into the probe. Stabilized reading = _______ ppm
- 3. Adjust meter settings to read 25 ppm

Background Determination Procedure

Upwind Background Reading: (Highest in 30 seconds)	Downwind Background Reading: (Highest in 30 seconds)	Background Value: (Upwind + Downwind) 2
2.0 ppm	2.6 ppm	2.3 ppm

Background Value = 2-3 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading Using Calibration Gas		90% of the Stabilia Reading	zed	Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas	
#1	23	ppm	20-7	ppm	5	
#2	25	ppm	22.5	ppm	5	
#3	75	ppm	22.5	ppm	2	
	5	#DIV/0!				
					Must be less than	30 seconds

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Zero Air (A)		Meter Reading for Calibration Gas (B)		Calculate Precision [STD – (B	
#1	0-14	ppm	23	ppm	2	
#2	0-11	ppm	25	ppm	Ð	
#3	0-06	ppm	25	ppm	0	
Calculate Precision	[STD-B1] + [S	TD-B2] + [S	STD-B3] X <u>1</u> X 25	1 <u>100</u>	2.6	#DIV/0!
					Must be less than	10%

Performed By	RICK IEM	D	Date/Time	2-8-22-1300
			_	



CALIBRATION PROCEDURE AND BACKGROUND REPORT - INTEGRATED

LANDFILL NAME 66605 lip~	INSTRUMENT	MAKE +	Henn
MODEL FUA 1005 EQUIPMENT #: 12		SERIAL#	1636246741
MONITORING DATE 2-8-27	TIME	1300	*

Calibration Procedure:

- 1 Allow instrument to zero itself while introducing air.
- 2. Introduce calibration gas into the probe Stabilized reading = 25 ppm
- Adjust meter settings to read 25 ppm.

Background Determination Procedure

Upwind Background Reading: (Highest in 30 seconds)	Downwind Background Reading: (Highest in 30 seconds)	Background Value: (Upwind + Downwind) 2
2.0 ppm	2.6 ppm	2.3 ppm

Background Value = 2-3 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading Using Calibration Gas		90% of the Stabilia Reading	zed	Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas	
#1	24	ppm	21.6	ppm	4	
#2	24	ppm	21.6	ppm	4	
#3	25	ppm	225	ppm	4	
	Calculate Response	Time (<u>1</u>	+2+3)		Must be less than	#DIV/0!

CALIBRATION PRECISION RECORD

Measurement #	surement # Meter Reading for Zero Air (A) Meter Reading for Calibration Gas			Calculate Precision [STD – (B)]		
#1	0-09	ppm	24	ppm	1	
#2	0.0)	ppm	24	bbiu	,	
#3	2-05	ppm	25	ppm	0	
Calculate Precision	[STD-B1] + [ST	D-B2] + [\$	STD-B3] X <u>1</u> X 25	100 1	2.6	#DIV/0!
					Must be less that	ın 10%

Performed By	DWIS	htanothson	Date/Time	2-8-22-	-1300



CALIBRATION PROCEDURE AND BACKGROUND REPORT - INTEGRATED

LANDFILL NAME _ 6460	plup	INSTRUMENT MAKE: + HEATS			
MODEL JUA 1000	EQUIPMENT #: 13	SE	ERIAL# 1102746775		
MONITORING DATE: 2	-8-22	TIME	300		

Calibration Procedure:

- 1. Allow instrument to zero itself while introducing air.
- 2 Introduce calibration gas into the probe Stabilized reading = ______ ppm
- 3. Adjust meter settings to read 25 ppm.

Background Determination Procedure

Upwind Backgro Reading: (Highest in 30 sec		Downwind Backg Reading: (Highest in 30 secon		Background Value: (Upwind + Downwing) 2	
7-0	ppm	2.6	ppm	2.3	ppm

Background Value = 2:3 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading Using Calibration Gas		90% of the Stabilized Reading		Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas	
#1	24	ppm	21.6	ppm	4	
#2	25	ppm	22.5	ppm	4	
#3	25	ppm	22.5	ppm	4	
	4	#DIV/0!				
					Must be less tha	an 30 seconds

CALIBRATION PRECISION RECORD

Measurement #	asurement # Meter Reading for Zero Air (A) Meter Reading for Calibration Gas (B)				Calculate Precision [STD – (B)]
#1	0-16	ppm	24	ppm	/
#2	0.12	ppm	25	ppm	0
#3	0.10	ppm	25	ppm	0
Calculate Precision	STD-B1] + [S	TD-B2] + [3 3	STD-B3] X <u>1</u> 25	X <u>100</u> 1	/_> #DIV/0! Must be less than 10%

Performed By	EALVINORAIL	Date/Time	2-8-22-1300	



CA	IBRATION	PROCEDURE	AND BACK	GROUND	REPORT -	INTEGRATED

LANDFILL NAME: 6400 4 /400	INSTRUME	INT MAKE: +	HEN 20
MODEL: WA 1000 EQUIPMENT#	15	SERIAL#	1036346772
MONITORING DATE: Z-8-22	TIME	1300	

- 1. Allow instrument to zero itself while introducing air.
- 2 Introduce calibration gas into the probe Stabilized reading = 25 ppm
- 3. Adjust meter settings to read 25 ppm.

Background Determination Procedure

Upwind Background Reading: (Highest in 30 seconds)	Downwind Background Reading: (Highest in 30 seconds)	Background Value: (Upwind + Downwind) 2
2.0 ppm	2.6 ppm	2.) ppm

Background Value = 23 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading Using Calibration Gas		90% of the Stabilized Reading		Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas	
#1	74	ppm	21.6	ppm	6	
#2	2.1	ppm	225	ppm	1	
#3	25	ppm	225	ppm	6	
Calculate Response Time (1+2+3)					6	#DIV/0!
					Must be less than	30 seconds

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Ze	ro Air (A)	Meter Reading Calibration Ga		Calculate Precision	[STD – (B)]
#1	0.13	ppm	24	ppm	1	
#2	0-11	ppm	rs	ppm	0	
#3	0.08	ppm	21	ppm	0	
Calculate Precision	on [STD-B1] + [S	TD-B2] + [S	STD-B3] X <u>1</u> X 25	1 <u>100</u> 1	1.3	#DIV/0!
					Must be less that	an 10%

Performed By	RICLE BANKS	Date/Time	2-8-22 -130	טי



CALIBRATION PROCEDURE AND BACKGROUND REPORT - INTEGRATED

LANDFILL NAME 640	Oslype	INSTRUMEN	TMAKE +4	onn
MODEL: FUATOOD	EQUIPMENT #:	10	SERIAL#	1036346777
MONITORING DATE:	2-9-22	TIME.	093	5

Calibration Procedure:

Allow instrument to zero itself while introducing air.
 Introduce calibration gas into the probe Stabilized reading = ______ ppm

3. Adjust meter settings to read 25 ppm.

Background Determination Procedure

Upwind Backg Reading: (Highest in 30 se		Downwind Backgrou Reading: (Highest in 30 seconds		Background Valu (Upwind + Down 2	
210	ppm	2.6	ppm	2-3	ppm

Background Value = 2-3 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading Using Calibration Gas		90% of the Stabilized Reading		Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas	
#1	24	ppm	21,6	ppm	Y	
#2	25	ppm	27:5	ppm	4	
#3	75	ppm	72.5	ppm	4	
	Calculate Response	Time (1	+2+3)		G #D)IV/0!
					Must be less than 30 secor	nds

CALIBRATION PRECISION RECORD

Measurement #			eter Reading for Zero Air (A) Meter Reading for Calibration Gas (B)		Calculate Precision [STD – (B)]
#1	0.14	ppm	24	ppm	1
#2	8212	ppm	25	ppm	8
#3	0.09	ppm	20	ppm	0
Calculate Precision	on [STD-B1] + [ST	TD-B2] + [3 3	STD-B3] X <u>1</u> X 25	(<u>100</u> 1	#DIV/0!

Performed By	LOIShWADT	Date/Time	2-9-22	8975



CALIBRATION PROCEDURE AND BACKGROUND REPORT - IN	TEGRATED
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LANDFILL NAME GGEDGlypr	INSTRUMENT M	TAKE +	Forms
MODEL FUA 1800 EQUIPMENT #: //	/	SERIAL#	1636346774
MONITORING DATE: Z-9-22	TIME	0875	

- 1. Allow instrument to zero itself while introducing air.
- 2. Introduce calibration gas into the probe Stabilized reading = 2/ ppm
- 3. Adjust meter settings to read 25 ppm.

Background Determination Procedure

Re	wind Backgr ading: ghest in 30 sec		Reading: (Highest in 30 seconds) (Upwind +		Background Value (Upwind + Dow 2	
	2.0	ppm	2.6	ppm	2-3	ppm

Background Value = 20 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	ment # Stabilized Reading Using 90% of the Stabilized Reading Reading								ized	Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas	
#1	25	ppm	200	ppm	4						
#2	24	ppm	7.1.8	ppm	4						
#3	25	ppm	27~	ppm	4						
	Calculate Respons	e Time (<u>1</u> 3	+2+3)		4	#DIV/0!					
					Must be less than	30 seconds					

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Ze	Meter Reading for Zero Air (A)		g for as (B)	Calculate Precision [STD – (B)]
#1	0-10	ppm	2.3	ppm	2
#2	0.07	ppm	24	ppm	1
#3	0.61	ppm	25	ppm	0
Calculate Precisio	n [STD-B1] + [S	TD-B2] + [5 3	STD-B3] X <u>1</u> 25	X <u>100</u> 1	#DIV/0!

Performed By PICIC/Enso	Date/Time	2-9-22-0935
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CALIBRATION PROCEDURE	AND	BACKGROUND	REPORT -	INTEGRATED
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MODEL LIA 1000 FOLLOWERT #		INSTRUMENT MAKE: + Horr				
MODEL LUA 1000	EQUIPMENT #:	12	SERIAL#	1036296741		
MONITORING DATE: 2-	9-22	TIME	0 -			

- 1. Allow instrument to zero itself while introducing air
- 2. Introduce calibration gas into the probe. Stabilized reading = _____ ppm
- Adjust meter settings to read 25 ppm.

Background Determination Procedure

Upwind Background Reading: (Highest in 30 seconds)	Downwind Background Reading: (Highest in 30 seconds)	Background Value: (Upwind + Downwind) 2
220 ppm	218 ppm	2-3 ppm

Background Value = 2.3 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	# Stabilized Reading Using 90% of the Stabilized Reading		lized	Time to Reach Stabilized Reac switching from Calibration Gas	ding after Zero Air to	
#1	23	ppm	2007	ppm	6	
#2	25	ppm	277	ppm	6	
#3	20	ppm	72.5	ppm	6	
	Calculate Respons	e Time (<u>1</u> -	+2+3)	- (6	#DIV/0!
					Must be less that	an 30 seconds

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Ze	ero Air (A)	Meter Reading Calibration G		Calculate Precision [STD – (B)]
#1	0-13	ppm	23	ppm	Z
#2	0.09	ppm	25	ppm	۵
#3	0-04	ppm	20	ppm	ð
Calculate Precision	on [STD-B1] + [S	3 3	STD-B3] X <u>1</u> 25	X <u>100</u> 1	Z \(#DiV/0!

Performed By	DWISHU	ANDERSON	Date/Time	2-9-22-0935	



CALIBRATION PROCEDUR	E AND BACKGROUND	REPORT - INTEGRATED

LANDFILL NAME GGODS/	P-	INSTRUMENT	MAKE THERM
MODEL: FUA 1010	_EQUIPMENT#:/	?	SERIAL # //02746775
MONITORING DATE: 2-9	-22	TIME	8934

- 1 Allow instrument to zero itself while introducing air
- 2 Introduce calibration gas into the probe Stabilized reading = ______ppm
- 3. Adjust meter settings to read 25 ppm.

Background Determination Procedure

R	pwind Backgr eading: lighest in 30 se	1	Downwind Backg Reading: (Highest in 30 seco		Background Value (Upwind + Down 2	
	2.0	ppm	2.6	ppm	23	ppm

Background Value = 2 - 3 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Readin Calibration Gas	ng Using	90% of the Stabi Reading	lized	Time to Reach S Stabilized Read switching from Calibration Gas	ing after Zero Air to
#1	24	ppm	21.6	ppm	5	
#2	23	ppm	26.6	ppm	5	
#3	25	ppm	225	ppm	5	
	Calculate Response	Time (<u>1</u>	+2+3)		~	#DIV/0!
					Must be less that	n 30 seconds

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Z	ero Air (A)	Meter Reading Calibration Ga		Calculate Precision	[STD - (B)]
#1	0.17	ppm	24	ppm	/	
#2	0-12	ppm	24	bbiu	1	
#3	0-10	ppm	25	ppm	0	
Calculate Precision	on [STD-B1] + [S	3 (STD-B2)	STD-B3] X <u>1</u> 25	1 100 1	Z-6 Must be less th	#DIV/0! an 10%

Performed By	COLVINORFIL	Date/Time	2-9-22-0975	



CALIBRATION PROCEDURE	AND BACKGROUND F	REPORT - INTEGRATED
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LANDFILL NAME 6600 Olyph	INSTRUMENT MAKE + HEAR
MODEL AVA 1000 EQUIPMENT#	16 SERIAL# 1117746776
MONITORING DATE 7-5-22	TIME 097

- 1. Allow instrument to zero itself while introducing air.
- 2. Introduce calibration gas into the probe. Stabilized reading = 2 / ppm
- 3. Adjust meter settings to read 25 ppm

Background Determination Procedure

Read	rind Backgro ding: hest in 30 sec	100	Downwind Back Reading: (Highest in 30 sec	-	Background Val (Upwind + Dow 2	
	2.0	ppm	2.6	ppm	2-3	ppm

Background Value = 22 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading Using Calibration Gas		90% of the Stabilized Reading		Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas	
#1	24	ppm	21.6	ppm	4	
#2	25	ppm	225	ppm	4	
#3	25	ppm	22.5	ppm	4	
	Calculate Response	Time (<u>1</u> 3	+2+3)		4	#DIV/0!
					Must be less than	30 seconds

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Ze	r Reading for Zero Air (A) Meter Reading for Calibration Gas (B)		Calculate Precision [STD – (B)]		
#1	0.13	ppm	24	ppm	1	
#2	0-0>	ppm	25	ppm	6	
#3	0.05	ppm	75	ppm	ð	
Calculate Precisio	n [STD-B1] + [S	[STD-B1] + [STD-B2] + [STD-B3] X 1 X 100 3 25 1				#DłV/0!

Performed By	Date/Time 2-9-77 -0971
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CALIBRATION PROCEDURE AND BACKGROUND DETERMINATION REPORT

Landfill Name: Cuadable Date: Z-10-22 Time: V3O AM PM Instrument Make: TVA 1000 B Model: TVerwal S/N: 092538 C111
Calibration Procedure
1. Allow instrument to internally zero itself while introducing zero air.
2. Introduce the calibration gas into the probe.
Stable Reading = 503 ppm
3. Adjust meter to read 500 ppm.
Background Determination Procedure
1. Upwind Reading (highest in 30 seconds):ppm (a)
2. Downwind Reading (highest in 30 seconds): ppm (b)
Calculate Background Value: (a) + (b) Background =ppm 2
Performed By:

CALIBRATION PROCEDURE AND BACKGROUND DETERMINATION REPORT

Landfill Name: Krby Date: 3 2 22 Time: 630 AM PM Instrument Make: TUA 6008 Model: THERMAL S/N: 0928538411
Calibration Procedure
1. Allow instrument to internally zero itself while introducing zero air.
2. Introduce the calibration gas into the probe.
Stable Reading = $\frac{499}{ppm}$
3. Adjust meter to read 500 ppm.
Background Determination Procedure 1. Upwind Reading (highest in 30 seconds): 2. Downwind Reading (highest in 30 seconds): 2 ppm (b)
Calculate Background Value: (a) + (b) Background = 1.5 ppm 2
Performed By: 2008

CALIBRATION PRECISION TEST RECORD

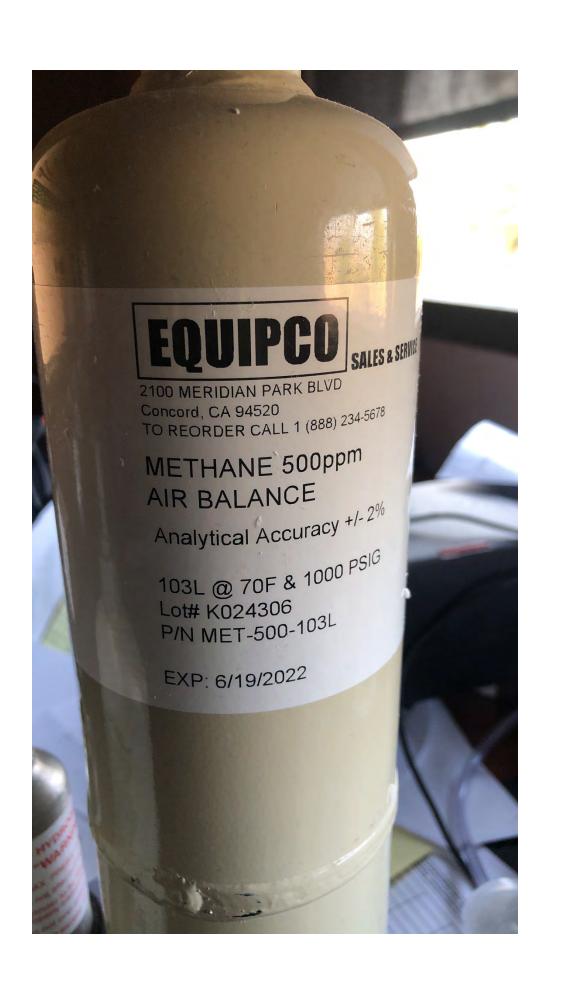
Date: 17-14-21
Expiration Date (3 months): 3/14/22
Time: (430 AM PM
Instrument Make: TVA 1000 B Model: Thermal S/N: 6928538411
Measurement #1:
Meter Reading for Zero Air: ppm (a) Meter Reading for Calibration Gas: ppm (b)
Meter Reading for Calibration Gas: ppm (b)
Measurement #2:
Meter Reading for Zero Air: ppm (c)
Meter Reading for Calibration Gas:ppm (d)
Measurement #3:
Meter Reading for Zero Air: ppm (e)
Meter Reading for Calibration Gas:ppm (f)
Calculate Precision:
$\frac{\{ (500) - (b) + (500) - (d) + (500) - (f) \} \times 1}{3} \times 100$
% (must be < than 10%)
Performed By: Police

RESPONSE TIME TEST RECORD

Date: 12-14-21		
Expiration Date (3 months): 3-14-22		
Time: (230 AM PM		
Instrument Make: TVA 1000 B Model: Thermal S/N: 092	538411	
Measurement #1:		
Stabilized Reading Using Calibration Gas: 90% of the Stabilized Reading: Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas:	499 450	ppm ppm seconds (a)
Measurement #2:		
Stabilized Reading Using Calibration Gas: 90% of the Stabilized Reading: Time to Reach 90% of Stabilized Reading after	900	ppm ppm
switching from Zero Air to Calibration Gas:	Q	_ seconds (b)
Measurement #3:		
Stabilized Reading Using Calibration Gas: 90% of the Stabilized Reading: Time to People 90% of Stabilized Re. 18	498	ppm ppm
Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas:	<u>d</u>	seconds (c)
Calculate Response Time:		
$\frac{(a) + (b) + (c)}{3} = \frac{2}{3}$ seconds (must be less than 30)	seconds)	
Performed By:		









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CERTIFICATE OF ANALYSIS

<u>Composition</u> <u>Certification</u> <u>Analytical Accuracy</u>

Air - Zero

THC < 2 PPM

Oxygen 20.9% $\pm 2\%$

Nitrogen Balance

Lot # 19-6779

Mfg. Date:

4/3/2019

Parent Cylinder ID

001739, 02268

Number:

Method of Preparation:

Gravimetric/Pressure Transfilled

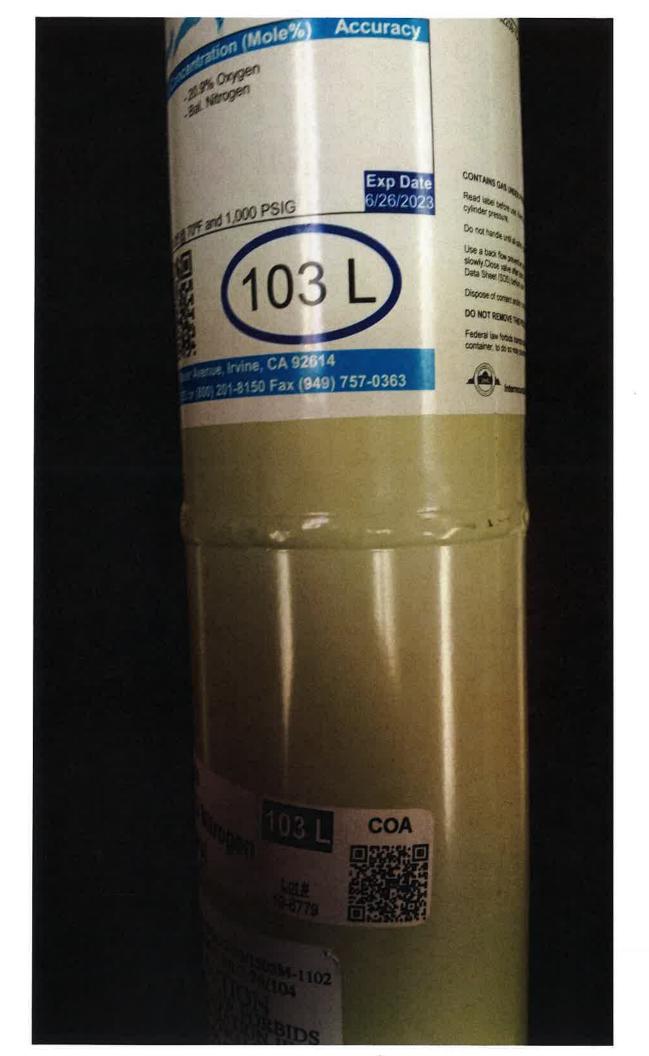
Method of Analysis:

This mix was prepared gravimetrically and is traceable to the NIST by certified weights (ID #CA10814) used to calibrate the scale.

Analysis By: Tony Janquart Quality Assurance Manager

800-552-5003

Certificate Date: 4/3/2019





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CERTIFICATE OF ANALYSIS

Composition

Certification

Analytical Accuracy

Methane

25 ppm

 $\pm 5\%$

Air

Balance

Lot#

17-6074

Mfg. Date:

10/16/2017

Parent Cylinder ID

17161

Number:

Method of Preparation:

Gravimetric/Pressure Transfilled

Method of Analysis:

The parent mix was prepared gravimetrically and is traceable to the NIST by certified weights (ID #CA10814) used to calibrate the scale.

Analysis By: Tony Janquart Quality Assurance Manager

800-552-5003

Certificate Date: 10/16/2017





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CERTIFICATE OF ANALYSIS

Composition

Certification

Analytical Accuracy

Methane

25 ppm

 $\pm 5\%$

Air

Balance

Lot#

17-6074

Mfg. Date:

10/16/2017

Parent Cylinder ID

17161

Number:

Method of Preparation:

Gravimetric/Pressure Transfilled

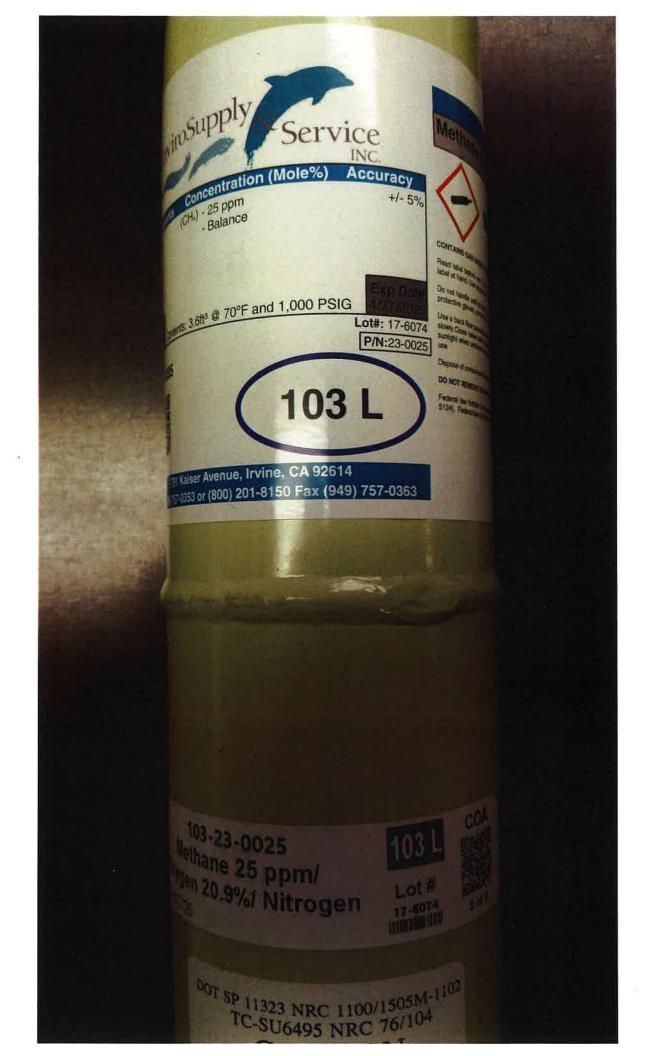
Method of Analysis:

The parent mix was prepared gravimetrically and is traceable to the NIST by certified weights (ID #CA10814) used to calibrate the scale.

Analysis By: Tony Janquart Quality Assurance Manager

800-552-5003

Certificate Date: 10/16/2017



Intermountain Specialty Gases

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"Your calibration gas manufacturer since 1992"

CERTIFICATE OF ANALYSIS

Composition	Certification	Analytical Accuracy (+/-)
Methane	500 ppm	2%
Oxygen	20.9 %	2%
Nitrogen	Balance UHP	

Lot # 20-7497

Mfg. Date: 7/10/2020

Expiration Date:

Transfill Date: see cylinder

Parent Cylinder ID TWC001763

Number:

Method of Preparation:

Gravimetric/Pressure Transfilled

Method of Analysis:

The parent mix was prepared gravimetrically and is traceable to the NIST by certified weights (ID #CA10814) used to calibrate the scale.

Analysis By:

Tony Janquart

Title:

Quality Assurance Manager

Certificate Date: 7

7/10/2020

Methane (0.) Service oltation (Mole%) Accuracy +/- 2% soo ppm Balance CONTAINS GAS UNDER PRESSA Road label before use You style label at hand. Use stage or Do not handle und at sales protective gloves, protective gloves, protective gloves ## 70°F and 1,000 PSIG Use a back flow provers a beauty slowly. Close valve started as surjight when antiser to be a surjight when antiser to be a surjight when antiser to be a surjight when an artiser to be a surjight when Lot#: 20-7497 P/N:23-0500 Dispose of content avoir an DO NOT REMOVE THIS PRO Federal law foroids tissue 103 L 5124). Federal law process Armue, Irvine, CA 92614 201-8150 Fax (949) 757-0363 A 100 ppm/ Nitrogen 103 L Lot # 20-2497



INTERMOUNTAIN SPECIALTY GASES

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CERTIFICATE OF ANALYSIS

<u>Composition</u> <u>Certification</u> <u>Analytical Accuracy</u>

Methane 500 ppm $\pm 2\%$

Air Balance

Lot # 19-6955

Mfg. Date: 7/24/2019

Parent Cylinder ID 001763

Number:

Method of Preparation:

Gravimetric/Pressure Transfilled

Method of Analysis:

The parent mix was prepared gravimetrically and is traceable to the NIST by certified weights (ID #CA10814) used to calibrate the scale.

Analysis By: Tony Janquart Quality Assurance Manager

800-552-5003

Certificate Date: 7/24/2019



Intermountain Specialty Gases

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"Your calibration gas manufacturer since 1992"

CERTIFICATE OF ANALYSIS

Composition	Certification	Analytical Accuracy (+/-)
Methane	500 ppm	2%
Oxygen	20.9 %	2%
Nitrogen	Balance UHP	

Lot # 18-6641

Mfg. Date: 12/18/2018

Expiration Date:

Transfill Date: see cylinder

Parent Cylinder ID 001763

Number:

Method of Preparation:

Gravimetric/Pressure Transfilled

Method of Analysis:

The parent mix was prepared gravimetrically and is traceable to the NIST by certified weights (ID #CA10814) used to calibrate the scale.

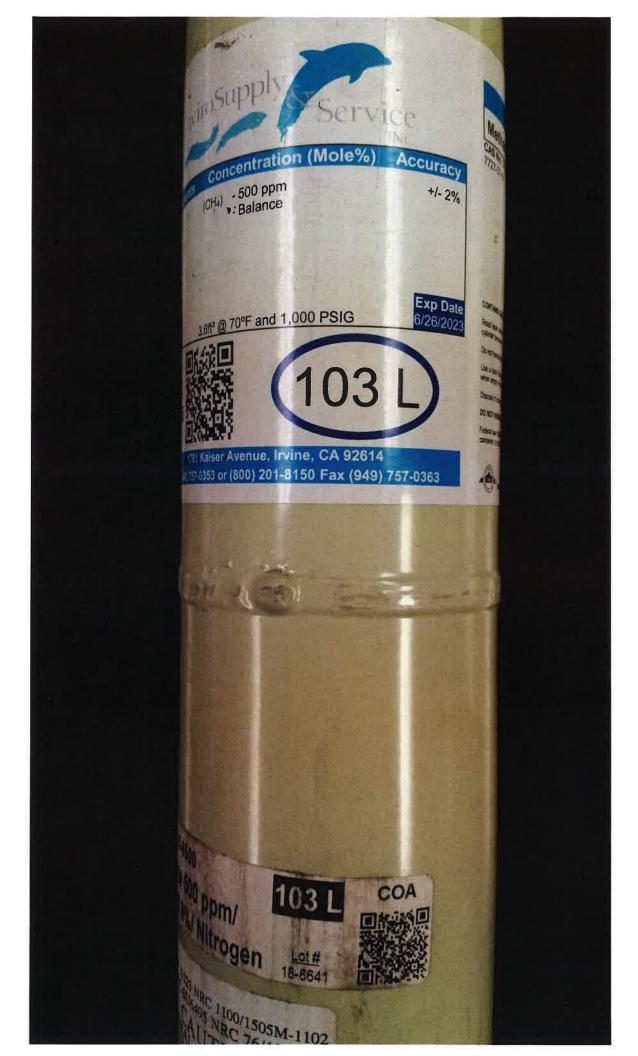
Analysis By:

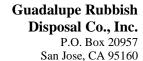
Tony Janquart

Title:

Quality Assurance Manager

Certificate Date: 12/18/2018







December 27, 2021

Ms. Becky Azevedo Guadalupe Rubbish Disposal Co., Inc 15999 Guadalupe Mines Road San Jose, CA 95120

Re: Fourth Quarter 2021 Surface Emissions and Component Leak Monitoring Report for Guadalupe Recycling & Disposal Facility

Dear Ms. Azevedo:

This monitoring report for "Guadalupe Rubbish Disposal Co., Inc. (GRDC)" contains the results of the Fourth Quarter 2021 Integrated and Instantaneous Surface Emissions Monitoring (SEM) and Component Leak Monitoring. Initial surface emissions monitoring was performed by Roberts Environmental Services, LLC. (RES). Re-monitoring of surface emissions and component leak monitoring was conducted by RES and/or Waste Management (WM) personnel.

APPLICABLE REQUIREMENTS

The monitoring discussed in this report was conducted in accordance with the following requirements:

Surface Emission Monitoring (SEM)

- New Source Performance Standard (NSPS), Title 40 of the Code of Federal Regulations (CFR) §60.755 (c) and (d), 40 CFR 60, Appendix A Method 21, promulgated by the United States Environmental Protection Agency (USEPA).
- California Code of Regulations (CCR) Title 17, Subchapter 10, Article 4, Subarticle 6, §95460 to §95476, known as the Assembly Bill 32 (AB32) landfill methane rule (LMR).
- Bay Area Air Quality Management District (BAAQMD) Regulation 8, Rule 34, Section 303 (Landfill Surface Requirements) and Section 607 (Landfill Surface Inspection Procedures).
- United States Environmental Protection Agency's (USEPA) Standards of Performance for Municipal Solid Waste Landfills; 40 Code of Federal Regulations (CFR) Part 63, Subpart AAAA-National Emission Standards for Hazardous Air Pollutants (NESHAP).

Component Leak

- BAAQMD Regulation 8, Rule 34, Section 301 (Landfill Gas Collection and Emission Control System Requirements) and Section 602 (Collection and Control System Leak Inspection procedures).
- California Code of Regulations (CCR) Title 17, Subchapter 10, Article 4, Subarticle 6, §95464, known as the AB32 LMR.

GRDC Plan and Alternative Compliance Measures

An Alternative Compliance Option (ACO) Request was submitted to the California Air Resources Board (CARB) on May 16, 2011. After receipt of comments, this ACO was amended, restated, and submitted to BAAQMD on July 1, 2016. SEM and Component Leak monitoring was conducted per the methods outlined in the July 1, 2016 ACO.

PROCEDURES

General

The surface of the GRDC disposal area has been divided into one-hundred-and-five (105), approximately 50,000 square foot monitoring grids. Of these grids, eleven (11) currently have no waste in place. The entire landfill surface is monitored with the exception of active portions of the Landfill, slope areas, and as requested in the approved ACO, areas containing only asbestoscontaining waste, inert waste and/or non-decomposable waste which are excluded for safety as allowed by CCR Title 17 §95466.

Field personnel walked the surface of the landfill following the walking pattern as depicted the 2011 GRDC AB-32 SEM Plan, which traverses each monitoring grid. Additionally, in accordance with the provisions of 40 CFR 60.753(d) and 60.755(c)(1-3), the entire perimeter of the landfill surface was monitored. During the event, special attention was given to monitoring unusual cover conditions (stressed vegetation, cracks, seeps, etc.) and any areas with unusual odors.

The monitoring probe was positioned 2 inches above the ground surface. While walking, the wand tip of the FID was held within 2 inches of the landfill surface while traversing the grid. Per the approved alternative request, the wand tip of the FID was held at 2 inches of vegetation in areas where the landfill surface is covered with low-lying vegetation such as grasses while traversing the grid.

Instantaneous Surface Emissions Monitoring

The Instantaneous and Integrated SEM was conducted using flame ionization detectors (FID), calibrated to 500 parts per million by volume (ppm_v) methane, which meets or exceeds all guidelines set forth in the CCR Title 17 §95471(a) and NSPS. The FIDs were calibrated prior to use in accordance with the United States Environmental Protection Agency (USEPA) Method 21 requirements. The SEM procedures followed the requirements of 40 CFR 60.755 (c) and (d) and CCR Title 17 §95471(c)(2).

RES personnel walked the surface of the landfill on a grid by grid basis with the wand tip held at 2 inches from the landfill surface. While sampling the grid; the technicians also checked any surface impoundments (wells or otherwise) for leaks. Technicians also checked any surface cracks, seeps, or other areas that show evidence of surface emissions (odors or distressed vegetation). Active and sloped areas excluded for safety were documented on field data sheets and maps.

All instantaneous surface monitoring was performed in accordance with the applicable requirements referenced in this report. Any detections of methane above 200 ppm_v (areas of concern) or 500 ppm_v (exceedances) for instantaneous were recorded, flagged, and marked on an SEM Map, which, wherever required, is included in the Appendices of this report. Applicable corrective action and re-monitoring timelines are listed below:

- Corrective actions must be initiated within 5 days of the initial exceedance and remonitoring shall be conducted within 10 days of the initial exceedance.
 - o If the re-monitoring event shows the exceedance is corrected, the location shall be re-monitored within 1 month of the initial exceedance.
 - o If the 1-month re-monitoring event shows the location is still corrected, all remonitoring requirements have been completed.
- If either the first 10-day or 1-month re-monitoring events show a second exceedance, additional corrective actions shall be completed and a second re-monitoring event shall be conducted within 10 days of the second exceedance.
- If the second 10-day re-monitoring event shows the second exceedance is corrected, the location shall be re-monitored within 1 month of the initial exceedance. If the 1-month remonitoring event shows the area is still corrected, monitoring requirements have been completed.
- If any location shows three exceedances, an additional well shall be installed within 120 days of the initial exceedance.

Integrated Surface Emissions Monitoring

The Integrated surface monitoring was conducted using a TVA 1000 calibrated to 25 ppm_v for the integrated monitoring, which meets or exceeds all guidelines set forth in the CCR Title 17 §95471(a). The field technician traversed the grid walking path over a continuous 25-minute period using the TVA 1000 held within 2 inches above the landfill surface. The Integrated monitoring procedures followed the requirements of CCR Title 17 §95471(c)(2).

Grids with results greater than 25 ppm_v were recorded, marked on the SEM map, and flagged for remediation. Any grids with integrated concentrations greater than 25 ppm_v are subject to the following re-monitoring timeline:

• Re-monitoring shall be conducted within 10 days of the initial exceedance.

- If the 10-day re-monitoring event shows the exceedance is corrected, all re-monitoring requirements have been completed.
- If either the first 10-day re-monitoring event shows a second grid exceedance, additional corrective actions shall be completed and a second re-monitoring event shall be conducted within 10 days of the second exceedance.
- If the second 10-day re-monitoring event shows the second exceedance is corrected, all remonitoring requirements have been completed.
- The second 10-day re-monitoring event shows a third grid exceedance, an additional well shall be installed within 120 days of the third exceedance.

Component Leak Monitoring Procedures

WM personnel monitored the exposed LFG components under positive pressure (pipes, wellheads, valves, blowers, and other mechanical appurtenances) using a TVA 1000 calibrated to 500 ppm_v. All leaks measured one half inch or less from the component exceeding the compliance limit of 500 ppm_v per requirements outlined in pursuant to CARB Title 17 of California Code of Regulations Subchapter 10, Article 4, Subarticle 6, Section 95464(b)(1)(B) and 1,000 ppm_v per requirements outlined in BAAQMD 8-34-303 were recorded. Applicable corrective action and remonitoring timelines are listed below:

- Leaks between 500 and 999 ppm_v must be corrected and re-monitored within 10 days of the initial exceedance.
- Leaks at or above 1000 ppm_v must be corrected and re-monitored within 7 days of the initial exceedance.

FOURTH QUARTER 2021 SEM AND COMPONENT LEAK RESULTS

The following is a summary of the SEM and component leak monitoring results completed for the Fourth Quarter 2021.

Instantaneous Surface Emissions Monitoring Results

The Instantaneous surface monitoring was performed on November 12, 2021, in accordance with the NSPS, BAAQMD 8-34, NESHAP, and CCR Title 17 §95469 and ACO. Results and data from the monitoring are presented in Attachment A.

Initial Monitoring Event Exceedances of 500 ppm_v

There were 6 exceedances of 500 ppm_v as methane detected on November 12, 2021. Corrective actions to initiate repairs of the exceedances were completed within five days for all locations (November 15, 2021).

Ten-Day Re-Monitoring Results

The 10-day re-monitoring event was completed on November 19, 2021. All locations were observed at less than 500 ppm_v .

One-Month Re-Monitoring Results

The 1-month re-monitoring event was completed on December 6, 2021. All locations were observed at less than 500 ppm_v .

Readings between 200 ppm_v and 499 ppm_v (Initial and Re-monitored)

There were no readings between 200 ppm_v and 499 ppm_v as methane detected during the initial monitoring event. Pursuant to CCR Title 17 §95471(c), instantaneous surface emissions exceeding 200 ppm_v but below 500 ppm_v are required to be recorded.

Integrated Surface Emissions Monitoring Results

The Integrated surface sampling (ISS) was performed on November 11 and 12, 2021, accordance with the ACO and requirements outlined in CCR Title 17 §95469.

*Initial Monitoring Event Exceedances of 25 ppm*_v

There were no grids with exceedances of 25 ppm_v as methane detected during monitoring on November 11 and 12, 2021.

The average methane concentration of each grid was recorded during the monitoring event per applicable requirements. See Attachment B, Integrated SEM 25 ppm_v Exceedances and Monitoring Log, and SEM Map included in Attachment B, for details.

Component Leak Monitoring Results

Component leak monitoring was conducted per the applicable requirements on November 12, 2021. No leaks greater than 500 ppm_v were identified during this monitoring period. Please see Attachment C, for details.

WEATHER CONDITIONS

Wind Speed Conductions during the Surface Emission Monitoring Events

Wind speeds during initial monitoring were monitored using a portable weather station. The station has a strip chart that records the wind speed and direction. After completion of monitoring, the strip chart is reviewed by RES office staff to determine the average and maximum wind speeds during the monitoring and the average wind direction during each grid and ensure that the wind speed requirements are met (no gusts greater than 20 mph, average wind speed cannot exceed 10 mph). These values are documented in the field data sheets. The strip chart data is scanned and included in Attachment D.

Precipitation Requirements

Per the GRDC's ACO, the initial monitoring event was carefully scheduled so that it could be conducted in compliance with the precipitation requirements (no measurable precipitation within 24 hours). Re-monitoring events are required to adhere to strict timelines. Any conflicts with precipitation requirements are discussed in the results section of this document.

EQUIPMENT CALIBRATION

The portable analyzers were calibrated to meet the instrument specifications requirements of U.S. EPA Method 21. The calibration gas used was methane, diluted to a nominal concentration of 25 ppm $_{v}$ in air for integrated sample analyses and 500 ppm $_{v}$ in air for instantaneous monitoring to comply with the requirements.

All analyzers were calibrated prior to use with required response time and precision related instrument checks. Calibration records include the following: One time response time test record; One time response factor determination for methane; Calibration Precision test records (test to be performed every 3 months); and Daily Instrument Calibration and Background test records for each gas meter that was used during the quarterly monitoring event. The calibration log records are included in Attachment E.

All monitoring was completed in accordance with the applicable regulatory requirements or approved alternatives. If you have any questions regarding this report, please do not hesitate to contact me at rphadnis@wm.com.

Thank you, Waste Management

Rajan Phadnis

Environmental Protection Specialist

Attachment A – Instantaneous Surface Emission Monitoring Event Records

- Monitoring Logs and Exceedances
- Surface Monitoring Weather Data
- SEM Map

Attachment B – Integrated Surface Emission Monitoring Event Records

- Monitoring Logs and Exceedances
- Surface Monitoring Weather Data
- SEM Map

Attachment C – Component Leak Monitoring Event Records

• Component Leak Exceedances and Monitoring Logs

Attachment D – Weather Station Data

• Strip Chart Data

Attachment E – Calibration Records

• Instrument and Gas Calibration Records

Attachment A

Instantaneous Surface Emission Monitoring Event Records

Instantaneous Landfill Surface Emissions Monitoring Exceedance and Monitoring Logs (NSPS/BAAQMD 8-34)

2021 QUARTER: Q4

INITIAL MONITORING PERFORMED BY RES

FOLLOW-UP MONITORING PERFORMED BY: Tino

LANDFILL NAME: GRDF Wind Direction: NE Wind Direction: NW Wind Speed: 5

Initia	l Monitorin	g Event	Corrective action within 5 days		1st 1	0-day Follow	[,] -Up	1st 30	-day Follo	ow-Up	Comments
Flag	Monitoring	Field	Repair	Action taken to repair	Monitoring	No Exced.	Exced.	Monitoring	No Exced.	Exced.	
Number	Date	Reading	Date	Exceedance	Date	<500 ppm	>500 ppm	Date	<500 ppm	>500 ppm	
1	11/12/2021	510	11/15/2021	Fully Open/No BECS	11/19/2021	15		12/6/2021	4		Well SV1
2	11/12/2021	600	11/15/2021	BECS fully open	11/19/2021	15		12/6/2021	6		Well 176
21	11/12/2021	1,500	11/15/2021	BECS fully open	11/19/2021	4		12/6/2021	3		Well 207
11	11/12/2021	500	11/15/2021	BECS fully open	11/19/2021	4		12/6/2021	2		Well 199
12	11/12/2021	19,432	11/15/2021	BECS fully open	11/19/2021	12	·	12/6/2021	8		Well 185
13	11/12/2021	1,500	11/15/2021	BECS fully open	11/19/2021	90		12/6/2021	24		Well 112

Table A.1 Instantaneous Landfill Surface Emissions Monitoring Initial Monitoring Event Areas of Concern

2021 QUARTER: 4

PERFORMED BY: RES

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Flag Number	Grid Number	Date of Monitoring	Concentration of Emission (ppmv)	Comments
1	1	11/12/2021	510	Well SVE1
2	10	11/12/2021	600	Well 176
21	13	11/12/2021	1,500	Well 207
11	13	11/12/2021	500	Well 199
12	36	11/12/2021	19,432	Well 185
13	90	11/12/2021	1,500	Well 112
13	90		1,500	Well 112

Notes: Please refer to field data sheets for details

Table A.2 Instantaneous Landfill Surface Emissions Monitoring Exceedance and Monitoring Logs (NSPS/BAAQMD 8-34)

2021 QUARTER: 4

INITIAL MONITORING PERFORMED BY: RES

FOLLOW-UP MONITORING PERFORMED BY: WM-Tino Robles LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Initi	al Monitoring	Event	Corre	ctive action within 5 days	1st 1	0-day Follov	v-Up	1st 3	0-day Follov	v-Up	
Flag	Monitoring	Field	Repair	Action taken to repair	Monitoring	No Exced.	Exced.	Monitoring	No Exced.	Exced.	
Number	Date	Reading	Date	Exceedance	Date	<500 ppm	>500 ppm	Date	<500 ppm	>500 ppm	Comments
1	11/12/2021	510	11/15/2021	Fully Open/No BECS	11/19/2021	15.00		12/6/2021	4.00		Well SVE1
2	11/12/2021	600	11/15/2021	BECS fully open	11/19/2021	15.00		12/6/2021	6.00		Well 176
21	11/12/2021	1,500	11/15/2021	BECS fully open	11/19/2021	4.00		12/6/2021	3.00		Well 207
11	11/12/2021	500	11/15/2021	BECS fully open	11/19/2021	4.00		12/6/2021	2.00		Well 199
12	11/12/2021	19,432	11/15/2021	BECS fully open	11/19/2021	12.00		12/6/2021	8.00		Well 185
13	11/12/2021	1,500	11/15/2021	BECS fully open	11/19/2021	90.00		12/6/2021	24.00		Well 112

Table A.3 Instantaneous Landfill Surface Emissions Monitoring Exceedance and Monitoring Logs (AB-32)

2021 QUARTER: 4

INITIAL MONITORING PERFORMED BY: RES
FOLLOW-UP MONITORING PERFORMED BY: WM-Tino Robles

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Ini	tial Monitoring Eve	nt	1st Re-mo	n Event - 10	Days	2nd Re-	mon Event -	10 Days	
Exceedance	Monitoring	Field	Monitoring	No Exced.	Exced.	Monitoring	No Exced.	Exced.	
Grid ID No.	Date	Reading	Date	<500 ppm	>500 ppm	Date	<500 ppm	>500 ppm	Comments
1	11/12/2021	510	11/19/2021	15.00					Well SVE1
10	11/12/2021	600	11/19/2021	15.00					Well 176
13	11/12/2021	1,500	11/19/2021	4.00					Well 207
13	11/12/2021	500	11/19/2021	4.00					Well 199
36	11/12/2021	19,432	11/19/2021	12.00					Well 185
90	11/12/2021	1,500	11/19/2021	90.00					Well 112

Table A.4 Instantaneous Landfill Surface Emissions Monitoring Areas of Concern Greater than 200 ppmv

2021 QUARTER: 4

INITIAL MONITORING PERFORMED BY: RES
FOLLOW-UP MONITORING PERFORMED BY: NA

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Initial	Monitoring	Event	Re-mo	n Event	
Exceedance	Monitoring	Field	Monitoring	Reading	Comments
Grid ID No.	Date	Reading	Date	ppm	
None					

Orange Flag Landfill Surface Emissions Monitoring Exceedances and Monitoring Log

Site: Ger Ontupe

Particle	Quarter / Year:	Year:	444 202	12/										Page of P	Pages
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1 2 2 1 2 2 2 2 2 2	Flag	Grid	Field Reading	Date	Date	No Excd.	Excd.	Date	No Excd.	Excd.	Date	No Excd.	Excd.	STEEL	
2 19 600 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Number 9	Number	(mdd)	Monitored	Monitored	<500 ppm	>500 ppm	Monitored	<500 ppm	>500 ppm	Monitored	<500 ppm	>500 ppm		11
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GUADALUPE LANDFILL INSTANTANEOUS LANDFILL SURFACE MONITORING

Personnel: LEIShw105	Celin offic	
P. CIC/ENGS		Cal. Gas Exp. Date: 69-22
Date: //-/2-2/ Instrument Us	sed: <u>+v*/060</u> Grid	Spacing: Z5'
Temperature: 50 Precip:	Upwind BG: //8	Downwind BG: 7.4

GRID ID	STAFF	START	STOP	тос	WII	ND INFOR	MOITAM	DEMARKS
	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	REMARKS
1	LW	0545	0600	510	2	3	1	W51/5V51
2	DA	0545	0600	45	2	7		
3	RL	0545	0600	80	2	3		
4	20	0545	0600	22	2	3	1	
5	1	0600	0615	27	2	3	2	
6	DA	0600	0615	39	7	J	2	
7	PL	0600	0615	45	7	2	1	
8	CO	0800	0615	32	2	3	2	
9	~	0615	0630	27	2	3	1	
10	DA	0615	0633	600	2	J		WE11176
11	RL	0615	0620	16	4	0		L
12	10	0615	0830	2.2	2	3	1	
13	W	0620	0645	1560	2	J	1	WE1/207
15	-DA	0630	0645	37	2	3		
16	RL	0630	0645	41	1	9		
18	CO	0830	8885	56	2	2	1	
19	W	0845	0700	13	2	3	1	
20	DA	0645	6780	49	2	1		1
21	RC	0645	COCO	130	2	J	The state of	
24	C0	0645	0)10	18	2	3	1	
25	W	0700	0715	59	d	9	2	
26	DA	0700	0715	34	7	y	2	
29	RC	0700	0)15	25	7	4	2	
30	00	0705	0)~	37	2	4	2	
31	1	0)15	0770	85	2	J	16	
35	DA	210	0550	18	9	3	16	
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3>	CB	0710	0738	54	て	J	16	
41		0730	0745	19	2	J	15	
42	DA	0730	0745	24	2	3	15	

Attach Calibration Sheet

Attach site map showing grid ID

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GUADALUPE LANDFILL INSTANTANEOUS LANDFILL SURFACE MONITORING

Personnel: LEISHWADE	calvin ortin	
DWINDLANDENSIV		
R.cllienes		Cal. Gas Exp. Date: 6-9-22
Date: //-/2-2/ Instrument U	sed: fun 1026 Grid	Spacing: Z//
Temperature: 57 Precip:	Dowind BG: 15	Downwind BG: 2:4

GRID ID	STAFF	START	STOP	TOC	WIN	D INFOR	MATION	DEMARKS
Oldo 15	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	REMARKS
43	RL	0730	0741	38	2	2	15	
47	10	0730	6745	ZZ	2	7	15	
48	lu	0743	08,90	19	1	3	15	
49	DA	0745	6860	26	7	1	K	
50	RI	0745	0800	65	7	С	15	
54	60	6745	0800	37	2	1	15	
55	1	0800	0875	68	2	3	15	
59	DA	0800	08/5	49	2	0	15	
60	pl	2800	0811	>1	2)	15	
6/	[0	0880	1880	42	2	3	15	
64	W	08/1	0830	18	2	2	15	
66	DA	0815	870	4/	7	J	15	
65	PL	0815	0830	82/	1 7	3	15.	
69	- 60	0818	0830	22	2	3	15	
71	1	0(10	0845	28	2	3	14	
72	DA.	0830	0845	35	7	J	1/4	
73	PL	0830	0845	Z3	2	3	14	
74	CO	0830	1845	16	2	0	14	
76	12	0845	0500	19	7	3	14	
77	DA	0845	0500	2.7	1	1	19	
78	pe	0845	0500	46	7	3	19	
79	CO	0885	0500	20	2	3	14	
8)	LW	0900	0715	27	2	J	12	
82	DA	0900	0915	39	0	3	12	
83	RI	0900	0915	33	1		12	
85	CO	0905	0915	92	2	3	12	
8-6	2	0915	0937	21	1	2	12	
68	DA	0915	0930	37		4	4	
89	pl	0915	0930	126		1	18	
90	60	0915	0930	1500	1	L	12	WE11/12

Attach Calibration Sheet Attach site map showing grid ID

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GUADALUPE LANDFILL INSTANTANEOUS LANDFILL SURFACE MONITORING

Personnel: Loishwhor	celurortiz	
pwill LANDERS , V	-	
ALCRE TENOV		Cal. Gas Exp. Date: $6-9-22$
Date: _//-/2/Instrument Us	sed: +VA/000	Grid Spacing: 25'
Temperature: 6 S Precip:	Upwind BG: /.	8 Downwind BG: 2.7

GRID ID	STAFF	START	STOP	тос	WII	ND INFORM	MATION	REMARKS
	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	KLMAKAS
91	LW	0930	0945	14	1	2	12	
92	DA	0930	0945	11		2	1 11	
93	RL	0530	0945	26		7	111	
84	60	0573	0943	18	1	2	12	
95	1	0945	1000	14	1	2	11/	
96	DA	0945	1000	11		7		
97	PC.	0545	1800	18		12	11	
98	20	0545	1000	45	1	2	it I	
95	1 w	1000	1015	15	1	2	12	
100	DA	1000	1015	11		12	1	
101	n.C	1000	1015	14)	7	12	
102	CD	1000	1015	2)	1	2	12	
103	22~	1013	1000	1>	1	2	12	
104	-DA	1865	1030	14		7	17	
105	RL	1015	1030	21	1	1	10	
		0						
						4.5		

Attach Calibration Sheet Attach site map showing grid ID

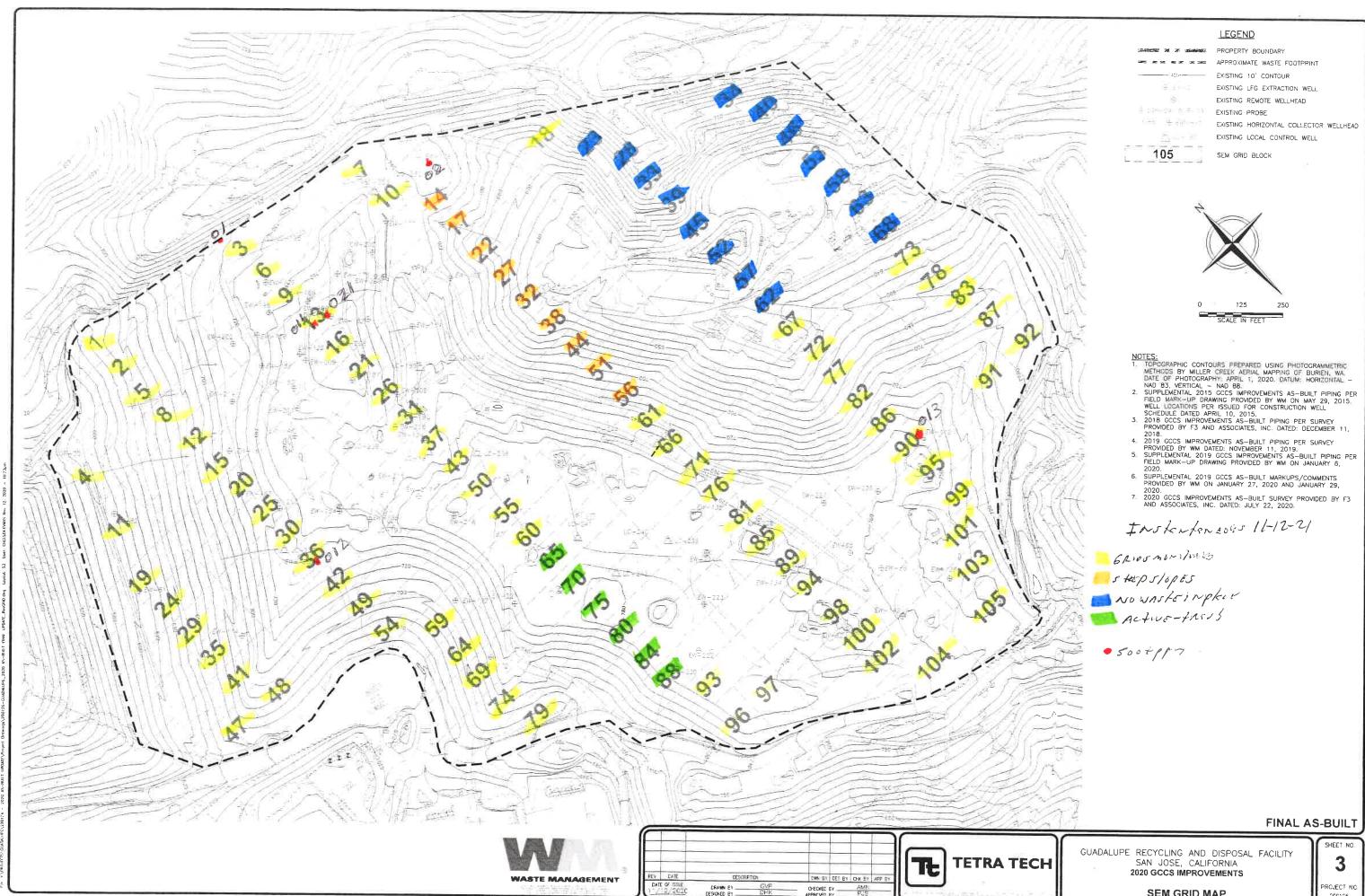
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GUADALUPE LANDFILL INSTANTANEOUS LANDFILL SURFACE MONITORING

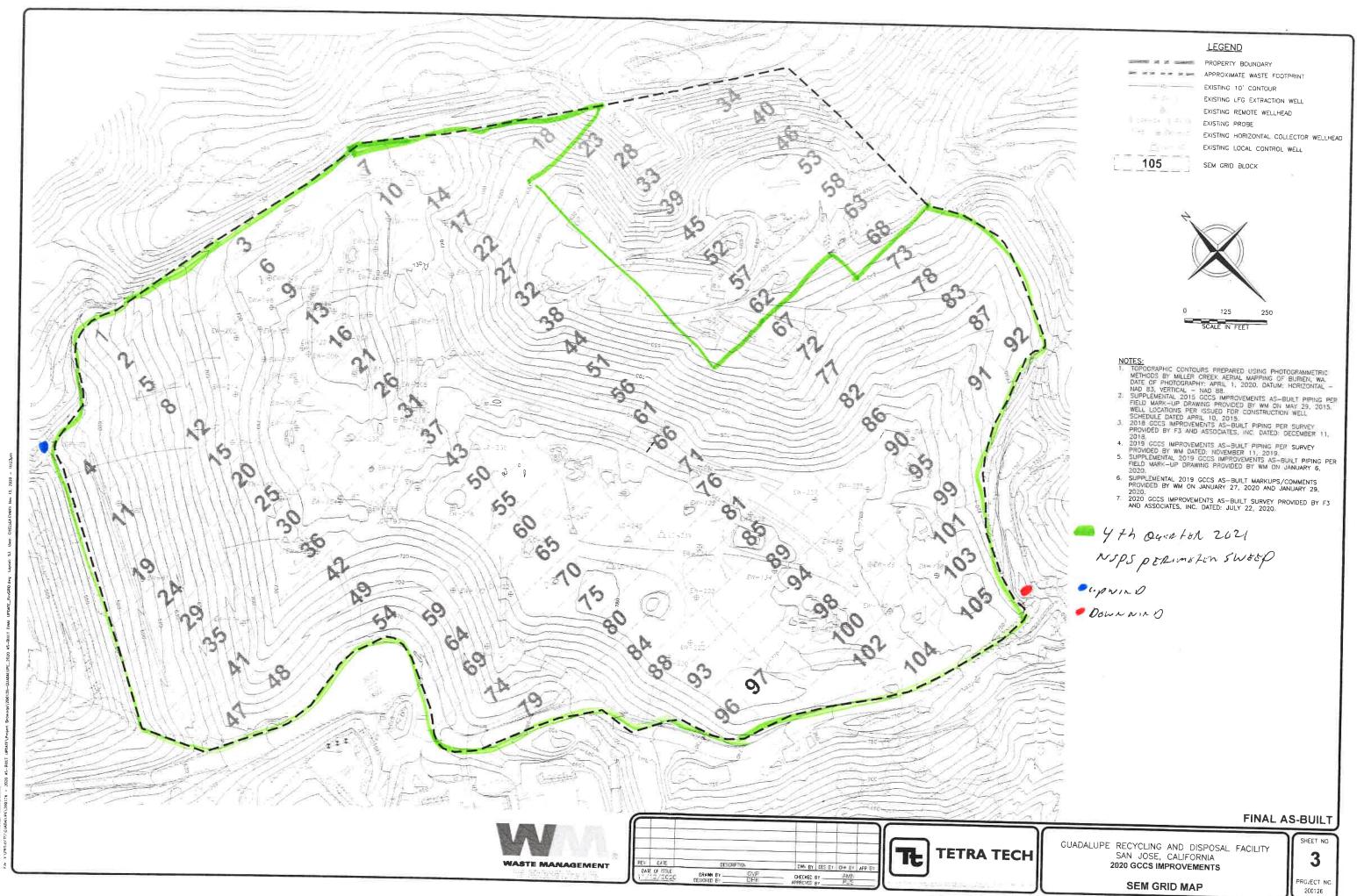
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oate: <u>//</u>	1-12-21	Instrur	ment Used	:		Gri	d Spacing:	-
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GRID ID	STAFF	START	STOP	тос	WIN	ID INFORM	MATION	REMARKS
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65								Active the s
70								1
75								
80								
84								
88								V
23								Nowasteinplace
28							T. 6	1
33								
34								
39								
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Attach Calibration Sheet Attach site map showing grid ID

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SEM GRID MAP



SEM GRID MAP

Attachment B

Integrated Surface Emission Monitoring Event Records

Table B.1 Integrated Landfill Surface Monitoring Exceedances and Monitoring Log

2021 QUARTER: 4

INITIAL MONITORING PERFORMED BY: RES
FOLLOW-UP MONITORING PERFORMED BY: NA

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Initial	Monitoring	Event	1st Re-m	on Event -	10 Days	
Exceedance	Monitoring	Field	Monitoring	No Exced.	No Exced.	_
Grid ID No.	Date	Reading	Date	<25 ppm	>25 ppm	Comments
None						

GUADALUPE LANDFILL INTEGRATED LANDFILL SURFACE MONITORING

Personnel: LEISHWAOV	Celiphrontin	
PICLETENS		Cal. Gas Exp. Date: 6-9-22
Date; //-// Instrument U	sed: +VD1000 G	rid Spacing:25/
Temperature: 70 Precin:	Q Unwind BG: // 8	Downwind BC: 214

GRID	STAFF	START	STOP	тос	WIN	ND INFOR	RMATION	REMARKS
ID	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	REMARKS
1	LW	1450	1515	6.51	1	2	16	
2	DA	1450	1315	6.45)	2	1/2	
3	RL	1410	1515	8.22		2	16	
4	60	1450	1515	6-17	1	2	16	
5	1	1515	1540	5-92	2	J	1	
6	DA	1515	1540	7-24	2	3	1	
)	PC	1515	1540	6-18	2	j		
8	60	1515	1540	6.57	2	3	/	
5	W	1540	1605	8.22	2	J	2	
10	DA	1540	1605	6.07	2	ĵ	7	
11	RC	1540	1665	9.10	2	3	2	
12.	20	1540	1605	7.42	2	3	2	
13	111	1600	1630	6.07	2	J	J	
15	DA	1605	1670	6-30	2	3	3	
16	PC	1601	1630	7.30	2	3	2	
18	CO	1605	1670	6.97	2	3	3	
19	22	1630	1655	3.77	2	J	J	
20	DA	1670	1655	7.45	7)	J	
2/	RL	1630	1655	6-13	7	3)	
24	C0	1830	1655	3.42	2	3	3	
25	LV	1655	1720	5.92	2	3	j	
2.6	DA	1681	1720	9.20	2	1	3	
29	RL	1255	1720	6.89	2	3	J	
30	CD	1655	1720	7-14	a	J	3	
					1			
				[1			

Attach Calibration Sheet Attach site map showing grid ID

Page _____ of ____

GUADALUPE LANDFILL INTEGRATED LANDFILL SURFACE MONITORING

ate: - - - -	,			-					rp. Date:
GRID STAFF INITIALS START TIME TIME TOC TIME PPM ANG MAX. DIRECTION SPEED SPEED 16 POINT ACTIVE TIME START TIME TIME PPM ANG MAX. DIRECTION SPEED 16 POINT ACTIVE TIME ACTIV	ate: <u>//</u>	-11-21	Instrume	nt Used: _			Grid S	Spacing: _	
GRID INITIALS START TIME STOP TOC PPM AVG MAX. DIRECTION SPEED SPE	emperat	ure:	Precip	:	_ Upwind	I BG:		Downwin	d BG:
ID INITIALS TIME TIME PPM AVG NAX, SPEED S	GRID	STAFF	START	STOP	TOC	WI	ND INFOR	RMATION	DEMARKS
70 75 80 80 80 80 80 80 80 80 80 80 80 80 80					1				REMARKS
70 75 80 80 80 80 80 80 80 80 80 80 80 80 80	65								ACTIVE-INC
80 84 88 23 28 33 34 39 40 45 45 45 57 57 58 62 63 64 63 64 64 74 77 22 27 38									1
8 4 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	75				1				
8 8 2 3	80								
8 8 2 3	84								
23	88								
28 33 3 3 9 3 9 3 9 3 9 9 9 9 9 9 9 9 9 9	23								NOWACLE IN
39 39 39 39 39 39 39 39 39 39 39 30 31 31 31 31 31 31 31 31 31 31 31 31 31					2		7		1
39 40 45 45 46 52 53 57 58 62 63 68 79 70 70 70 70 70 70 70 70 70 70 70 70 70									
40	34						-		
13								2	
76 52 53 57 58 62 63 68 79 77 22 27 27 27 27									
\$ 2 \$ 3 \$ 57 \$ 58 \$ 62 \$ 63 \$ 68 \$ 19 \$ 77 \$ 22 \$ 27 \$ 32 \$ 38 \$ 99	15	1							
53 57 58 62 63 68 19 77 22 27 32 38									
57 58 62 63 68 19 19 22 27 32 38	52								
62 63 68 14 77 22 27 32	53								
62 63 68 14 77 22 27 32	57								
63 68 14 17 22 27 38									
68 19 17 22 27 32 38									
19 17 22 27 32 38									
22 27 32 38									1
77 22 27 32 38	19								StEEPS lope
27 32 38 44									///
32 38 44									
38									
44									
44									
	51								
	56				V				

Attach Calibration Sheet Attach site map showing grid ID

Page _____ of ____

GUADALUPE LANDFILL INTEGRATED LANDFILL SURFACE MONITORING

Personnel: Leighward	eglun ortiz	
Pick Imas		Cal. Gas Exp. Date: <u>6-9-72</u>
Date: 11-12-2/ Instrument Us	ed: <u>LVA 1000</u> Gri	id Spacing: 28
Temperature: 70 Precip: 2	Upwind BG: // 8	Downwind BG: 7.4

GRID	STAFF	START	STOP	тос	WIN	ND INFOR	RMATION	REMARKS
ID	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	KEMAKAS
31	LW	1040	1105	6.97	1	2	13	
35	DA	1640	1105	5.40	1	2	D	
36	Pl	1040	1105	8,42		2	D	
37	60	1640	1.105	10.12		2	13	
41	w	1/05	1120	5.40	1	2	\(\mathcal{L}\)	
47	DA	1105	1170	6.49		2	()	
43	pl	1101	1130	6-77		L	D	
47	60	1185	1420	5-21		2	13	
48	W	1170	1155	7.30		2	D	
49	DA	11:30	1155	7.58		1	1)	
50	16	1130	1115	6.27		1	1)	
54	6.0	1130	1155	5.48	J	2	L3	
55	1	1155	1220	9-21	1	2	13	
59	DA	1155	1220	6.14		7	D	
60	RL	1150	1220	7-31		4	D	
61	60	1155	1720	5-25	1	2	13	
64	LV	1220	1245	5-15	ľ	2	D D	
66	DA	1720	1245	7-38		7	D	
67	pi	1220	1241	8-19		7	D	
69	00	1270	1245	6-34	1	2	D	
7/	W	1245	1310	5.58		2	14	
72	DA	1245	1710	5.96		7	14	
73	Pr	1245	1310	6-24		7	1)	
74	00	1245	13/0	5,50	1	2	14	
76	W	1310	1335	5.75	1	2	14	
77	DA	1310	1375	6-03		4	14	
78	PC	1310	1325	5.30	1	7	14	
79	co	1310	132	4.67	1	2	14	
81	W	1370	1400	5-46	1	2	14	
82	DA	1735	1400	5-18		2	14	

Attach Calibration Sheet

Attach site map showing grid ID

Page $\frac{1}{2}$ of $\frac{2}{2}$

GUADALUPE LANDFILL INTEGRATED LANDFILL SURFACE MONITORING

Ρ	ersonnel: LOIS AWARE DWIST LANDONIN	csluw onfiz	
	RICIC Lonis		Cal. Gas Exp. Date: 6-9-22
	Date: _//~/2-2/ Instrument Use	ed: <u>FUA1000</u>	_ Grid Spacing:Z /
	Temperature: 7/ Precip: 0	Upwind BG:	/ 8 Downwind BG: 7.4

GRID	STAFF	START	STOP	тос	IIW	ND INFOR	RMATION	REMARKS
ID	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	REMARKS
83	RL	1335	1400	6.34	/	2	12	
85	LD	1335	1400	5.21	1	2	12	
86	lu	1400	1425	6-07	1	2	H	
8)	DA	1400	1475	5.30	1	2	14	
89	PZ	1400	1425	5.47	1	2	14	
90	60	1400	1425	5-22	1	2	14	
91	LW	1425	1450	4,60	1	2	14	
97	DA	7425	1450	4-28		2	14	
9.7	RL	1421	1450	4.75		2	14	
99	60	1421	1450	5-18	1	2	14	
95	w	1450	1515	4.29	Ĭ	2	13	
96	DA	1450	1815	5-35		2	D	
9)	RL	1450	1515	5-10	= 9	2	D	
98	CO	1410	1511	4-07	1	d	D	
99	W	1315	1540	4-65				
100	DA	1511	1540	3.95		2	D	
101	RL	1515	1540	5-18		4	0	
162	20	1515	1540	4.66	1	2	B	
163	in	1540	1605	4-14	1	2	4	
104	DA	1540	1605	3.65		7	12	
105	pr	1540	1605	3-22	1	2	12	
					==7			
						E		
					===			

Attach Calibration Sheet Attach site map showing grid ID

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	UPDATED ON 11-09-2	
	ADALUPE LANDFILL - MONITORING POINTS FOR SEM - UPDATED ON 11-09-2021	
,	GUADALUPE LAND	

11-12-21

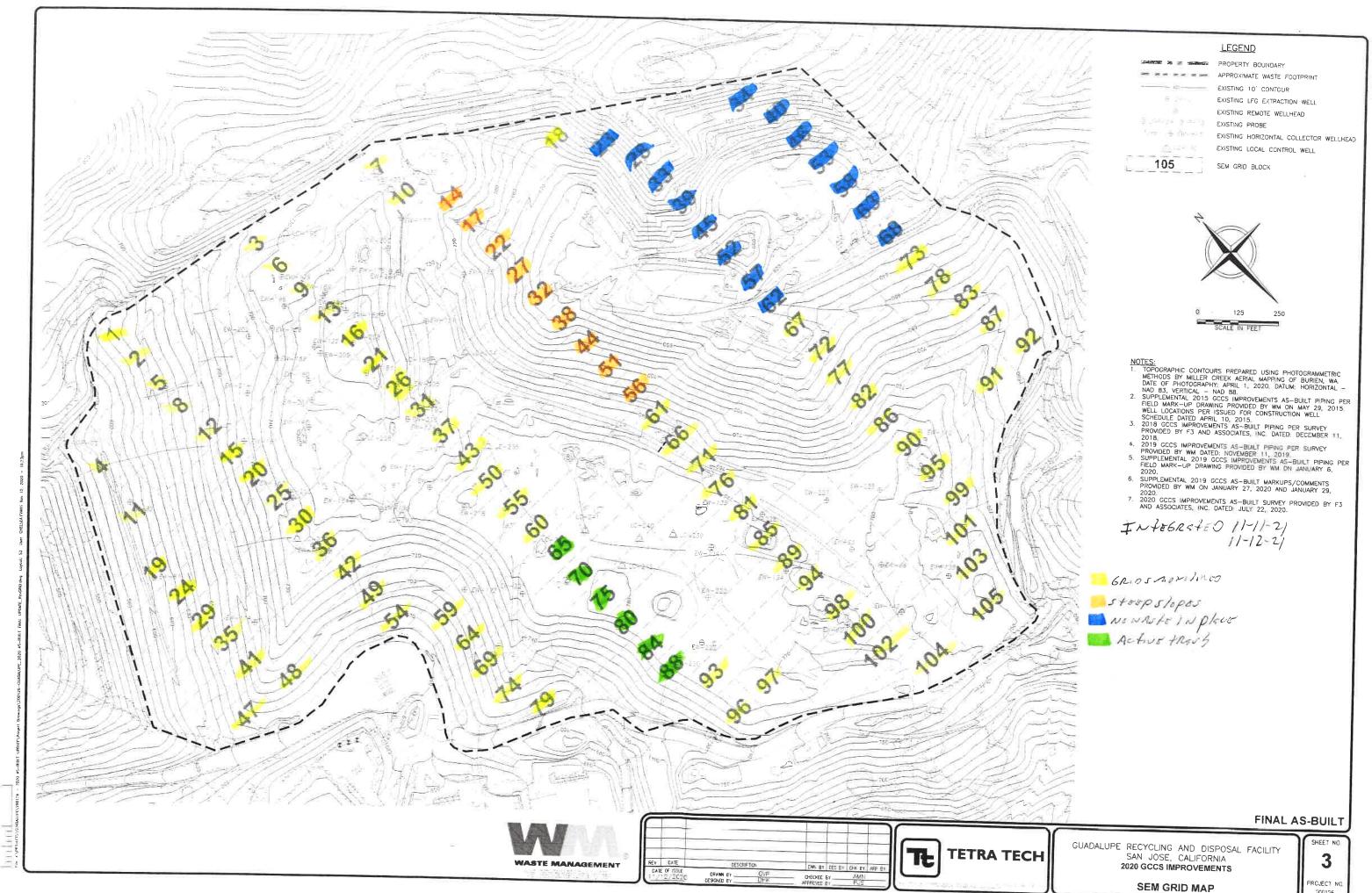
NOTES	LCRS NORTH			WAS 2019 PW6	WAS 2019 PW7									Stard Slope top								7.00	40000 5 435 1 Sleple	4												WAS 2019 PW1A								
READING (PPM)	510	0.0	2.2	5	43	15	2.2	2	009	20	14	11	16	14	22	55	17	500	500	1500	25	Ŋ	27	14	200	6)	15	34	27	27	35	7	27	5%	2.5	130	73	16	28	200	20	()	34	
DATE																																												
SEM GRID BLOCK NO.	1	3	4	9	7	7	6	6	10	10	10	10	11	12	12	13	13	13	13	13	14	15	16	16	16	16	16	16	16	17	17	19	20	20	21	21	21	21	25	25	26	26	26	
LONGITUDE			-121.9013879	-121.8987819	-121.8971917		-121.8988572	-121.8994333	-121.896709	-121.8974175	-121.8970001	-121.8972595	-121.9015677	-121.8997801	-121.8997801	-121.8989765	-121.8981799	-121.8985607	-121.8984098	-121.8984098	-121.8982343	-121.899993	-121.897694	-121.899249	-121.8986408	-121.898995	-121.8986408	-121.898995	-121.8979523	-121.8974612	-121.8974352	-121.9016828	-121.8996248	-121.9004384	-121.8976265	-121.8981417	-121.899347	-121.899347	-121.9000587	-121.9000587	-121.8985607	-121.8981168	-121.8993035	
LATITUDE			37.2175051	37.2172819	37.217485		37.217173	37.2171697	37.2171275	37.217047	37.2171237	37.2172233	37.216757	37.2168516	37.2168516	37.2167213	37.2170005	37.216939	37.2167973	37.2167973	37.2165278	37.2163602	37.2170233	37.2164993	37.2166558	37.2166911	37.2166558	37.2166911	37.2165115	37.2163282	37.2164842	37.2164003	37.2161893	37.2162872	37.216596	37.2163757	37.2164085	37.2164085	37.2157313	37.2157313	37.2159232	37.2159743	37.2159606	
POINT TYPE			Leachate Riser or Sump (LR)	LFG Collector - Standard	LFG Collector - Standard		LFG Collector - Standard																																					
DESCRIPTION	Riser-1	Riser-2	H-12L 🗸	EW-179 🗸	✓ FC-196	Riser-3	EW-198	EW-202 /	- EW-176	EW-177 /	LC-232 🖍	LC-233 /	EW-82 ✓	EW-214	EW-214 &	EW-122 ✓	EW-178 /	EW-199	EW-207 /	EW-207	EW-200 ✓	EW-161	EW-152 <	EW-180 /	EW-208	EW-209 <	EW-208 /	EW-209 <	LC-188 /	EW-147 🗸	EW-204 V	EW-81 ✓	EW-146 ✓	EW-162	EW-151/	EW-181	EW-211 /	FW-211	EW-213 /	EW-213	EW-205	LC-189 <	LC-236 /	
Point ID			39270	46004	49173	-	51829	51833	45884	45883	60097	86009	23223	54149	54149	38188	45881	51830	54142	54142	51831	39762	39753	49230	54143	54144	54143	54144	49165	39748	54139	23222	39766	39763	39752	45882	54146	54146	54148	54148	54140	49166	60101	
No.	1	2	3	4	2	9	7	∞	6	10	11	12	13	14	15	16	17	1,8	19	202	21	22	23	24	25	26	27	28	29	30	31	32	33	34	3.5	36	37	38	30	S Q	41	42	43	!

1-09-2021	
ADALUPE LANDFILL - MONITORING POINTS FOR SEM - UPDATED ON 11-09-202	
OR SEM - UF	
NG POINTS F	
- MONITORI	
PE LANDFILL	
GUADALUI	

NOTES	V2					V3	Wettow 20									0 5/20 B						V15	Out Butten													48 1rp/468						1 1 1	1 1 1 1
	WAS 2019 PW2					WAS 2019 PW3	5-45 EX 5 124			2						400 StEGD	LCRS SOUTH					WAS 2019 PW15	STR40 5100E												WAS 2019 PW4	NOWAST		>	11400	- With	ACTIV	AC 4 いど WAS 2019 PW10	ACチルで WAS 2019 PW10 WAS 2019 PW8
READING (PPM)	27	19	24	65	35	15	\S\	81	175	19.93	95	31	26	55	53	15	121	5.3	1	12	\ \frac{1}{2}	22	37	65	49	M	000	68	613	200	00	49	50	71	42	155	500	110					
DATE																																											
SEM GRID BLOCK NO.	30	31	31	31	31	31	32	35	36	36	36	37	37	37	37	38	41	42	43	43	43	43	44	20	20	55	55	55	59	09	09	09	09	09	61	62	62	62	65		65	65	65 65 65
LONGITUDE	-121.9004241	-121.8977395	-121.8988583	-121.8988583	-121.8986935	-121.8978367		-121.9010846	-121.8997444	-121.9003022	-121.8998067	-121.8985882	-121.899337	-121.899337	-121.8987616	-121.8973953	-121.9024543	-121.8997004	-121.897999	-121.8990435	-121.8990435	-121.8982697		-121.8989922	-121.8989922	-121.8977769	-121.89889	-121.8985396	-121.8994779	-121.8522755	-121.898854	-121.8985888	-121.898854	-121.8985888	-121,8974755	-121.8986237	-121.8974755	-121.9024543	-121.8990035		-121.8990035	-121.8990035 -121.8981348	-121.8990035 -121.8981348 -121.8986237
LATITUDE	37.2155189	37.2158282	37.2157522	37.2157522	37.2158131	37.2158817		37.2156196	37.2155737	37.2153905	37.2154869	37.2153568	37.215772	37.215772	37.2152815	37.2148903	37.2152234	37.2152829	37.2151482	37.2151787	37.2151787	37.2151227		37.2148855	37.2148855	37.2147669	37.2144877	37.2147005	37.2145096	37.2086995	37.2142966	37.2145068	37.2142966	37.2145068	37.2148416	37.2141842	37.2148416	37.2152234	37.2141303		37.2141303	37.2141303 37.214152	37.2141303 37.214152 37.2141842
POINT TYPE	LFG Collector - Standard		LFG Collector - Standard	Leachate Riser or Sump (LR)	LFG Collector - Standard		LFG Collector - Standard	Condensate Sump or Drain (CS)	Condensate Sump or Drain (CS)	Condensate Sump or Drain (CS)	LFG Collector - Standard		LFG Collector - Standard	LFG Collector - Standard LFG Collector - Standard	LFG Collector - Standard LFG Collector - Standard LFG Collector - Standard																												
DESCRIPTION	LC-237 <	EW-201 /	EW-216 /	EW-216 ~	LC-190 🖊	LC-234 /	Riser-4	EW-114 /	EW-154	EW-185 /	EW-186~	EW-124 🗸	EW-215 🗸	EW-215 ✓	LC-191 🗸	EW-203 /	H-11L 🗸	LC-193 /	EW-183 /	EW-217	EW-217	LC-235 🗸	Riser-5	EW-218 ~	EW-218 C	EW-184 🗸	EW-187 /	LC-192 <	EW-173 🗸	EW-129 /	EW-219 🗸	EW-220 /	EW-219 🗸	EW-220 /	LC-244 🗸	CS-1	CS-2	CS-3	EW-221~		EW-221 ~	EW-221 //	EW-221 // LC-241 // LC-243 //
Point ID	60102	51832	54151	54151	49167	66009		31994	39755	46005	49231	38190	54150	54150	49168	51834	39269	49170	48202	54152	54152	60100		54153	54153	48203	46006	49169	42102	38195	54154	54155	54154	54155	60109				54156		54156	54156 60106	54156 60106 60108
O	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	09	61	62	63	64	65	99	29	89	69	70	71	72	73	74	75	9/	77	78	79	80	81	82	70	83	83	833

11-12-21 GUADALUPE LANDFILL - MONITORING POINTS FOR SEM - UPDATED ON 11-09-2021

														1													7			
NOTES	WAS 2019 PW11			WAS 2019 PW13 AC+1 NE		Actus	WAS 2019 PW14 / C. P.V.		WAS 2019 PW239				Activa	Active		Active	processing		>											
READING (PPM)	27	128	2.2		22			61	12	2/	141	2.7	35		75					126	57	25	0051	37	2.5	21	17/2	11	12	17
DATE																														
SEM GRID BLOCK NO.	99	29	69	70	71	75	75	92	9/	81	81	81	84	84	85	88	88	88	88	68	68	89	06	06	06	94	86	100	102	103
LONGITUDE	-121.896996		-121.8996291	-121.8978297	-121.8967375	-121.8993258	-121.8983188	-121.897305	-121.897615	-121.8974548	-121.8969069	-121.8974548	-121.8977091	-121.8977091	-121.8969069	-121.8981113	-121.8980338	-121.8981113	-121.8980338	-121.8970899	-121.8961233	-121.8961233	-121.8949208	-121.8956942	-121.8956942	-121.896153	-121.8960039	-121.8968871	-121.8963646	-121.8959464
LATITUDE	37.2142127		37.21412	37.2138042	37.2138179	37.2136797	37.2138288	37.2136061	37.2134243	37.2132002	37.2132484	37.2132002	37.2129712	37.2129712	37.2132484	37.2127377	37.2126277	37.2127377	37.2126277	37.2129335	37.2129485	37.2129485	37.2127553	37.2126679	37.2126679	37.2123487	37.2119331	37.2119254	37.2118093	37.2118108
POINT TYPE	LFG Collector - Standard		LFG Collector - Standard																											
DESCRIPTION	LC-238, 🖊	Riser-6	EW-172 V	LC-240 🖊	LC-197	EW-131	LC-242 🥕	EW-135 🗸	LC-239 🕶	EW-224	EW-228 ~	EW-224 /	EW-223 🖍	EW-223	EW-228	EW-222 ~	EW-230 🦯	EW-222 /	EW-230 🗸	EW-134 🗸	EW-227 🗸	EW-227 🗸	EW-112 ~	EW-225 🖍	EW-225	►W-65 ✓	EW-66	EW-62 🗸	EW-142	EW-138 🗸
Point ID	60103		42101	60105	49174	38197	60107	38201	60104	54159	54163	54159	54158	54158	54163	54157	54165	54157	54165	38200	54162	54162	23240	54160	54160	23214	23215	23211	38208	38204
No.	88	68	06	91	92	93	94	95	96	26	86	66	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117



PROJECT NO 200126

Attachment C

Component Leak Monitoring Event Records

Table C.1

AB-32 Component Leak Monitoring Summary of Component Leaks Greater than 500 ppmv

2021 QUARTER: 4

INITIAL MONITORING PERFORMED BY: RES FOLLOW-UP MONITORING PERFORMED BY: NA

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Location	lı	nitial Monitorin	g	C	Corrective Action	10-Day Remonitoring						
Location	Date	TOC (ppmv)	Tech	Date	Description	Date	TOC (ppmv)	Tech				
Flare Station A-9	11/12/2021	ND	RES	NA	NA	NA	NA	NA				
Flare Station A-14	11/12/2021	ND	RES	NA	NA	NA	NA	NA				

ND= Non Exceedances

Table C.2

BAAQMD Component Leak Monitoring Summary of Component Leaks Greater than 1,000 ppmv

2021 QUARTER: 4

INITIAL MONITORING PERFORMED BY: RES FOLLOW-UP MONITORING PERFORMED BY: NA

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Location	lı	nitial Monitorin	g	Corrective Action 7-Day Remonitoring			ing	
Location	Date	TOC (ppmv)	Tech	Date	Description	Date	TOC (ppmv)	Tech
Flare Station A-9	11/12/2021	ND	RES	NA	NA	NA	NA	NA
Flare Station A-14	11/12/2021	ND	RES	NA	NA	NA	NA	NA

ND= Non Exceedances

BAAQMD Component Leak Field Data Sheet Template 06052014

LANDFILL NAME: Gures ly E

INSTRUMENT FID MAKE: Thermo Environr MODEL: TVA 1000 S/N: / p 3 6 3 4 6 5 7 3

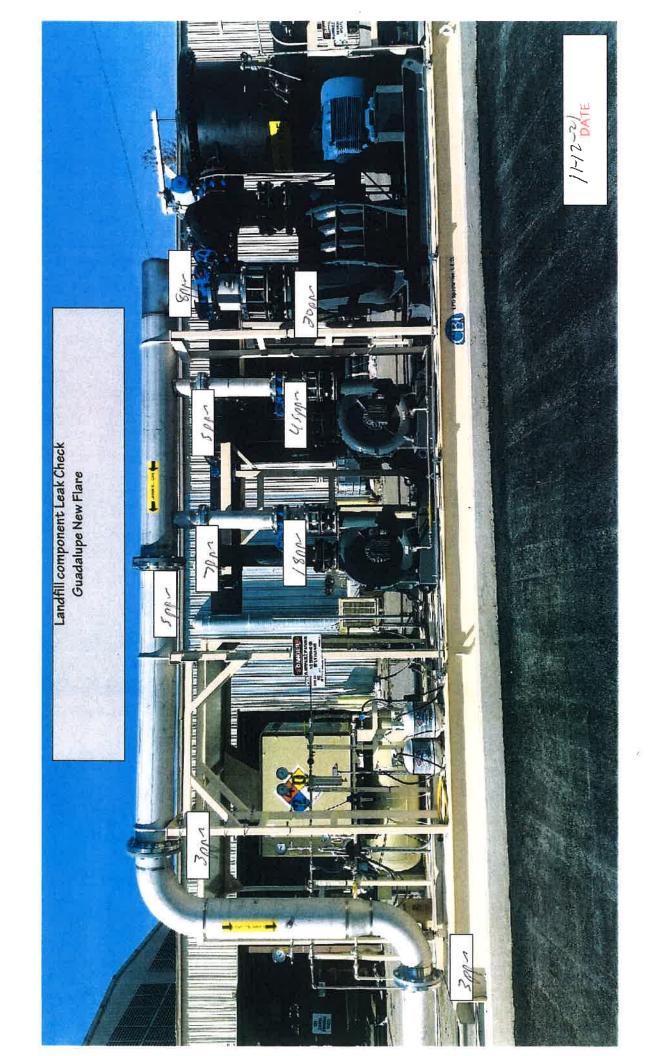
DATE OF SAMPLING: / 1-12-2/ TECHNICIAN: LE153 WAO &

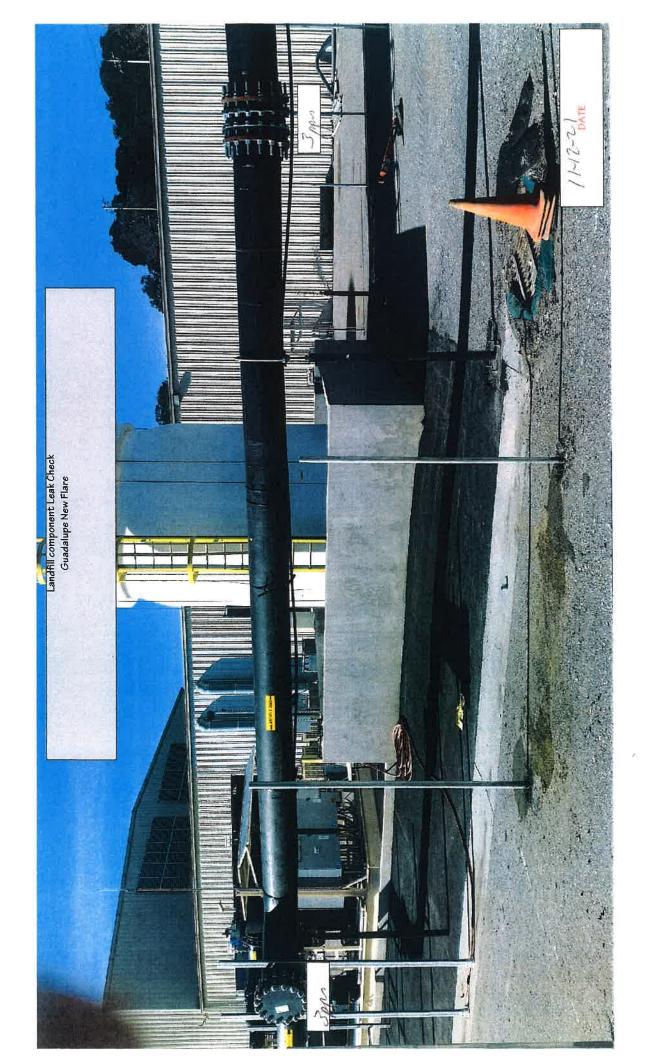
4) 0 EUC & DOWN & S.	LOCATION OF LEAK	LEAK CONCENTRATION (ppmv)	DATE OF DISCOVERY	TECHNICIAN	ACTION TAKEN TO REPAIR LEAK	DATE OF REPAIR	DATE OF ANY REQUIRED RE- MONITORING	RE-MONITORED CONCENTRATION (ppmv)
	んのななくなないいらう							

In the event that an exceedance is detected, please intiate corrective action and re-monitor the exceedance location within 7 days of the initial exceedance.

NOTE: Leaks over 500 ppmv methane are exceedances at any component containing landfill gas, pursuant to CARB Title 17 of California Code of Regulations Subchapter 10, Article 4, Subarticle 6, Section 95464(b)(1)(B).

NOTE: Leaks over 1,000 ppmv methane are exceedances at any component containing landfill gas, pursuant to BAAQMD Regulation 8-34-301.2.

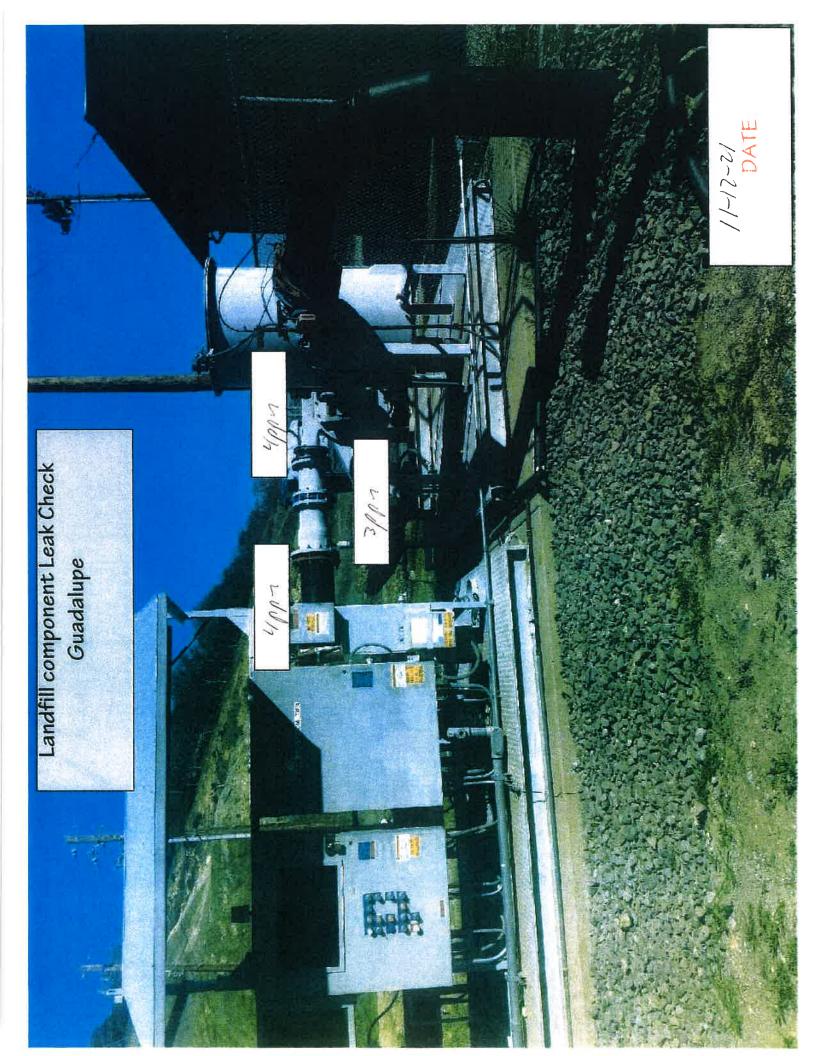






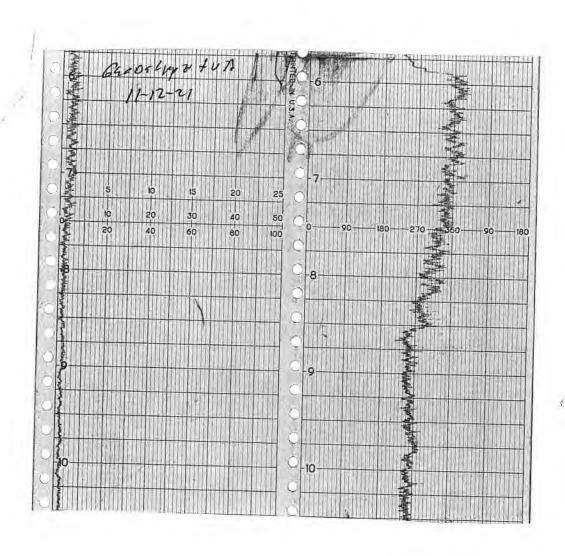




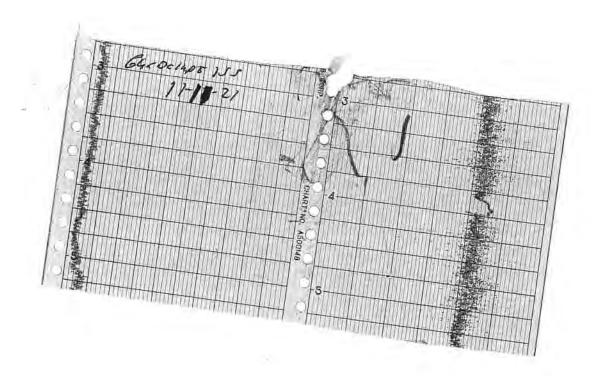


Attachment DWeather Station Data

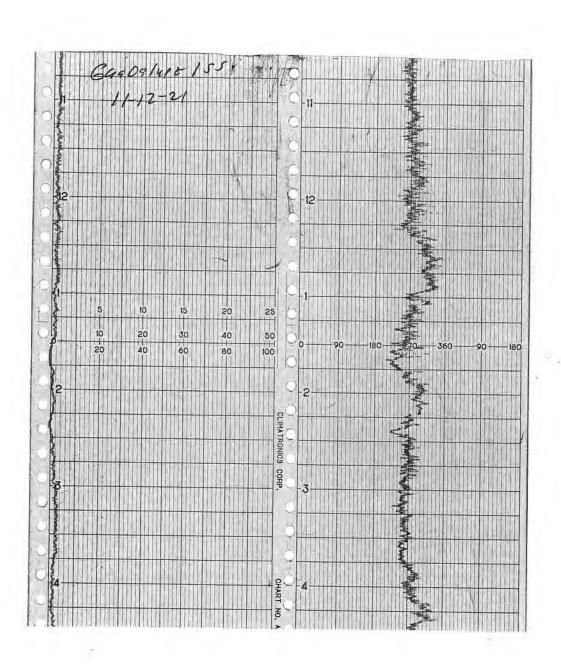
WIND SPEED & DIRECTION CHART ROLL



WIND SPEED & DIRECTION CHART ROLL



WIND SPEED & DIRECTION CHART ROLL





	16-POINT V	VIND DIRECTION	INDEX	
NO	DIRECTION		DEGREES	
		FROM	CENTER	<u>T0</u>
16	NORTH (N)	348.8	369.0	t,13
1	NORTH-NORTHEAST (NNE)	011.3	022.5	033.8
2	NORTHEAST (NE)	033,8	045.0	056.3
3	EAST-NORTHEAST (ENE)	056.3	067.5	078.8
1	EAST (E)	078.8	090.0	101,3
5	EAST-SOUTHEAST (ESE)	101.3	112.5	123.8
5	SOUTHEAST (SE)	123.8	135.0	146.3
7	SOUTH-SOUTHEAST (SSE)	146.3	<u>157.5</u>	168.8
3	SOUTH (S)	168.8	180.0	191.3
)	SOUTH-SOUTHWEST (SSW)	191.3	202.5	213.8
66	SOUTHWEST (SW)	213.8	225.0	236.5
1	WEST-SOUTHWEST (WSW)	236,3	<u>247.</u> 5	258.8
2	WEST (W)	258.8	270.0	281.3
3	WEST-NORTHWEST (WNW)	281.3	292.5	303.8
4	NORTHWEST (NW)	30.3.8	315.0	326.3
5	NORTH-NORTHWEST (NNW)	326.3	337.5	348.8

Attachment E

Calibration Records

CUSTOMER:	Mis Vait #	-10
SERIAL NUMBER: _	10363467	73
TECHNICIAN:	1 Oloswits	DATE: 10-2-21

GAS CALIBRATION CHECK (PERFORMED AT ROOM TEMPERATURE)

	FII	D	
METHANE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)
100	100	100	+/- 25
500	500	500	+/- 125
10000	10000	10,006	+/- 2500
< 1	ZERO GAS	0.24	< 3
	Pil	D	
ISOBUTYLENE GAS NOMINAL (ppm)	CALIBRATION GAS ₋ (ppm)	TVA READING (ppm)	TOLERANCE (ppm)
50	50		+/- 12.5
100	100		+/- 25
500	500		+/- 125
< 1	ZERO GAS		< 3

CUSTOMER:	MES UNG	+#11	
SERIAL NUMBER:	1036346	774	
TECHNICIAN:	MB1985	DATE:/	10-2-21

GAS CALIBRATION CHECK (PERFORMED AT ROOM TEMPERATURE)

FID						
METHANE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)			
100	100	100	+/- 25			
500	500	500	+/- 125			
10000	10000	10,000	+/- 2500			
< 1	ZERO GAS	0.61	< 3			
	PII	D				
ISOBUTYLENE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)			
50	50	/	+/- 12.5			
100	100		+/- 25			
500	500		+/- 125			
<1	ZERO GAS		< 3			

CUSTOMER:	1155 Vait # 12	-
SERIAL NUMBER:	1036246741	_

TECHNICIAN: MBIFITS DATE: 10-2-21

GAS CALIBRATION CHECK (PERFORMED AT ROOM TEMPERATURE)

	FI	D	
METHANE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)
100	100	Coo	+/- 25
500	500	500	+/- 125
10000	10000	14,003	+/- 2500
< 1	ZERO GAS	0,64	< 3
	PII	D	
ISOBUTYLENE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)
50	50	/	+/- 12.5
100	100		+/- 25
500	500		+/- 125
< 1	ZERO GAS		< 3

CUSTOMER:	NES	UNIT #13	
	/	11	

TECHNICIAN: 14 MBIGS DATE: 10-2-21

GAS CALIBRATION CHECK (PERFORMED AT ROOM TEMPERATURE)

FID						
METHANE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)			
100	100	100	+/- 25			
500	500	SOO	+/- 125			
10000	10000	10,000	+/- 2500			
< 1	ZERO GAS	0,72	< 3			
	PII	D				
ISOBUTYLENE GAS NOMINAL (ppm)	CALIBRATION GAS ₋ (ppm)	TVA READING (ppm)	TOLERANCE (ppm)			
50	50		+/- 12.5			
100	100		+/- 25			
500	500		+/- 125			
< 1	ZERO GAS		< 3			



SURFACE EMISSION MONITORING INSTRUMENT CALIBRATION LOG

Purpose:				
Operator:	1 M			
Date://-6-2/		Time:	0 900	
Model # 704 1000V	3			
Serial # # 10 1036	346773			
INSTRUMENT INTEGRITY	CHECKLIST	INST	RUMENT CALIBRA	TION
		CA	ALIBRATION CHEC	CK
Battery test	Pass / Fail	Calibration	Actual	%
Reading following ignition	2,4 ppm	Gas (ppm)	(ppm)	Accuracy
todding following ignition		500	500	1007
eak test	Pass / Fail / NA	,		
Clean system check	Pass / Fail / NA		RESPONSE TIME	
check valve chatter)	(dass) I dill / IVA	Calibration Gas, p	opm	500
		90% of Calibration		(50
H ₂ supply pressure gauge (acceptable range 9.5 - 12)	Pass / Fail / NA	1	attain 90% of Cal G	ias ppm
acceptable lange 3.3 - 12)	A 12-53	12	2	
Date of last factory calibration	10-2-2-	3.		
Tankan and the salt	50015 "	Average 5	3	
Factory calibration record w/instrument within 3 months	Pass/Fail	Equal to or less the	han 30 seconds?	Ø N
2 Sustain 9 Mondio		Instrument calibra		_gas.
Comments:				



SURFACE EMISSION MONITORING INSTRUMENT CALIBRATION LOG

Purpose:	ř.			
Operator:	lu M			
Date:		Time:	0915	
Model # TVA 1000	3			
Serial # # // 10363	46774			
INSTRUMENT INTEGRITY CHECKLIST		INSTRUMENT CALIBRATION		
-		CALIBRATION CHECK		
Battery test	Pass / Fail	Calibration	Actual	%
Reading following ignition	2,5 ppm	Gas (ppm)	(ppm)	Accuracy
	- Pp	500	500	100/
eak test	Pass / Fail / NA		RESPONSE TIME	=
Clean system check	Rass / Fail / NA		TEST STACE THAT	_
check valve chatter)		Calibration Gas, p	P'''	500
H₂ supply pressure gauge	Pass / Fail / NA	90% of Calibration		450
acceptable range 9.5 - 12)	Fass / Fall / NA	Time required to a	attain 90% of Cai (Gas ppm
,	1/0 0 3/	2.	6	
Date of last factory calibration	10-2-21		6 ·	
Factory calibration record	Fase / Fail	· · · · · · · · · · · · · · · · · ·	0,0	
v/instrument within 3 months	, C. J. C. I.	Equal to or less th		Ø N
		Instrument calibra	ated to <u>CM</u>	gas.
Comments:				
Comments.				
John Henris.				

465



SURFACE EMISSION MONITORING INSTRUMENT CALIBRATION LOG

Operator:		Time:	0930	
Model # <u>TVA 1000 B</u> Serial # <u>#12 103 6</u>	246)4			
INSTRUMENT INTEGRITY CHECKLIST		INSTRUMENT CALIBRATION		
	~	CA	LIBRATION CHE	CK
Battery test	Pass / Fail	Calibration	Actual	%
Pooding following ::4:	0 (-	Gas (ppm)	(ppm)	Accuracy
Reading following ignition	<u>26</u> ppm	500	500	1008
eak test	Rass / Fail / NA	700	700	(007,
	0		RESPONSE TIME	Ē
Clean system check	Pass / Fail / NA	Calibratian Cana		S00
check valve chatter)		Calibration Gas, p 90% of Calibration		<u>uso</u>
H₂ supply pressure gauge	Pass / Fail / NA		attain 90% of Cal (
acceptable range 9.5 - 12)	<u> </u>	1.	6	sas ppiii
	1000 10	2.	6	
Date of last factory calibration	10-2-21	3.	6	
	6-215-3		0,0	
actory calibration record	Pass / Fail	Equal to or less th		Ø N
The second secon		Instrument calibra		_gas.
Comments:				



SURFACE EMISSION MONITORING INSTRUMENT CALIBRATION LOG

Operator:	My			
Date:		Time:	0945	
Model # YUA 1000 13				
Serial # # 13 1/0270	16775			
INSTRUMENT INTEGRITY CHECKLIST		INSTRUMENT CALIBRATION		
		CA	ALIBRATION CHE	CK
Battery test	Pass / Fail	Calibration	Actual	%
Reading following ignition		Gas (ppm)	(ppm)	Accuracy
codding following ignition	453	900	500	1004.
eak test	Pass / Fail / NA			. ,
Clean system check	Pass / Fail / NA		RESPONSE TIME	=
check valve chatter)	ass / I dil / NA	Calibration Gas, p	opm	SOO
	Ø	90% of Calibratio		450
H ₂ supply pressure gauge Pass / Fail / NA		•	attain 90% of Cal	Gas ppm
acceptable range 9.5 - 12)		1.	<u>)</u>	
Date of last factory calibration	10-2-21	2. 3.	6	
54 Pl - 4*	500 15 "		6	
Factory calibration record v/instrument within 3 months	Rass / Fail	Equal to or less to		- Ø N
STOCK WILLIAM O MORUS		_	ated to Child	_gas.
Comments:				



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 $\pm 2\%$

CERTIFICATE OF ANALYSIS

<u>Composition</u> <u>Certification</u> <u>Analytical Accuracy</u>

Air - Zero

THC <2 PPM

Oxygen 20.9%

Nitrogen Balance

Lot # 19-6779

Mfg. Date: 4/3/2019

Parent Cylinder ID 001730

Number:

001739, 02268

Method of Preparation:

Gravimetric/Pressure Transfilled

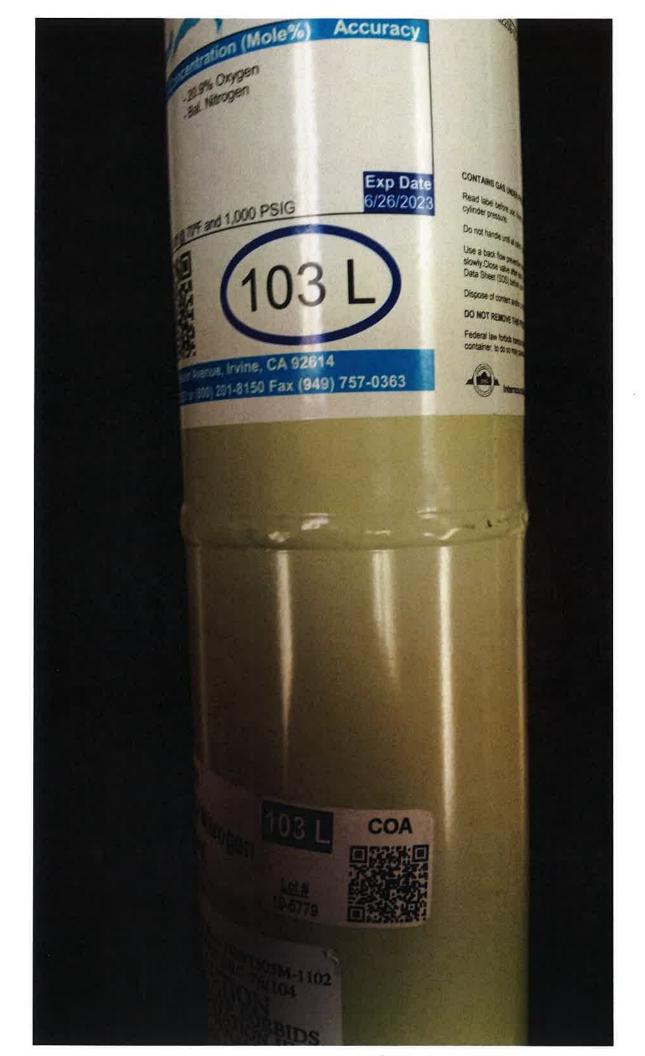
Method of Analysis:

This mix was prepared gravimetrically and is traceable to the NIST by certified weights (ID #CA10814) used to calibrate the scale.

Analysis By: Tony Janquart Quality Assurance Manager

800-552-5003

Certificate Date: 4/3/2019





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CERTIFICATE OF ANALYSIS

Composition

Certification

Analytical Accuracy

Methane

Air

25 ppm Balance

 $\pm 5\%$

Lot#

17-6074

Mfg. Date:

10/16/2017

Parent Cylinder ID

17161

Number:

Method of Preparation:

Gravimetric/Pressure Transfilled

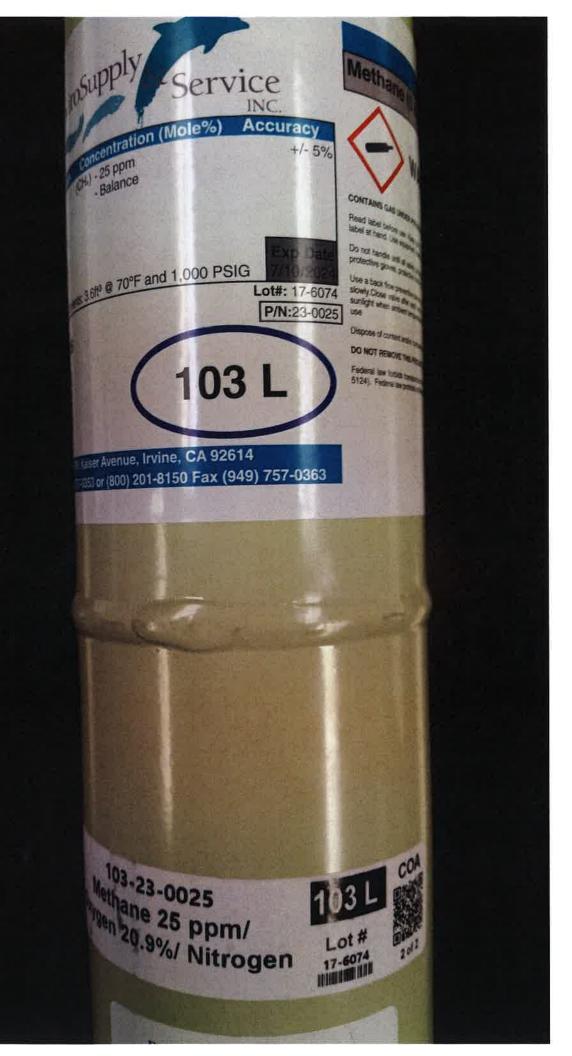
Method of Analysis:

The parent mix was prepared gravimetrically and is traceable to the NIST by certified weights (ID #CA10814) used to calibrate the scale.

Analysis By: Tony Janquart Quality Assurance Manager

800-552-5003

Certificate Date: 10/16/2017





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CERTIFICATE OF ANALYSIS

Composition

Methane

Air

Certification

25 ppm

Balance

Analytical Accuracy

± 5%

Lot#

17-6074

Mfg. Date:

10/16/2017

Parent Cylinder ID

17161

Number:

Method of Preparation:

Gravimetric/Pressure Transfilled

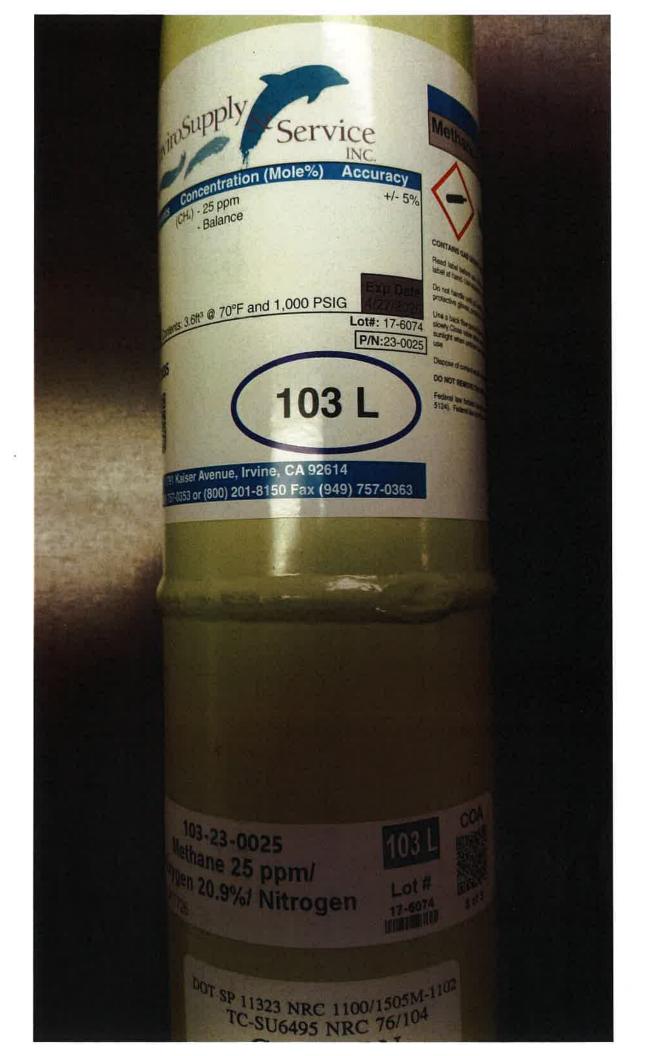
Method of Analysis:

The parent mix was prepared gravimetrically and is traceable to the NIST by certified weights (ID #CA10814) used to calibrate the scale.

Analysis By: Tony Janquart Quality Assurance Manager

800-552-5003

Certificate Date: 10/16/2017



Intermountain Specialty Gases

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CERTIFICATE OF ANALYSIS

Composition	Certification	Analytical Accuracy (+/-)	
Methane	500 ppm	2%	
Oxygen Nitrogen	20.9 % Balance UHP	2%	

Lot# 20-7497

Mfg. Date: 7/10/2020

Expiration Date:

Transfill Date: see cylinder

Parent Cylinder ID TWC001763

Number:

Method of Preparation:

Gravimetric/Pressure Transfilled

Method of Analysis:

The parent mix was prepared gravimetrically and is traceable to the NIST by certified weights (ID #CA10814) used to calibrate the scale.

Analysis By:

Title:

Tony Janquart Quality Assurance Manager

Certificate Date: 7/10/2020

Methane (0.) Service INC. atration (Mole%) Accuracy +/- 2% . 500 ppm . Balance CONTAINS GAS UNDER PRESENT Flead label before us, You and label at hand. Use statement Do not handle until at sales personative gloves, protective gloves, pr #0 70°F and 1,000 PSIG Use a back flow provening assets slowly. Close valve after set as sunlight when ambient second Lot#: 20-7497 uso. P/N:23-0500 Dispose of content around DO NOT REMOVE THIS PROD Foderal law forbids min 103 L 5124) Federal law process Minue, Irvine, CA 92614 1000 201-8150 Fax (949) 757-0363 103 L Lot # 20-3497 Nitrogen



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CERTIFICATE OF ANALYSIS

Composition

Certification

Analytical Accuracy

Methane

500 ppm

 $\pm 2\%$

Air

Balance

Lot#

19-6955

Mfg. Date:

7/24/2019

Parent Cylinder ID ₀₀₁₇₆₃

Number:

Method of Preparation:

Gravimetric/Pressure Transfilled

Method of Analysis:

The parent mix was prepared gravimetrically and is traceable to the NIST by certified weights (ID #CA10814) used to calibrate the scale.

> Analysis By: Tony Janquart Quality Assurance Manager

800-552-5003

Certificate Date: 7/24/2019



Intermountain Specialty Gases

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CERTIFICATE OF ANALYSIS

Certification	Analytical Accuracy (+/-)
500 ppm	2%
20.9 %	2%
	500 ppm

Lot# 18-6641

Mfg. Date: 12/18/2018

Expiration Date:

Transfill Date: see cylinder

Parent Cylinder ID 001763

Number:

Method of Preparation:

Gravimetric/Pressure Transfilled

Method of Analysis:

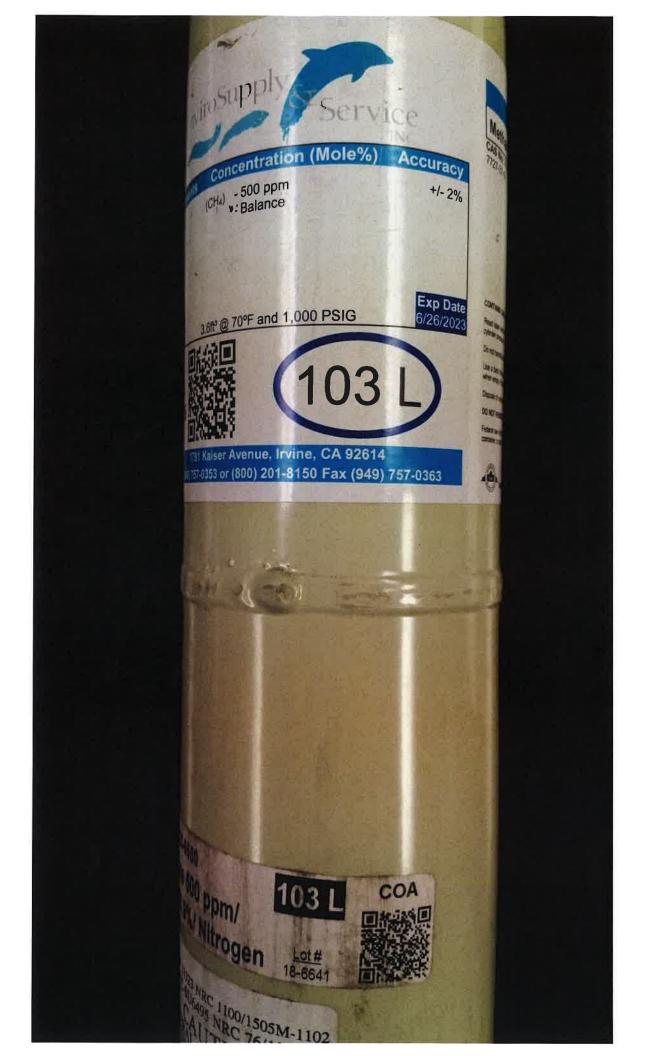
The parent mix was prepared gravimetrically and is traceable to the NIST by certified weights (ID #CA10814) used to calibrate the scale.

Analysis By:

Title:

Tony Janquart

Quality Assurance Manager Certificate Date: 12/18/2018





RESPONSE TIME TEST RECORD

Time: AM 3:30 PM Instrument Make: TVA Model: 1000 S/N: 0936 Measurement #1:	338909	
Stabilized Reading Using Calibration Gas: 90% of the Stabilized Reading: Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas:	498 448 3	ppn
Measurement #2:		secon
Stabilized Reading Using Calibration Gas: 90% of the Stabilized Reading: Time to Reach 90% of Stabilized Reading after	50Z 45Z 3	ppm ppm
switching from Zero Air to Calibration Gas: Measurement #3:		_ second
Stabilized Reading Using Calibration Gas: 90% of the Stabilized Reading: Time to Reach 90% of Stabilized Reading after	501 451	ppm ppm
switching from Zero Air to Calibration Gas:	3	_ second
Calculate Response Time:		
$\frac{(a)+(b)+(c)}{3}$ = $\frac{5}{3}$ seconds (must be less than 30)	seconds)	

CALIBRATION PRECISION TEST RECORD

Date: ## 2/21 Expiration Date (3 months): Time: AM	s/n: <u>093</u>	6338909
Measurement #1:		
Meter Reading for Zero Air:	&_	_ ppm (a)
Meter Reading for Calibration Gas:	499	_ ppm (b)
Measurement #2: Meter Reading for Zero Air: Meter Reading for Calibration Gas:	50	_ ppm (c) _ ppm (d)
Measurement #3:		
Meter Reading for Zero Air:		_ ppm (e)
Meter Reading for Calibration Gas:	502	_ ppm (f)
Calculate Precision:		
$\frac{\{ (500) - (b) + (500) - (d) + (500) - (f) \}}{3} \times \frac{1}{500}$	x 100	
% (must be < than 10	0%)	
Performed By: 5044		

CALIBRATION PROCEDURE AND BACKGROUND DETERMINATION REPORT

Landfill Name: Challet Date: 1/192
Time: 930 AND PM
Instrument Make: 14A,000 Model: TVA 1000 R S/N: 093633 8909
1 Net 10 810 Co
Calibration Procedure
 Allow instrument to internally zero itself while introducing zero air.
2. Introduce the calibration gas into the probe.
Stable Reading =ppm
Adjust meter to read 500 ppm.
Background Determination Procedure
Upwind Reading (highest in 30 seconds): ppm (a)
2. Downwind Reading (highest in 30 seconds): ppm (b)
•
Calculate Background Value:
$\frac{(a) + (b)}{2} \text{Background} = \underbrace{\qquad}_{ppm}$
Performed By: Tino R.
~ 17
a company of the comp

CALIBRATION PROCEDURE AND BACKGROUND DETERMINATION REPORT

000	MPM	006 SAN: 0936338909
Instrument Make:	Thermo Model: TUR-100	100 S/N: 04/2023 0100
Calibration Proce	dure	
1. Allow inst	rument to internally zero itself while introd	lucing zero air.
	the calibration gas into the probe. able Reading = 495 ppm	
	ter to read 500 ppm.	
Background Dete	rmination Procedure	6
With the Calculate A.	rmination Procedure eading (highest in 30 seconds):	
1. Upwind Re	ALTERIOR CONTROL AND A CONTROL OF THE PROPERTY	ppm (a) ppm (b)
 Upwind Re Downwind 	eading (highest in 30 seconds):	X 1

APPENDIX I MONTHLY SOLID WASTE PLACEMENT TOTALS

Guadalupe Recycling & Disposal Facility, San Jose, CA Solid Waste Placement Totals

October 1, 2021 through March 31, 2022

Month	Decomposed Waste Disposed in tons	During Reporting Period		
Oct-21	9,350			
Nov-21	9,641			
Dec-21	8,698	E 4 E 4 O		
Jan-22	9,133	54,548		
Feb-22	8,366			
Mar-22	9,359			

APPENDIX J WELLFIELD MONITORING LOGS

Guadalupe Recycling & Disposal Facility, San Jose, CA

Wellfield Monitoring Report -October 5, 6, 7, 8, 11, 12, and 13, 2021

Device Name	Date Time	CH4 (Methane) (%)	CO2 (Carbon Dioxide)(%)	O2 (Oxygen) (%)	Balance Gas(%)	Initial Temperature (oF)	Adjusted Temperature (oF)	Initial Static Pressure("H2O)	Adjusted Static Pressure("H2O)
GDLC0188	10/7/2021 13:42	2.8	2.8	20.5	73.9	83.1	82.9	-1.12	-1.09
GDLC0188	10/7/2021 13:45	1.3	1.1	21.3	76.3	81.6	81.6	-1.04	-1.03
GDLC0189	10/7/2021 13:53	51.6	39	0.2	9.2	137.5	137.6	-0.11	-0.07
GDLC0190	10/12/2021 9:19	46.7	46.1	0.0	7.2	128.6	129.1	-8.41	-9.01
GDLC0191	10/5/2021 13:46	49.2	41.4	0.7	8.7	124.9	124.9	-1.64	-1.64
GDLC0192	10/5/2021 14:01	42.4	43.7	0.0	13.9	127.5	127.3	-6.34	-4.44
GDLC0193	10/6/2021 13:45	41.3	36.9	0.1	21.7	129.4	128.3	-0.1	-0.06
GDLC0196	10/8/2021 12:44	59.6	40.4	0.0	0	102.4	102.5	-1.61	-1.69
GDLC0197	10/12/2021 8:03	34.4	34.1	0.0	31.5	118.1	118	-0.8	-0.8
GDLC0232	10/8/2021 13:13	55.9	44.1	0.0	0	113.1	113.1	-0.26	-0.27
GDLC0233	10/8/2021 12:39	49.6	37.1	1.6	11.7	108.7	109.2	-0.66	-0.69
GDLC0233	10/8/2021 12:40	48.9	36.9	1.6	12.6	109.6	109.8	-0.63	-0.65
GDLC0234	10/7/2021 13:22	31.1	34.1	0.0	34.8	118.5	118.5	-0.06	-0.06
GDLC0235	10/5/2021 13:38	54.9	41.7	0.2	3.2	124.4	124.5	-32.2	-32.26
GDLC0236	10/8/2021 16:23	52.3	43.7	0.0	4.0	124.4	124.6	-0.46	-0.44
GDLC0237	10/6/2021 13:57	55.5	41.5	0.1	2.9	123.2	124.9	-1.51	-2.09
GDLC0238	10/7/2021 13:05	17.5	28.2	0.0	54.3	110.8	110.6	-0.16	-0.01
GDLC0239	10/5/2021 11:09	26	30	0.0	44	111.5	111.6	-0.35	-0.35
GDLC0240	10/5/2021 11:00	36.4	36.4	3.1	24.1	117.7	117.8	-0.76	-0.76
GDLC0241	10/5/2021 13:10	46.5	42.7	0.0	10.8	124.9	124.9	-1.61	-1.59
GDLC0242	10/8/2021 15:50	53.6	46.4	0.0	0	124.6	124.6	-43.81	-43.8
GDLC0242	10/8/2021 15:57	53.3	46.7	0.0	0	124.8	124.8	-34.22	-34.22
GDLC0243	10/5/2021 12:47	44.9	37.4	0.2	17.5	103.9	104	-0.18	-0.18
GDLC0244	10/7/2021 13:13	25.5	31.8	0.0	42.7	116.3	115.1	-0.11	-0.04
GUAD0062	10/5/2021 9:53	46.2	36.7	0.0	17.1	95.2	95.1	-2	-1.97
GUAD0065	10/6/2021 12:53	47.2	38.6	0.2	14.0	114.4	114.4	-41.4	-41.44
GUAD0065	10/6/2021 12:56	46.9	38.4	0.2	14.5	115.3	115.5	-41.52	-42.23
GUAD0066	10/6/2021 12:39	39.0	32.7	0.1	28.2	105.1	105.1	-3.42	-3.39
GUAD0081	10/8/2021 8:53	50.6	40.6	1.7	7.1	104.8	103.7	-48.29	-48.5
GUAD0082	10/8/2021 8:29	46.9	36.4	0.6	16.1	101.1	100.9	-12.71	-12.5
GUAD0112	10/6/2021 13:20	44.3	34.5	0.0	21.2	125.4	125.4	-0.04	-0.03
GUAD0114	10/13/2021 11:37	55.2	43.7	0.0	1.1	133.3	133.4	-5.36	-5.37
GUAD0122	10/12/2021 14:31	55.8	44.2	0.0	0.0	135	135	-35.84	-36.25
GUAD0124	10/5/2021 13:43	55.3	42	0.1	2.6	129.9	130	-30.07	-30.09
GUAD0129	10/5/2021 13:18	57.2	40.7	0.0	2.1	108	108	-41.96	-41.94
GUAD0131	10/12/2021 7:19	59.3	40.7	0.0	0	116.4	116.4	-46.2	-46.27
GUAD0134	10/5/2021 10:36	46.5	37.4	0.0	16.1	124.4	124.3	-0.98	-0.96
GUAD0135	10/5/2021 10:44	52.9	40.5	0.0	6.6	131.9	132	-1.74	-1.74
GUAD0138	10/6/2021 12:45	28.2	30.7	0.0	41.1	99.7	99.5	-0.91	-0.83
GUAD0142	10/6/2021 12:34	45.4	31.9	0.4	22.3	99.4	99.5	-4.42	-4.42
GUAD0146	10/11/2021 15:09	56.8	43.2	0.0	0.0	127.1	126.6	-35.37	-35.96
GUAD0147	10/8/2021 13:01	56.2	43.8	0.0	0.0	116.8	116.9	-7.04	-7
GUAD0151	10/7/2021 13:33	59.7	34.9	0.0	5.4	85	86.6	0.14	0.14
GUAD0151	10/7/2021 13:36	60.4	34.4	0.0	5.2	84.9	84.8	0.16	0.16

GUAD0151	10/19/2021 12:45	60.8	37.6	0	1.6	77.9	77.5	5.13	5.14
GUAD0152	10/7/2021 15:34	56.5	41.3	0.2	2.0	124.9	124.9	-18.59	-19.89
GUAD0154	10/6/2021 14:08	56.5	41	0.7	1.8	136	135.8	-14.53	-13.86
GUAD0161	10/12/2021 17:41	49.8	35.7	0.1	14.4	139.7	139.6	-21.22	-21.22
GUAD0162	10/12/2021 17:48	51.7	40	0.1	8.2	144.8	144.7	-41.72	-42.49
GUAD0172	10/8/2021 9:37	57	41.8	0.0	1.2	111.3	111.3	-2.66	-2.74
GUAD0173	10/8/2021 9:47	55.4	42.7	0.0	1.9	106	105.9	-0.05	-0.06
GUAD0176	10/8/2021 12:55	55.5	44.5	0.0	0.0	108.5	108.5	-1.27	-1.24
GUAD0177	10/8/2021 13:09	55.4	44.6	0.0	0.0	128.6	128.7	-9.51	-10.7
GUAD0178	10/7/2021 15:38	52.2	40.1	1.6	6.1	121.5	121.4	-43.84	-44.64
GUAD0179	10/7/2021 15:48	24.1	27.5	0.0	48.4	103.5	103.3	-0.59	-0.57
GUAD0180	10/7/2021 16:00	46.8	40.1	1.7	11.4	129.4	129.2	-40.1	-40.07
GUAD0181	10/12/2021 9:55	52.6	47.4	0.0	0.0	111.1	110.1	-39.53	-38.41
GUAD0183	10/5/2021 13:34	54.4	41.9	0.0	3.7	125.0	125.0	-35.42	-35.4
GUAD0184	10/6/2021 13:38	41.7	41.9	0.3	16.1	126.8	125.3	-30.56	-9.46
GUAD0185	10/6/2021 13:51	50.8	39.3	0.1	9.8	137.9	138.1	-0.4	-0.29
GUAD0186	10/6/2021 13:41	45.1	41.2	0.5	13.2	133.0	133.0	-17.21	-17.19
GUAD0187	10/5/2021 14:04	43.8	43.7	0.6	11.9	124.0	124.0	-33.93	-33.92
GUAD0198	10/7/2021 15:51	47.9	38.3	0.0	13.8	123.8	123.8	-2.58	-2.57
GUAD0199	10/7/2021 15:44	41.5	35.5	0.8	22.2	130.2	130.5	-32.95	-27.94
GUAD0200	10/7/2021 15:29	57.5	39.9	0.0	2.6	134.1	134.1	-15.31	-15.26
GUAD0200	10/12/2021 16:24	58.6	39.5	0.0	1.9	130.5	132.3	-5.94	-5.89
GUAD0200	10/12/2021 16:26					CO was 0 pp	m		
GUAD0201	10/7/2021 13:27	54.2	42.2	0.7	2.9	81.4	81.4	-17.05	-17.03
GUAD0202	10/12/2021 8:16	45.9	38.6	0.0	15.5	123	122.9	-1.18	-1.17
GUAD0203	10/8/2021 13:21	52.2	47.8	0.0	0.0	119.5	119.4	-32.76	-32.76
GUAD0204	10/7/2021 14:05	53.5	43.7	0.1	2.7	130.9	130.9	-29.14	-29.77
GUAD0205	10/7/2021 13:57	54.3	45.3	0.0	0.4	132.1	133.8	-0.01	-0.03
GUAD0207	10/8/2021 11:07	44.8	55.2	0.0	0.0	125.3	125.7	-0.05	-0.04
GUAD0208	10/8/2021 10:57	49.5	50.5	0.0	0.0	129.9	130.0	-0.06	-0.05
GUAD0209	10/12/2021 14:29	53.1	46.9	0.0	0.0	111.1	115.0	-0.06	-0.09
GUAD0211	10/12/2021 8:49	44.0	42.4	0.0	13.6	121.0	121.2	-0.63	-0.64
GUAD0213	10/12/2021 8:57	48.4	43.1	0.0	8.5	124.3	124.2	-24.19	-24.19
GUAD0214	10/12/2021 8:30	45.3	41.2	0.0	13.5	128.3	128.4	-4.34	-4.99
GUAD0215	10/11/2021 15:16	46.7	42	0.0	11.3	129.5	128.5	-0.74	-0.72
GUAD0216	10/12/2021 9:15	47.8	44.9	0.0	7.3	122.6	122.1	-0.49	-0.49
GUAD0217	10/5/2021 13:50	45.3	41.1	0.8	12.8	131.3	131.3	-2.49	-2.48
GUAD0217	10/5/2021 14:50	34.7	37	0.0	28.3	128.5	128.5	-5.1	-5.12
GUAD0217	10/5/2021 14:52					CO was 10 p	om		
GUAD0217	10/8/2021 16:13	49.6	42.4	0.0	8.0	129.8	129.9	-0.74	-0.79
GUAD0217	10/8/2021 16:15					CO was 0 pp	m		
GUAD0218	10/5/2021 13:54	30.2	34.3	0.0	35.5	127.8	127.7	-1.02	-0.99
GUAD0218	10/6/2021 14:12	46.0	40.4	0.1	13.5	132.3	132.3	-0.69	-0.68
GUAD0218	10/8/2021 16:07	44.8	41.1	0.0	14.1	111.7	111.5	-0.15	-0.16
GUAD0218	10/8/2021 16:08					CO was 0 pp	m		
GUAD0219	10/5/2021 12:55	45.8	39.0	0.2	15.0	124.0	124.0	-1.33	-1.35
GUAD0220	10/12/2021 7:27	47.0	41.0	0.0	12.0	124.3	124.4	-36.38	-36.37
GUAD0221	10/8/2021 9:55	55	43.9	0.0	1.1	115.9	116.1	-0.07	-0.09

GUAD0222	10/5/2021 10:11	35.2	31.0	0.0	33.8	114.4	114.6	-0.1	-0.12
GUAD0223	10/5/2021 10:21	33.4	32.9	0.0	33.7	121.2	121.2	-0.12	-0.12
GUAD0224	10/5/2021 10:30	21.5	27.2	0.0	51.3	114.1	114.1	-0.19	-0.19
GUAD0225	10/6/2021 13:12	48.3	36.1	0.0	15.6	119.9	120.1	-0.09	-0.09
GUAD0226	10/12/2021 7:44	47.7	40.5	0.0	11.8	122.2	122.2	-23.81	-24.6
GUAD0227	10/6/2021 13:00	44.9	35.9	0.0	19.2	120.2	120.2	-0.69	-0.69
GUAD0228	10/7/2021 15:08	42.9	35.1	0.0	22	114.1	113.7	-0.01	-0.01
GUAD0230	10/5/2021 10:03	45.4	35	0.0	19.6	113	113	-0.27	-0.26
GUADH11L	10/8/2021 9:03	46.1	30.5	4.3	19.1	73	73.8	-3.31	-3.3
GUADH12L	10/8/2021 8:16	20.3	12.7	12.7	54.3	54.6	53.1	-2.78	-2.72

Wells 114, 122, 134, 135, 146, 151, 152, 154, 161, 162, 180, 181, 185, 186, 188, 189, 199, 200, 204, 205, 207, 209, 213, 215, 216, 217, and 218, are approved to There are 87 total collectors (85 vertical wells and 2 horizontal wells) at GRDF.

%= percent

in. w.c.= inches in water column degrees F= degrees Fahrenheit

GCCS = Gas Collection and Control System

Guadalupe Recycling & Disposal Facility, San Jose, CA

Wellfield Monitoring Report -November 1, 2, 3, 4, 8, 9, 10, 15, and 18, 2021

Device Name	Date Time	CH4 (Methane) (%)	CO2 (Carbon Dioxide)(%)	O2 (Oxygen) (%)	Balance Gas(%)	Initial Temperature (oF)	Adjusted Temperature (oF)	Initial Static Pressure("H2O)	Adjusted Static Pressure("H2O)
GDLC0188	11/15/2021 15:27	53.5	46.1	0	0.4	128.7	128.6	-8.63	-10.29
GDLC0188	11/15/2021 15:30		Nev	v collection	system instal	led;NSPS/EG Co	orrective Action (Completed (CAC)	
GDLC0189	11/4/2021 15:38	53.6	45.1	0	1.3	125.7	126.5	-2.15	-4.41
GDLC0190	11/4/2021 13:34	52.9	45.5	0	1.6	129.4	129.3	-8.08	-8.08
GDLC0191	11/1/2021 9:06	32.1	38.1	0	29.8	115.9	116.2	-1.19	-1.2
GDLC0192	11/1/2021 9:34	46.7	45.6	0	7.7	125.2	125.4	-4.34	-4.72
GDLC0193	11/10/2021 15:52	54.6	45.3	0.1	0	127.8	126.9	-1.45	-1.47
GDLC0196	11/3/2021 13:45	53.8	42.7	0	3.5	104.3	104.3	-7.72	-7.79
GDLC0197	11/3/2021 11:19	40.4	38.8	0	20.8	123.8	123.9	-0.3	-0.31
GDLC0232	11/3/2021 14:05	52.4	43.7	0	3.9	114.9	115.1	-0.49	-0.53
GDLC0233	11/3/2021 13:50	54.8	43.2	0	2	108.1	109.2	-0.62	-0.64
GDLC0234	11/3/2021 13:10	38.2	37.4	0	24.4	117.8	117.9	-0.36	-0.37
GDLC0234	11/3/2021 13:11	37.4	37.7	0	24.9	117.9	118	-19.97	-0.45
GDLC0235	11/1/2021 9:26	43.1	43.2	0.1	13.6	124	124	-29.7	-29.64
GDLC0236	11/8/2021 10:50	51.4	39.6	0	9	126.7	127.5	-0.35	-0.41
GDLC0237	11/9/2021 9:43	55.8	44.2	0	0	122	120.2	-2.47	-2.81
GDLC0238	11/3/2021 11:55	22.1	32.8	0	45.1	110.2	110.3	-0.12	-0.07
GDLC0239	11/1/2021 11:51	36.3	34.3	0	29.4	111.5	111.5	-0.37	-0.37
GDLC0240	11/1/2021 11:47	54.2	39.2	0	6.6	116.3	115.9	-0.65	-0.54
GDLC0241	11/1/2021 10:15	52.8	44.7	0	2.5	124.2	124.1	-1.8	-1.58
GDLC0242	11/1/2021 10:26	53.7	46	0.1	0.2	117.2	117.4	-43.81	-43.41
GDLC0243	11/1/2021 10:21	54	46	0	0	69.1	74.5	-0.14	-0.11
GDLC0244	11/3/2021 11:47	33.1	38.4	0	28.5	114.4	114.4	-0.15	-0.14
GUAD0062	11/1/2021 12:57	47.9	37.8	0	14.3	92.5	92.5	-1.47	-1.46
GUAD0065	11/3/2021 10:34	52.2	43.4	0	4.4	108.6	108.7	-38.15	-38.14
GUAD0066	11/3/2021 9:58	47.5	38.4	0	14.1	106.3	106.8	-7.92	-8.62
GUAD0081	11/1/2021 7:42	54.3	44.2	0.4	1.1	100.7	100.5	-43.96	-44.23
GUAD0082	11/1/2021 7:34	52.4	35.2	0.1	12.3	100.3	100.8	-11.21	-14.74
GUAD0112	11/3/2021 10:17	45.7	38.1	0	16.2	126.5	126.5	-0.53	-0.54
GUAD0114	11/3/2021 7:50	54.7	42.7	0	2.6	130	130.2	-14.48	-14.49
GUAD0122	11/4/2021 15:06	53.7	46.3	0	0	127.8	127.6	-35.19	-35.09
GUAD0124	11/1/2021 9:10	53.5	46.4	0.1	0	126.5	127.3	-29.47	-29.44
GUAD0129	11/1/2021 10:06	55.9	44.1	0	0	103	103.2	-39.93	-39.95
GUAD0131	11/1/2021 8:39	56	43.9	0.2	-0.1	116.4	116.4	-40.33	-38.91
GUAD0134	11/1/2021 13:03	51.3	40.7	0	8	122.9	122.9	-0.63	-0.63
GUAD0135	11/1/2021 11:57	54.4	42.6	0	3	130.1	129.8	-1.37	-1.37
GUAD0138	11/3/2021 10:02	37.4	33.4	0	29.2	88.4	89.5	-0.26	-0.32
GUAD0142	11/3/2021 9:40	47.1	38.4	0	14.5	104.9	104.7	-3.54	-3.23
GUAD0146	11/8/2021 10:56	56.8	43.2	0	0	126.3	125.1	-33.29	-33.26
GUAD0147	11/3/2021 13:33	54.7	44.1	0	1.2	116.1	116.4	-6.24	-6.88
GUAD0151	11/15/2021 15:21	58.7	41.3	0	0	128.9	128.9	-0.36	-0.4
GUAD0151	11/15/2021 15:25			NSPS/EG	Corrective A	ction Completed	(CAC) Collectio	n line added	
GUAD0152	11/4/2021 14:27	56.4	43.3	0.3	0	114.9	115.4	-4.85	-3.89
GUAD0154	11/9/2021 10:20	62.8	37.1	0	0.1	70.4	70.9	-3.45	-3.51

	1		1				1	1	
GUAD0161	11/9/2021 9:28	51.7	41.6	0.1	6.6	128.3	128.2	-21.64	-21.64
GUAD0162	11/9/2021 11:04	54	44.1	0	1.9	129.5	129.7	-36.94	-36.92
GUAD0172	11/1/2021 8:18	43.7	33.9	0	22.4	94.4	94.4	-3.19	-3.24
GUAD0173	11/1/2021 8:26	51.1	39.5	0	9.4	101.3	105.2	-0.46	-0.53
GUAD0176	11/3/2021 13:39	52.6	44.2	0	3.2	89.8	91.4	-0.65	-0.65
GUAD0177	11/3/2021 13:57	54.2	45.8	0	0	127.9	128.1	-4.35	-3.71
GUAD0178	11/4/2021 14:33	56.1	43.4	0.5	0	101.7	108.4	-37.99	-38.36
GUAD0179	11/4/2021 14:45	39.3	32.7	0	28	108.4	108.5	-0.08	-0.06
GUAD0180	11/4/2021 14:56	53.9	43.8	0	2.3	128.2	128.8	-32.51	-33.27
GUAD0181	11/4/2021 15:28	53.4	46.6	0	0	127.9	127.7	-33.37	-32.77
GUAD0183	11/1/2021 9:22	54.7	45.2	0.1	0	98.4	99.5	-33.01	-33.07
GUAD0184	11/1/2021 10:00	52.7	47	0	0.3	126	126.2	-3.38	-3.33
GUAD0185	11/9/2021 9:50	56.6	43.4	0	0	129.1	130.4	-0.84	-0.9
GUAD0186	11/11/2021 7:39	48.4	43	0.1	8.5	130.3	130.4	-28.95	-28.98
GUAD0187	11/1/2021 9:38	53.4	46.5	0	0.1	122.9	123	-31.95	-31.96
GUAD0198	11/4/2021 14:51	50.2	38.8	0	11	119.6	119	-1.58	-1.58
GUAD0199	11/4/2021 14:37	51.7	39.6	0	8.7	129.8	129.8	-14.85	-14.83
GUAD0200	11/4/2021 14:07	58.5	41.5	0	0	128.4	128.5	-0.25	-0.51
GUAD0200	11/18/2021 12:45	56.8	43.2	0.1	-0.1	125.5	126.8	-11.86	-12.6
GUAD0200	11/18/2021 12:50	00.0		J	1	CO was 5 pp			.2.0
GUAD0201	11/3/2021 13:17	53.8	45.6	0.6	0	122.1	122.1	-13.59	-13.58
GUAD0202	11/3/2021 14:22	50.4	41.2	0	8.4	124.3	124.3	-0.57	-0.57
GUAD0202	11/3/2021 11:31	51	45.4	0	3.6	118.9	118.8	-30.52	-30.49
GUAD0203	11/3/2021 13:26	51.4	48.6	0	0	128.4	128.4	-28.46	-28.45
GUAD0204 GUAD0205	11/15/2021 15:04	55.7	42.3	0	2	126.3	126.8	-1.69	-1.48
GUAD0207	11/4/2021 15:16	47	44.9	0	8.1	128.4	128.3	-0.12	-0.16
GUAD0208	11/4/2021 15:10	45.2	42.8	0	12	129.8	129.8	-0.21	-0.27
GUAD0209	11/4/2021 15:03	42.8	45.4	0	11.8	124.8	125.1	-0.11	-0.11
GUAD0211	11/9/2021 9:12	45.8	39.6	0	14.6	116.9	116.2	-0.64	-0.65
GUAD0213	11/9/2021 9:36	53.7	44.2	0	2.1	130.5	129.8	-21.91	-21.93
GUAD0214	11/9/2021 9:17	45.6	40.5	0	13.9	99.3	97.7	-6.67	-6.66
GUAD0215	11/4/2021 13:24	52.1	43.1	0.1	4.7	129.1	129.1	-0.22	-0.17
GUAD0216	11/15/2021 15:10	52.6	45.1	0	2.3	129.4	129.4	-2	-1.99
GUAD0217	11/1/2021 13:20	02.0	40.1		2.0	CO was 0 pp		-2	-1.50
GUAD0217	11/1/2021 13:23	48.5	44.4	0	7.1	126.3	126.2	-0.47	-0.46
GUAD0217	11/1/2021 13:11	50.1	42.6	0	7.3	126.5	126.5	-1.11	-1.11
GUAD0218	11/1/2021 13:14	00.1	72.0		7.0	CO was 0 pp		-1.11	-1.11
GUAD0210	11/1/2021 8:47	48	40	0	12	121.4	122.4	-1.91	-2.47
GUAD0219	11/1/2021 9:52	48.3	44	0	7.7	124.1	124.1	-31.2	-31.18
GUAD0220	11/1/2021 8:34	41.2	39.5	0	19.3	116.7	116.9	-1.61	-1.8
GUAD0221	11/1/2021 6.34	42.7	33.9	0	23.4	113	111.2	-0.28	-0.2
GUAD0222 GUAD0223	11/1/2021 12:23	41.7	38.3	0	20.4	126.8	126.9	-0.28	-0.2
GUAD0224	11/1/2021 12:03	29	32.7	0	38.3	110	110.6	-0.16	-0.17
GUAD0225	11/3/2021 10:11	47.7	40.1	0	12.2	123	123.4	-1.13	-1.24
GUAD0226	11/1/2021 10:52	50.7	42.4	0	6.9	122.5	122.4	-16.56	-17.22
GUAD0227	11/3/2021 10:23	48.4	40.3	0	11.3	121.6	121.7	-1.59	-1.7
GUAD0228	11/3/2021 11:10	44.6	38.4	0	17	114	114.1	-0.27	-0.27

GUAD0230	11/1/2021 12:29	50.7	39.1	0	10.2	111.9	111.7	-0.41	-0.34
GUADH11L	11/1/2021 8:02	50.5	35.9	2.9	10.7	66.4	66.4	-0.58	-0.55
GUADH12L	11/2/2021 7:51	51	31.3	3.3	14.4	55.1	55.1	-0.37	-0.36

Wells 114, 122, 134, 135, 146, 151, 152, 154, 161, 162, 180, 181, 185, 186, 188, 189, 199, 200, 204, 205, 207, 209, 213, 215, 216, 217, and 218, are approved to There are 87 total collectors (85 vertical wells and 2 horizontal wells) at GRDF.

%= percent

in. w.c.= inches in water column degrees F= degrees Fahrenheit

GCCS = Gas Collection and Control System

Guadalupe Recycling & Disposal Facility, San Jose, CA

Wellfield Monitoring Report -December 1, 2, 3, 6, 10, 14, 15 and 16, 2021

Device Name	Date Time	CH4 (Methane) (%)	CO2 (Carbon Dioxide)(%)	O2 (Oxygen) (%)	Balance Gas(%)	Initial Temperature (oF)	Adjusted Temperature (oF)	Initial Static Pressure("H2O)	Adjusted Static Pressure("H2O)
GDLC0188	12/10/2021 12:02	43.7	40.7	0	15.6	128.4	129.1	-19.33	-19.38
GDLC0189	12/6/2021 13:11	35.6	39.7	0	24.7	129.8	129.1	-13.02	-3.84
GDLC0190	12/6/2021 13:07	32.6	36.8	0	30.6	127.8	125.6	-7.08	-3.67
GDLC0191	12/2/2021 12:54	28.4	35.2	0	36.4	117.4	117.4	-2.98	-2.32
GDLC0192	12/2/2021 13:16	49.3	45.1	0	5.6	126.6	126.3	-4.74	-3.13
GDLC0193	12/6/2021 10:19	37.6	39.3	0	23.1	128.9	127.1	-1.54	-1.43
GDLC0196	12/15/2021 13:29	23.6	25.4	0	51	98.9	98.9	-4.54	-4.53
GDLC0197	12/10/2021 9:01	47.6	35.5	0	16.9	129.8	129	-4.02	-2.55
GDLC0232	12/15/2021 13:04	23.6	28	0	48.4	117.4	117.4	-3.86	-3.86
GDLC0233	12/15/2021 13:18	24.4	28.9	0	46.7	117.1	117.1	-4.91	-4.91
GDLC0234	12/10/2021 9:33	32.6	32.2	0	35.2	116.3	116.3	-0.44	-0.46
GDLC0235	12/2/2021 13:12	45.5	43.6	0	10.9	124.9	124.7	-27.93	-8.25
GDLC0236	12/6/2021 13:25	41.3	41.3	0	17.4	120.7	120.8	-0.2	-0.24
GDLC0237	12/6/2021 10:05	53.9	43.6	0	2.5	90.9	87	-6.14	-4.6
GDLC0238	12/15/2021 12:58	30.3	32.2	0	37.5	110.2	110.6	-0.24	-0.68
GDLC0239	12/15/2021 14:32	49.7	37.3	0	13	112.3	111.8	-0.36	-0.3
GDLC0240	12/15/2021 14:38	57.1	42.9	0	0	115.6	115.7	-0.35	-0.38
GDLC0241	12/2/2021 13:43	54.3	44.2	0	1.5	125.1	124.6	-1.22	-0.54
GDLC0242	12/15/2021 14:17	55.6	44.4	0	0	115.6	114.6	-46.29	-33
GDLC0243	12/2/2021 13:47	52.9	43.4	0	3.7	108.7	108.7	-1.1	-1.05
GDLC0244	12/10/2021 9:19	35.6	35.7	0	28.7	115	115	-0.32	-0.32
GUAD0062	12/3/2021 10:04	50.8	36.4	0	12.8	92.4	91.8	-1.61	-1.51
GUAD0065	12/3/2021 9:43	52.6	39.4	0.2	7.8	109.5	110	-39.61	-39.92
GUAD0066	12/3/2021 9:50	37.6	33.8	0	28.6	112.8	106.2	-12.4	-6.7
GUAD0081	12/1/2021 8:03	55.3	44.4	0.3	0	102.1	100.6	-42.04	-41.42
GUAD0082	12/1/2021 7:54	50.7	38.3	0.1	10.9	100.8	101	-16.86	-16.88
GUAD0112	12/3/2021 9:35	39.8	32.7	0.1	27.4	121.4	121.5	-0.26	-0.25
GUAD0114	12/1/2021 7:46	38.6	36.6	0.2	24.6	126.6	126.2	-13.79	-5.46
GUAD0122	12/6/2021 9:27	56.7	43.3	0.1	-0.1	128.2	126.4	-35.34	-33.98
GUAD0122	12/14/2021 13:05	56.5	43.5	0	0	129.6	129.6	-33.93	-26.32
GUAD0124	12/2/2021 12:59	55.1	44.1	0	0.8	123.5	123.7	-18.54	-18.59
GUAD0129	12/2/2021 13:37	59.3	39.4	0.1	1.2	106.5	106.4	-36.24	-31.89
GUAD0129	12/2/2021 13:39	58.3	40	0	1.7	103.8	104.2	-36.2	-27.58
GUAD0131	12/1/2021 8:50	57.2	42.6	0.2	0	116.9	116.9	-40.58	-38.32
GUAD0134	12/3/2021 10:09	50.9	40.4	0	8.7	123.6	123.6	-0.86	-0.85
GUAD0135	12/15/2021 15:23	57.7	41.7	0	0.6	127.3	124.7	-1.42	-0.85
GUAD0138	12/3/2021 9:54	27	30.6	0	42.4	93.7	93.6	-0.98	-0.98
GUAD0142	12/3/2021 9:59	49.8	37.1	0	13.1	104	102.6	-3.26	-2.5
GUAD0146	12/6/2021 13:30	55.7	44.3	0	0	128.2	127.8	-34.71	-29.15
GUAD0146	12/14/2021 12:42	59.2	40.7	0.1	0	125.4	126.7	-20.88	-20.06
GUAD0147	12/14/2021 13:59	55.6	38.9	0	5.5	110.5	112.2	-9.64	-10.45
GUAD0151	12/10/2021 11:36	57	37.9	0	5.1	128.5	127.8	-22.12	-20.12
GUAD0152	12/14/2021 13:24	56.6	41.7	0.4	1.3	126.5	125.2	-36.72	-37.46
GUAD0154	12/6/2021 10:12	62.3	37.7	0	0	93.9	94.1	-3.69	-3.69

GUAD0161	12/6/2021 9:42	52.4	42	0	5.6	128.6	126.8	-21.17	-16.81
GUAD0162	12/6/2021 9:49	53	44.2	0.1	2.7	130	129	-38.54	-39.21
GUAD0172	12/1/2021 8:22	40.4	34.8	0	24.8	100	100.1	-3.13	-3.1
GUAD0173	12/1/2021 9:42	55.7	44.3	0	0	104.1	104.5	-1.12	-1.13
GUAD0176	12/15/2021 13:11	33.9	33.8	0	32.3	105.5	105.5	-2.96	-2.92
GUAD0177	12/14/2021 13:28	44.7	38.5	0	16.8	127.6	127.8	-34.63	-31.02
GUAD0178	12/6/2021 9:13	55.3	42.7	0.9	1.1	104.1	103.4	-39.09	-38.99
GUAD0179	12/6/2021 9:18	39.9	34.5	0	25.6	108.5	108.4	-0.51	-0.49
GUAD0180	12/14/2021 12:56	51.9	43	0	5.1	100.3	100	-35.68	-34.32
GUAD0181	12/14/2021 12:49	55.9	43.2	0	0.9	126.8	126.2	-32.82	-34.38
GUAD0183	12/2/2021 13:05	55.7	43.5	0	0.8	110.9	110.8	-32.2	-28.66
GUAD0184	12/2/2021 13:31	53.4	45.1	0	1.5	129.9	129.4	-6.62	-13.39
GUAD0185	12/6/2021 8:56	57.2	42.8	0.1	-0.1	125.2	125.3	-1.03	-1.03
GUAD0186	12/6/2021 10:16	41.5	41	0.2	17.3	68.9	68.9	-25.98	-26
GUAD0187	12/2/2021 13:20	56	43.6	0	0.4	123.9	123.9	-32.77	-32.46
GUAD0198	12/6/2021 9:21	53.1	39.9	0	7	118.4	118.3	-2.21	-2.2
GUAD0199	12/6/2021 9:06	54.3	40.3	0	5.4	129.1	128.4	-16.48	-14.77
GUAD0200	12/10/2021 15:51	58.2	40.6	0	1.2	115.3	112.3	-25.88	-24.11
GUAD0201	12/10/2021 11:18	55.2	41.4	0.1	3.3	118	118.5	-29.26	-29.63
GUAD0202	12/1/2021 7:34	54.6	39.5	0.1	5.8	123.4	123.4	-1.04	-1.04
GUAD0203	12/10/2021 9:27	55	42.7	0	2.3	118.1	118	-29.49	-29.36
GUAD0204	12/10/2021 11:43	56.6	42.6	0	0.8	117.4	117.4	-27.88	-27.93
GUAD0205	12/6/2021 13:16	36.4	41.5	0	22.1	126.9	124.5	-1.4	-0.9
GUAD0207	12/14/2021 13:18	44.5	41.2	0	14.3	129.5	128.2	-0.26	-0.22
GUAD0208	12/15/2021 14:01	39.2	40.4	0	20.4	129	129.1	-0.12	-0.12
GUAD0209	12/6/2021 9:32	36	42.1	0	21.9	125.8	123.8	-0.31	-0.17
GUAD0209	12/14/2021 12:59	47.7	43.1	0	9.2	122.3	120.1	-0.12	-0.09
GUAD0211	12/15/2021 14:07	41.3	39.6	0	19.1	121.1	122.3	-0.12	-0.13
GUAD0213	12/6/2021 9:54	52.2	45	0	2.8	130	125.5	-22.29	-14.8
GUAD0214	12/6/2021 9:37	42.2	40.8	0	17	128.8	127.9	-8.56	-6.6
GUAD0215	12/6/2021 13:04	44.3	40.3	0.1	15.3	128.8	126	-0.84	-0.62
GUAD0216	12/6/2021 13:21	39	40.9	0	20.1	127.1	119.8	-1.6	-1.03
GUAD0217	12/2/2021 12:48	43.3	41.9	0	14.8	129.4	129.8	-4.12	-1.74
GUAD0218	12/2/2021 12:43	41.2	38.2	0.1	20.5	125	125.1	-0.75	-0.68
GUAD0219	12/1/2021 9:04	43	37.7	0	19.3	122.1	120.9	-3.36	-2.66
GUAD0220	12/2/2021 13:24	48.5	42.1	0	9.4	125.3	125.2	-32.1	-32.11
GUAD0221	12/1/2021 8:54	37.8	36.1	0	26.1	118.9	117.4	-2.05	-1.23
GUAD0222	12/15/2021 15:06	41.3	34.1	0	24.6	108.6	108.8	-0.21	-0.13
GUAD0223	12/15/2021 14:55	46.3	39.2	0	14.5	127.9	127.8	-0.81	-0.77
GUAD0224	12/15/2021 15:00	33.8	38.8	0	27.4	115.6	116.6	-0.26	-0.28
GUAD0225	12/3/2021 9:37	37.3	32.5	0	30.2	123.3	119.2	-1.81	-0.7
GUAD0226	12/16/2021 10:23	59.4	40.3	0	0.3	118	119.7	-0.93	-1.05
GUAD0227	12/3/2021 10:14	40.1	36	0	23.9	121.5	118.9	-2.32	-0.72
GUAD0228	12/10/2021 8:49	43.4	33.5	0	23.1	112.3	112.4	-0.48	-0.49
GUAD0230	12/15/2021 14:48	46.4	36.7	0	16.9	111.1	111.1	-0.29	-0.28
GUADH11L	12/1/2021 8:08	58.6	41	0.3	0.1	64.5	64.2	-0.57	-0.53
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GUADH12L	12/1/2021 8:19	58.9	40.7	0.4	0	63.4	63.8	-0.53	-0.45

Wells 114, 122, 134, 135, 146, 151, 152, 154, 161, 162, 180, 181, 185, 186, 188, 189, 199, 200, 204, 205, 207, 209, 213, 215, 216, 217, and 218, are approved to There are 87 total collectors (85 vertical wells and 2 horizontal wells) at GRDF.

%= percent

in. w.c.= inches in water column degrees F= degrees Fahrenheit

GCCS = Gas Collection and Control System

Guadalupe Recycling & Disposal Facility, San Jose, CA

Wellfield Monitoring Report -January 4, 5, 6, 10, 11, 12, and 13, 2022

Device Name	Date Time	CH4 (Methane) (%)	CO2 (Carbon Dioxide)(%)	O2 (Oxygen) (%)	Balance Gas(%)	Initial Temperature (oF)	Adjusted Temperature (oF)	Initial Static Pressure("H2O)	Adjusted Static Pressure("H2O)
GDLC0188	1/10/2022 9:03	54.7	43.2	0.0	2.1	127.6	128.5	-21.95	-31.95
GDLC0189	1/11/2022 10:14	49.1	43.1	0.0	7.8	130.1	129.1	-2.52	-5.49
GDLC0190	1/11/2022 10:09	41.8	40.2	0.0	18.0	127.1	120.3	-5.37	-1.07
GDLC0191	1/6/2022 8:48	33.5	44.3	0.0	22.2	111.3	112.6	-2.93	-2.86
GDLC0192	1/6/2022 8:23	53.7	42.8	0.0	3.5	122.1	123.6	-2.96	-6.21
GDLC0193	1/11/2022 13:29	44.4	38.3	0.0	17.3	127.9	127.1	-0.84	-3.46
GDLC0196	1/10/2022 7:43	21.3	26.2	0.0	52.5	90.5	90.6	-2.42	-2.45
GDLC0197	1/10/2022 7:21	51.3	28.6	0.0	20.1	128.5	128.7	-2.51	-3.49
GDLC0232	1/10/2022 7:37	20.5	26.7	0.6	52.2	116.9	115.5	-4.26	-2.06
GDLC0233	1/10/2022 8:10	26.0	28.9	0.6	44.5	115.6	114.4	-6.75	-4.75
GDLC0234	1/4/2022 10:04	37.2	33.6	0.0	29.2	115.4	114.4	-0.52	-0.41
GDLC0235	1/6/2022 8:31	48.2	43.7	0.0	8.1	123.5	124.6	-8.11	-17.74
GDLC0236	1/11/2022 10:27	43.4	41.4	0.0	15.2	122.4	122.4	-0.71	-0.70
GDLC0237	1/13/2022 14:35	55.3	41.6	0.0	3.1	124.6	125.5	-3.33	-4.86
GDLC0238	1/4/2022 9:47	34.6	33.4	0.0	32.0	110.0	108.8	-0.30	-0.08
GDLC0239	1/12/2022 10:44	47.6	35.8	0.0	16.6	111.9	111.9	-0.50	-0.45
GDLC0240	1/12/2022 9:35	56.7	43.3	0.0	0.0	116.2	118.1	-0.60	-2.36
GDLC0241	1/6/2022 9:40	57.2	42.3	0.0	0.5	121.7	123.3	-0.44	-0.99
GDLC0242	1/12/2022 9:44	55.0	45.0	0.0	0.0	113.7	104.4	-36.89	-41.90
GDLC0243	1/6/2022 8:10	58.3	40.3	0.1	1.3	92.4	92.4	-1.31	-1.83
GDLC0244	1/4/2022 9:55	36.9	37.3	0.0	25.8	112.3	111.7	-0.35	-0.23
GUAD0062	1/4/2022 8:15	55.8	37.9	0.0	6.3	87.9	90.4	-0.80	-2.78
GUAD0062	1/11/2022 15:42	52.7	35.7	0.1	11.5	95.4	95.3	-4.34	-4.01
GUAD0065	1/12/2022 8:47	57.2	38.4	0.1	4.3	109.3	109.0	-38.65	-37.32
GUAD0066	1/4/2022 8:04	53.5	37.3	0.0	9.2	102.3	107.3	-4.95	-12.36
GUAD0081	1/13/2022 15:37	58.1	41.2	0.0	0.7	100.8	100.6	-43.11	-43.50
GUAD0082	1/13/2022 15:24	57.1	34.5	0.0	8.4	99.3	99.6	-19.23	-29.96
GUAD0112	1/4/2022 9:37	49.5	36.3	0.0	14.2	119.2	121.1	-0.29	-0.26
GUAD0114	1/11/2022 12:15	55.4	43.6	0.3	0.7	65.3	66.8	-44.98	-45.31
GUAD0122	1/10/2022 8:39	53.8	43.5	0.2	2.5	129.6	129.5	-24.59	-26.07
GUAD0124	1/6/2022 8:44	56.7	43.3	0.0	0.0	125.9	126.2	-29.77	-29.82
GUAD0129	1/6/2022 9:33	57.8	42.2	0.0	0.0	101.4	100.1	-19.46	-9.82
GUAD0131	1/13/2022 14:19	60.5	39.4	0.1	0.0	105.9	105.7	-40.50	-40.65
GUAD0134	1/11/2022 8:58	46.4	47.4	0.1	6.1	123.2	123.2	-1.13	-1.09
GUAD0135	1/12/2022 8:57	57.9	42.1	0.0	0.0	130.4	130.5	-0.84	-0.93
GUAD0138	1/4/2022 7:54	25.2	28.2	0.0	46.6	84.1	84.1	-1.10	-1.10
GUAD0142	1/4/2022 8:10	57.9	38.1	0.0	4.0	99.5	104.1	-1.38	-4.01
GUAD0146	1/11/2022 10:33	56.9	42.8	0.2	0.1	129.1	129.2	-16.84	-17.84
GUAD0147	1/4/2022 10:29	51.2	39.0	0.0	9.8	110.9	112.1	-12.69	-9.45
GUAD0151	1/10/2022 9:07	57.8	40.5	0.0	1.7	128.8	128.3	-17.69	-17.69
GUAD0152	1/10/2022 8:21	33.6	33.6	6.7	26.1	128.1	127.5	-40.94	-40.05
GUAD0152	1/10/2022 10:14	55.9	41.6	0.4	2.1	127.0	126.2	-40.16	-34.45
GUAD0154	1/11/2022 13:39	57.9	42.1	0.0	0.0	129.8	129.8	-10.07	-10.50
GUAD0161	1/11/2022 11:28	53.5	43.2	0.0	3.3	129.1	129.5	-11.18	-11.17

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GUAD0161	1/11/2022 11:29	56.9	41.3	0.0	1.8	129.5	129.0	-11.11	-11.12
GUAD0162	1/13/2022 14:43	54.7	44.7	0.0	0.6	130.5	127.3	-39.18	-39.19
GUAD0172	1/4/2022 12:06	58.2	38.3	0.0	3.5	108.9	110.3	-1.10	-3.10
GUAD0173	1/4/2022 12:13	59.0	41.0	0.0	0.0	87.5	81.2	0.00	-0.57
GUAD0173	1/5/2022 6:50	60.7	38.2	0.0	1.1	105.2	103.6	-1.10	-1.17
GUAD0176	1/11/2022 9:37	32.5	32.4	0.0	35.1	105.2	104.1	-2.70	-1.48
GUAD0177	1/10/2022 8:17	42.3	37.4	0.0	20.3	126.5	125.4	-37.15	-19.35
GUAD0178	1/10/2022 8:27	39.3	30.8	6.2	23.7	63.9	62.2	-39.93	-39.44
GUAD0178	1/10/2022 10:17	48.3	37.9	2.3	11.5	81.1	81.4	-43.44	-44.18
GUAD0179	1/10/2022 8:06	36.5	33.0	0.6	29.9	112.8	112.3	-1.51	-1.06
GUAD0180	1/10/2022 8:45	51.7	44.3	0.0	4.0	129.1	128.6	-33.77	-32.29
GUAD0181	1/10/2022 8:49	54.7	45.1	0.0	0.2	128.2	127.8	-36.21	-33.61
GUAD0183	1/6/2022 8:36	54.8	44.7	0.0	0.5	107.2	108.1	-30.76	-36.02
GUAD0184	1/6/2022 8:54	49.4	45.9	0.0	4.7	128.2	129.4	-16.98	-39.24
GUAD0185	1/11/2022 12:48	57.0	43.0	0.0	0.0	127.6	118.8	-0.37	-1.36
GUAD0186	1/11/2022 13:34	46.3	43.0	0.0	10.7	80.7	82.6	-35.91	-36.39
GUAD0187	1/6/2022 8:20	58.7	40.7	0.1	0.5	122.8	122.6	-36.30	-28.99
GUAD0198	1/10/2022 8:02	55.3	39.0	0.0	5.7	120.3	121.8	-2.38	-3.41
GUAD0199	1/10/2022 8:31	56.6	37.7	0.0	5.7	128.8	129.0	-13.68	-13.92
GUAD0200	1/10/2022 8:57	56.2	43.8	0.0	0.0	128.9	128.3	-23.08	-27.15
GUAD0201	1/4/2022 10:07	56.0	44.0	0.0	0.0	118.1	118.3	-33.71	-33.23
GUAD0202	1/10/2022 7:55	49.9	34.9	0.0	15.2	122.3	121.5	-1.46	-1.34
GUAD0203	1/10/2022 7:26	58.5	39.5	0.0	2.0	116.8	116.9	-33.69	-33.76
GUAD0204	1/4/2022 10:22	53.7	46.1	0.2	0.0	74.0	75.2	-34.83	-34.86
GUAD0205	1/11/2022 10:18	44.2	44.0	0.0	11.8	130.5	130.8	-0.63	-0.72
GUAD0207	1/10/2022 8:36	47.7	40.4	0.0	11.9	126.5	125.2	-0.02	-0.31
GUAD0208	1/10/2022 8:53	41.2	42.8	0.0	16.0	128.9	128.3	-0.32	-0.27
GUAD0209	1/10/2022 8:42	48.6	44.6	0.0	6.8	111.5	128.3	-0.04	-0.29
GUAD0211	1/11/2022 10:43	48.3	41.3	0.0	10.4	120.1	123.5	-0.29	-0.65
GUAD0213	1/11/2022 11:34	58.0	40.8	0.0	1.2	128.9	127.0	-5.78	-11.66
GUAD0214	1/11/2022 10:48	45.9	42.2	0.0	11.9	128.4	128.4	-7.62	-8.98
GUAD0215	1/4/2022 13:21	53.6	31.7	1.1	13.6	126.8	127.8	-0.41	-0.49
GUAD0215	1/11/2022 10:05	45.7	40.7	0.0	13.6	128.1	127.7	-1.01	-0.95
GUAD0216	1/11/2022 10:23	45.6	41.9	0.0	12.5	129.5	127.2	-0.71	-1.22
GUAD0217	1/4/2022 13:13	36.8	38.2	0.0	25.0	127.5	125.7	-2.65	-1.50
GUAD0218	1/4/2022 12:24	35.7	37.4	0.0	26.9	124.4	124.4	-0.71	-0.78
GUAD0219	1/4/2022 12:19	51.2	39.1	0.0	9.7	119.6	121.1	-0.99	-1.05
GUAD0220	1/12/2022 11:50	51.9	40.4	0.0	7.7	124.4	124.4	-30.30	-27.11
GUAD0221	1/4/2022 12:33	45.7	38.2	0.0	16.1	104.9	106.5	-0.15	-0.21
GUAD0222	1/12/2022 11:21	41.6	34.9	0.0	23.5	110.7	110.8	-0.13	-0.14
GUAD0223	1/12/2022 10:51	48.6	41.9	0.0	9.5	127.4	127.9	-0.40	-0.91
GUAD0224	1/12/2022 11:01	41.4	41.8	0.0	16.8	118.8	118.3	-0.34	-0.31
GUAD0225	1/4/2022 9:32	51.9	39.0	0.0	9.1	110.0	116.2	-0.05	-0.50
GUAD0226	1/13/2022 9:29	59.1	40.9	0.0	0.0	118.0	118.1	-0.73	-0.72
GUAD0227	1/4/2022 9:24	54.9	37.3	0.0	7.8	112.3	115.2	-0.49	-0.92
GUAD0228	1/4/2022 9:16	54.6	36.7	0.0	8.7	108.5	114.2	-0.43	-1.28
GUAD0230	1/12/2022 11:06	50.6	39.7	0.0	9.7	111.3	111.7	-0.33	-0.78
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GU	IADH11L	1/13/2022 15:39	58.4	40.6	0.3	0.7	59.6	59.4	-2.60	-3.34
GU	IADH12L	1/13/2022 15:16	55.4	26.7	2.7	15.2	65.3	65.0	-42.58	-44.62

Wells 114, 122, 134, 135, 146, 151, 152, 154, 161, 162, 180, 181, 185, 186, 188, 189, 199, 200, 204, 205, 207, 209, 213, 215, 216, 217, and 218, are approved to There are 87 total collectors (85 vertical wells and 2 horizontal wells) at GRDF.

%= percent

in. w.c.= inches in water column degrees F= degrees Fahrenheit

GCCS = Gas Collection and Control System

Guadalupe Recycling & Disposal Facility, San Jose, CA

Wellfield Monitoring Report -February 2, 3, 4, and 7, 2022

Device Name	Date Time	CH4 (Methane) (%)	CO2 (Carbon Dioxide)(%)	O2 (Oxygen) (%)	Balance Gas(%)	Initial Temperature (oF)	Adjusted Temperature (oF)	Initial Static Pressure("H2O)	Adjusted Static Pressure("H2O)
GDLC0188	2/3/2022 13:52	50	42.9	0	7.1	129.1	128.8	-24.92	-25.08
GDLC0189	2/3/2022 13:04	44.9	40.6	0	14.5	129.8	130.6	-5.45	-6.49
GDLC0190	2/3/2022 12:51	45.5	41.6	0	12.9	107.9	124.4	-1.53	-17.84
GDLC0191	2/4/2022 9:56	36.2	43.8	0	20	109.8	111.5	-1.89	-6.45
GDLC0192	2/4/2022 10:14	49.4	44.5	0	6.1	126.8	126.8	-7.32	-9.58
GDLC0193	2/3/2022 12:30	42.2	39.5	0	18.3	130.3	130.2	-3.08	-2.3
GDLC0196	2/2/2022 13:08	37.2	32.2	0	30.6	94.6	94.8	-1.43	-1.85
GDLC0197	2/2/2022 11:32	44.9	38.4	0	16.7	129.8	129.8	-3.39	-3.4
GDLC0232	2/2/2022 12:47	40	33.8	0	26.2	112.7	113.6	-0.57	-0.79
GDLC0233	2/2/2022 13:11	40.7	33.3	0	26	114.1	114.4	-1.95	-2.71
GDLC0234	2/2/2022 11:44	41	32.6	0	26.4	113.7	114.4	-0.18	-0.32
GDLC0235	2/4/2022 10:07	48.6	43.1	0.1	8.2	124.8	124.7	-24.99	-27.93
GDLC0236	2/3/2022 13:21	39.8	40.9	0	19.3	120.1	122.8	-0.67	-1.37
GDLC0237	2/3/2022 12:20	50	43.8	0	6.2	126.5	126.5	-4.55	-4.55
GDLC0238	2/7/2022 10:31	34.7	35.5	0.1	29.7	109.4	109.4	-0.23	-0.23
GDLC0239	2/4/2022 11:48	27.1	30.4	0	42.5	103.9	103.6	-0.3	-0.24
GDLC0240	2/4/2022 11:43	48.6	40.5	0	10.9	118.9	118.9	-3.57	-2.53
GDLC0241	2/4/2022 10:31	55	45	0	0	125.2	125.2	-1.92	-2.58
GDLC0242	2/4/2022 11:39	55.2	44.8	0	0	104.2	104.2	-39.2	-39
GDLC0243	2/4/2022 10:34	50.4	43.5	0	6.1	105.5	105.6	-2.32	-2.32
GDLC0244	2/2/2022 11:38	47.1	41.4	0	11.5	111.2	113.7	-0.09	-0.76
GUAD0062	2/2/2022 11:09	41.5	32.3	1.1	25.1	76	75.7	-3.72	-2.56
GUAD0065	2/2/2022 10:14	56.7	39.3	0	4	108.7	108.6	-37.6	-36.08
GUAD0066	2/2/2022 10:22	39.8	34.4	0	25.8	112.1	111.5	-16.51	-13.35
GUAD0081	2/4/2022 9:05	54.4	40.5	0	5.1	97.7	97.7	-43.09	-43.22
GUAD0082	2/4/2022 9:00	46.5	35.5	0	18	99.3	99.2	-38.43	-39.83
GUAD0112	2/2/2022 10:36	42.8	34.9	0	22.3	124.9	124.4	-0.59	-0.38
GUAD0114	2/3/2022 14:46	56	43.2	0	0.8	102.8	105.7	-43.74	-43.73
GUAD0122	2/3/2022 11:40	55.9	41.5	0.1	2.5	128.4	129.6	-30.06	-31.43
GUAD0124	2/4/2022 9:59	55	44.7	0	0.3	123.4	123.2	-21.94	-21.92
GUAD0129	2/4/2022 11:07	60.4	39.6	0	0	104	104.1	-0.11	-4.62
GUAD0131	2/7/2022 8:57	60.5	39.4	0.1	0	110.9	111.1	-39.55	-42.51
GUAD0134	2/2/2022 10:50	45.9	50.6	0	3.5	122.1	122.6	-0.92	-1.33
GUAD0135	2/4/2022 11:30	57	43	0	0	129.2	129.1	-1.53	-2.19
GUAD0138	2/2/2022 10:26	21	25.9	0	53.1	89.2	89.2	-1.46	-1.45
GUAD0142	2/2/2022 10:18	48.7	36.3	0.5	14.5	103.8	103.7	-5.42	-4.87
GUAD0146	2/3/2022 11:59	55.8	44.2	0	0	127.8	128.2	-23.6	-24.71
GUAD0147	2/2/2022 12:03	58.6	41.2	0	0.2	113.5	114.4	-5.65	-8.51
GUAD0151	2/3/2022 12:57	56	39.2	0	4.8	130.7	130.8	-15.87	-16.33
GUAD0152	2/3/2022 13:58	54.7	43.2	0.5	1.6	124	125.2	-30.14	-31.46
GUAD0154	2/3/2022 12:40	56.6	43.4	0	0	127.6	128.1	-19.19	-18.84
GUAD0161	2/3/2022 12:07	53	42.3	0	4.7	129.3	128.7	-10.85	-10.89
GUAD0162	2/7/2022 10:40	54	42.6	0	3.4	130.4	130.2	-37.22	-37.23
GUAD0172	2/4/2022 9:18	49.3	38	0	12.7	110.9	110.9	-4.13	-3.86

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GUAD0173	2/4/2022 9:24	41.2	36.6	0	22.2	107.6	105.6	-1.53	-1.28
GUAD0176	2/2/2022 12:44	50.9	40	0	9.1	104.7	107.1	-0.69	-2.05
GUAD0177	2/3/2022 14:08	52.7	41.5	0	5.8	126.8	128.2	-12.1	-25.95
GUAD0178	2/3/2022 11:24	46.2	33.1	3.8	16.9	63.1	69.3	-40.74	-41.23
GUAD0179	2/3/2022 11:32	31	32	0	37	112.6	112.9	-0.65	-0.72
GUAD0180	2/3/2022 11:48	48	43.9	0.1	8	128	127.8	-34.02	-33.82
GUAD0181	2/3/2022 13:26	53.3	45	0	1.7	129.8	129.6	-32.37	-35.87
GUAD0183	2/4/2022 10:03	56.1	43.9	0	0	121.4	121.4	-33.79	-33.62
GUAD0184	2/4/2022 10:44	45.6	43.6	0	10.8	129.4	129.3	-37.06	-37.46
GUAD0185	2/3/2022 12:25	53	42.9	0	4.1	129.9	129.3	-2.6	-2.45
GUAD0186	2/3/2022 12:35	47.3	43.7	0	9	72.1	69.2	-34.57	-34.28
GUAD0187	2/4/2022 10:18	55.7	44.3	0	0	122.5	122.7	-23.09	-24.82
GUAD0198	2/3/2022 11:36	48.7	38.7	0	12.6	124.3	124.3	-4.31	-4.26
GUAD0199	2/3/2022 11:28	51.6	38.4	0	10	129.6	129.7	-15.42	-15.98
GUAD0200	2/3/2022 13:46	56.5	43.5	0	0	128	130.4	-24.51	-24.89
GUAD0201	2/2/2022 11:48	55.3	43.8	0.1	0.8	118.3	118.5	-29.13	-29.51
GUAD0202	2/2/2022 13:04	47.4	34.8	0	17.8	119.5	122.1	-0.74	-0.78
GUAD0203	2/2/2022 11:58	55.5	44.5	0	0	117.2	116.9	-28.69	-27.45
GUAD0204	2/7/2022 10:47	54.8	43.5	0.1	1.6	93.3	93.1	-21.85	-21.68
GUAD0205	2/3/2022 13:07	39.8	41.3	0	18.9	129.2	129.5	-1.13	-1.18
GUAD0207	2/3/2022 13:41	37.2	40.6	0	22.2	129.1	127.6	-0.51	-0.45
GUAD0208	2/3/2022 13:30	33	39	0	28	127.3	127.3	-0.15	-0.15
GUAD0209	2/3/2022 11:44	35.1	39.9	0	25	129	129.1	-0.63	-0.28
GUAD0211	2/3/2022 11:55	44.5	41.2	0	14.3	122.2	120.9	-0.5	-0.3
GUAD0213	2/3/2022 12:17	53.5	44.9	0	1.6	128.6	127.7	-16.91	-16.9
GUAD0214	2/3/2022 12:02	43.5	41.3	0	15.2	127.5	127.6	-10.2	-8.27
GUAD0215	2/3/2022 12:45	44.2	40.5	0	15.3	130.6	130.7	-1.12	-1.25
GUAD0216	2/3/2022 13:16	39.7	36.3	0	24	130.4	129.9	-1.71	-1.64
GUAD0217	2/4/2022 9:51	39.2	40.5	0	20.3	127.8	128.7	-0.91	-0.98
GUAD0218	2/4/2022 9:47	37.8	40	0	22.2	125.8	126.2	-1.2	-1.19
GUAD0219	2/4/2022 9:31	54.1	40.6	0	5.3	118.5	123.2	-1.59	-2.19
GUAD0220	2/4/2022 10:19	53.1	43	0	3.9	124.9	124.8	-24.53	-24.46
GUAD0221	2/4/2022 9:35	49.1	39.9	0	11	112.6	115.9	-0.65	-1.15
GUAD0222	2/4/2022 12:06	32.5	33.1	0	34.4	110	110.2	-0.27	-0.26
GUAD0223	2/4/2022 12:00	45.5	42.9	0	11.6	127.3	127.4	-0.78	-0.79
GUAD0224	2/4/2022 11:54	30.3	39.6	0	30.1	112.8	112.8	-0.23	-0.23
GUAD0225	2/2/2022 10:31	55.5	39.1	0	5.4	120.2	122.1	-0.52	-1.21
GUAD0226	2/4/2022 11:24	58	42	0	0	118.2	118.3	-1.08	-0.97
GUAD0227	2/2/2022 10:52	48.5	39.7	0	11.8	119.6	119.8	-1.01	-1.55
GUAD0228	2/2/2022 10:42	38.7	37	0	24.3	116.4	116	-1.86	-1.29
GUAD0230	2/4/2022 12:10	43.7	38.1	0	18.2	112.8	112.6	-1.03	-0.78
GUADH11L	2/4/2022 9:09	56.6	40	0.6	2.8	55.1	55.1	-6.51	-6.55
GUADH12L	2/4/2022 8:58	42.9	27.7	3.1	26.3	100.2	100.1	-38.26	-37.94

Wells 114, 122, 134, 135, 146, 151, 152, 154, 161, 162, 180, 181, 185, 186, 188, 189, 199, 200, 204, 205, 207, 209, 213, 215, 216, 217, and 218, are approved to There are 87 total collectors (85 vertical wells and 2 horizontal wells) at GRDF.

%= percent

in. w.c.= inches in water column degrees F= degrees Fahrenheit

GCCS = Gas Collection and Control System

Guadalupe Recycling & Disposal Facility, San Jose, CA

Wellfield Monitoring Report -March 10, 14, 15 and 16, 2022

VVeiilleid Morii	toring Report -ivia	ort -March 10, 14, 15 and 16, 2022 CH4							
Device Name	Date Time	(Methane)	(Carbon Dioxide)(%)	O2 (Oxygen) (%)	Balance Gas(%)	l	Adjusted Temperature (oF)	Initial Static Pressure("H2O)	Adjusted Static Pressure("H2O)
GDLC0188	3/14/2022 13:56	48.3	42.3	0	9.4	127.1	127.2	-25.65	-26.69
GDLC0189	3/15/2022 11:45	39.9	39.8	0	20.3	127.2	120.4	-7.33	-4.25
GDLC0190	3/15/2022 11:41	31.4	36.5	0	32.1	129.4	129.1	-18.91	-10.39
GDLC0191	3/10/2022 11:57	20	33.7	0	46.3	115.8	115.8	-7.85	-7.37
GDLC0192	3/10/2022 12:11	48.8	45.2	0	6	127.2	127.2	-10.57	-10.58
GDLC0193	3/15/2022 10:28	38.3	38.1	0	23.6	130.2	129.1	-1.93	-0.86
GDLC0196	3/14/2022 14:33	38	32.3	0	29.7	97.4	96.9	-1.95	-1.17
GDLC0196	3/14/2022 14:33	38	32.3	0	29.7	97.4	96.9	-1.95	-1.17
GDLC0197	3/16/2022 7:50	37.5	33.2	0	29.3	130.7	129.9	-3.58	-1.72
GDLC0232	3/14/2022 14:41	37.7	33.7	0	28.6	116.4	116.3	-0.97	-0.85
GDLC0233	3/16/2022 13:20	29.4	29.8	0.4	40.4	114.1	113.5	-4.94	-3.03
GDLC0234	3/16/2022 8:07	32.2	33.1	0	34.7	108.5	112.6	-0.48	-0.24
GDLC0235	3/10/2022 12:03	50.2	44.3	0	5.5	125.8	125.8	-28.39	-33.35
GDLC0236	3/15/2022 11:31	31.2	37.5	0	31.3	126.3	125.6	-1.64	-1.18
GDLC0237	3/15/2022 10:40	49.6	43.7	0	6.7	126.5	127	-4	-5.97
GDLC0238	3/16/2022 8:27	24.5	31.9	0	43.6	109.7	108	-0.27	-0.03
GDLC0239	3/15/2022 9:14	21.4	26.3	0.9	51.4	102.6	103.6	-0.48	-0.4
GDLC0240	3/10/2022 14:51	51.7	40.3	0	8	118.6	118.7	-2.49	-3.34
GDLC0241	3/10/2022 12:55	54.7	45.3	0	0	126.3	126.2	-2.7	-3.65
GDLC0242	3/15/2022 9:41	57.5	42.5	0	0	78.6	70.3	-42.24	-42.06
GDLC0243	3/10/2022 12:37	45.5	42.8	0	11.7	111.9	111.9	-2.67	-3.05
GDLC0244	3/16/2022 8:20	25.4	32	0	42.6	116.4	113.7	-1.65	-0.18
GUAD0062	3/15/2022 9:05	52.5	38.9	0	8.6	92.9	93.5	-2.28	-3.75
GUAD0065	3/15/2022 8:47	54.7	41.5	0	3.8	107.8	103.9	-37.07	-35.74
GUAD0066	3/15/2022 8:53	40.2	34.1	0	25.7	110.3	110.1	-9.08	-7.78
GUAD0081	3/16/2022 10:03	53.4	41.5	0	5.1	103	102.9	-44.71	-44.66
GUAD0082	3/16/2022 9:59	43.4	34.8	0	21.8	100.1	100.4	-41.81	-34.96
GUAD0112	3/15/2022 8:04	35.3	31.1	0	33.6	123.2	122.6	-0.4	-0.29
GUAD0114	3/16/2022 9:36	53.3	46.7	0	0	79.6	79.6	-45.47	-45.1
GUAD0122	3/14/2022 13:27	54.9	41.4	0	3.7	130.1	130.4	-34.83	-36.22
GUAD0124	3/10/2022 11:59	55.4	43.6	0	1	121	121	-20.19	-20.11
GUAD0129	3/10/2022 13:10	58.8	41.2	0	0	101.8	101.8	-17.75	-17.73
GUAD0131	3/10/2022 11:09	58.1	41.9	0	0	103.1	113.9	-35.35	-44.29
GUAD0134					Offline f	or filling			
GUAD0135	3/15/2022 9:45	57.7	42.3	0	0	129	129.1	-2.59	-3.88
GUAD0138	3/15/2022 7:41	24.6	25	0	50.4	90.5	90.5	-1.19	-1.19
GUAD0142	3/15/2022 8:55	51.6	39	0	9.4	103.1	103.3	-3.16	-3.22
GUAD0146	3/15/2022 11:08	56.6	43.4	0	0	129.3	128.8	-29.67	-30.03
GUAD0147	3/14/2022 14:46	53.4	39.5	0	7.1	115.3	115.8	-9.68	-14.66
GUAD0151	3/16/2022 13:16	59	36.4	0	4.6	129.5	129.1	-18.23	-19.29
GUAD0152	3/14/2022 14:01	55.7	42.2	0.6	1.5	124.6	125.4	-28.65	-28.55
GUAD0154	3/15/2022 9:58	57.6	42.4	0	0	126.5	129	-23.29	-22.69
GUAD0161	3/15/2022 10:59	55.4	41.7	0	2.9	130.1	129	-14.93	-15.54
GUAD0162	3/15/2022 10:53	54.3	43.9	0	1.8	129.8	129.4	-38.88	-38.86

GUAD0172	3/10/2022 10:41	35.3	28.1	0.9	35.7	107.8	104.9	-3.03	-1.36
GUAD0173	3/10/2022 10:49	39.8	33.7	0	26.5	116.6	111.4	-0.72	-0.55
GUAD0176					Offline f	or filling			
GUAD0177	3/14/2022 14:49	47.7	38.6	0	13.7	124.5	124.8	-27.84	-28.82
GUAD0178	3/14/2022 14:05	46.6	36	3.2	14.2	92.5	93.3	-38.61	-40.89
GUAD0179	3/14/2022 13:19	25	27.9	0	47.1	114.1	113.7	-0.75	-0.59
GUAD0180	3/14/2022 13:33	47.6	43.3	0	9.1	129.8	130.3	-35.84	-36.58
GUAD0181	3/14/2022 13:37	52.9	44.4	0	2.7	129.1	129.8	-34.82	-36.93
GUAD0183	3/10/2022 12:06	55.7	44.3	0	0	119.9	119.9	-35.3	-35.28
GUAD0184	3/10/2022 14:24	45.1	40.2	0	14.7	129.1	129.1	-37.86	-37.83
GUAD0185	3/15/2022 10:35	55.8	43	0	1.2	127.7	127.9	-1.85	-2.84
GUAD0186	3/15/2022 10:03	47.6	42.7	0	9.7	130.1	130	-35.01	-34.98
GUAD0187	3/10/2022 12:14	55.4	44.6	0	0	122.9	122.9	-28.66	-30.55
GUAD0198	3/14/2022 13:23	44.3	36.2	0	19.5	125.2	125	-4.53	-3.04
GUAD0199	3/14/2022 13:17	47.5	37.4	0.1	15	130.4	130.4	-18.9	-18.16
GUAD0200	3/14/2022 13:53	56.6	42.7	0	0.7	129.8	129.6	-25.08	-25.07
GUAD0201	3/16/2022 8:13	55.5	43.9	0	0.6	118.8	118.3	-29.3	-29.24
GUAD0202	3/16/2022 9:30	42.7	35.9	0	21.4	123.1	123.9	-1.14	-1.67
GUAD0203	3/16/2022 7:55	55.4	43.2	0	1.4	118.2	118.3	-27.55	-27.49
GUAD0204	3/16/2022 8:01	55.4	44.6	0	0	109.9	111.6	-29.35	-29.72
GUAD0205	3/15/2022 11:49	34.8	40.3	0	24.9	128.4	127.2	-1.57	-1.45
GUAD0207	3/14/2022 13:45	42.8	39.5	0	17.7	130.2	130.4	-0.16	-0.28
GUAD0208	3/7/2022 11:24	33.5	37.4	0	29.1	126.8	126.8	-0.33	-0.18
GUAD0208	3/14/2022 13:41	34.5	39	0	26.5	127.9	127.1	-0.11	-0.01
GUAD0209	3/16/2022 8:44	35	42.9	0	22.1	129.4	125.8	-0.16	-0.08
GUAD0211	3/15/2022 11:13	36	40.3	0	23.7	124	124	-0.56	-0.52
GUAD0213	3/15/2022 10:46	52.7	44.2	0	3.1	129.1	129.1	-17.97	-20.25
GUAD0214	3/15/2022 11:04	42.9	40.5	0	16.6	127.7	127.7	-8.22	-9.02
GUAD0215	3/15/2022 11:37	36.6	38.6	0	24.8	127.6	127.3	-1.76	-1.35
GUAD0216	3/15/2022 11:54	34.2	37.2	0	28.6	130.8	130.1	-1.42	-1.38
GUAD0217	3/10/2022 11:50	33.5	38.1	0	28.4	129.7	128.3	-1.56	-1.02
GUAD0218	3/10/2022 11:19	30	35.9	0	34.1	127.8	126.8	-2.12	-1.44
GUAD0219	3/10/2022 9:17	42.5	38.5	0	19	123.1	122.4	-3.75	-3.12
GUAD0220	3/10/2022 12:19	49.8	43.1	0	7.1	125.1	125.1	-28.08	-28.09
GUAD0221	3/10/2022 8:23	34.1	33.8	0	32.1	117.8	117.2	-3.01	-2.35
GUAD0222	3/15/2022 9:33	35.5	35.2	0	29.3	108.6	108.6	-0.2	-0.22
GUAD0223	3/15/2022 9:29	44.9	43.8	0	11.3	126.9	126.8	-0.91	-1.01
GUAD0223	3/16/2022 8:52	27.3	28.2	2.1	42.4	110.9	109.3	-2.42	-2.27
GUAD0224	3/15/2022 9:26	30.4	38.7	0	30.9	111.3	111.4	-0.23	-0.26
GUAD0225	3/15/2022 8:41	42.2	36.2	0	21.6	122.9	123.2	-1.76	-1.96
GUAD0226	3/10/2022 14:39	58.1	41.9	0	0	117	117.9	-0.13	-0.3
GUAD0227	3/15/2022 8:17	43.2	38.2	0	18.6	120.9	121.4	-2.22	-3.07
GUAD0228	3/15/2022 8:09	39.2	36.6	0	24.2	114.9	114.1	-0.97	-0.83
GUAD0230	3/15/2022 9:36	47.1	38.2	0	14.7	111.7	112.6	-0.56	-1.35
GUADH11L	3/16/2022 10:20	48.2	35.8	1.2	14.8	62.8	62.9	-8.73	-7.72
GUADH12L	3/16/2022 10:13	51.7	34.9	1.6	11.8	62.8	62.8	-7.31	-10.52
144 400	13/ 135 1/6 151 1	50 454 404		105 100	100 100 101				

Wells 114, 122, 134, 135, 146, 151, 152, 154, 161, 162, 180, 181, 185, 186, 188, 189, 199, 200, 204, 205, 207, 209, 213, 215, 216, 217, and 218, are approved to

There are 87 total collectors (85 vertical wells and 2 horizontal wells) at GRDF.

%= percent

in. w.c.= inches in water column

degrees F= degrees Fahrenheit GCCS = Gas Collection and Control System

APPENDIX K WELLFIELD DEVIATION LOGS

Guadalupe Recycling & Disposal Facility, San Jose, CA Wellfield Deviation Report October 1, 2021 - March 31, 2022

REPORT PREPARED BY: Rajan Phadnis
UPDATED DATE: 4/1/2022
LFG MONITORING DEVICE: GEM
MODEL: 5000
DATE LAST CALIBRATED: Daily

GDLC0188	10/7/2021 13:42 10/7/2021 13:45	CH₄	CO ₂	Gas Composition (% by volume)		Initial	Droceuro	al Static Adjusted Static Pressure	Comments	As of the End of	
GDLC0188 GDLC0188 GDLC0188	10/7/2021 13:45	0.0	_	O ₂	Balance	Temperature(oF)	Temperature(oF)	("H ₂ O)	("H ₂ O)	Comments	Reporting Period (Days)
GDLC0188 GDLC0188		2.8	2.8	20.5	73.9	83.1	82.9	-1.1	-1.1	NSPS/EG CAI;Pinched	
GDLC0188		1.3	1.1	21.3	76.3	81.6	81.6	-1.0	-1.0	NSPS/EG CAI;Pinched	
	11/15/2021 15:27	53.5	46.1	0	0.4	128.7	128.6	-8.6	-10.3	NSPS/EG CAI;Barely Open;Inc. Flow/Vac.	
1/ 11 400 1 1	11/15/2021 15:30			New collect	ion system inst	alled;NSPS/EG Correct	ctive Action Complete	d (CAC)			39
veii 188 nad oxy	gen exceedance dur	ng initial mo	nitoring in C	october 2021	. New lateral v	was installed and ex	ceedance was corre	ected during Nov	vember 2021.		
GUAD0151	10/7/2021 13:33	59.7	34.9	0.0	5.4	85.0	86.6	0.1	0.1	NSPS/EG CAI;Fully Open	
GUAD0151	10/7/2021 13:36	60.4	34.4	0.0	5.2	84.9	84.8	0.2	0.2	NSPS/EG CAI;Pinched	
GUAD0151	10/19/2021 12:45	60.8	37.6	0.0	1.6	77.9	77.5	5.13	5.14	NSPS/EG CAI;Fully Open;Pinched	
GUAD0151	11/15/2021 15:21	58.7	41.3	0.0	0.0	128.9	128.9	-0.4	-0.4	NSPS/EG CAI;Barely Open;No Adj. Made	
	11/15/2021 15:25					Action Completed (CA	,				39
	sure exceedance during		ring in Octob			alled and exceedance	was corrected during	November 2021.			
GUAD0200	10/7/2021 15:29	57.5	39.9	0.0	2.6	134.1	134.1	-15.3	-15.3	Fully Open	
GUAD0200	10/12/2021 16:24	58.6	39.5	0.0	1.9	130.5	132.3	-5.9	-5.9	NSPS/EG CAI;Fully Open;Pinched	
GUAD0200	10/12/2021 16:26					CO was 0 ppm			•		
GUAD0200	11/4/2021 14:15	58.5	41.5	0.0	0.0	128.4	128.5	-0.3	-0.5	NSPS/EG CAI;Fully Open;Surging;No Adj. Made	
	11/18/2021 12:45	56.8	43.2	0.1	-0.1	125.5	126.8	-11.9	-12.6	NSPS/EG CAI;Barely Open;Inc. Flow/Vac.;Surging	
GUAD0200	11/18/2021 12:50	-		-	-	CO was 5 ppm				CO sample was 5 ppm	47
Vell 200 had tempe	erature exceedance du	ring initial mo	nitoring in Oc	tober 2021. C	O was below 1	00 ppm. HOV notificat	ion letter was submit	ted and well was p	olaced on the existin	ng list of HOV wells.	
GUAD0217	10/5/2021 13:50	45.3	41.1	0.8	12.8	131.3	131.3	-2.5	-2.5	No Adj. Made	
GUAD0217	10/5/2021 14:50	34.7	37	0.0	28.3	128.5	128.5	-5.1	-5.1	NSPS/EG CAI;Dec. Flow/Vac.;Surging	
GUAD0217	10/5/2021 14:52					CO was 10 ppm					
GUAD0217	11/1/2021 13:23	48.5	44.4	0	7.1	126.3	126.2	-0.5	-0.5	NSPS/EG CAI;Barely Open;No Adj. Made	
GUAD0217	11/1/2021 13:20					CO was 0 ppm					47
Vell 217 had tempe	erature exceedance du	ring initial mo	nitoring in Oc	tober 2021. C	O was below 1	00 ppm. HOV notificat	ion letter was submit	ted and well was p	olaced on the existin	ng list of HOV wells.	
GUAD0218	10/6/2021 14:12	46.0	40.4	0.1	13.5	132.3	132.3	-0.7	-0.7	No Adj. Made	
GUAD0218	10/8/2021 16:07	44.8	41.1	0.0	14.1	111.7	111.5	-0.2	-0.2	NSPS/EG CAI;Barely Open;No Adj. Made	
GUAD0218	10/8/2021 16:08					CO was 0 ppm					
GUAD0218	11/1/2021 13:11	50.1	42.6	0	7.3	126.5	126.5	-1.1	-1.1	NSPS/EG CAI;Barely Open;No Adj. Made	
GUAD0218	11/1/2021 13:14					CO was 0 ppm					47
Nell 218 had tem	perature exceedance	e during initia	al monitorino	g in October	2021. CO was	s below 100 ppm. Ho	OV notification lette	r was submitted	and well was place	ced on the existing list of HOV wells.	
GUAD0173	1/4/2022 12:13	59.0	41.0	0.0	0.0	87.5	81.2	0.0	-0.6	Barely Open;Inc. Flow/Vac.	<1
Vell 173 had press	sure exceedance during	initial monito	oring in Janua	ry 2022. Adju	stments were r	made and exceedance	was corrected.				
GUAD0152	1/10/2022 8:21	33.6	33.6	6.7	26.1	128.1	127.5	-40.9	-40.1	Fully Open;Surging;No Adj. Made	
GUAD0152	1/10/2022 10:14	55.9	41.6	0.4	2.1	127.0	126.2	-40.2	-34.5	NSPS/EG CAI;Fully Open;Surging	<1
Vell 152 had oxyge	en exceedance during i	nitial monitori	ng in January	2022. Adjust	tments were m	ade and exceedance v	vas corrected on the	same day.			
GUAD0178	1/10/2022 8:27	39.3	30.8	6.2	23.7	63.9	62.2	-39.9		Barely Open;Dec. Flow/Vac.;Surging	
GUAD0178	1/10/2022 10:17	48.3	37.9	2.3	11.5	81.1	81.4	-43.4	-44.2	NSPS/EG CAI;Barely Open;Surging;No Adj. Made	<1
Vell 178 had oxyge	en exceedance during i	nitial monitori	ng in January	2022. Adjus	tments were m	ade and exceedance v	vas corrected on the	same day.			

%= percent

in. w.c.= inches in water column

NSPS= New Source Performance Standards

EG CAI= Emissions Guidelines Corrective Action Initiated

EG CAC= Emissions Guidelines Corrective Action Completed

°F = degrees Fahrenheit

APPENDIX L MONTHLY LANDFILL GAS FLOW RATES

October 1, 2021 - March 31, 2022 SAR MONTHLY LFG Input to Flare (A-9) Guadalupe Recycling & Disposal Facility, San Jose, CA

A-9 Old Enclosed Flare

Month	Total Available Runtime (hours)	Total Downtime (hours)	Total Runtime (hours)	Average Flow (scfm)	Average CH ₄ (%)*	Total LFG Volume (scf)	Total CH ₄ Volume (scf)	Total MMBTU
October 2021	744.00	744.00	0.00	0	49.9	0	0	0
November 2021	721.00	721.00	0.00	0	49.9	0	0	0
December 2021	744.00	744.00	0.00	0	49.9	0	0	0
January 2022	744.00	744.00	0.00	0	49.9	0	0	0
February 2022	672.00	672.00	0.00	0	49.9	0	0	0
March 2022	743.00	743.00	0.00	0	49.9	0	0	0
October 1, 2021 - March 31, 2022 Totals/Avg:	4,368.00	4,368.00	0.00	0	49.9	0	0	0

Notes:

*Starting June 24, 2020 methane content determined from flare A-9 April 29, 2020 source test.

scfm= standard cubic feet per minute

scf= standard cubic feet

MMBTU= million British thermal units

LFG= landfill gas CH₄= methane

San Jose, CA

Heat Input Rate Flare A-9

MONTH: October-21

Date	Runtime (hours)	CH ₄ (%)*	Average Flow (scfm)	Total LFG Volume (scf)	CH₄ Volume (scf)	Heating Value of CH ₄ (BTU/scf)	Heat Input (MMBTU)/Day
10/1/2021	0.0	49.9	0	0	0	1,013.0	0
10/2/2021	0.0	49.9	0	0	0	1,013.0	0
10/3/2021	0.0	49.9	0	0	0	1,013.0	0
10/4/2021	0.0	49.9	0	0	0	1,013.0	0
10/5/2021	0.0	49.9	0	0	0	1,013.0	0
10/6/2021	0.0	49.9	0	0	0	1,013.0	0
10/7/2021	0.0	49.9	0	0	0	1,013.0	0
10/8/2021	0.0	49.9	0	0	0	1,013.0	0
10/9/2021	0.0	49.9	0	0	0	1,013.0	0
10/10/2021	0.0	49.9	0	0	0	1,013.0	0
10/11/2021	0.0	49.9	0	0	0	1,013.0	0
10/12/2021	0.0	49.9	0	0	0	1,013.0	0
10/13/2021	0.0	49.9	0	0	0	1,013.0	0
10/14/2021	0.0	49.9	0	0	0	1,013.0	0
10/15/2021	0.0	49.9	0	0	0	1,013.0	0
10/16/2021	0.0	49.9	0	0	0	1,013.0	0
10/17/2021	0.0	49.9	0	0	0	1,013.0	0
10/18/2021	0.0	49.9	0	0	0	1,013.0	0
10/19/2021	0.0	49.9	0	0	0	1,013.0	0
10/20/2021	0.0	49.9	0	0	0	1,013.0	0
10/21/2021	0.0	49.9	0	0	0	1,013.0	0
10/22/2021	0.0	49.9	0	0	0	1,013.0	0
10/23/2021	0.0	49.9	0	0	0	1,013.0	0
10/24/2021	0.0	49.9	0	0	0	1,013.0	0
10/25/2021	0.0	49.9	0	0	0	1,013.0	0
10/26/2021	0.0	49.9	0	0	0	1,013.0	0
10/27/2021	0.0	49.9	0	0	0	1,013.0	0
10/28/2021	0.0	49.9	0	0	0	1,013.0	0
10/29/2021	0.0	49.9	0	0	0	1,013.0	0
10/30/2021	0.0	49.9	0	0	0	1,013.0	0
10/31/2021	0.0	49.9	0	0	0	1,013.0	0
Totals/ Average:	0.0	49.9	0	0	0	1013.0	0
Notes:						Maximum:	0

*Methane content determined from the the April 28, 2020 source test.

scfm= standard cubic feet per minute

BTU/scf= British thermal unit per square cubic feet

scf= standard cubic feet

MMBTU= million British thermal units

LFG= landfill gas

San Jose, CA

Heat Input Rate Flare A-9

MONTH: November-21

Date	Runtime (hours)	CH ₄ (%)*	Average Flow (scfm)	Total LFG Volume (scf)	CH₄ Volume (scf)	Heating Value of CH ₄ (BTU/scf)	Heat Input (MMBTU)/Day
11/1/2021	0.0	49.9	0	0	0	1,013.0	0
11/2/2021	0.0	49.9	0	0	0	1,013.0	0
11/3/2021	0.0	49.9	0	0	0	1,013.0	0
11/4/2021	0.0	49.9	0	0	0	1,013.0	0
11/5/2021	0.0	49.9	0	0	0	1,013.0	0
11/6/2021	0.0	49.9	0	0	0	1,013.0	0
11/7/2021	0.0	49.9	0	0	0	1,013.0	0
11/8/2021	0.0	49.9	0	0	0	1,013.0	0
11/9/2021	0.0	49.9	0	0	0	1,013.0	0
11/10/2021	0.0	49.9	0	0	0	1,013.0	0
11/11/2021	0.0	49.9	0	0	0	1,013.0	0
11/12/2021	0.0	49.9	0	0	0	1,013.0	0
11/13/2021	0.0	49.9	0	0	0	1,013.0	0
11/14/2021	0.0	49.9	0	0	0	1,013.0	0
11/15/2021	0.0	49.9	0	0	0	1,013.0	0
11/16/2021	0.0	49.9	0	0	0	1,013.0	0
11/17/2021	0.0	49.9	0	0	0	1,013.0	0
11/18/2021	0.0	49.9	0	0	0	1,013.0	0
11/19/2021	0.0	49.9	0	0	0	1,013.0	0
11/20/2021	0.0	49.9	0	0	0	1,013.0	0
11/21/2021	0.0	49.9	0	0	0	1,013.0	0
11/22/2021	0.0	49.9	0	0	0	1,013.0	0
11/23/2021	0.0	49.9	0	0	0	1,013.0	0
11/24/2021	0.0	49.9	0	0	0	1,013.0	0
11/25/2021	0.0	49.9	0	0	0	1,013.0	0
11/26/2021	0.0	49.9	0	0	0	1,013.0	0
11/27/2021	0.0	49.9	0	0	0	1,013.0	0
11/28/2021	0.0	49.9	0	0	0	1,013.0	0
11/29/2021	0.0	49.9	0	0	0	1,013.0	0
11/30/2021	0.0	49.9	0	0	0	1,013.0	0
Totals/ Average:	0.0	49.9	0	0	0	1013.0	0
Notes:						Maximum:	0

*Methane content determined from the the April 28, 2020 source test. scfm= standard cubic feet per minute BTU/scf= British thermal unit per square cubic feet

scf= standard cubic feet

MMBTU= million British thermal units

LFG= landfill gas

San Jose, CA

Heat Input Rate Flare A-9

MONTH: December-21

Date	Runtime (hours)	CH ₄ (%)*	Average Flow (scfm)	Total LFG Volume (scf)	CH₄ Volume (scf)	Heating Value of CH ₄ (BTU/scf)	Heat Input (MMBTU)/Day
12/1/2021	0.0	49.9	0	0	0	1,013.0	0
12/2/2021	0.0	49.9	0	0	0	1,013.0	0
12/3/2021	0.0	49.9	0	0	0	1,013.0	0
12/4/2021	0.0	49.9	0	0	0	1,013.0	0
12/5/2021	0.0	49.9	0	0	0	1,013.0	0
12/6/2021	0.0	49.9	0	0	0	1,013.0	0
12/7/2021	0.0	49.9	0	0	0	1,013.0	0
12/8/2021	0.0	49.9	0	0	0	1,013.0	0
12/9/2021	0.0	49.9	0	0	0	1,013.0	0
12/10/2021	0.0	49.9	0	0	0	1,013.0	0
12/11/2021	0.0	49.9	0	0	0	1,013.0	0
12/12/2021	0.0	49.9	0	0	0	1,013.0	0
12/13/2021	0.0	49.9	0	0	0	1,013.0	0
12/14/2021	0.0	49.9	0	0	0	1,013.0	0
12/15/2021	0.0	49.9	0	0	0	1,013.0	0
12/16/2021	0.0	49.9	0	0	0	1,013.0	0
12/17/2021	0.0	49.9	0	0	0	1,013.0	0
12/18/2021	0.0	49.9	0	0	0	1,013.0	0
12/19/2021	0.0	49.9	0	0	0	1,013.0	0
12/20/2021	0.0	49.9	0	0	0	1,013.0	0
12/21/2021	0.0	49.9	0	0	0	1,013.0	0
12/22/2021	0.0	49.9	0	0	0	1,013.0	0
12/23/2021	0.0	49.9	0	0	0	1,013.0	0
12/24/2021	0.0	49.9	0	0	0	1,013.0	0
12/25/2021	0.0	49.9	0	0	0	1,013.0	0
12/26/2021	0.0	49.9	0	0	0	1,013.0	0
12/27/2021	0.0	49.9	0	0	0	1,013.0	0
12/28/2021	0.0	49.9	0	0	0	1,013.0	0
12/29/2021	0.0	49.9	0	0	0	1,013.0	0
12/30/2021	0.0	49.9	0	0	0	1,013.0	0
12/31/2021	0.0	49.9	0	0	0	1,013.0	0
Totals/ Average:	0.0	49.9	0	0	0	1013.0	0
Notes:						Maximum:	0

*Methane content determined from the the April 28, 2020 source test.

scfm= standard cubic feet per minute

BTU/scf= British thermal unit per square cubic feet

scf= standard cubic feet

MMBTU= million British thermal units

LFG= landfill gas

San Jose, CA

Heat Input Rate Flare A-9

MONTH: January-22

						1	1
Date	Runtime (hours)	CH ₄ (%)*	Average Flow (scfm)	Total LFG Volume (scf)	CH ₄ Volume (scf)	Heating Value of CH ₄ (BTU/scf)	Heat Input (MMBTU)/Day
1/1/2022	0.0	49.9	0	0	0	1,013.0	0
1/2/2022	0.0	49.9	0	0	0	1,013.0	0
1/3/2022	0.0	49.9	0	0	0	1,013.0	0
1/4/2022	0.0	49.9	0	0	0	1,013.0	0
1/5/2022	0.0	49.9	0	0	0	1,013.0	0
1/6/2022	0.0	49.9	0	0	0	1,013.0	0
1/7/2022	0.0	49.9	0	0	0	1,013.0	0
1/8/2022	0.0	49.9	0	0	0	1,013.0	0
1/9/2022	0.0	49.9	0	0	0	1,013.0	0
1/10/2022	0.0	49.9	0	0	0	1,013.0	0
1/11/2022	0.0	49.9	0	0	0	1,013.0	0
1/12/2022	0.0	49.9	0	0	0	1,013.0	0
1/13/2022	0.0	49.9	0	0	0	1,013.0	0
1/14/2022	0.0	49.9	0	0	0	1,013.0	0
1/15/2022	0.0	49.9	0	0	0	1,013.0	0
1/16/2022	0.0	49.9	0	0	0	1,013.0	0
1/17/2022	0.0	49.9	0	0	0	1,013.0	0
1/18/2022	0.0	49.9	0	0	0	1,013.0	0
1/19/2022	0.0	49.9	0	0	0	1,013.0	0
1/20/2022	0.0	49.9	0	0	0	1,013.0	0
1/21/2022	0.0	49.9	0	0	0	1,013.0	0
1/22/2022	0.0	49.9	0	0	0	1,013.0	0
1/23/2022	0.0	49.9	0	0	0	1,013.0	0
1/24/2022	0.0	49.9	0	0	0	1,013.0	0
1/25/2022	0.0	49.9	0	0	0	1,013.0	0
1/26/2022	0.0	49.9	0	0	0	1,013.0	0
1/27/2022	0.0	49.9	0	0	0	1,013.0	0
1/28/2022	0.0	49.9	0	0	0	1,013.0	0
1/29/2022	0.0	49.9	0	0	0	1,013.0	0
1/30/2022	0.0	49.9	0	0	0	1,013.0	0
1/31/2022	0.0	49.9	0	0	0	1,013.0	0
Totals/ Average:	0.0	49.9	0	0	0	1013.0	0
Notes:			•			Maximum:	0

*Methane content determined from the the April 28, 2020 source test.

scfm= standard cubic feet per minute

BTU/scf= British thermal unit per square cubic feet

scf= standard cubic feet

MMBTU= million British thermal units

LFG= landfill gas

San Jose, CA

Heat Input Rate Flare A-9

MONTH: February-22

Date	Runtime (hours)	CH ₄ (%)*	Average Flow (scfm)	Total LFG Volume (scf)	CH₄ Volume (scf)	Heating Value of CH ₄ (BTU/scf)	Heat Input (MMBTU)/Day
2/1/2022	0.0	49.9	0	0	0	1,013.0	0
2/2/2022	0.0	49.9	0	0	0	1,013.0	0
2/3/2022	0.0	49.9	0	0	0	1,013.0	0
2/4/2022	0.0	49.9	0	0	0	1,013.0	0
2/5/2022	0.0	49.9	0	0	0	1,013.0	0
2/6/2022	0.0	49.9	0	0	0	1,013.0	0
2/7/2022	0.0	49.9	0	0	0	1,013.0	0
2/8/2022	0.0	49.9	0	0	0	1,013.0	0
2/9/2022	0.0	49.9	0	0	0	1,013.0	0
2/10/2022	0.0	49.9	0	0	0	1,013.0	0
2/11/2022	0.0	49.9	0	0	0	1,013.0	0
2/12/2022	0.0	49.9	0	0	0	1,013.0	0
2/13/2022	0.0	49.9	0	0	0	1,013.0	0
2/14/2022	0.0	49.9	0	0	0	1,013.0	0
2/15/2022	0.0	49.9	0	0	0	1,013.0	0
2/16/2022	0.0	49.9	0	0	0	1,013.0	0
2/17/2022	0.0	49.9	0	0	0	1,013.0	0
2/18/2022	0.0	49.9	0	0	0	1,013.0	0
2/19/2022	0.0	49.9	0	0	0	1,013.0	0
2/20/2022	0.0	49.9	0	0	0	1,013.0	0
2/21/2022	0.0	49.9	0	0	0	1,013.0	0
2/22/2022	0.0	49.9	0	0	0	1,013.0	0
2/23/2022	0.0	49.9	0	0	0	1,013.0	0
2/24/2022	0.0	49.9	0	0	0	1,013.0	0
2/25/2022	0.0	49.9	0	0	0	1,013.0	0
2/26/2022	0.0	49.9	0	0	0	1,013.0	0
2/27/2022	0.0	49.9	0	0	0	1,013.0	0
2/28/2022	0.0	49.9	0	0	0	1,013.0	0
Totals/ Average:	0.0	49.9	0	0	0	1013.0	0
Notes:						Maximum:	0

*Methane content determined from the the April 28, 2020 source test.

scfm= standard cubic feet per minute

BTU/scf= British thermal unit per square cubic feet

scf= standard cubic feet

MMBTU= million British thermal units

LFG= landfill gas

San Jose, CA

Heat Input Rate Flare A-9

MONTH: March-22

Date	Runtime (hours)	CH ₄ (%)*	Average Flow (scfm)	Total LFG Volume (scf)	CH₄ Volume (scf)	Heating Value of CH ₄ (BTU/scf)	Heat Input (MMBTU)/Day
3/1/2022	0.0	49.9	0	0	0	1,013.0	0
3/2/2022	0.0	49.9	0	0	0	1,013.0	0
3/3/2022	0.0	49.9	0	0	0	1,013.0	0
3/4/2022	0.0	49.9	0	0	0	1,013.0	0
3/5/2022	0.0	49.9	0	0	0	1,013.0	0
3/6/2022	0.0	49.9	0	0	0	1,013.0	0
3/7/2022	0.0	49.9	0	0	0	1,013.0	0
3/8/2022	0.0	49.9	0	0	0	1,013.0	0
3/9/2022	0.0	49.9	0	0	0	1,013.0	0
3/10/2022	0.0	49.9	0	0	0	1,013.0	0
3/11/2022	0.0	49.9	0	0	0	1,013.0	0
3/12/2022	0.0	49.9	0	0	0	1,013.0	0
3/13/2022	0.0	49.9	0	0	0	1,013.0	0
3/14/2022	0.0	49.9	0	0	0	1,013.0	0
3/15/2022	0.0	49.9	0	0	0	1,013.0	0
3/16/2022	0.0	49.9	0	0	0	1,013.0	0
3/17/2022	0.0	49.9	0	0	0	1,013.0	0
3/18/2022	0.0	49.9	0	0	0	1,013.0	0
3/19/2022	0.0	49.9	0	0	0	1,013.0	0
3/20/2022	0.0	49.9	0	0	0	1,013.0	0
3/21/2022	0.0	49.9	0	0	0	1,013.0	0
3/22/2022	0.0	49.9	0	0	0	1,013.0	0
3/23/2022	0.0	49.9	0	0	0	1,013.0	0
3/24/2022	0.0	49.9	0	0	0	1,013.0	0
3/25/2022	0.0	49.9	0	0	0	1,013.0	0
3/26/2022	0.0	49.9	0	0	0	1,013.0	0
3/27/2022	0.0	49.9	0	0	0	1,013.0	0
3/28/2022	0.0	49.9	0	0	0	1,013.0	0
3/29/2022	0.0	49.9	0	0	0	1,013.0	0
3/30/2022	0.0	49.9	0	0	0	1,013.0	0
3/31/2022	0.0	49.9	0	0	0	1,013.0	0
Totals/ Average:	0.0	49.9	0	0	0	1013.0	0
Notes:	 					Maximum:	0

*Methane content determined from the the April 28, 2020 source test.

scfm= standard cubic feet per minute

BTU/scf= British thermal unit per square cubic feet

scf= standard cubic feet

MMBTU= million British thermal units

LFG= landfill gas

October 1, 2021 - March 31, 2022 SAR MONTHLY LFG Input to Flare (A-17) Guadalupe Recycling & Disposal Facility, San Jose, CA

A-17 Enclosed Flare (Based on the correspondence with the BAAQMD, flare A-14 is now designated as flare A-17)

Month	Total Available Runtime (hours)	Total Downtime (hours)	Total Runtime (hours)	Average Flow (scfm)	Average CH ₄ (%)*	Total LFG Volume (scf)	Total CH ₄ Volume (scf)	Total MMBTU
October 2021	744.0	52.5	691.5	1,595	40.4	66,345,058	26,826,624	27,175
November 2021	721.0	1.2	719.8	1,700	40.4	73,411,662	29,684,006	30,070
December 2021	744.0	2.8	741.2	1,452	40.4	64,578,886	26,112,473	26,452
January 2022	744.0	3.5	740.5	1,647	40.4	73,146,929	29,576,961	29,961
February 2022	672.0	4.4	667.6	1,784	40.4	71,436,687	28,885,424	29,261
March 2022	743.0	5.8	737.2	1,783	40.4	78,861,505	31,887,650	32,302
October 1, 2021 - March 31, 2022 Totals/Avg:	4,368.0	70.1	4,297.9	1,660	40.4	427,780,727	172,973,137	175,222
Annual 2021 Totals/Avg:	8,760.0	70.4	8,689.6	1,840	40.4	960,592,129	397,307,589	402,473

Notes:

NA= Initial startup of A-14 flare was on November 17, 2016. Stack was replaced with standard 120 MMBTU/HR stack at the end of October 2020. Per BAAQMD new designation is flare A-17.

*Starting April 9, 2021, Methane content determined from flare A-17 February 18, 2021 source test.

scfm= standard cubic feet per minute scf= standard cubic feet MMBTU= million British thermal units

LFG= landfill gas

San Jose, CA

Heat Input Rate Flare A-17

MONTH: October-21

Notes:						Maximum:	1,024
Totals/ Average:	691.53	40.4	1,595	66,345,058	26,826,624	1013.0	27,175
10/31/2021	24.0	40.4	1,485	2,138,486	864,697	1,013.0	875.9
10/30/2021	24.0	40.4	1,498	2,157,699	872,466	1,013.0	883.8
10/29/2021	24.0	40.4	1,518	2,185,686	883,782	1,013.0	895.3
10/28/2021	24.0	40.4	1,541	2,218,395	897,008	1,013.0	908.7
10/27/2021	24.0	40.4	1,610	2,318,098	937,323	1,013.0	949.5
10/26/2021	13.1	40.4	1,669	1,315,065	531,747	1,013.0	538.7
10/25/2021	7.3	40.4	1,201	528,311	213,623	1,013.0	216.4
10/24/2021	24.0	40.4	1,545	2,224,337	899,411	1,013.0	911.1
10/23/2021	24.0	40.4	1,650	2,375,735	960,628	1,013.0	973.1
10/22/2021	16.8	40.4	1,688	1,701,671	688,071	1,013.0	697.0
10/21/2021	12.6	40.4	1,662	1,256,579	508,098	1,013.0	514.7
10/20/2021	17.7	40.4	1,591	1,686,791	682,054	1,013.0	690.9
10/19/2021	24.0	40.4	1,575	2,268,693	917,346	1,013.0	929.3
10/18/2021	24.0	40.4	1,547	2,227,411	900,654	1,013.0	912.4
10/17/2021	24.0	40.4	1,568	2,258,584	913,258	1,013.0	925.1
10/16/2021	24.0	40.4	1,603	2,307,884	933,193	1,013.0	945.3
10/15/2021	24.0	40.4	1,594	2,294,732	927,875	1,013.0	939.9
10/14/2021	24.0	40.4	1,585	2,282,765	923,036	1,013.0	935.0
10/13/2021	24.0	40.4	1,590	2,289,945	925,939	1,013.0	938.0
10/12/2021	24.0	40.4	1,570	2,260,991	914,232	1,013.0	926.1
10/11/2021	24.0	40.4	1,561	2,247,854	908,920	1,013.0	920.7
10/10/2021	24.0	40.4	1,597	2,300,123	930,055	1,013.0	942.1
10/9/2021	24.0	40.4	1,586	2,284,155	923,598	1,013.0	935.6
10/8/2021	24.0	40.4	1,571	2,262,821	914,972	1,013.0	926.9
10/7/2021	24.0	40.4	1,609	2,316,607	936,720	1,013.0	948.9
10/6/2021	24.0	40.4	1,627	2,343,280	947,505	1,013.0	959.8
10/5/2021	24.0	40.4	1,650	2,375,871	960,683	1,013.0	973.2
10/4/2021	24.0	40.4	1,701	2,449,252	990,355	1,013.0	1,003.2
10/3/2021	24.0	40.4	1,729	2,489,116	1,006,474	1,013.0	1,019.6
10/2/2021	24.0	40.4	1,721	2,478,250	1,002,080	1,013.0	1,015.1
10/1/2021	24.0	40.4	1,736	2,499,871	1,010,823	1,013.0	1,024.0
Date	Runtime (hours)	CH ₄ (%)*	Average Flow (scfm)	Total LFG Volume (scf)	CH ₄ Volume (scf)	Heating Value of CH ₄ (BTU/scf)	Heat Input (MMBTU)/Day
		1	1				

*Methane content determined from flare A-17-Starting April 9, 2021, Methane content determined from flare A-17 February 18, 2021 source test. scfm= standard cubic feet per minute

BTU/scf= British thermal unit per square cubic feet scf= standard cubic feet MMBTU= million British thermal units LFG= landfill gas $CH_4 = methane$

San Jose, CA

Heat Input Rate Flare A-17

MONTH: November-21

11/29/2021 11/29/2021 11/30/2021	24.0 24.0 24.0	40.4 40.4 40.4	1,705 1,696	2,457,149 2,454,754	993,548 992,580 987,540	1,013.0 1,013.0 1,013.0	1,005.5 1,005.5 1,000.4
11/27/2021 11/28/2021	24.0 24.0	40.4 40.4	1,711 1,706	2,464,301	996,440	1,013.0	1,009.4 1,006.5
11/26/2021	24.0	40.4	1,721	2,477,651	1,001,838	1,013.0	1,014.9
11/25/2021	24.0	40.4	1,731	2,493,085	1,008,079	1,013.0	1,021.2
11/24/2021	22.8	40.4	1,705	2,329,659	941,998	1,013.0	954.2
11/23/2021	24.0	40.4	1,709	2,460,612	994,948	1,013.0	1,007.9
11/22/2021	24.0	40.4	1,719	2,474,651	1,000,625	1,013.0	1,013.6
11/21/2021	24.0	40.4	1,721	2,477,757	1,001,881	1,013.0	1,014.9
11/20/2021	24.0	40.4	1,720	2,477,112	1,001,620	1,013.0	1,014.6
11/19/2021	24.0	40.4	1,724	2,482,624	1,003,849	1,013.0	1,016.9
11/18/2021	24.0	40.4	1,729	2,490,402	1,006,994	1,013.0	1,020.1
11/17/2021	24.0	40.4	1,730	2,491,682	1,007,512	1,013.0	1,020.6
11/16/2021	24.0	40.4	1,737	2,501,218	1,011,367	1,013.0	1,024.5
11/15/2021	24.0	40.4	1,720	2,477,107	1,001,618	1,013.0	1,014.6
11/14/2021	24.0	40.4	1,702	2,451,401	991,224	1,013.0	1,004.1
11/13/2021	24.0	40.4	1,707	2,458,205	993,975	1,013.0	1,006.9
11/12/2021	24.0	40.4	1,709	2,461,161	995,170	1,013.0	1,008.1
11/11/2021	24.0	40.4	1,714	2,468,041	997,952	1,013.0	1,010.9
11/10/2021	24.0	40.4	1,707	2,458,019	993,900	1,013.0	1,006.8
11/9/2021	24.0	40.4	1,678	2,416,650	977,172	1,013.0	989.9
11/8/2021	24.0	40.4	1,690	2,433,527	983,997	1,013.0	996.8
11/7/2021	25.0	40.4	1,700	2,550,609	1,031,339	1,013.0	1,044.7
11/6/2021	24.0	40.4	1,706	2,456,355	993,227	1,013.0	1,006.1
11/5/2021	24.0	40.4	1,721	2,477,973	1,001,968	1,013.0	1,015.0
11/4/2021	24.0	40.4	1,735	2,498,941	1,010,447	1,013.0	1,023.6
11/3/2021	24.0	40.4	1,685	2,426,134	981,007	1,013.0	993.8
11/2/2021	24.0	40.4	1,569	2,259,562	913,654	1,013.0	925.5
11/1/2021	24.0	40.4	1,488	2,143,030	866,534	1,013.0	877.8
Date	Runtime (hours)	CH ₄ (%)*	Average Flow (scfm)	Total LFG Volume (scf)	CH ₄ Volume (scf)	Heating Value of CH₄ (BTU/scf)	Heat Input (MMBTU)/Day

*Methane content determined from flare A-17-Starting April 9, 2021, Methane content determined from flare A-17 February 18, 2021 source test. scfm= standard cubic feet per minute

BTU/scf= British thermal unit per square cubic feet scf= standard cubic feet MMBTU= million British thermal units LFG= landfill gas

San Jose, CA

Heat Input Rate Flare A-17

MONTH: December-21

12/1/2021 24.0 40.4 1,688 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 892.0 12/5/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/5/2021 24.0 40.4 1,516 2,183,711 882,984 1,013.0 894.5 12/6/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 858.3 12/17/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 830.3 12/18/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 830.3 12/18/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 830.3 12/18/2021 22.8 40.4 1,451 1,982,037 801,437 1,013.0 811.9 12/10/2021 24.0 40.4 1,425 2,052,453 829,909 1,013.0 840.7 12/11/2021 24.0 40.4 1,425 2,052,453 829,586 1,013.0 840.4 12/12/2021 24.0 40.4 1,445 2,042,515 825,891 1,013.0 836.6 12/13/2021 24.0 40.4 1,418 2,042,515 825,891 1,013.0 836.6 12/13/2021 24.0 40.4 1,419 2,043,580 826,322 1,013.0 837.1 12/14/2021 24.0 40.4 1,435 2,065,854 835,328 1,013.0 837.1 12/14/2021 24.0 40.4 1,435 2,065,854 835,328 1,013.0 847.5 12/17/2021 24.0 40.4 1,437 2,069,125 836,651 1,013.0 847.5 12/17/2021 24.0 40.4 1,437 2,069,125 836,651 1,013.0 847.5 12/17/2021 24.0 40.4 1,437 2,069,125 836,651 1,013.0 847.5 12/17/2021 24.0 40.4 1,431 2,059,991 832,553 1,013.0 843.8 12/18/2021 24.0 40.4 1,436 2,067,878 836,146 1,013.0 847.5 12/17/2021 24.0 40.4 1,431 2,069,911 832,156 1,013.0 843.4 12/19/2021 24.0 40.4 1,431 2,069,911 832,553 1,013.0 843.4 12/19/2021 24.0 40.4 1,448 2,041,218 825,866 1,013.0 843.4 12/19/2021 24.0 40.4 1,448 2,069,971 829,310 1,013.0 840.1 12/12/20201 24.0 40.4 1,448 2,065,971 829,310 1,013.0 840.1 12/12/20201 24.0 40.	Notes:						Maximum:	984
Date Runtime (hours) CH ₄ (%)* Flow (scfm) (scf)* (sc	Totals/ Average:	741.20	40.4	1,452	64,578,886	26,112,473		
Date Runtime (hours) CH4 (%)* Flow (scfm) (scf) (scf) (scf) (scf) (grU/scf) (MMBTU)/Date (MBTU)/Date (scf) (grU/scf) (MMBTU)/Date (MBTU)/Date (MBTU)/Dat				1,408			· ·	
Date Runtime (hours) CH ₄ (%)* Flow (scfm) Iotal LFG volume (scf) (scf) (gcf) (mMBTU)/Data (MBTU)/Data (gcf) (scf) (gcf) (gcf) (mMBTU)/Data (gcf) (gcf) (gcf) (gcf) (mMBTU)/Data (gcf) (gcf) (gcf) (gcf) (mMBTU)/Data (gcf)		24.0	40.4		2,050,975	829,312	1,013.0	840.1
Date Runtime (hours) CH ₄ (%)* Flow (scfm) (scf) (scf) (scf) (scf) (mMBTU)/Date (MBTU)/Date (scf) (scf) (scf) (scf) (mMBTU)/Date (MBTU)/Date (scf) (scf) (scf) (scf) (mMBTU)/Date (MBTU)/Date (scf) (s	12/29/2021	24.0	40.4		, ,	822,801	1,013.0	833.5
Date Runtime (hours) CH ₄ (%)* Flow (scfm) (scf) (scf) (scf) (scf) (gTU/scf) (MMBTU)/Da	12/28/2021	24.0			2,046,950	827,684	1,013.0	
Date Runtime (hours) CH ₄ (%)* Flow (scfm) (scf) (scf) (scf) (scf) (dBTU/scf) (MMBTU)/DB (scf) (scf) (scf) (scf) (dBTU/scf) (MMBTU)/DB (scf) (scf) (scf) (scf) (scf) (scf) (dBTU/scf) (MMBTU)/DB (scf)	12/27/2021	24.0				831,017	1,013.0	
Date Runtime (hours) CH ₄ (%)* Flow (scfm) (scf) (scf) (scf) (scf) (mMBTU)/DB (scfm) (scf) (scf) (scf) (mMBTU)/DB (scfm) (scf) (scf) (scf) (scf) (scf) (mMBTU)/DB (scfm) (scf) (scf	12/26/2021	24.0			2,050,971	829,310	1,013.0	840.1
Date Runtime (hours) CH4 (%)* Flow (scfm) (scf) (scf) (scf) (scf) (mMSTU)/Date (scf) (mMSTU)/D	12/25/2021	24.0	40.4		2,047,859	828,052	1,013.0	838.8
Date Runtime (hours) CH ₄ (%)* Flow (scfm) (scf) (scf) (scf) (scf) (scf) (scf) (mMBTU)/Date (mMBTU)/Date (scf) (scf) (scf) (scf) (scf) (mMBTU)/Date (scf) (sc	12/24/2021	24.0	40.4	1,448	2,085,136	843,125	1,013.0	854.1
Date Runtime (hours) CH ₄ (%)* Flow (sofm) (sof) (sof) (sof) (sof) (sof) (sof) (mMBTU)/Da	12/23/2021	22.4	40.4	1,470	1,979,163	800,275	1,013.0	810.7
Date Runtime (hours) CH ₄ (%)* Flow (scfm) CH ₄ (%cf) CH ₄ volume (scf) CH ₄ volume (scf) (gft) (mMBTU)/Date (mMBTU)/Date (scf) (gft)/Date (mMBTU)/Date (scf) (gft)/Date (mMBTU)/Date (mMBTU)	12/22/2021	24.0	40.4		2,041,218	825,366	1,013.0	
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG Volume (scf) CH ₄ Volume (gcf) of CH ₄ (BTU/scf) Heat input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 981.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/6/2021 24.0 40.4 1,516 2,183,711 882,984 1,013.0 894.5 12/6/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 858.3 12/7/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 829.5 12/9/2021 24.0 40.4 1,406 2,025,171 818,878 1,013.0 840.7 12/11/2021 2	12/21/2021	24.0	40.4		2,060,931	833,337	1,013.0	844.2
Date Runtime (hours) CH ₄ (%)* Flow (scfm) CH ₄ (%)* Flow (scfm) (scf) (scf) (scf) (scf) (BTU/scf) (MMBTU)/Da	12/20/2021	24.0	40.4		2,038,655	824,330	1,013.0	835.0
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG volume (scf) CH ₄ volume (scf) of CH ₄ (BTU/scf) Heat input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/5/2021 24.0 40.4 1,516 2,183,711 882,984 1,013.0 894.5 12/6/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 858.3 12/7/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 830.3 12/9/2021 22.8 40.4 1,451 1,982,037 801,437 1,013.0 840.7 12/10/2021 2					2,058,991	832,553	1,013.0	
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG volume (scf) CH ₄ volume (scf) of CH ₄ (BTU/scf) Heat input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/5/2021 24.0 40.4 1,516 2,183,711 882,984 1,013.0 894.5 12/6/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 858.3 12/7/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 829.5 12/9/2021 22.8 40.4 1,451 1,982,037 801,437 1,013.0 811.9 12/10/2021 2	12/18/2021	24.0	40.4			832,156	1,013.0	843.0
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG Volume (scf) CH ₄ Volume (BTU/scf) Heat input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/5/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 894.5 12/6/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 830.3 12/8/2021 24.0 40.4 1,406 2,025,171 818,878 1,013.0 829.5 12/9/2021 22.8 40.4 1,425 2,052,453 829,909 1,013.0 840.7 12/11/2021 24.0 40.4	12/17/2021	24.0	40.4		2,059,993	832,958	1,013.0	843.8
Date Runtime (hours) CH ₄ (%)* Average Flow (scfn) Total LFG Volume (scf) CH ₄ Volume (gcf) of CH ₄ (BTU/scf) Heat input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/5/2021 24.0 40.4 1,516 2,183,711 882,984 1,013.0 894.5 12/6/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 858.3 12/7/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 830.3 12/8/2021 24.0 40.4 1,451 1,982,037 801,437 1,013.0 811.9 12/10/2021 2	12/16/2021	24.0	40.4	1,437	2,069,125	836,651	1,013.0	847.5
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG volume (scf) CH ₄ volume (scf) of CH ₄ (BTU/scf) Heat input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/5/2021 24.0 40.4 1,516 2,183,711 882,984 1,013.0 894.5 12/6/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 858.3 12/7/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 829.5 12/9/2021 22.8 40.4 1,451 1,982,037 801,437 1,013.0 811.9 12/10/2021 2	12/15/2021	24.0	40.4	1,436	2,067,878	836,146	1,013.0	847.0
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG volume (scf) CH ₄ volume (scf) of CH ₄ (BTU/scf) Heat input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/5/2021 24.0 40.4 1,516 2,183,711 882,984 1,013.0 894.5 12/6/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 858.3 12/7/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 830.3 12/8/2021 24.0 40.4 1,406 2,025,171 818,878 1,013.0 811.9 12/10/2021 2	12/14/2021	24.0	40.4	1,435	2,065,854	835,328	1,013.0	846.2
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG volume (scf) CH ₄ volume (scf) of CH ₄ (BTU/scf) Heat input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/5/2021 24.0 40.4 1,516 2,183,711 882,984 1,013.0 894.5 12/6/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 858.3 12/7/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 829.5 12/9/2021 22.8 40.4 1,451 1,982,037 801,437 1,013.0 811.9 12/10/2021 2	12/13/2021	24.0		· ·	2,043,580	826,322	1,013.0	
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG Volume (scf) CH ₄ Volume (BTU/scf) of CH ₄ (BTU/scf) Heat Input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/5/2021 24.0 40.4 1,516 2,183,711 882,984 1,013.0 894.5 12/6/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 858.3 12/7/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 830.3 12/8/2021 24.0 40.4 1,406 2,025,171 818,878 1,013.0 829.5 12/9/2021 <t< td=""><td>12/12/2021</td><td>24.0</td><td>40.4</td><td></td><td>2,042,515</td><td>825,891</td><td>1,013.0</td><td>836.6</td></t<>	12/12/2021	24.0	40.4		2,042,515	825,891	1,013.0	836.6
Date Runtime (hours) CH ₄ (%)* Average Flow (scfn) Total LFG Volume (scf) CH ₄ Volume (scf) of CH ₄ (BTU/scf) Heat Input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/5/2021 24.0 40.4 1,516 2,183,711 882,984 1,013.0 894.5 12/6/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 858.3 12/7/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 830.3 12/8/2021 24.0 40.4 1,406 2,025,171 818,878 1,013.0 829.5 12/9/2021 22	12/11/2021	24.0	40.4		2,051,654	829,586	1,013.0	840.4
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG volume (scf) CH ₄ volume (scf) of CH ₄ (BTU/scf) Heat input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/5/2021 24.0 40.4 1,516 2,183,711 882,984 1,013.0 894.5 12/6/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 858.3 12/7/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 830.3 12/8/2021 24.0 40.4 1,406 2,025,171 818,878 1,013.0 829.5 12/9/2021 22	12/10/2021	24.0	40.4		2,052,453	829,909	1,013.0	840.7
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG Volume (scf) CH ₄ Volume (scf) of CH ₄ (BTU/scf) Heat input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/5/2021 24.0 40.4 1,516 2,183,711 882,984 1,013.0 894.5 12/6/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 858.3 12/7/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 830.3	12/9/2021	22.8	40.4		1,982,037	801,437	1,013.0	811.9
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG volume (scf) CH ₄ volume (scf) of CH ₄ (BTU/scf) Heat input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/5/2021 24.0 40.4 1,516 2,183,711 882,984 1,013.0 894.5 12/6/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 858.3 12/7/2021 24.0 40.4 1,408 2,027,089 819,653 1,013.0 830.3	12/8/2021	24.0	40.4	1,406	2,025,171	818,878	1,013.0	829.5
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG Volume (scf) CH ₄ Volume (scf) of CH ₄ (BTU/scf) Heat input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0 12/5/2021 24.0 40.4 1,516 2,183,711 882,984 1,013.0 894.5 12/6/2021 24.0 40.4 1,455 2,095,505 847,317 1,013.0 858.3	12/7/2021	24.0	40.4		2,027,089	819,653	1,013.0	830.3
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG Volume (scf) CH ₄ Volume (scf) of CH ₄ (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3 12/4/2021 24.0 40.4 1,512 2,177,628 880,524 1,013.0 892.0	12/6/2021	24.0	40.4	1,455	2,095,505	847,317	1,013.0	858.3
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG volume (scf) CH ₄ volume (scf) of CH ₄ (BTU/scf) Heat input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9 12/3/2021 24.0 40.4 1,557 2,241,821 906,480 1,013.0 918.3	12/5/2021	24.0	40.4	1,516	2,183,711	882,984	1,013.0	894.5
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) Total LFG Volume (scf) CH ₄ Volume (scf) of CH ₄ (BTU/scf) Heat input (MMBTU)/Da 12/1/2021 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6 12/2/2021 24.0 40.4 1,636 2,355,594 952,484 1,013.0 964.9	12/4/2021	24.0	40.4	1,512	2,177,628	880,524	1,013.0	892.0
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) (scf) (scf) (scf) (scf) (hours) CH ₄ Volume (scf) (scf) (hours) of CH ₄ (MMBTU)/Date (hours) (MMBTU)/Date (hours) (hours) (hours) 24.0 40.4 1,668 2,401,254 970,947 1,013.0 983.6	12/3/2021	24.0	40.4	1,557	2,241,821	906,480	1,013.0	918.3
Date Runtime (hours) CH ₄ (%)* Average Flow (scfm) (scf) CH ₄ Volume (scf) of CH ₄ (MMBTU)/Da	12/2/2021	24.0	40.4	1,636	2,355,594	952,484	1,013.0	964.9
Date Runtime (hours) CH ₄ (%)* Flow (scfm) (scf) CH ₄ Volume of CH ₄ (MMRTI)/Da	12/1/2021	24.0	40.4	1,668	2,401,254	970,947	1,013.0	983.6
	Date	Runtime (hours)	CH ₄ (%)*			•	of CH ₄	Heat Input (MMBTU)/Da

*Methane content determined from flare A-17-Starting April 9, 2021, Methane content determined from flare A-17 February 18, 2021 source test. scfm= standard cubic feet per minute

BTU/scf= British thermal unit per square cubic feet scf= standard cubic feet MMBTU= million British thermal units LFG= landfill gas

Guadalupe Recycling & Disposal Facility

San Jose, CA

Heat Input Rate Flare A-17

MONTH: January-22

Notes:					·	Maximum:	1,081
Totals/ Average:	740.50	40.4	1,647	73,146,929	29,576,961	1013.0	29,961
1/31/2022	24.0	40.4	1,658	2,386,839	965,118	1,013.0	977.7
1/30/2022	24.0	40.4	1,678	2,416,111	976,954	1,013.0	989.7
1/29/2022	24.0	40.4	1,687	2,428,850	982,105	1,013.0	994.9
1/28/2022	24.0	40.4	1,678	2,415,667	976,775	1,013.0	989.5
1/27/2022	24.0	40.4	1,682	2,422,002	979,337	1,013.0	992.1
1/26/2022	24.0	40.4	1,706	2,456,951	993,468	1,013.0	1,006.4
1/25/2022	21.4	40.4	1,714	2,200,668	889,840	1,013.0	901.4
1/24/2022	24.0	40.4	1,672	2,406,990	973,266	1,013.0	985.9
1/23/2022	24.0	40.4	1,673	2,409,610	974,326	1,013.0	987.0
1/22/2022	24.0	40.4	1,683	2,423,020	979,748	1,013.0	992.5
1/21/2022	24.0	40.4	1,690	2,433,052	983,805	1,013.0	996.6
1/20/2022	24.0	40.4	1,694	2,438,918	986,176	1,013.0	999.0
1/19/2022	24.0	40.4	1,707	2,458,470	994,082	1,013.0	1,007.0
1/18/2022	23.1	40.4	1,723	2,387,687	965,461	1,013.0	978.0
1/17/2022	24.0	40.4	1,690	2,432,998	983,783	1,013.0	996.6
1/16/2022	24.0	40.4	1,710	2,461,688	995,384	1,013.0	1,008.3
1/15/2022	24.0	40.4	1,700	2,448,101	989,890	1,013.0	1,002.8
1/14/2022	24.0	40.4	1,819	2,619,063	1,059,018	1,013.0	1,072.8
1/13/2022	24.0	40.4	1,693	2,437,914	985,771	1,013.0	998.6
1/12/2022	24.0	40.4	1,662	2,393,406	967,774	1,013.0	980.4
1/11/2022	24.0	40.4	1,833	2,639,289	1,067,197	1,013.0	1,081.1
1/10/2022	24.0	40.4	1,645	2,369,425	958,077	1,013.0	970.5
1/9/2022	24.0	40.4	1,578	2,272,357	918,828	1,013.0	930.8
1/8/2022	24.0	40.4	1,582	2,277,472	920,896	1,013.0	932.9
1/7/2022	24.0	40.4	1,577	2,270,358	918,019	1,013.0	930.0
1/6/2022	24.0	40.4	1,589	2,288,633	925,409	1,013.0	937.4
1/5/2022	24.0	40.4	1,582	2,277,950	921,089	1,013.0	933.1
1/4/2022	24.0	40.4	1,512	2,176,875	880,219	1,013.0	891.7
1/3/2022	24.0	40.4	1,417	2,040,687	825,152	1,013.0	835.9
1/2/2022	24.0	40.4	1,416	2,039,230	824,563	1,013.0	835.3
1/1/2022	24.0	40.4	1,400	2,016,648	815,432	1,013.0	826.0
Date	Runtime (hours)	CH ₄ (%)*	Average Flow (scfm)	Total LFG Volume (scf)	CH ₄ Volume (scf)	Heating Value of CH ₄ (BTU/scf)	Heat Input (MMBTU)/Day
	-	1	1				I

*Methane content determined from flare A-17-Starting April 9, 2021, Methane content determined from flare A-17 February 18, 2021 source test. scfm= standard cubic feet per minute

BTU/scf= British thermal unit per square cubic feet scf= standard cubic feet MMBTU= million British thermal units LFG= landfill gas CH_4 = methane

Guadalupe Recycling & Disposal Facility

San Jose, CA

Heat Input Rate Flare A-17

MONTH: February-22

WONTH.	i ebiuaiy-22						
Date	Runtime (hours)	CH ₄ (%)*	Average Flow (scfm)	Total LFG Volume (scf)	CH₄ Volume (scf)	Heating Value of CH ₄ (BTU/scf)	Heat Input (MMBTU)/Day
2/1/2022	24.0	40.4	1,649	2,374,790	960,246	1,013.0	972.7
2/2/2022	24.0	40.4	1,691	2,435,520	984,803	1,013.0	997.6
2/3/2022	24.0	40.4	1,740	2,505,475	1,013,089	1,013.0	1,026.3
2/4/2022	24.0	40.4	1,776	2,557,804	1,034,248	1,013.0	1,047.7
2/5/2022	24.0	40.4	1,803	2,596,558	1,049,918	1,013.0	1,063.6
2/6/2022	24.0	40.4	1,799	2,591,090	1,047,707	1,013.0	1,061.3
2/7/2022	24.0	40.4	1,810	2,606,946	1,054,119	1,013.0	1,067.8
2/8/2022	24.0	40.4	1,821	2,621,838	1,060,140	1,013.0	1,073.9
2/9/2022	24.0	40.4	1,829	2,633,405	1,064,817	1,013.0	1,078.7
2/10/2022	24.0	40.4	1,832	2,637,478	1,066,464	1,013.0	1,080.3
2/11/2022	24.0	40.4	1,831	2,637,024	1,066,281	1,013.0	1,080.1
2/12/2022	24.0	40.4	1,819	2,619,078	1,059,024	1,013.0	1,072.8
2/13/2022	24.0	40.4	1,820	2,621,175	1,059,872	1,013.0	1,073.7
2/14/2022	24.0	40.4	1,791	2,579,048	1,042,838	1,013.0	1,056.4
2/15/2022	23.8	40.4	1,813	2,588,688	1,046,736	1,013.0	1,060.3
2/16/2022	24.0	40.4	1,794	2,583,016	1,044,443	1,013.0	1,058.0
2/17/2022	24.0	40.4	1,780	2,563,578	1,036,583	1,013.0	1,050.1
2/18/2022	24.0	40.4	1,780	2,563,898	1,036,712	1,013.0	1,050.2
2/19/2022	24.0	40.4	1,782	2,565,384	1,037,313	1,013.0	1,050.8
2/20/2022	24.0	40.4	1,775	2,555,698	1,033,396	1,013.0	1,046.8
2/21/2022	24.0	40.4	1,745	2,512,927	1,016,102	1,013.0	1,029.3
2/22/2022	24.0	40.4	1,735	2,498,277	1,010,178	1,013.0	1,023.3
2/23/2022	24.0	40.4	1,712	2,465,751	997,026	1,013.0	1,010.0
2/24/2022	19.8	40.4	1,817	2,161,702	874,084	1,013.0	885.4
2/25/2022	24.0	40.4	1,805	2,599,552	1,051,129	1,013.0	1,064.8
2/26/2022	24.0	40.4	1,786	2,571,580	1,039,818	1,013.0	1,053.3
2/27/2022	24.0	40.4	1,796	2,585,841	1,045,585	1,013.0	1,059.2
2/28/2022	24.0	40.4	1,808	2,603,566	1,052,752	1,013.0	1,066.4
Totals/ Average:	667.63	40.4	1,784	71,436,687	28,885,424	1013.0	29,261
Notes:						Maximum:	1,080

^{*}Methane content determined from flare A-17-Starting April 9, 2021, Methane content determined from flare A-17 February 18, 2021 source test. scfm= standard cubic feet per minute

BTU/scf= British thermal unit per square cubic feet scf= standard cubic feet MMBTU= million British thermal units LFG= landfill gas

CH₄= methane

Guadalupe Recycling & Disposal Facility

San Jose, CA

Heat Input Rate Flare A-17

MONTH: March-22

MONTH.		1	ı			1	
Date	Runtime (hours)	CH ₄ (%)*	Average Flow (scfm)	Total LFG Volume (scf)	CH ₄ Volume (scf)	Heating Value of CH ₄ (BTU/scf)	Heat Input (MMBTU)/Day
3/1/2022	24.0	40.4	1,796	2,585,740	1,045,544	1,013.0	1,059.1
3/2/2022	24.0	40.4	1,795	2,585,420	1,045,415	1,013.0	1,059.0
3/3/2022	24.0	40.4	1,781	2,564,549	1,036,975	1,013.0	1,050.5
3/4/2022	24.0	40.4	1,762	2,537,691	1,026,115	1,013.0	1,039.5
3/5/2022	24.0	40.4	1,757	2,529,394	1,022,760	1,013.0	1,036.1
3/6/2022	24.0	40.4	1,761	2,536,461	1,025,618	1,013.0	1,039.0
3/7/2022	24.0	40.4	1,770	2,549,381	1,030,842	1,013.0	1,044.2
3/8/2022	24.0	40.4	1,793	2,582,558	1,044,257	1,013.0	1,057.8
3/9/2022	24.0	40.4	1,786	2,571,619	1,039,834	1,013.0	1,053.4
3/10/2022	24.0	40.4	1,754	2,525,867	1,021,334	1,013.0	1,034.6
3/11/2022	18.2	40.4	1,843	2,015,831	815,101	1,013.0	825.7
3/12/2022	24.0	40.4	1,825	2,627,557	1,062,453	1,013.0	1,076.3
3/13/2022	23.0	40.4	1,793	2,474,204	1,000,444	1,013.0	1,013.5
3/14/2022	24.0	40.4	1,800	2,591,880	1,048,027	1,013.0	1,061.7
3/15/2022	24.0	40.4	1,838	2,647,399	1,070,476	1,013.0	1,084.4
3/16/2022	24.0	40.4	1,827	2,631,014	1,063,851	1,013.0	1,077.7
3/17/2022	24.0	40.4	1,803	2,595,625	1,049,541	1,013.0	1,063.2
3/18/2022	24.0	40.4	1,805	2,599,753	1,051,210	1,013.0	1,064.9
3/19/2022	24.0	40.4	1,770	2,548,478	1,030,477	1,013.0	1,043.9
3/20/2022	24.0	40.4	1,759	2,532,469	1,024,004	1,013.0	1,037.3
3/21/2022	24.0	40.4	1,780	2,562,920	1,036,317	1,013.0	1,049.8
3/22/2022	24.0	40.4	1,804	2,598,282	1,050,615	1,013.0	1,064.3
3/23/2022	24.0	40.4	1,793	2,581,445	1,043,807	1,013.0	1,057.4
3/24/2022	24.0	40.4	1,790	2,577,144	1,042,068	1,013.0	1,055.6
3/25/2022	24.0	40.4	1,783	2,568,086	1,038,406	1,013.0	1,051.9
3/26/2022	24.0	40.4	1,782	2,566,198	1,037,642	1,013.0	1,051.1
3/27/2022	24.0	40.4	1,767	2,544,253	1,028,769	1,013.0	1,042.1
3/28/2022	24.0	40.4	1,729	2,489,665	1,006,696	1,013.0	1,019.8
3/29/2022	24.0	40.4	1,733	2,495,582	1,009,089	1,013.0	1,022.2
3/30/2022	24.0	40.4	1,753	2,524,188	1,020,655	1,013.0	1,033.9
3/31/2022	24.0	40.4	1,751	2,520,852	1,019,307	1,013.0	1,032.6
Totals/ Average:	737.23	40.4	1,783	78,861,505	31,887,650	1013.0	32,302
Notes:						Maximum:	1,084

*Methane content determined from flare A-17 February 18, 2021 source test results.

scfm= standard cubic feet per minute

BTU/scf= British thermal unit per square cubic feet scf= standard cubic feet

MMBTU= million British thermal units

LFG= landfill gas

CH₄= methane

APPENDIX M GAS MIGRATION MONITORING REPORTS



Guadalupe Rubbish Disposal Company, Inc.

15999 Guadalupe Mines Road PO Box 20957 San Jose, California 95160 T: 408.268.1670

March 30, 2022

Ms. Becky Azevedo Guadalupe Recycling & Disposal Facility 15999 Guadalupe Mines Road San Jose, CA 95120

Re: First Quarter 2022 Perimeter Gas and Methane in Structure Monitoring Report Guadalupe Recycling & Disposal Facility

Dear Ms. Azevedo:

This report for the Guadalupe Recycling & Disposal Facility (GRDF) contains the results of the First Quarter 2022 Perimeter Gas and Methane in Structure Monitoring conducted at the GRDF. All monitoring was conducted by GRDF personnel.

REGULATORY REQUIREMENTS

Requirements for monitoring are outlined in 40 CFR 258.23, Title 27 California Code of Regulations (CCR), Article 6, Gas Monitoring at Active and Closed Disposal Sites. These regulations require periodic monitoring to ensure that methane concentrations are less than 5 percent at the property boundary and less than 1.25 percent in on-site buildings and structures. Reporting requirements are presented in Title 27 §20934.

MONITORING RESULTS AND MAP [TITLE 27 §20934(a)(1), (2), (3) AND (5)]

Monitoring was conducted in accordance with 40 CFR 258.23 and Title 27, Article 6 at the locations shown in the attached map (Attachment A). Results for both probes and structures are summarized in Table 1. Field data are presented in Attachment B.

Table 1 Monitoring Results

Probe ID	Time	CH ₄	Probe Pressure		Condition ped, locked)	Comments
1100e ID	Time	(%)	(in-H ₂ 0)	Arrival	Departure	Comments
GUADGP01	3/17/2022; 10:53 AM	0	-0.01	Yes	Yes	
GUADGP02	3/17/2022; 10:43 AM	0	-1.18	Yes	Yes	
GUADGP03	3/17/2022; 10:06 AM	0	0.02	Yes	Yes	
GUADGP04	3/17/2022; 8:49 AM	0	-1.95	Yes	Yes	
GUADGP05	3/17/2022; 8:56 AM	0	-0.40	Yes	Yes	
GUADGP6S	3/17/2022; 9:43 AM	0	-0.06	Yes	Yes	
GUADGP6D	3/17/2022; 9:45AM	0	-0.11	Yes	Yes	

STRUCTURE FID MONITORING DATA

Analyst: Tino Robles Date: 3/2/2022
Instrument: TVA 1000 Serial #:0928538411

Monitored Location	Time	PPM	Comments
Scale House #1 Occupied Space	1:55 PM	0	
Scale House #1 Electrical Closet	1:02 PM	0	
Scale House #2 Occupied Space	1:05 PM	0	
Scale House #2 Electrical Closet	1:09 PM	0	
Scale House #3 Occupied Space	1:11 PM	0	
Scale House #3 Electrical Closet	1:15 PM	0	
Admin Office Crawl Space	12:25 PM	0	
Admin Office Electrical Closet	12:20 PM	0	
Admin Trailer	12:35 PM	0	
Security Trailer	12:40 PM	0	
MRF Scale House	1:50 PM	0	
MRF Building East Electrical	1:52 PM	0	
Maintenance Building Office Outlet	2:39 PM	0	
Maintenance Building Kitchen Outlet	2:43 PM	0	
Maintenance Building Office Outlet	2:45 PM	0	
Maintenance Building Electrical Box	2:40 PM	0	
Scale House #1 Occupied Space	1:55 PM	0	

Immediately notify compliance personnel of any readings in excess of 1.25 percent methane.

ND = No detection

California Code of Regulations Title 27, Division 2, Chapter 3, Article 6, §20921 require that:

Note: The reading should not exceed 25% LEL = 1.25% CH₄ = 12,500 ppm CH₄

No exceedances of Subtitle D (40 CFR 258.23) and California Code of Regulations (CCR) Title 27, Division 2, Section 20919.5 were detected during the monitoring events.

MONITORING EQUIPMENT AND METHODOLOGY [TITLE 27 §20934(a)(4)]

Perimeter Gas Monitoring

The First Quarter 2022 monitoring was conducted by Tino Robles on March 17, 2022, using a GEM 5000. The static pressure of each probe was monitored using the GEM 5000. Following the measurement of the static pressure, the probes were monitored to determine methane concentration.

⁽¹⁾ The concentration of methane gas must not exceed 1.25 percent by volume in air within any portion of any on-site structures.

⁽²⁾ The concentration of methane gas migrating from the disposal site must not exceed 5 percent by volume in air at the disposal site permitted facility boundary or an alternative boundary approved in accordance with §20925.

Facility Structures

Tino Robles used a Toxic Vapor Analyzer (TVA1000) to monitor buildings and structures to check for the presence of methane on March 2, 2022. The instrument was calibrated on March 2, 2022, using 500 parts per million by volume (ppm_v) methane standard.

Combustible Methane Gas Monitor Calibration

Some facility structures are monitored continuously using Sierra Monitors. The monitor is calibrated at a frequency determined by the manufacturer. This event was conducted by Tino Robles on March 2, 2022.

GENERAL WEATHER CONDITIONS [TITLE 27 §20934(a)(3)]

General weather conditions at the time of monitoring are presented in Table 2.

Table 2 General Weather Conditions

Description	3/17/2022
General Conditions	Cloudy
Temperature (°F) Low/High	64/70
Wind Speed (mph)	11.2
Wind Direction	NNW
Barometric Pressure ("Hg)	30.17

CLOSING

If you have any questions regarding this notification, please do not hesitate to contact me at rphadnis@wm.com.

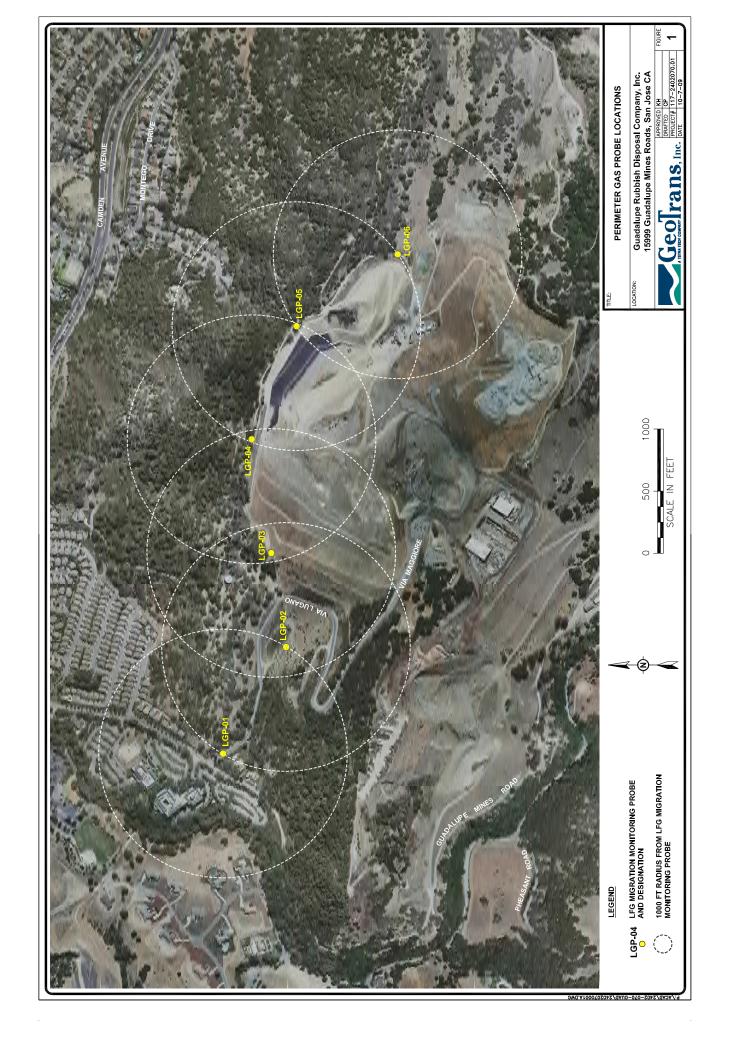
Thank you,

Waste Management,

Rajan Phadnis

Environmental Protection Specialist

ATTACHMENT A PROBE LOCATION MAP



ATTACHMENT B FIELD DATA

Guadalupe Rubbish Disposal Facility Perimeter Gas Monitoring Probe Results

Analyst: Robles Date: 3/17/22

Instrument: <u>Gem5000</u> Serial #: <u>G502468</u> Atmospheric Temperature (Deg F): <u>54</u> Barometric Pressure: 30__Inch of HG

Wind Speed: 10 mph Wind Direction: N

Weather Condition: Sunny

Probe ID	Time	CH ₄	Probe Pressu	Probe Condition (clean, capped, locked)		Comments
Frome ID	Time	(%)	re (in- H ₂ 0)	Arrival	Departure	Comments
GUADGP01	10:53 AM	0	-0.01	Yes	Yes	
GUADGP02	10:43 AM	0	-1.18	Yes	Yes	
GUADGP03	10:06 AM	0	0.02	Yes	Yes	
GUADGP04	8:49 AM	0	-1.95	Yes	Yes	
GUADGP05	8:56 AM	0	-0.40	Yes	Yes	
GUADGP6S	9:43 AM	.0	-0.06	Yes	Yes	
GUADGP6D	9:45AM	0	-0.11	Yes	Yes	

Immediately notify compliance personnel of any readings in excess of 5 percent methane.

STRUCTURE FID MONITORING DATA

Analyst: Robles Date: 3/2/2022
Instrument: TVA 1000 Serial #: 0928538411

Monitored Location	Time	PPM	Comments
Scale House #1 Occupied Space	1:55 PM	0	
Scale House #1 Electrical Closet	1:02 PM	0	
Scale House #2 Occupied Space	1:05 PM	0	
Scale House #2 Electrical Closet	1:09 PM	0	
Scale House #3 Occupied Space	1:11 PM	0	
Scale House #3 Electrical Closet	1:15 PM	0	
Admin Office Crawl Space	12:25 PM	0	
Admin Office Electrical Closet	12:20 PM	0	
Admin Trailer	12:35 PM	0	
Security Trailer	12:40 PM	0	
MRF Scale House	1:50 PM	0	
MRF Building East Electrical	1:52 PM	Ò	
Maintenance Building Office Outlet	2:39 PM	0	
Maintenance Building Kitchen Outlet	2:43 PM	0	
Maintenance Building Office Outlet	2:45 PM	0	
Maintenance Building Electrical Box	2:40 PM	0	

Immediately notify compliance personnel of any readings in excess of 1.25 percent methane.

ND = No detection

California Code of Regulations Title 27, Division 2, Chapter 3, Article 6, §20921 require that:

(1) The concentration of methane gas must not exceed 1.25 percent by volume in air within any portion of any on-site structures.(2) The concentration of methane gas migrating from the disposal site must not exceed 5 percent by volume in air at the disposal site permitted facility boundary or an alternative boundary approved in accordance with §20925.

Note: The reading should not exceed 25% LEL = 1.25% CH₄ = 12,500 ppm CH₄



GAS DETECTOR CALIBRATION RECORD

LOCATION: Guadalupe Recycling a	nd Disposal Inc.
MANUFACTURER & MODEL NUMBER:_	Sierra Monitor Corporation Model #0908401174M
CALIBRATED BY/INSTRUMENT USED:	/ Sierra Monitor Corporation
CALIBRATION GAS EXPIRATION DATE:	June 16, 2023

LOCATION	DATE CALIBRATED	SERIAL NUMBER	Methane LEL* SENSOR alarm 10,000 ppm	MAINTENANCE PERFORMED/ COMMENTS ON MONITOR CONDITION
Scale House #1	3-2-22	1500700093GAM	Yes	Good Condition
Scale House #2	3-2-22	1500700098GAM	Yes	Good Condition
Scale House #3	3-2-22	1500700101GAM	Yes	Good Condition
Admin. Trailer	3-2-22	1500700097GAM	Yes	Good Condition
Main Office	3-2-22	1500700090GAM	Yes	Good Condition
MRF Scale House	3-2-22	1500700099GAM	Yes	Good Condition
Materials Yard Trailer	3-2-22	1500700091GAM	Yes	Good Condition
Shop Office #1	3-2-22	1500700010GAM	Yes	Good Condition
Shop Office #2	3-2-22	1500700094GAM	Yes	Good Condition
Shop Office #3	3-2-22	1500700095GAM	Yes	Good Condition
Kitchen #4	3-2-22	1500700092GAM	Yes	Good Condition

^{*}This form must be retained for 12 months after completion

CALIBRATION PROCEDURE AND BACKGROUND DETERMINATION REPORT

Landfill Name: Gradalife Date: 3/2/22 Time: AM WS PM Instrument Make: TVA (000B Model: THERMAL S/N: 092853841
Calibration Procedure
 Allow instrument to internally zero itself while introducing zero air. Introduce the calibration gas into the probe. Stable Reading =
Background Determination Procedure
1. Upwind Reading (highest in 30 seconds): 2. Downwind Reading (highest in 30 seconds): ppm (a) ppm (b)
Calculate Background Value: (a) + (b) Background = \(\sum \) ppm
erformed By:

CALIBRATION PRECISION TEST RECORD

Date: 17-14-21
Expiration Date (3 months): 3/14/22
Time: (430 AM PM
Instrument Make: TVA 1000 B Model: Thermal S/N: 6928538411
Measurement #1:
Meter Reading for Zero Air: ppm (a) Meter Reading for Calibration Gas: 505 ppm (b)
Meter Reading for Calibration Gas: ppm (b)
Measurement #2:
Meter Reading for Zero Air: ppm (c)
Meter Reading for Calibration Gas:
Measurement #3:
Meter Reading for Zero Air: ppm (e)
Meter Reading for Calibration Gas: ppm (f)
Calculate Precision:
$\frac{\{ (500) - (b) + (500) - (d) + (500) - (f) \} \times 1}{3} \times 100$
% (must be < than 10%)
Performed By: Police

RESPONSE TIME TEST RECORD

Date: 12-14-21		
Expiration Date (3 months): 3-14-22		
Time: 630 AMPM		
Instrument Make: TVA 1000 B Model: Thermal S/N: 0928	538411	
Measurement #1:		
Stabilized Reading Using Calibration Gas: 90% of the Stabilized Reading: Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas:	499 450	ppm ppm _ seconds (a)
Measurement #2:		
Stabilized Reading Using Calibration Gas: 90% of the Stabilized Reading: Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas:	900 449 (e	ppm ppm _ seconds (b)
Measurement #3:		
Stabilized Reading Using Calibration Gas:	498	ppm ppm _ seconds (c)
Calculate Response Time:	\	
$\frac{(a) + (b) + (c)}{3} = \frac{6}{3}$ seconds (must be less than 30)	seconds)	
Performed By:		

WASTE MANAGEMENT



910 Coyote Creek Golf Drive, San Jose, CA 95037

January 31, 2022

Ms. Becky Azevedo Guadalupe Recycling & Disposal Facility 15999 Guadalupe Mines Road San Jose, CA 95120

Re: Fourth Quarter 2021 Perimeter Gas and Methane in Structure Monitoring Report Guadalupe Recycling & Disposal Facility

Dear Ms. Azevedo:

This report for the Guadalupe Recycling & Disposal Facility (GRDF) contains the results of the Fourth Quarter 2021 Perimeter Gas and Methane in Structure Monitoring conducted at the GRDF. All monitoring was conducted by GRDF personnel.

REGULATORY REQUIREMENTS

Requirements for monitoring are outlined in 40 CFR 258.23, Title 27 California Code of Regulations (CCR), Article 6, Gas Monitoring at Active and Closed Disposal Sites. These regulations require periodic monitoring to ensure that methane concentrations are less than 5 percent at the property boundary and less than 1.25 percent in on-site buildings and structures. Reporting requirements are presented in Title 27 §20934.

MONITORING RESULTS AND MAP [TITLE 27 §20934(a)(1), (2), (3) AND (5)]

Monitoring was conducted in accordance with 40 CFR 258.23 and Title 27, Article 6 at the locations shown in the attached map (Attachment A). Results for both probes and structures are summarized in Table 1. Field data are presented in Attachment B.

Table 1 Monitoring Results

Probe ID	Time	Proceiiro —		Condition ped, locked)	Comments	
11000 1D	Time	(%)	(in-H ₂ 0)	Arrival	Departure	Comments
GUADGP01	12/21/2021;4:00 PM	0	0.01	Yes	Yes	
GUADGP02	12/21/2021;3:48 PM	0	0.02	Yes	Yes	
GUADGP03	12/21/2021;3:41 PM	0	0.00	Yes	Yes	
GUADGP04	12/21/2021;3:18 PM	0	-0.64	Yes	Yes	
GUADGP05	12/21/2021;3:29 PM	0	-0.14	Yes	Yes	
GUADGP6S	12/21/2021;3:06 PM	0	0.02	Yes	Yes	
GUADGP6D	12/21/2021;3:08 PM	0	-0.01	Yes	Yes	

STRUCTURE FID MONITORING DATA

Analyst: Tino Robles Date: 12/14/2021
Instrument: TVA 1000 Serial #:0928538411

Monitored Location	Time	PPM	Comments
Scale House #1 Occupied Space	8:55 AM	0	
Scale House #1 Electrical Closet	9:02 AM	0	
Scale House #2 Occupied Space	9:05 AM	115	Near the back side of wall
Scale House #2 Electrical Closet	9:07 AM	0	
Scale House #3 Occupied Space	9:10 AM	0	
Scale House #3 Electrical Closet	9:12 AM	0	
Admin Office Crawl Space	9:25 AM	0	
Admin Office Electrical Closet	9:20 AM	0	
Admin Trailer	9:35 AM	0	
Security Trailer	9:40 AM	0	
MRF Scale House	9:50 AM	0	
MRF Building East Electrical	9:52 AM	0	
Maintenance Building Office Outlet	10:20 AM	0	
Maintenance Building Kitchen Outlet	10:25 AM	0	
Maintenance Building Office Outlet	10:30 AM	0	
Maintenance Building Electrical Box	10:35 AM	0	
Scale House #1 Occupied Space	8:55 AM	0	

Immediately notify compliance personnel of any readings in excess of 1.25 percent methane.

ND = No detection

California Code of Regulations Title 27, Division 2, Chapter 3, Article 6, §20921 require that:

Note: The reading should not exceed 25% LEL = 1.25% $CH_4 = 12,500 \text{ ppm } CH_4$

No exceedances of Subtitle D (40 CFR 258.23) and California Code of Regulations (CCR) Title 27, Division 2, Section 20919.5 were detected during the monitoring events.

MONITORING EQUIPMENT AND METHODOLOGY [TITLE 27 §20934(a)(4)]

Perimeter Gas Monitoring

The Fourth Quarter 2021 monitoring was conducted by Tino Robles on December 21, 2021, using a GEM 5000. The static pressure of each probe was monitored using the GEM 5000. Following the measurement of the static pressure, the probes were monitored to determine methane concentration.

⁽¹⁾ The concentration of methane gas must not exceed 1.25 percent by volume in air within any portion of any on-site structures.

⁽²⁾ The concentration of methane gas migrating from the disposal site must not exceed 5 percent by volume in air at the disposal site permitted facility boundary or an alternative boundary approved in accordance with §20925.

Facility Structures

Tino Robles used a Toxic Vapor Analyzer (TVA1000) to monitor buildings and structures to check for the presence of methane on December 14, 2021. The instrument was calibrated on December 14, 2021, using 500 parts per million by volume (ppm_v) methane standard.

Combustible Methane Gas Monitor Calibration

Some facility structures are monitored continuously using Sierra Monitors. The monitor is calibrated at a frequency determined by the manufacturer. This event was conducted by Tino Robles on December 14, 2021.

GENERAL WEATHER CONDITIONS [TITLE 27 §20934(a)(3)]

General weather conditions at the time of monitoring are presented in Table 2.

Table 2 General Weather Conditions

Description	12/21/2021
General Conditions	Cloudy
Temperature (°F) Low/High	52/57
Wind Speed (mph)	4.97
Wind Direction	NNW
Barometric Pressure ("Hg)	30.09

CLOSING

If you have any questions regarding this notification, please do not hesitate to contact me at rphadnis@wm.com.

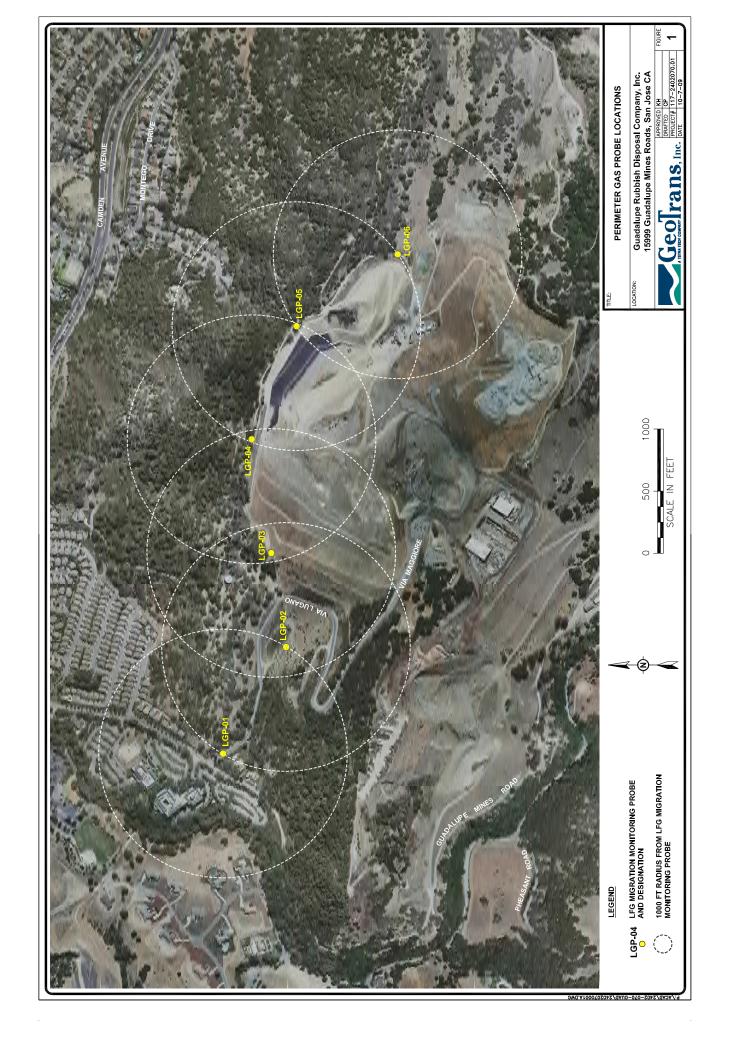
Thank you,

Waste Management,

Rajan Phadnis

Environmental Protection Specialist

ATTACHMENT A PROBE LOCATION MAP



ATTACHMENT B FIELD DATA

Guadalupe Rubbish Disposal Facility Perimeter Gas Monitoring Probe Results

Analyst: Robles
Date: 12/21/21

Instrument: <u>Gem5000</u> Serial <u>#: G502649</u> Atmospheric Temperature (Deg F): <u>52</u> Barometric Pressure: 30__Inch of HG

Wind Speed: 15 mph Wind Direction: N

Weather Condition: <u>Cloudy</u>

Probe ID	Time	CH ₄ (%)	Probe Pressu		ondition ped, locked)	Comments
1 Tobe 1D	Time	C114 (70)	re (in- H ₂ 0)	Arrival	Departure	Comments
GUADGP01	4:00 PM	0	0.01	Yes	Yes	
GUADGP02	3:48 PM	0	0.02	Yes	Yes	
GUADGP03	3:41 PM	0	0.00	Yes	Yes	
GUADGP04	3:18 PM	0	-0.64	Yes	Yes	
GUADGP05	3:29 PM	0	-0.14	Yes	Yes	
GUADGP6S	3:06 PM	0	0.02	Yes	Yes	
GUADGP6D	3:08PM	0	-0.01	Yes	Yes	

Immediately notify compliance personnel of any readings in excess of 5 percent methane.

STRUCTURE FID MONITORING DATA

Analyst: Robles Date: 12/14/2021
Instrument: TVA 1000 Serial #: 0928538411

monument. I vii 1000	Serial 11. 0/20330411		
Monitored Location	Time	PPM	Comments
Scale House #1 Occupied Space	8:55 AM	0	
Scale House #1 Electrical Closet	9:02 AM	0	
Scale House #2 Occupied Space	9:05 AM	115	Near the back side of wall
Scale House #2 Electrical Closet	9:07 AM	0	
Scale House #3 Occupied Space	9:10 AM	0	
Scale House #3 Electrical Closet	9:12 AM	0	
Admin Office Crawl Space	9:25 AM	0	
Admin Office Electrical Closet	9:20 AM	0	
Admin Trailer	9:35 AM	0	
Security Trailer	9:40 AM	0	
MRF Scale House	9:50 AM	0	
MRF Building East Electrical	9:52 AM	0	
Maintenance Building Office Outlet	10:20 AM	0	
Maintenance Building Kitchen Outlet	10:25 AM	0	
Maintenance Building Office Outlet	10:30 AM	0	
Maintenance Building Electrical Box	10:35 AM	0	

Immediately notify compliance personnel of any readings in excess of 1.25 percent methane.

ND = No detection

California Code of Regulations Title 27, Division 2, Chapter 3, Article 6, §20921 require that:

(1) The concentration of methane gas must not exceed 1.25 percent by volume in air within any portion of any on-site structures.(2) The concentration of methane gas migrating from the disposal site must not exceed 5 percent by volume in air at the disposal site permitted facility boundary or an alternative boundary approved in accordance with \$20925.

Note: The reading should not exceed 25% LEL = 1.25% CH₄ = 12,500 ppm CH₄



GAS DETECTOR CALIBRATION RECORD

MANUFACTURER & MODEL NUMBER: Sierra Monitor Corporation Model # 2001	
CALIBRATED BY/INSTRUMENT USED: / Sierra Monitor Corporation	
CALIBRATION GAS EXPIRATION DATE: June 9, 2022	

	DATE		Methane LEL*	MAINTENANCE
LOCATION	CALIBRATED	SERIAL NUMBER	SENSOR alarm	PERFORMED/ COMMENTS
			10,000 ppm	ON MONITOR CONDITION
Scale House #1	12-14-21	1500700093GAM	Yes	Good Condition
Scale House #2	12-14-21	1500700098GAM	Yes	Good Condition
Scale House #3	12-14-21	1500700101GAM	Yes	Good Condition
Admin. Trailer	12-14-21	1500700097GAM	Yes	Good Condition
Main Office	12-14-21	1500700090GAM	Yes	Good Condition
MDF Cools House	12.11.21	450070000000		Good Condition
MRF Scale House	12-14-21	1500700099GAM	Yes	Good Condition
Materials Yard Trailer	12-14-21	1500700091GAM	Yes	Good Condition
iviateriais faid frailei	12-14-21	1500700091GAIN	res	Good Condition
Shop Office #1	12-14-21	1500700010GAM	Yes	Good Condition
	12 14 21	13007000100AW	163	
Shop Office #2	12-14-21	1500700094GAM	Yes	Good Condition
Shop Office #3	12-14-21	1500700095GAM	Yes	Good Condition
Kitchen #4	12-14-21	1500700092GAM	Yes	Good Condition

^{*}This form must be retained for 12 months after completion

CALIBRATION PROCEDURE AND BACKGROUND DETERMINATION REPORT

Landfill Name: Crydd Lell Date: 12-14-21 Time: \(\frac{30}{20}\) AM \(\text{PM} \) Instrument Make: \(\frac{100}{100}\) Model: \(\frac{100}{100}\) Model: \(\frac{100}{100}\) S/N: \(\frac{0921536411}{1000}\)
Calibration Procedure
1. Allow instrument to internally zero itself while introducing zero air.
2. Introduce the calibration gas into the probe.
Stable Reading = $\frac{600}{\text{ppm}}$
3. Adjust meter to read 500 ppm.
Background Determination Procedure 1. Upwind Reading (highest in 30 seconds): ppm (a) 2. Downwind Reading (highest in 30 seconds): ppm (b)
Calculate Background Value: (a) + (b) Background = ppm 2

APPENDIX N SOURCE TEST SUMMARY AND RESULTS

Guadalupe Rubbish Disposal Facility (GRDF) BAAQMD Facility # 3294

Initial Compliance Test Report #21054 Landfill Gas Flare A-17

Located at: **Guadalupe Recycling and Disposal Facility**15999 Guadalupe Mines Road

San Jose, CA 95120

Prepared for:
SCS Engineers
3117 Fite Circle, Suite 108
Sacramento, CA 95827
Attn: Michael O'Connor
moconnor@scsengineers.com

For Submittal to:

Bay Area Air Quality Management District

375 Beale Street, Suite 600 San Francisco, CA 94105 Attn: Gloria Espena/Marco Hernandez

gespena@baaqmd.gov/mhernandez@baaqmd.gov sourcetest@baaqmd.gov

Testing Performed on: **February 18th, 2021**

Final Report Submitted on: **April 7th, 2021**

Performed and Reported by: Blue Sky Environmental, Inc. 624 San Gabriel Avenue Albany, CA 94706

Office (510) 508-3469/Mobile (510) 508 3469 bluesky@blueskyenvironmental.com

REVIEW AND CERTIFICATION

Team Leader:

The work performed herein was conducted under my supervision, and I certify that:

- a) the details and results contained within this report are to the best of my knowledge an authentic and accurate representation of the test program,
- b) that the sampling and analytical procedures and data presented in the report are authentic and accurate,
- c) that all testing details and conclusions are accurate and valid, and
- d) that the production rate and/or heat input rate during the source test are reported accurately.

If this report is submitted for compliance purposes it should only be reproduced in its entirety. If there are any questions concerning this report, please contact me at (925) 338-4875.

Chill Ch

Chuck Arrivas, QSTI

Project Manager

Blue Sky Environmental, Inc.



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SECTION 1. INTRODUCTION

1.1. Summary

Blue Sky Environmental, Inc. was contracted by SCS Engineers to perform the emissions testing for Waste Management (WM), at the Guadalupe Recycling and Disposal Facility (GRDF), located in San Jose, California. This initial source test was conducted to demonstrate that Landfill Gas Flare A-17 (previously Flare A-14) is operating in compliance with the Bay Area Air Quality Management District (BAAQMD) Authority to Construct 21927 for Facility #3294. Results of the test program are presented in this report. The source test information is summarized in Table 1. Test results derived from the source test are summarized in Table 2. Results for individual test runs are provided in Appendix A. The flare met all compliance emission criteria.

Table 1. Source Test Information

Test Location:	Guadalupe Recycling and Disposal Facility (GRDF), 15999 Guadalupe Mines Road, San Jose, CA 95120
Source Contact:	Michael O'Connor, SCS Engineers (707) 236-3791
Source Tested:	LFG Specialties, Inc. Enclosed Landfill Gas Flare A-17, 120 MMBtu/hr
Source Test Date:	February 18th, 2020
Test Objective:	Determine Compliance with Bay Area Air Quality Management District (BAAQMD) Authority to Construct 21927 for Plant #3294, Condition 25320; Regulation 8, Rule 34; and the State Landfill Methane Gas Rule under AB32 for Flare performance.
Test Performed By:	Blue Sky Environmental, Inc 624 San Gabriel Avenue, Albany, CA 94706 Chuck Arrivas (925) 338-4875 carrivas@blueskyenvironmental.com
Test Parameters:	Landfill Gas O ₂ , N ₂ , CO ₂ , BTU, THC, CH ₄ , NMOC, HHV, F-Factor, Sulfur Species, Volumetric Flow rate Flare Emissions THC, CH ₄ , NMOC, NO _X , CO, O ₂ , SO ₂ , Moisture, Volumetric Flow rate.



Table 2. Compliance Summary

Condensate On

Emission Parameter	Average Results (Condensate ON)	Permit Limit	Compliance Status
NO _X , ppm @ 15% O ₂	13.3	15	In Compliance
CO, ppm @ 15% O ₂	1.24	81	In Compliance
SO ₂ , ppm	51.3	300	In Compliance
NMOC, (ppm @ 3% O ₂ as CH ₄)	<5.79	30	In Compliance
NMOC Destruction Efficiency	98.57	>98%	In Compliance
CH ₄ Destruction Efficiency	>99.974	>99%	In Compliance

Condensate Off

Emission Parameter	Average Results (Condensate OFF)	Permit Limit	Compliance Status
NOx, ppm @ 15% O ₂	10.3	15	In Compliance
CO, ppm @ 15% O ₂	2.50	81	In Compliance
SO ₂ , ppm	53.9	300	In Compliance
NMOC, (ppm @ 3% O ₂ as CH ₄)	<2.6	30	In Compliance
NMOC Destruction Efficiency	99.53	>98%	In Compliance
CH ₄ Destruction Efficiency	>99.973	>99%	In Compliance

SECTION 2. SOURCE TEST PROGRAM

2.1. Overview

This initial source test was performed to demonstrate that landfill gas Flare A-17 (previously A-14) is operating in accordance with Bay Area Air Quality Management District (BAAQMD) Authority to Construct Application #21927 for Facility #3294, Condition 25320 and Regulation 8, Rule 34. This testing also satisfies the compliance requirements outlined in the State Landfill Methane Gas Rule under AB32 for Flare performance.

2.2. Pollutants Tested

The following U.S. Environmental Protection Agency (EPA) and ASTM International sampling and analytical methods were used:

EPA Method 1 Sample and Traverse Point Determination EPA Method 3A O₂ and CO₂, Stack Gas Molecular Weight

EPA Method 10 CO

EPA Method 7E NO_X and NO₂ Converter Check

EPA Method 4, part 16.4 Moisture Calculation EPA Method 18 CH₄, THC, NMOC

EPA Method 19 Flow Rate Calculation DSCFM

EPA Method 25A VOC Emissions

EPA Method 25C TNMHC (NMOC) in fuel

ASTM D-1945/3588 BTU, F-Factor and Fixed Gases in Fuel

ASTM D-5504 Sulfur Species, Hydrogen Sulfide (H₂S) and TRS

2.3. Test Date(s)

Testing was conducted on February 18th, 2021.

2.4. Sampling and Observing Personnel

Testing was conducted by Chuck Arrivas and Guy Worthington, representing Blue Sky Environmental, Inc.

Rajan Phadnis, Ben Tarver and Marcus Bernard of Waste Management (WM) were present to operate the Flare and assist in coordinating testing and the collection of process data during testing. Jon Silva of SCS Engineers was also on site to coordinate and assist.

The BAAQMD was notified of the scheduled testing in a plan submitted by SCS Engineering on behalf of Waste Management on January 27th, 2021. A Source Test Protocol acknowledgement (NST #6330) was received on February 9th, 2021; however, no agency observers were present during testing. A copy of the source test protocol and email correspondence are provided in Appendix I.

2.5. Source/Process Description

The Guadalupe Recycling and Disposal Facility, located in San Jose, CA, is a multi-material landfill with a gas collection system that is abated by an industrial landfill gas flare. Flare A-17

has a 120 MMBtu/hr multiple nozzle burner. The flare shell is 50 feet high and 12 feet in diameter. The inside diameter (ID) is approximately 130 inches.

The flare is typically operated at an average 1,945 standard cubic feet per minute (SCFM) with the Condensate On and 1,976 SCFM with the Condensate Off. The flare set-point is established at 1,500 °F. Methane quality typically ranges from 39-41 %, with an oxygen content of \leq 4.5%. Landfill gas condensate that is collected is periodically injected into the flare via one vertical nozzle positioned near the burner.

2.6. Source Operating Conditions

The flare was operated on landfill gas under normal operating conditions during testing with the condensate injection both on and off. The condensate injection rate was approximately 1.88 gallons per minute (gpm).

The average exhaust temperature at normal operating condition was 1,499 °F. The LFG flowrate ranged from 1,937 to 1,984 SCFM. The operating exhaust temperature, and LFG flowrate records are provided in Appendix F.

Landfill gas samples collected at the head of the flare showed an average methane content of 40.4% and an oxygen content of 4.5%.



SECTION 3. SAMPLING AND ANALYSIS PROCEDURES

3.1. Port Location

Sampling was conducted in the 130-inch diameter ID stack of the flare through ports that were accessed with a 60-foot boom lift. The four 4-inch flange ports were located approximately 45 feet above grade, five stack diameters downstream from the burners and one stack diameters upstream from the exhaust.

3.2. Point Description/Labeling – Ports/Stack

Blue Sky Environmental, Inc. conducted two perpendicular 8-point traverses to check for the presence of cyclonic flow. O₂ stratification was greater than 10%; therefore, subsequent CEM sampling was conducted using all traverse points. Sampling was performed for two minutes per point for a total of 16 points over a 32-minute test run. The traverse points for the 130-inch diameter stack with 8-inch ports were 4.2, 13.7, 25.2, 42.0, 88.0, 104.8, 116.4 and 125.8 inches from the inside wall of the stack.

3.3. Sample Train Description

Sampling system diagrams are included in the Appendix H. Additional descriptive information is included in the following section.

3.4. Sampling Procedure Description

Six consecutive 32-minute gaseous emissions tests were performed for oxides of nitrogen (NO_X), nitric oxide (NO), carbon monoxide (CO), carbon dioxide (CO₂), oxygen (O₂), and total hydrocarbons (THC) at the flare exhaust stack. Three tests were performed with the Condensate Injection On and three tests were performed with the Condensate Injection Off. The gas flow was controlled with a rotameter to collect the 32-minute integrated samples.

The sampling system was checked for leaks before the start of the testing, by plugging the sample probe and observing the sample rotameter flow drop to zero. Instrument linearity and system bias were checked. The system response time for each analyzer was recorded. The temperatures of the heated sample line between the probe and sample conditioner/condenser, and the condenser exhaust temperatures were maintained within limits during each test run.

Analyzer external calibrations were performed before and after each run using EPA protocol certified gas standards. Calibration gases were introduced to the sample manifold at the same flow rate as the sample. Any drift or bias was corrected using equation 100-3 from CARB Method 100. A NOx analyzer converter efficiency check was performed before the first test run and achieved an efficiency greater than 90%.

Concurrent with the exhaust sampling, Blue Sky collected a total of nine integrated fuel samples (three samples with the condensate injection on and six samples with the condensate injection off) for off-site analysis by Atmospheric Analysis & Consulting, Inc., located in Ventura, CA. The samples were collected in 6-liter SUMMA canisters and analyzed for hydrocarbons by EPA Method 25, sulfur species (incl. H₂S and TRS) by ASTM D-5504, and HHV, F-factor, fixed gases, volatile organic compounds (VOCs), nonmethane organic compounds (NMOCs) and C¹-C⁶+ hydrocarbons by EPA Method 25C and ASTM D-1945. Three landfill gas samples collected while the condensate injection was off were analyzed for toxic organic compounds by EPA Method TO-15 (AP-42 2.4-1).



The sampling and analysis procedures are summarized below:

EPA Method 1 – Sample and Velocity Traverses for Stationary Sources

This method is used to determine the duct or stack area and appropriate traverse points that represent equal areas of the duct for sampling and velocity measurements.

EPA Method 3A – Determination of Oxygen and Carbon Dioxide Concentrations in Emissions from Stationary Sources (Instrumental Analyzer Procedure)

This method is used to measure oxygen and carbon dioxide in stationary source emissions using a continuous instrumental analyzer to determine the molecular weight of the stack gas.

EPA Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources

This method is used to measure carbon monoxide from integrated or continuous gas samples extracted from a sampling point.

EPA Method 7E – Determination of Nitrogen Oxides Emissions from Stationary Sources (Instrumental Analyzer Procedure)

This method is used to measure nitrogen oxides in stationary source emissions using a continuous instrumental analyzer. Section 16.2.2 of the method is used to determine the NO_X analyzer NO₂ to NO conversion efficiency.

EPA Methods 3A, 7E and 10 are all continuous monitoring techniques using instrumental analyzers. Sampling is performed by extracting exhaust flue gas from the stack, conditioning the sample, and analyzing it by continuous monitoring gas analyzers in a continuing emissions monitoring (CEM) test van. The sampling system consists of a stainless steel sample probe, Teflon sample line, glass-fiber particulate filter, and glass moisture-knockout condensers in ice, followed by thermoelectric coolers (optional), Teflon sample transfer tubing, a diaphragm pump, and a stainless steel/Teflon manifold and flow control/delivery system. A constant sample and calibration gas supply pressure of 5 PSI is provided to each analyzer to avoid pressure variable response differences. The entire sampling system is leak checked prior to and at the end of the sampling program.

The sampling and analytical system is checked for linearity with zero, mid (40-60%) and high span (80-100%) calibrations and is checked for system bias at the beginning and end of each run. System bias is determined by introducing calibration gas to the probe and pulling it through the entire sampling system. Individual test run calibrations use the calibration gas that most closely matches the stack gas effluent. All calibrations during testing are performed externally to incorporate any system bias that may exist. Sampling system bias, zero and calibration drift values are determined for each test. EPA Methods 3A, 7E and 10 all defer to EPA Method 7E for the calculations of effluent concentration, span, calibration gas, analyzer calibration error (linearity), sampling system bias, zero drift, calibration drift and response time.



System Performance Criteria

Instrument Linearity	≤2% Full Scale
Instrument Bias	≤5% Full Scale
System Response Time	≤± 2 minutes

 NO_X Converter Efficiency (EPA 7E) $\geq 90\%$

Instrument Zero Drift $\leq \pm 3\%$ Full Scale Instrument Span Drift $\leq \pm 3\%$ Full Scale

EPA Method 4-16.4 - Determination of Moisture Content in Stack Gas

This is an acceptable alternative to EPA Method 4 for the determination of moisture using F-factors. The mole fraction of moisture in the ambient air is calculated using equations in EPA Method 4-16.4 from 1) the measured ambient relative humidity, ambient temperature, and barometric pressure, 2) the mole fraction of free water in the fuel, calculated from the moisture % in the fuel, which is determined by the analytical lab to be the balance after all the major gaseous components have been summed or directly measured by wet bulb, dry bulb of the landfill gas, and 3) the mole fraction of hydrogen in the fuel. To determine the moisture in the fuel, the raw fuel analysis before normalization to 100% is referenced.

EPA Method 18 - Measurement of Gaseous Organic Compound Emissions by Gas Chromatography

This method is used to determine emissions of volatile organics by gas chromatograph/mass spectroscopy (GC/MS). Gaseous emissions are drawn through a Teflon sample transfer line to a Tedlar bag held in a rigid leak proof bag container. The sample is drawn into the bag by evacuating the container to stack gas pressure to allow sample flow without using a pump to avoid contamination. Negative pressure is adjusted to maintain an integrated sample flow for the collection time. The bag samples are taken to a laboratory and analyzed within 72 hours.

EPA Method 19 - Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxide Emission Rates

This method is used to determine stack gas volumetric flow rates using oxygen-based F-factors. F-factors are ratios of combustion gas volumes to heat inputs. The heating value of the fuel in Btu per cubic foot is determined from analysis of fuel gas samples using ASTM D1946/1945 gas chromatography analytical procedures. The total cubic feet per hour of fuel multiplied times the Btu/cf provides million Btu per hour (MMBtu) heat input. The heat input in MMBtu/hr is multiplied by the F-factor (DSCF/MMBtu) and adjusted for the measured oxygen content of the source to determine volumetric flow rate. The flow rates are used to determine emission rates. 301.

EPA Method 25A – Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer

This method is used to measure total hydrocarbons, methane, and non-methane hydrocarbons in stationary source emissions using a gas chromatograph with a flame ionization detector (GC/FID). Heated Teflon sample gas transfer lines are used to provide a continuous sample to the heated GC/FID hydrocarbon analyzer. Heated lines are used to avoid moisture or hydrocarbon condensation.

The sampling and analytical system is checked for linearity with zero, low (25-35%), mid (45-55%), and high (80-90%) span calibrations. All calibrations during testing are performed



externally to incorporate any system bias that may exist. Sampling system bias, zero and calibration drift values are determined for each test.

EPA Method 25C – Determination of Nonmethane Organic Compounds (NMOC) in Landfill Gas

This method is used to sample and measure NMOC in landfill gases. The method is written for evacuated tank sampling but is adaptable to Tedlar bag sampling procedures. The sampling equipment consists of a stainless steel or glass lined probe with a short stainless-steel or Teflon transfer line to a Tedlar bag housed in a sealed chamber. The chamber is evacuated by pump at a prescribed rate for the test duration and the Tedlar bag capacity, so the sample is integrated over the test period. The sample is injected into a GC column where the methane and CO₂ are flushed through and removed then the NMOC (ROC) fraction is oxidized to form CO₂ then reduced to methane and analyzed

ASTM D1945 - Analysis of Natural Gas by Gas Chromatography

This method is used to measure fixed gases (such as oxygen, nitrogen, carbon monoxide, and carbon dioxide) and methane by gas chromatography (GC/TCD). Light hydrocarbons, including C1-C7, are analyzed by GC/FID.

ASTM D-3588 – Standard Practice for Calculating Heat Value, Compressibility Factor, and Relative Density of Gaseous Fuels

This method uses the molar composition of gaseous fuel determined from Method ASTM D-1945 to calculate the heating value and F-factor.

ASTM D-5504 – Determination of Sulfur Compounds in Natural Gas and Gaseous Fuels by Gas Chromatography and Chemiluminescence

This method is used for the determination of speciated volatile sulfur-containing compounds in high methane content gaseous fuels by gas chromatography. Sulfur compounds are processed using a flame ionization detector (GC/FID). The products are then analyzed with a sulfur chemiluminescence detector (GC/SCD). Samples may be collected in Tedlar bags and analyzed within 24 hours or in Silco SUMMA canisters and analyzed 7 days.

3.5. Instrumentation and Analytical procedures

The following continuous emissions analyzers were used:

Instrumentation	Parameter	Principle
TECO Model 42C	NO _X /NO	Chemiluminescence
TECO Model 48C	CO	GFC/IR
TECO Model 55C	NMOC/CH ₄	FID
CAI Fuji ZRH	CO ₂	IR
Servomex Model 1440	O_2	Paramagnetic

The analyzer data recording system consists of a Honeywell DPR300 strip chart recorder, supported by a Data Acquisition System (DAS). The instrument response is recorded on strip charts and DAS. The averages are corrected for drift using BAAQMD and EPA Method 7E equations. All system performance criteria were met.

3.6. Comments: Limitations and Data Qualifications

This source test was performed in accordance with the protocol submitted to the BAAQMD. No deviations from the protocol or anomalies were observed during testing. The measured emissions from the flare comply with the permit limits.

Blue Sky Environmental has reviewed this report for accuracy and concluded that the test procedures were followed and accurately described and documented. The review included the following items:

Review of the general text Review of calculations Review of CEMS data Review of supporting documentation

The services described in this report were performed in a manner consistent with the generally accepted professional testing principles and practices. No other warranty, expressed or implied, is made. These services were performed in a manner consistent with our agreement with our client. The report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions contained in this report pertain to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and operating parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations, subsequent to this, and do not warranty the accuracy of information supplied by others.

SECTION 4. APPENDICES

Α.	Tabulated Results
В.	Calculations
C.	Laboratory Reports
D.	Field Data Sheets
E.	Strip Charts
F.	Process Information
G.	QC Calibration Certificates and Quality Assurance Records
Н.	Sample Train Configuration and Stack Diagrams
I.	Related Correspondence (Source Test Plan and Email
J.	BAAQMD Permit Conditions
K.	Flare Flow Meter Calibration Records

A Tabulated Results

TABLE #1

Guadalue Recycling and Disposal Facility (GRDF) Flare A-17

1,498°F - Condensate ON

RUN	1	2	3	AVERAGE	LIMITS
Test Date	2/18/21	2/18/21	2/18/21		
Test Time	0857-0934	1002-1040	1106-1142		1
Standard Temperature, °F	70	70	70		
Flare Temperature, °F Average	1,498	1,499	1,498	1,498	
Condensate Injection, gpm	1.87	1.86	1.92	1.88	1
Fuel Flow Rate, SCFM	1,948	1,937	1,950	1,945	1
Fuel Heat Input, MMBTU/hr	46.3	46.4	47.0	46.6	1
Exhaust Flow Rate, DSCFM (EPA M19)	19,071	18,845	18,427	18,781]
Oxygen, O ₂ , %	12.7	12.6	12.3	12.6]
Carbon Dioxide, CO ₂ , %	7.3	7.3	7.2	7.2	
Water Vapor, H ₂ O, % (EPA M4.16)	8.57	8.68	9.17	8.81	
NO, ppm	19.3	19.1	18.5	18.9	
NO ₂ , ppm	<1.0	<1.0	<1.0	<1.0]
NO_2/NO	< 0.05	< 0.05	< 0.05	< 0.05	1
NOx, ppm	19.0	18.9	18.2	18.7	
NOx, ppm @ 15% O ₂	13.7	13.5	12.6	13.3	15
NOx, lbs/hr	2.59	2.54	2.40	2.51	
CO, ppm	2.26	1.42	1.56	1.75	1
CO, ppm @ 15% O ₂	1.63	1.01	1.08	1.24	81
CO, lbs/hr	0.19	0.12	0.13	0.14	
TRS as H ₂ S, ppm in Fuel	484	511	492	496	
SO ₂ , ppm Exhaust (calculated)	49.4	52.5	52.1	51.3	300
THC, ppm wet (Sum NMOC + CH_4)	<14.2	<11.0	<12.1	<12.5	
THC, ppm dry	<15.6	<12.0	<13.3	<13.6	1
THC, lbs/hr as CH ₄	< 0.737	< 0.563	< 0.607	< 0.636	1
CH ₄ , ppm wet (EPA ALT 097)	<10.0	<10.0	<10.0	<10.0	1
CH ₄ , ppm dry	<10.9	<10.9	<10.9	<10.9	1
CH ₄ , lbs/hr	< 0.518	< 0.512	< 0.500	< 0.510	1
TNMHC, ppm as CH ₄ (EPA ALT 097)	4.23	<1.00	2.13	<2.45	1
TNMHC, ppm dry as CH ₄	4.63	<1.09	2.33	<2.68	1
TNMHC, lbs/hr as CH ₄	0.219	< 0.051	0.106	< 0.126	1
TNMHC, ppm @ 3% O ₂ as CH ₄	10.14	<2.37	4.87	<5.79	30
INLET TNMOC (EPA M25C)	1,735	1,845	1,981	1,854	0.44
INLET NMOC lbs/hr as CH ₄	8.4	8.9	9.6	9.0	or
NMOC Destruction Efficiency	97.39%	99.42%	98.89%	98.57%	98
INLET CH ₄ , ppm	398,000	401,000	403,000	400,667	
INLET CH ₄ lbs/hr	1,924.6	1,928.2	1,950.8	1,935	1
CH ₄ Destruction Efficiency	>99.973%	>99.973%	>99.974%	>99.974%	99
INLET THC (TOC) ppm as CH ₄	399,735	402,845	404,981	402,520	
INLET THC (TOC) lbs/hr as CH ₄	1,933	1,937	1,960	1,943]
THC (TOC) Destruction Efficiency	99.962%	99.971%	99.969%	99.967%	

< Value = 2% of Analyzer Range

WHERE,

ppm = Parts per Million Concentration

Lbs/hr = Pound per Hour Emission Rate

Tstd. = Standard Temperature (°R = °F+460)

MW = Molecular Weight

DSCFM = Dry Standard Cubic Feet Per Minute

NOx = Oxides of Nitrogen as NO_2 (MW = 46)

CO = Carbon Monoxide (MW = 28)

TOC = THC = Total Organic Carbon as Methane including CH₄ (MW = 16)

THC = Total Hydrocarbons as Methane (MW = 16)

TNMOC = Total Non-Methane Hydrocarbons (MW = 16)

 SO_2 = Sulfur Dioxide as SO_2 (MW = 64.1)

CALCULATIONS,

PPM @ 15% $O_2 = ppm * 5.9 / (20.9 - \%O_2)$

PPM @ $3\% O_2 = ppm * 17.9 / (20.9 - \%O_2)$

Lbs/hr = ppm * 8.223 E-05 * DSCFM * MW / Tstd. °R

Lbs/day = Lbs/hr * 24

Removal Efficiency = (inlet lbs/hr- outlet lbs/hr) / inlet lbs/hr

SO₂ emission ppm = H2S in fuel * Fuel Flow/Stack Gas Flow

TABLE #2

Guadalue Recycling and Disposal Facility (GRDF) Flare A-17

1,499°F - Condensate OFF

RUN	1	2	3	AVERAGE	LIMITS
Test Date	2/18/21	2/18/21	2/18/21		
Test Time	1205-1244	1313-1350	1412-1447		
Standard Temperature, °F	70	70	70		
Flare Temperature, °F Average	1,499	1,499	1,499	1,499	
Condensate Injection, gpm	0.00	0.00	0.00	0.00	
Fuel Flow Rate, SCFM	1,965	1,978	1,984	1,976	
Fuel Heat Input, MMBTU/hr	47.9	48.4	48.3	48.2	
Exhaust Flow Rate, DSCFM (EPA M19)	20,953	21,018	22,488	21,486	
Oxygen, O ₂ , %	13.23	13.18	13.70	13.37	
Carbon Dioxide, CO ₂ , %	6.47	6.47	5.99	6.31	
Water Vapor, H ₂ O, % (EPA M4.16)	7.64	7.75	7.19	7.53	
NO, ppm	13.43	13.67	12.50	13.20	
NO ₂ , ppm	<1.0	<1.0	<1.0	<1.0	
NO ₂ /NO	< 0.07	< 0.07	< 0.08	< 0.08	
NOx, ppm	13.30	13.67	12.39	13.12	
NOx, ppm @ 15% O ₂	10.2	10.4	10.2	10.3	
NOx, ppm @ 15% O ₂	10.2	10.4	10.2	10.3	15
NOx, lbs/hr	1.99	2.05	1.99	2.01	
CO, ppm	2.55	3.05	3.90	3.17	
CO, ppm @ 15% O ₂	1.96	2.33	3.20	2.50	81
CO, lbs/hr	0.23	0.28	0.38	0.30	
TRS as H ₂ S, ppm in Fuel	485	772	494	584	
SO ₂ , ppm Exhaust (calculated)	45.5	72.7	43.6	53.9	300
THC, ppm wet (EPA M25A)	<1.0	<1.0	<1.0	<1.0	
THC, ppm dry	<1.1	<1.1	<1.1	<1.1	
THC, lbs/hr as CH ₄	< 0.056	< 0.057	< 0.060	< 0.058	
CH ₄ , ppm wet (EPA ALT 097)	<10.0	<10.0	<10.0	<10.0	
CH ₄ , ppm dry	<10.8	<10.8	<10.8	<10.8	
CH ₄ , lbs/hr	< 0.520	< 0.522	< 0.558	< 0.533	
TNMHC, ppm as CH ₄ (EPA ALT 097)	<1.08	<1.08	<1.08	<1.08	
TNMHC, ppm dry as CH ₄	<1.2	<1.2	<1.2	<1.2	
TNMHC, lbs/hr as CH ₄	< 0.056	< 0.057	< 0.060	< 0.058	
TNMHC, ppm @ 3% O ₂ as CH ₄	<2.5	<2.5	<2.7	<2.6	30
INLET TNMOC (EPA M25C)	2,223	3,112	2,386	2,574	0*
INLET NMOC lbs/hr as CH ₄	10.8	15.3	11.8	12.6	or
NMOC Destruction Efficiency	99.48%	99.63%	99.49%	99.53%	98
INLET CH ₄ , ppm	408,000	409,000	407,000	408,000	
INLET CH ₄ lbs/hr	1,990.2	2,008.3	2,004.5	2,001	
CH ₄ Destruction Efficiency	>99.974%	>99.974%	>99.972%	>99.973%	99
INLET THC (TOC) ppm as CH ₄	410,223	412,112	409,386	410,574	
INLET THC (TOC) lbs/hr as CH ₄	2,001	2,024	2,016	2,014	
THC (TOC) Destruction Efficiency	99.997%	99.997%	99.997%	99.997%	

< Value = 2% of Analyzer Range

WHERE,

ppm = Parts per Million Concentration

Lbs/hr = Pound per Hour Emission Rate

Tstd. = Standard Temperature (°R = °F+460)

MW = Molecular Weight

DSCFM = Dry Standard Cubic Feet per Minute

NOx = Oxides of Nitrogen as NO₂ (MW = 46)

CO = Carbon Monoxide (MW = 28)

TOC = THC = Total Organic Carbon as Methane including CH₄ (MW = 16)

THC = Total Hydrocarbons as Methane (MW = 16)

TNMOC = Total Non-Methane Hydrocarbons (MW = 16)

 SO_2 = Sulfur Dioxide as SO_2 (MW = 64.1)

CALCULATIONS,

PPM @ $15\% O_2 = ppm * 5.9 / (20.9 - \%O_2)$

PPM @ $3\% O_2 = ppm * 17.9 / (20.9 - \%O_2)$

Lbs/hr = ppm * 8.223 E-05 * DSCFM * MW / Tstd. °R

Lbs/day = Lbs/hr * 24

 $Removal\ Efficiency = (inlet\ lbs/hr-outlet\ lbs/hr)\ /\ inlet\ lbs/hr\\ SO_2\ emission\ ppm = H2S\ in\ fuel\ *Fuel\ Flow/Stack\ Gas\ Flow$

Guadalupe Rubbish Disposal

BAAQMD Facility 3294

Compliance Test Report #22050 Landfill Gas Flare A-17

Located at:

Guadalupe Recycling and Disposal Facility (GRDF)

15999 Guadalupe Mines Road San Jose, CA 95120

Prepared for:

SCS Engineers

3117 Fite Circle, Suite 108 Sacramento, CA 95827

Attn: Maria Bowen mbowen@scsengineers.com

For Submittal to:

Bay Area Air Quality Management District

375 Beale Street, Suite 600 San Francisco, CA 94105 Attn: Gloria Espena and Marco Hernandez

gespena@baaqmd.gov/mhernandez@baaqmd.gov sourcetest@baaqmd.gov

Testing Performed on: **February 16th, 2022**

Final Report Submitted on: **April 8th**, **2022**

Performed and Reported by: Blue Sky Environmental, Inc. 624 San Gabriel Avenue Albany, CA 94706

Office (510) 508-3469/Cell (510) 508-3469 bluesky@blueskyenvironmental.com



REVIEW AND CERTIFICATION

Team Leader:

The work performed herein was conducted under my supervision, and I certify that:

- a) the details and results contained within this report are to the best of my knowledge an authentic and accurate representation of the test program,
- b) that the sampling and analytical procedures and data presented in the report are authentic and accurate,
- c) that all testing details and conclusions are accurate and valid, and
- d) that the production rate and/or heat input rate during the source test are reported accurately.

If this report is submitted for compliance purposes, it should only be reproduced in its entirety. If there are any questions concerning this report, please contact me at (810) 923-3181.

Jeramie Richardson

Project Manager

Blue Sky Environmental, Inc.

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SECTION 1. INTRODUCTION

1.1. Summary

Blue Sky Environmental, Inc. was contracted by SCS Engineers to perform emissions testing for at the Guadalupe Recycling and Disposal Facility (GRDF) in San Jose, California. The source test was conducted to demonstrate that landfill gas Flare A-17 is operating in compliance with Bay Area Air Quality Management District (BAAQMD) authority to construct application 21927 for Facility 3294. Results of the test program are presented in this report. The source test information is summarized in Table 1-1. Test results derived from the source test are summarized in Table 1-2. Results for individual test runs are provided in Appendix A. The flare met all compliance emission criteria.

Table 1-1 Source Test Information

Test Location:	Guadalupe Recycling and Disposal Facility (GRDF) 15999 Guadalupe Mines Road, San Jose, CA 95120
Source Contact:	Becky Acevedo, Waste Management (408) 779-2206
Source Tested:	Flare A-17 – 120 MMBtu/hr LFG Specialties, Inc. enclosed landfill gas flare
Source Test Date:	February 16 th , 2022
Test Objective:	Determine compliance with condition 25320 of Bay Area Air Quality Management District (BAAQMD) authority to construct application 21927 for Facility 3294; BAAQMD Regulation 8, Rule 34; and the State Landfill Methane Gas Rule under AB32 for Flare performance.
Test Performed by:	Blue Sky Environmental, Inc. 624 San Gabriel Avenue, Albany, CA 94706 Jeramie Richardson (810) 923-1198 jrichardson@blueskyenvironmental.com
Test Parameters:	Landfill Gas O ₂ , N ₂ , CO ₂ , Btu, THC, CH ₄ , NMOC, HHV, F-factor, sulfur species, volumetric flow rate Flare Emissions THC, CH ₄ , NMOC, NO _x , CO, O ₂ , SO ₂ , moisture, volumetric flow rate

Table 1-2 Compliance Summary

Flare A-17 Condensate ON

Emission Parameter	Average Results (Condensate ON)	Permit Limit	Compliance Status
NO _x , ppmvd @ 15% O ₂	12.7	15	In Compliance
CO, ppmvd @ 15% O ₂	3.7	81	In Compliance
SO ₂ , ppmvd	70.8	300	In Compliance
NMOC, ppmvd @ 3% O ₂	<2.2	30	In Compliance
NMOC Destruction Efficiency, %	>99.46%	>98%	In Compliance
CH ₄ Destruction Efficiency, %	>99.97%	>99%	In Compliance

Flare A-17 Condensate OFF

Emission Parameter	Average Results (Condensate OFF)	Permit Limit	Compliance Status
NO _x , ppmvd @ 15% O ₂	9.6	15	In Compliance
CO, ppmvd @ 15% O ₂	4.8	81	In Compliance
SO ₂ , ppmvd	84.8	300	In Compliance
NMOC, ppmvd @ 3% O ₂	<2.3	30	In Compliance
NMOC Destruction Efficiency, %	>99.46%	>98%	In Compliance
CH ₄ Destruction Efficiency, %	>99.97%	>99%	In Compliance

SECTION 2. SOURCE TEST PROGRAM

2.1. Overview

This source test was performed to demonstrate that landfill gas Flare A-17 (previously A-14) is operating in compliance with NO_x, CO, and NMOC emission limits specified in condition 25320 of Bay Area Air Quality Management District (BAAQMD) authority to construct application 21927 for Facility 3294, and BAAQMD Regulation 8, Rule 34. This testing also satisfies compliance requirements outlined in the State Landfill Methane Gas Rule under AB32 for Flare performance.

2.2. Pollutants Tested

The following U.S. Environmental Protection Agency (EPA) and ASTM International sampling and analytical methods were used:

EPA Method 1	Sample and Traverse Point Determination
EPA Method 3A	O ₂ and CO ₂ Emissions, Stack Gas Molecular Weight
EPA Method 7E	NO _x Emissions and NO ₂ Converter Check
EPA Method 10	CO Emissions
EPA Method 4	Moisture Calculation
EPA Method 18	CH ₄ Emissions
EPA Method 19	Flow Rate Calculation DSCFM
EPA Method 25A	THC, NMOC Emissions
EPA Method 25C	TNMHC (NMOC) in Fuel
ASTM D-1945/3588	BTU, F-Factor and Fixed Gases in Fuel
ASTM D-5504	Sulfur Species, Hydrogen Sulfide (H ₂ S) and TRS

2.3. Test Date

Testing was conducted on February 16th, 2022.

2.4. Sampling and Observing Personnel

Testing was conducted by Jeramie Richardson and Timothy Eandi, representing Blue Sky Environmental, Inc.

Rajan Phadnis, James Dutra, and Tino Robles of Waste Management (WM) were on-site to oversee flare operations and assist in coordinating testing and the collection of process data during testing. Jon Silva of SCS Engineers was also on-site to coordinate and assist with the test program.

BAAQMD was notified of the scheduled testing in a source test protocol submitted by SCS Engineering on behalf of Waste Management on January 21st, 2022. A Source Test Protocol acknowledgement (NST-7171) was received on January 24th, 2022; however, no agency observers were present during the test program. A copy of the source test protocol and email correspondence are provided in Appendix I.



2.5. Source/Process Description

Guadalupe Recycling and Disposal Facility is an operating multi-material landfill located in San Jose, California with a landfill gas collection system that is abated by an industrial landfill gas flare. Flare A-17 has a 120 MMBtu/hr multiple nozzle burner. The flare shell is 50 feet high and 12 feet in diameter. The inside diameter (ID) is approximately 130 inches.

The flare is maintained at a setpoint of 1,500 °F. It is typically operated at ~1,850 standard cubic feet per minute (SCFM) with the condensate on and 1,976 SCFM with the condensate off. Methane quality on average ranges from 44 to 49%, with an oxygen content to be in range of 1-2%. Collected landfill gas condensate is periodically injected into the flare through one vertical nozzle positioned near the burner.

2.6. Source Operating Conditions

The flare was operated under normal conditions with an average exhaust temperature of 1,499 °F during testing. The flare was operated on landfill gas with a condensate injection rate of 1.78 gallons per minute (gpm) for the first set of tests, and on landfill gas with the condensate injection turned off for the second set of tests.

The LFG flowrate ranged from 1,784 to 1,836 SCFM. The facility exhaust temperature and LFG flowrate records are provided in Appendix F.

Landfill gas samples collected at the head of the flare had an average methane content of 44.2% and an oxygen content of 1.6%.

SECTION 3. SAMPLING AND ANALYSIS PROCEDURES

3.1. Port Location

Sampling was conducted at the 130-inch diameter ID stack of the flare through ports that were accessed with a 60-foot boom lift. Four 4-inch flange ports were located approximately 45 feet above grade, five stack diameters downstream from the burners and one stack diameter upstream from the exhaust.

3.2. Point Description/Labeling – Ports/Stack

Blue Sky Environmental, Inc. conducted two perpendicular 8-point traverses of the stack (90° apart) to check for the presence of cyclonic flow. The traverse points for the 130-inch diameter stack with 8-inch ports were 4.2, 13.7, 25.2, 42.0, 88.0, 104.8, 116.4 and 125.8 inches from the inside wall of the stack. Sampling was performed for two minutes per point for a total of 16 points over the 32-minute test run. Oxygen stratification was greater than 10%; therefore, subsequent CEM sampling was conducted using all traverse points.

3.3. Sample Train Description

Sampling system diagrams are provided in Appendix H. Additional descriptive information is included in the following section.

3.4. Sampling Procedure Description

Six consecutive 32-minute gaseous emissions tests were performed for oxides of nitrogen (NO_X), nitric oxide (NO), carbon monoxide (CO), carbon dioxide (CO₂), oxygen (O₂), methane (CH₄) and total hydrocarbons (THC) at the flare exhaust stack. Three tests were performed with the condensate injection on, and three tests were performed with the condensate injection off.

The sampling system was checked for leaks before the start of the testing by plugging the sample probe and observing the sample rotameter flow drop to zero. Instrument linearity and system bias were checked. The system response time for each analyzer was recorded. The temperatures of the heated sample line between the probe and sample conditioner/condenser, and the condenser exhaust temperatures were maintained within limits during each test run.

Analyzer external calibrations were performed before and after each run using EPA protocol certified gas standards. Calibration gases were introduced to the sample manifold at the same flow rate as the sample. Any drift or bias was corrected using equation 100-3 from CARB Method 100. A NOx analyzer converter efficiency check was performed before the first test run and achieved an efficiency greater than 90%.

Concurrent with the exhaust sampling, Blue Sky Environmental collected a total of three integrated fuel samples (three samples with the condensate injection on and three samples with the condensate injection off) for off-site analysis by Atmospheric Analysis & Consulting, Inc. (AAC) in Ventura, California. The samples were collected in 6-liter SUMMA canisters and analyzed for sulfur species (including H₂S and total reduced sulfur compounds) by ASTM D-5504, and HHV, F-factor, fixed gases, volatile organic compounds (VOCs), nonmethane organic compounds (NMOCs) and C₁-C₆₊ hydrocarbons by EPA Method 25C and ASTM D-1945.



The sampling and analysis procedures are summarized below:

EPA Method 1 – Sample and Velocity Traverses for Stationary Sources

This method is used to determine the duct or stack area and appropriate traverse points that represent equal areas of the duct for sampling and velocity measurements.

EPA Method 3A – Determination of Oxygen and Carbon Dioxide Concentrations in Emissions from Stationary Sources (Instrumental Analyzer Procedure)

This method is used to measure oxygen and carbon dioxide in stationary source emissions using a continuous instrumental analyzer to determine the molecular weight of the stack gas. A continuous representative gas sample is extracted from the sampling point and conditioned to remove water and particulate material. A small portion of the sample is passed through a fuel cell type paramagnetic oxygen analyzer which measures the electrical current generated by the oxidation reaction at the gas/fuel cell interface. Carbon dioxide is determined by passing the sample through a non-dispersive infrared analyzer (NDIR) tuned to a frequency at which carbon dioxide absorbs infrared radiation.

EPA Method 7E – Determination of Nitrogen Oxides Emissions from Stationary Sources (Instrumental Analyzer Procedure)

This method is used to measure nitrogen oxides in stationary source emissions using a continuous instrumental analyzer. A continuous representative gas sample is extracted from the sampling point and conditioned to remove water and particulate material. Nitric oxide is determined by passing the sample through a chemiluminescent analyzer. The chemiluminescent process is based on the light given off when nitric oxide and ozone react. Nitrogen dioxide (NO₂) concentrations are determined by passing the sample through a catalyst which reduces the NO₂ to NO. The total oxides of nitrogen concentration (NO₂ + NO) is then determined by chemiluminescence.

Section 16.2.2 of the method is used to determine the NO_X analyzer NO₂ to NO conversion efficiency.

EPA Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources

This method is used to measure carbon monoxide from integrated or continuous gas samples extracted from a sampling point. A continuous representative gas sample is extracted from the sampling point and conditioned to remove water and particulate material. Carbon monoxide is determined by passing the sample through a non-dispersive infrared analyzer (NDIR) tuned to a frequency at which carbon monoxide absorbs infrared radiation.

EPA Methods 3A, 7E and 10 are all continuous monitoring techniques using instrumental analyzers. Sampling is performed by extracting exhaust flue gas from the stack, conditioning the sample, and analyzing it by continuous monitoring gas analyzers in a continuing emissions monitoring (CEM) test van. The sampling system consists of a stainless steel sample probe, Teflon sample line, glass-fiber particulate filter, and glass moisture-knockout condensers in ice, followed by thermoelectric coolers (optional), Teflon sample transfer tubing, a diaphragm pump, and a stainless steel/Teflon manifold and flow control/delivery system. A constant sample and calibration gas supply pressure of 5 psi is provided to each analyzer to avoid pressure variable response differences. The entire sampling system is leak checked prior to and at the end of the sampling program.

The sampling and analytical system is checked for linearity with zero, mid (40-60%) and high span (80-100%) calibrations and is checked for system bias at the beginning and end of each run. System bias is determined by introducing calibration gas to the probe and pulling it through the entire sampling system. Individual test run calibrations use the calibration gas that most closely matches the stack gas effluent. All calibrations during testing are performed externally to incorporate any system bias that may exist. Sampling system bias, zero and calibration drift values are determined for each test. EPA Methods 3A, 7E and 10 all defer to EPA Method 7E for the calculations of effluent concentration, span, calibration gas, analyzer calibration error (linearity), sampling system bias, zero drift, calibration drift and response time.

System Performance Criteria

Instrument Linearity \leq 2% Full ScaleInstrument Bias \leq 5% Full ScaleSystem Response Time \leq ± 2 minutes

 NO_X Converter Efficiency (EPA Method 7E) $\geq 90\%$

Instrument Zero Drift $\leq \pm 3\%$ Full Scale Instrument Span Drift $\leq \pm 3\%$ Full Scale

EPA Method 4 – Determination of Moisture Content in Stack Gas

This method is used to determine the moisture content of stack gas. The sample is extracted and condensed in Greenburg-Smith impingers immersed in an ice bath and in a final impinger silica gel trap. The moisture is condensed in a solution of de-ionized water, or solutions of another type of sampling train if the moisture is being determined as part of another sampling method, such as EPA Method 5, SCAQMD Method 201.7 or BAAQMD ST-32. The moisture gain in the impinger solutions and silica gel is determined volumetrically and gravimetrically respectively.

QA/QC procedures require that a minimum of 21 cubic feet of sample is pulled using a leak tight pump. The sample volume is measured with a calibrated dry gas meter. The impingers are immersed in an ice bath to maintain a gas outlet temperature of less than 68°F. Pre-test leak checks are performed for each run using a minimum 15 inches of mercury vacuum. Post-test leak checks are performed at the highest sample vacuum or greater. The leak test is acceptable if the leak rate is less than 0.02 cubic feet per minute or 4% of the average sampling rate, whichever is less. If the final leak check exceeds the criteria, either the volume is corrected based on the leak rate or the run is voided and repeated.

EPA Method 19 – Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxide Emission Rates

This method is used to determine stack gas volumetric flow rates using oxygen-based F-factors. F-factors are ratios of combustion gas volumes to heat inputs. The heating value of the fuel in Btu per cubic foot is determined from analysis of fuel gas samples using ASTM D1946/1945 gas chromatography analytical procedures. The total cubic feet per hour of fuel multiplied times the Btu/cf provides million Btu per hour (MMBtu) heat input. The heat input in MMBtu/hr is multiplied by the F-factor (DSCF/MMBtu) and adjusted for the measured oxygen content of the source to determine volumetric flow rate. The flow rates are used to determine emission rates.

EPA Method 25A – Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer

This method is used to measure total hydrocarbons, methane, and non-methane hydrocarbons in stationary source emissions using a gas chromatograph with a flame ionization detector

(GC/FID). Heated Teflon sample gas transfer lines are used to provide a continuous sample to the heated GC/FID hydrocarbon analyzer. Heated lines are used to avoid moisture or hydrocarbon condensation.

The sampling and analytical system is checked for linearity with zero, low (25-35%), mid (45-55%), and high (80-90%) span calibrations. All calibrations during testing are performed externally to incorporate any system bias that may exist. Sampling system bias, zero and calibration drift values are determined for each test.

Methane in the exhaust is determined using EPA Method 18.

EPA Method 18 – Measurement of Gaseous Organic Compound Emissions by Gas Chromatography

This method is used to determine emissions of methane using a gas chromatograph with a flame ionization detector. An integrated Tedlar bag is collected and either analyzed offsite by GC or onsite using a charcoal scrubber to remove the non-methane organics and determining the difference between the total hydrocarbon and non-methane hydrocarbon concentrations.

EPA Method 25C – Determination of Nonmethane Organic Compounds (NMOC) in Landfill Gas

This method is used to sample and measure NMOC in landfill gases. Gases are collected in a pre-evacuated 6-Liter SUMMA canister with pre-set flow controller set to integrate over the desired test duration. The SUMMA® passivated canisters allow holding times up to 14 days. The sample gas is drawn by the canister vacuum through a micro-filter, pre-set orifice flow controller and on/off valve into the canister. The canister vacuum is monitored with a vacuum gauge to verify sample collection. The flow controller consists of capillary orifice tubing designed to sample for a pre-set duration of 0.5 hrs. The sample is injected into a GC column where the methane and CO₂ are flushed through and removed then the NMOC (ROC) fraction is oxidized to form CO₂ then reduced to methane and analyzed.

ASTM D-1945 – Analysis of Natural Gas by Gas Chromatography

This method is used to measure fixed gases (such as oxygen, nitrogen, carbon monoxide, and carbon dioxide) and methane by gas chromatography (GC/TCD). Light hydrocarbons, including C1-C7, are analyzed by GC/FID.

ASTM D-3588 – Standard Practice for Calculating Heat Value, Compressibility Factor, and Relative Density of Gaseous Fuels

This method uses the molar composition of gaseous fuel determined from Method ASTM D-1945 to calculate the heating value and F-factor.

ASTM D-5504 – Determination of Sulfur Compounds in Natural Gas and Gaseous Fuels by Gas Chromatography and Chemiluminescence

This method is used for the determination of speciated volatile sulfur-containing compounds in high methane content gaseous fuels by gas chromatography. Sulfur compounds are processed using a flame ionization detector (GC/FID). The products are then analyzed with a sulfur chemiluminescence detector (GC/SCD). Samples may be collected in Tedlar bags and analyzed within 24 hours or in Silco SUMMA canisters and analyzed 7 days.



3.5. Instrumentation and Analytical procedures

The following continuous emissions analyzers were used:

Instrumentation	Parameter	Principle	
TECO Model 42C	NO _X /NO/NO ₂	Chemiluminescence	
CAI Model Fuji ZRH	CO_2	Infrared (IR)	
TECO Model 48C	CO	Gas Filter Correlation/IR	
Servomex Model 1440	O_2	Paramagnetic	
TECO Model 55C	NMOC/CH ₄	Flame Ionization (FID)	

The analyzer data recording system consists of a Honeywell DPR300 strip chart recorder, supported by a data acquisition system (DAS). The instrument response is recorded on strip charts and DAS. The averages are corrected for drift using BAAQMD and EPA Method 7E equations. All system performance criteria were met.

3.6. Comments: Limitations and Data Qualifications

This source test was performed in accordance with the protocol submitted to BAAQMD. No deviations from the protocol or anomalies were observed during testing. The measured emissions comply with the permit limits.

Blue Sky Environmental has reviewed this report for accuracy and concluded that the test procedures were followed and accurately described and documented. The review included the following items:

Review of the general text Review of calculations Review of CEMS data Review of supporting documentation

The services described in this report were performed in a manner consistent with the generally accepted professional testing principles and practices. No other warranty, expressed or implied, is made. These services were performed in a manner consistent with our agreement with our client. The report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions contained in this report pertain to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and operating parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations, subsequent to this, and do not warranty the accuracy of information supplied by others.

SECTION 4. APPENDICES

Α.	Tabulated Results
В.	Calculations
C.	Laboratory Reports
D.	Field Data Sheets
E.	Strip Charts
F.	Process Information
G.	QC Calibration Certificates and Quality Assurance Records
Н.	Sample Train Configuration and Stack Diagrams
I.	Related Correspondence (Source Test Plan and Email
J.	BAAQMD Permit Conditions
K.	Flare Flow Meter Calibration Records

A Tabulated Results

TABLE #1

Guadalupe Recycling and Disposal Facility (GRDF) Flare A-17

1,499°F - Condensate ON

Parameter	Run 1	Run 2	Run 3	Average Results	Permit Limits
Test Date	2/16/22	2/16/22	2/16/22		
Test Time	0837-0921	0956-1039	1101-1145		
Standard Temperature, °F	70	70	70		
Process Parameters:					
Flare Temperature, °F	1,498	1,499	1,499	1,499	
Condensate Injection, gpm	1.8	1.8	1.8	1.8	
Fuel:					
Fuel Flow Rate, SCFM	1,784	1,792	1,785	1,787	
Fuel Heat Input, MMBtu/hr	46.2	46.7	47.0	46.6	
Stack Gas:	1.	· I		•	
Exhaust Flow Rate, DSCFM (EPA Method 19)	19,301	20,019	20,072	19,798	
Oxygen (O ₂), % volume dry	12.74	12.98	12.94	12.89	
Carbon Dioxide (CO ₂), % volume dry	7.47	7.25	7.28	7.33	
Water Vapor (H ₂ O), % volume (EPA Method 4)	7.86	8.77	8.14	8.25	
NO/NO ₂ /NO _X Emissions:	,,,,,,	****			
NO, ppmvd	17.6	17.6	16.6	17.2	
NO ₂ , ppmvd	<1.0	<1.0	<1.0	<1.0	
NO ₂ /NO Ratio	<0.06	<0.06	<0.06	<0.06	
7	17.7	17.4	16.6	17.2	
NOx, ppmvd NOx, ppmvd @ 15% O ₂	12.8	13.0	12.3	12.7	15
					13
NOx, lb/hr	2.43	2.48	2.37	2.43	
CO Emissions:	1 01				
CO, ppmvd	2.6	7.5	5.1	5.1	0.1
CO, ppmvd @ 15% O ₂	1.9	5.6	3.7	3.7	81
CO, lb/hr	0.22	0.66	0.44	0.44	
Total Reduced Sulfurs (ASTM 5504):	704	770	0.50	705	
Total Reduced Sulfurs as H ₂ S, ppmv in Fuel	724	778	852	785	200
Sulfur Dioxide (SO ₂) Emissions, ppmvd (calculated)	66.9	69.6	75.8	70.8	300
THC Emissions (reported as CH ₄):	1	1		1	
THC, ppmv wet (EPA Method ALT-097)	<11.0	<11.0	<11.0	<11.0	
THC, ppmvd	<11.9	<12.1	<12.0	<12.0	
THC, lb/hr	< 0.572	< 0.599	< 0.597	< 0.589	
Methane (CH ₄) Emissions:					
CH ₄ , ppmv wet (EPA Method ALT-097)	<10.0	<10.0	<10.0	<10.0	
CH ₄ , ppmvd	<10.9	<11.0	<10.9	<10.9	
CH ₄ , lb/hr	< 0.479	< 0.497	< 0.498	< 0.491	
NMOC Emissions (reported as CH ₄):					
NMOC, ppmv wet (EPA Method ALT-097)	<1.0	<1.0	<1.0	<1.0	
NMOC, ppmvd	<1.1	<1.1	<1.1	<1.1	
NMOC, ppmvd @ 3% O ₂	<2.2	<2.3	<2.2	<2.2	30 [*]
NMOC, lb/hr	< 0.048	< 0.050	< 0.050	< 0.049	
Inlet Hydrocarbons (reported as CH ₄):	•	•	•	•	
Inlet NMOC, ppmvd (EPA Method 25C)	2,013	1,997	2,203	2,071	
Inlet NMOC, lb/hr	8.92	8.88	9.76	9.19	
NMOC Destruction Efficiency, %	>99.46%	>99.44%	>99.49%	>99.46%	>98%*
Inlet CH ₄ , % (ASTM D-1945)	440,000	442,000	447,000	443,000	
Inlet CH ₄ , lb/hr	1,949	1,966	1,980	1,965	
CH ₄ Destruction Efficiency, %	>99.98%	>99.97%	>99.97%	>99.97%	>99%
Inlet THC (TOC), %	442,013	443,997	449,203	445,071	
Inlet THC (TOC), 70 Inlet THC (TOC), lb/hr	1,958	1,975	1,990	1,974	
THC (TOC) Destruction Efficiency, %	>99.97%	>99.97%	>99.97%	>99.97%	>98%

WHERE,

ppmvd = parts per million concentration by volume expressed on a dry gas basis

lb/hr = pound per hour emission rate

Tstd. = standard temperature (${}^{\circ}R = {}^{\circ}F+460$)

MW = molecular weight

DSCFM = dry standard cubic feet per minute

 $\mathrm{NO_X}$ = oxides of nitrogen, reported as $\mathrm{NO_2}$ (MW = 46)

CO = carbon monoxide (MW = 28)

THC = TOC = total hydrocarbons including CH_4 , reported as CH_4 (MW = 16) NMOC = non-methane organic compounds, reported as CH₄ (MW = 16)

CALCULATIONS,

ppm @ 15% $\mathrm{O_2} = \mathrm{ppm} \cdot 5.9 \; / \; (20.9 \; \text{-} \; \% \mathrm{O_2})$

ppm @ $3\% O_2 = ppm \cdot 17.9 / (20.9 - \%O_2)$

lb/hr = ppm \cdot 8.223 E-05 \cdot DSCFM \cdot MW / Tstd. °R

NMOC, ppm as $CH_4 = THC - CH_4$

Destruction Efficiency (DE) = (inlet, lb/hr- outlet, lb/hr) / inlet, lb/hr

< Value = 2% of Analyzer Range

^{*} NMOC permit limits are 30 ppmvd @ 3% O $_2$ or DE >98%

TABLE #2

Guadalupe Recycling and Disposal Facility (GRDF) Flare A-17

1,499°F - Condensate OFF

Parameter	Run 1	Run 2	Run 3	Average Results	Permit Limits
Test Date	2/16/22	2/16/22	2/16/22		
Test Time	1216-1300	1318-1402	1419-1502		
Standard Temperature, °F	70	70	70		
Process Parameters:					
Flare Temperature, °F	1,498	1,498	1,501	1,499	
Condensate Injection, gpm	0.0	0.0	0.0	0.0	
Fuel:	l	l .			
Fuel Flow Rate, SCFM	1,825	1,836	1,832	1,831	
Fuel Heat Input, MMBtu/hr	47.5	47.1	48.2	47.6	
Stack Gas:				,,,,,	
Exhaust Flow Rate, DSCFM (EPA Method 19)	20,218	20,849	20,223	20,430	
Oxygen (O ₂), % volume dry	12.92	13.20	12.81	12.98	
Carbon Dioxide (CO ₂), % volume dry	7.40	7.12	7.33	7.28	
Water Vapor (H ₂ O), % volume (EPA Method 4)	9.49	7.96	9.01	8.82	
NO/NO ₂ /NO _X Emissions:	7.47	7.50	7.01	0.02	
	12.4	10.2	12.1	12.0	
NO, ppmvd NO ₂ , ppmvd	13.4 <1.0	12.3 <1.0	13.1 <1.0	12.9 <1.0	
NO ₂ , ppmvd NO ₂ /NO Ratio	<0.07	<0.08	<0.08	<0.08	
7					
NOx, ppmvd	13.4	12.2	13.0	12.9	4.5
NOx, ppmvd @ 15% O ₂	9.9	9.4	9.5	9.6	15
NOx, lb/hr	1.93	1.82	1.87	1.87	
CO Emissions:	•	T	•	1	
CO, ppmvd	4.1	3.8	11.5	6.5	
CO, ppmvd @ 15% O ₂	3.0	2.9	8.4	4.8	81
CO, lb/hr	0.36	0.35	1.01	0.57	
Total Reduced Sulfurs (ASTM 5504):					
Total Reduced Sulfurs as H ₂ S, ppmv in Fuel	778	1,095	965	946	
Sulfur Dioxide (SO ₂) Emissions, ppmvd (calculated)	70.2	96.4	87.4	84.8	300
THC Emissions (reported as CH ₄):					
THC, ppmv wet (EPA Method ALT-097)	<11.0	<11.0	<11.0	<11.0	
THC, ppmvd	<12.2	<12.0	<12.1	<12.1	
THC, lb/hr	< 0.610	< 0.619	< 0.607	< 0.612	
Methane (CH ₄) Emissions:	l	l .			
CH ₄ , ppmv wet (EPA Method ALT-097)	<10.0	<10.0	<10.0	<10.0	
CH ₄ , ppmvd	<11.0	<10.9	<11.0	<11.0	
CH ₄ , lb/hr	< 0.502	< 0.518	< 0.502	< 0.507	
NMOC Emissions (reported as CH ₄):		******		V-0-01	
NMOC, ppmv wet (EPA Method ALT-097)	<1.0	<1.0	<1.0	<1.0	
	- 			 	
NMOC, ppmvd NMOC, ppmvd @ 3% O ₂	<1.1 <2.2	<1.1 <2.3	<1.1 <2.2	<1.1 <2.3	20*
-11					30 [*]
NMOC, lb/hr Inlet Hydrocarbons (reported as CH ₄):	< 0.050	< 0.052	< 0.050	< 0.051	
*	0.005	2.055	2.424	2.002	
Inlet NMOC, ppmvd (EPA Method 25C)	2,035	2,077	2,134	2,082	
Inlet NMOC, lb/hr	9.22	9.46	9.71	9.46	*
NMOC Destruction Efficiency, %	>99.46%	>99.45%	>99.48%	>99.46%	>98%
Inlet CH ₄ , % (ASTM D-1945)	442,000	436,000	446,000	441,333	
Inlet CH ₄ , lb/hr	2,002	1,987	2,029	2,006	
CH ₄ Destruction Efficiency, %	>99.97%	>99.97%	>99.98%	>99.97%	>99%
Inlet THC (TOC), %	444,035	438,077	448,134	443,415	
Inlet THC (TOC), lb/hr	2,011	1,996	2,038	2,015	
THC (TOC) Destruction Efficiency, %	>99.97%	>99.97%	>99.97%	>99.97%	>98%

WHERE,

ppmvd = parts per million concentration by volume expressed on a dry gas basis

lb/hr = pound per hour emission rate

Tstd. = standard temperature (°R = °F+460)

MW = molecular weight

DSCFM = dry standard cubic feet per minute

 $\mathrm{NO_X}$ = oxides of nitrogen, reported as $\mathrm{NO_2}$ (MW = 46)

CO = carbon monoxide (MW = 28)

THC = TOC = total hydrocarbons including CH₄, reported as CH₄ (MW = 16) NMOC = non-methane organic compounds, reported as CH₄ (MW = 16)

CALCULATIONS,

ppm @ 15% O_2 = ppm · 5.9 / (20.9 - % O_2) ppm @ 3% O_2 = ppm · 17.9 / (20.9 - % O_2)

lb/hr = ppm \cdot 8.223 E-05 \cdot DSCFM \cdot MW / Tstd. °R

NMOC, ppm as CH_4 = THC - CH_4

 $Destruction \; Efficiency \; (DE) = (inlet, lb/hr-outlet, lb/hr) \; / \; inlet, lb/hr$

< Value = 2% of Analyzer Range

^{*} NMOC permit limits are 30 ppmvd @ 3% O $_2$ or DE >98%