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October 24, 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 compliance@baaqmd.gov Director of the Air Division USEPA, Region IX 75 Hawthorne Street San Francisco, CA 94105 Attn: Air-3 r9.aeo@epa.gov

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 April 1, 2022, through September 30, 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 Enrique 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

April 1, 2022, through September 20, 2022

Submitted on: October 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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1.1 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 April 1, 2022, through September 30, 2022. During the timeframe included in this report from April 1, 2022, through September 30, 2022, the site also began performed 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. Annual 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 8, 2022, 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 16, 2022, 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 April 1, 2022, through September 30, 2022. The following table lists the rules and regulations that are required to be included in this Combined Report.

RULE	REQUIREMENT	LOCATION IN 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

Table 2-1 Combined Report Requirements

RULE	REQUIREMENT	LOCATION IN REPORT
8-34-501.9, 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
8-34-501.10, 8-34-508, §60.757(f)(1)	Continuous gas flow rate records for any site subject to Section 8-34- 508.	Section 2.11, Appendices F and L
	For operations subject to Section 8-34-509, records or key emission control system operating parameters.	Section 2.2.2
	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
	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 2022 partial calendar year from January 1, 2022, through September 30, 2022, was 48.1 hours, out of an allowable 240 hours per year. The partial total downtime for the reporting period of April 1, 2022, through September 30, 2022, was 34.5 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 eleven (11) wellfield SSM events during the reporting period. Well 223 was disconnected for filling on September 1, 2022, pursuant to 8-34-116. Well monitoring was conducted on Well 223 on August 31, 2022. Subsequent well monitoring on Well 223 was conducted on October 11, 2022, upon reconnection of the well. 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 2022 partial calendar year from January 1, 2022, through September 30, 2022, was 48.1 hours, out of an allowable 240 hours per year. The total downtime for the reporting period of April 1, 2022, through September 30, 2022, was 34.5 hours. The GCCS Downtime Log for the reporting period is included in Appendix B.

During the reporting period, GRDF submitted the request for Breakdown Relief from BAAQMD for the June 5, 2022, PG&E unplanned power outage via BAAQMD's Reportable Compliance Activity (RCA) notification forms submitted on June 6, 2022, and was assigned RCA numbers 08J18. GRDF submitted the Title V 10-day and 30-day letter on June 10, 2022; 30-day follow-up report for breakdown relief on June 30, 2022; During the reporting period, GRDF also submitted the request for Breakdown Relief from BAAQMD for the July 11, 2022, PG&E unplanned power outage via BAAQMD's Reportable Compliance Activity (RCA) notification forms submitted on June 12, 2022, and was assigned RCA numbers 08K15. GRDF submitted the Title V 10-day and 30day letter on July 14, 2022; 30-day follow-up report for breakdown relief on July 14, 2022; Additionally, during the reporting period, GRDF also submitted the request for Breakdown Relief from BAAQMD for the August 8, 2022, PG&E unplanned power outage via BAAQMD's Reportable Compliance Activity (RCA) notification forms submitted on August 8, 2022, and was assigned RCA numbers 08K82, GRDF submitted the Title V 10-day and 30-day letter on August 10, 2022; 30-day follow-up report for breakdown relief on August 10, 2022; 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 April 1, 2022, through September 30, 2022.

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

The cover integrity monitoring was performed on the following dates:

- April 26, 2022
- May 20 and 31, 2022
- June 27, 2022
- July 27, 2022
- August 29, 2022
- September 23, 2022

During May 2022 monthly monitoring event, one location with surface cracks was identified on May 29, 2022. The corrective actions were completed on May 31, 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:

- Second Quarter 2022 April 13, 2022
- Third Quarter 2022 September 12, 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 Second Quarter 2022 SEM was conducted by Roberts Environmental Services (RES) on April 13, 2022, identifying one exceedance location. GRDF personnel performed the ten-day re-monitoring on April 14, 2022. GRDF personnel performed the thirty-day follow-up monitoring event on May 9, 2022. No exceedances were observed during the 30-day re-monitoring events. Detailed monitoring results are available in the Second Quarter 2022 SEM Report, included in Appendix H.

The Initial monitoring event for the Third Quarter 2022 SEM was conducted by Roberts Environmental Services (RES) on September 12, 2022, identifying zero exceedance locations. Detailed monitoring results are available in the Third 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:

- Second Quarter 2022 April 13, 2022
- Third Quarter 2022 September 12, 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 April 1, 2022, through September 30, 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.

Description	Total Waste Landfilled (Decomposable)				
Total Waste Acceptance April 1, 2022, through September 30, 2022	88,526				
Current Waste In Place as of September 30, 2022	Approximately 10.26 Million tons				

Table 2-2 Waste Acceptance

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. The well readings for April 1, 2022, through September 30, 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:

- April 6, 7, 11, 12, 13, and 18, 2022
- May 2, 9, and 13, 2022
- June 1, 2, 6, 7, and 9, 2022
- July 6, 7, 14, 18, 19, and 26, 2022
- August 4, 5, 8, 9, 11, 23, and 31, 2022
- September 1, 6, 7, 8, and 9, 2022

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

There were eleven (11) 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 September 30, 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 April 1, 2022, through September 30, 2022.

Table 2-3 below is a summary of the total LFG flow for the reporting period of April 1, 2022, through September 30, 2022.

Emission Control Device	Average Flow (scfm)	Average CH₄ (%)*	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	1,631	44.1	426,151,479	186,414,793	190,183

Table 2-3 Total LFG Flow for April 1, 2022, through September 30, 2022

scfm = standard cubic feet per minute

 $CH_4 = methane$

scf = standard cubic feet *Methane content determined from April 29, 2020, Source Test on Flare A-9.

*Methane content determined from February 16, 2022, Source Test on Flare A-9.

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 September 30, 2022, the GRDF has a total 87 collectors, (85 vertical wells and 2 horizontal Leachate collectors).

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 1,187.0 tons of Low-VOC soil (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.

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

Table 3-1 Performance Test Requirements

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 Annual Compliance Demonstration Test was performed on the A-17 Flare by Blue Sky Environmental, Inc. on February 16, 2022, 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.

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
NOx (ppm @ 15% O ₂)	8.4	9.5	16	In Compliance
CO (ppm @ 15% O ₂)	<3.3	<3.4	134	In Compliance

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

Table 3-3 Flare Initial Compliance Demonstration Test Results- Test DataFebruary 16, 2022

Condition	Flare (A-17) (Condensate Off) Average Results		8-34-301.3 limit	Compliance Status
NMOC (either 98% DRE or 30 ppm @ 3% O ₂)	<2.3 ppm	<2.2 ppm	30 ppm	In Compliance
NO _x (ppm @ 15% O ₂)	9.6	12.7	15	In Compliance
CO (ppm @ 15% O ₂)	4.8	3.7	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, (0.757)(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:

- Second Quarter 2022– June 7, 2022
- Third Quarter 2022- September 14, 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 semiannual 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 (April 1, 2022, through September 30, 2022). The following information is included as required:

- During the reporting period, eleven (11) 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, twenty-three (23) 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 thirty-four (34) 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)).

I certify the following:

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 Inrique Perez Signature of Responsible Official

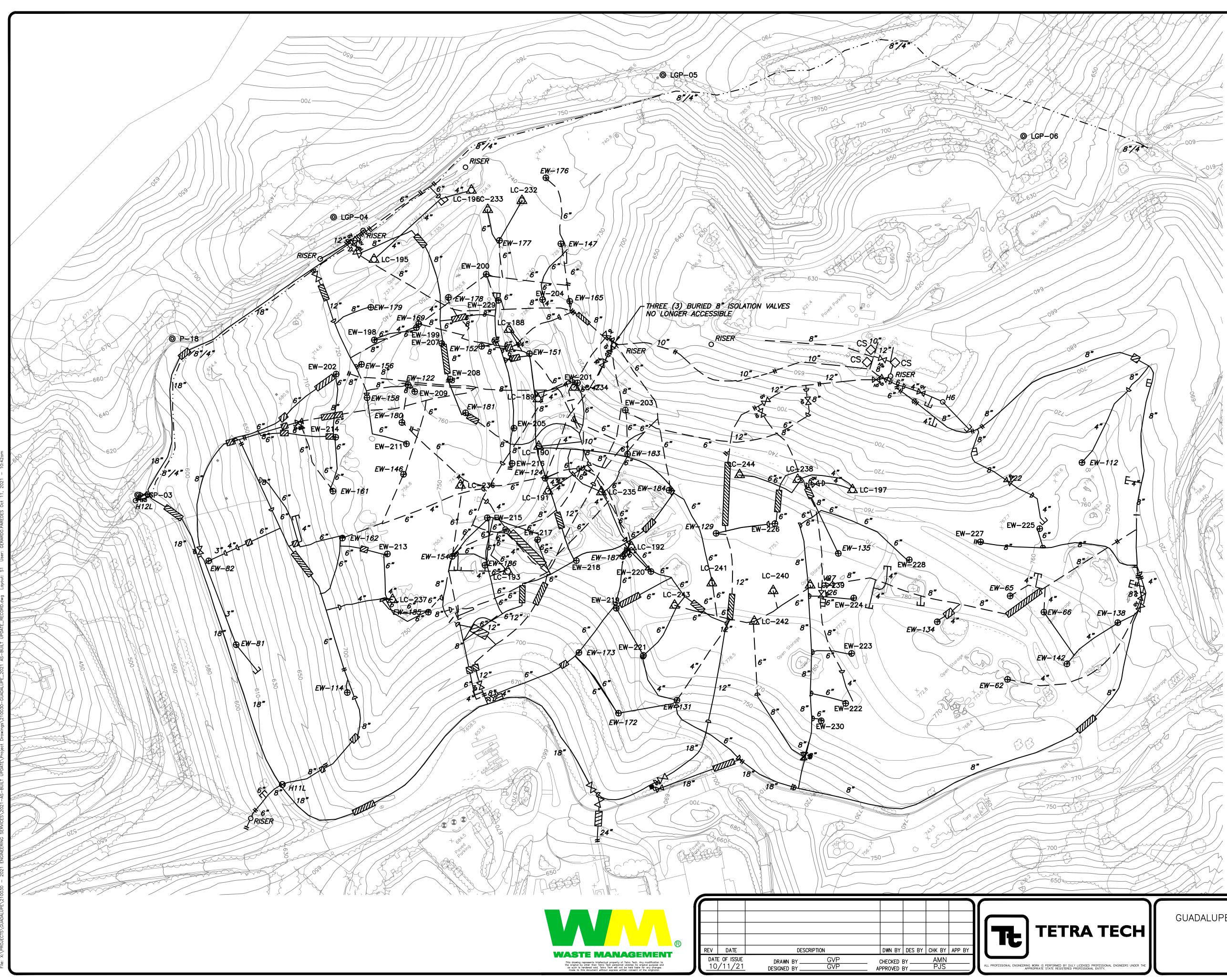
10.24.2022

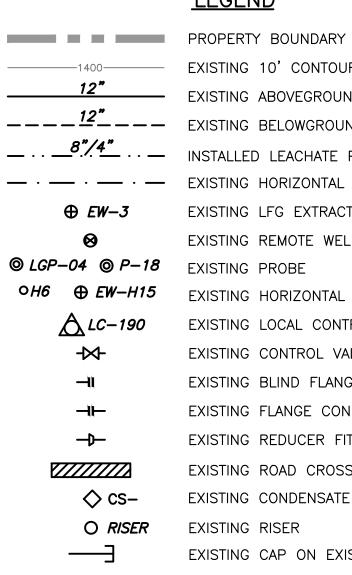
Date

Enrique Perez Name of Responsible Official

APPENDIX A

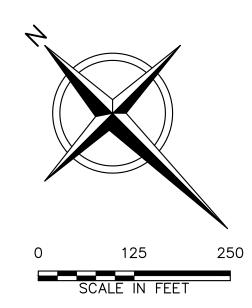
SITE MAP





<u>LEGEND</u>

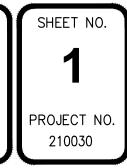
EXISTING 10' CONTOUR - EXISTING ABOVEGROUND PIPING ---------- EXISTING BELOWGROUND PIPING _____ INSTALLED LEACHATE PIPING - EXISTING HORIZONTAL COLLECTOR EXISTING LFG EXTRACTION WELL EXISTING REMOTE WELLHEAD EXISTING HORIZONTAL COLLECTOR WELLHEAI EXISTING LOCAL CONTROL WELL EXISTING CONTROL VALVE EXISTING BLIND FLANGE EXISTING FLANGE CONNECTION EXISTING REDUCER FITTING EXISTING ROAD CROSSING EXISTING CONDENSATE SUMP EXISTING RISER EXISTING CAP ON EXISTING PIPE



- NOTES: 1. TOPOGRAPHIC CONTOURS PREPARED USING PHOTOGRAMMETRIC METHODS BY MILLER CREEK AERIAL MAPPING OF BURIEN, WA. DATE OF PHOTOGRAPHY: MARCH 26, 2021. DATUM: HORIZONTAL NAD 83, VERTICAL - NAD 88.
- SUPPLEMENTAL 2015 GCCS IMPROVEMENTS AS-BUILT PIPING PER FIELD MARK-UP DRAWING PROVIDED BY WM ON MAY 29, 2015. WELL LOCATIONS PER ISSUED FOR CONSTRUCTION WELL SCHEDULE DATED APRIL 10, 2015.
- 3. 2018 GCCS IMPROVEMENTS AS-BUILT PIPING PER SURVEY PROVIDED BY F3 AND ASSOCIATES, INC. DATED: DECEMBER 11, 2018.
- 2019 GCCS IMPROVEMENTS AS-BUILT PIPING PER SURVEY PROVIDED BY WM DATED: NOVEMBER 11, 2019.
- SUPPLEMENTAL 2019 GCCS IMPROVEMENTS AS-BUILT PIPING PER FIELD MARK-UP DRAWING PROVIDED BY WM ON JANUARY 6, 2020.
- 6. SUPPLEMENTAL 2019 GCCS AS-BUILT MARKUPS/COMMENTS PROVIDED BY WM ON JANUARY 27, 2020 AND JANUARY 29, 2020.
- 2020 GCCS IMPROVEMENTS AS-BUILT SURVEY PROVIDED BY F3 AND ASSOCIATES, INC. DATED: JULY 22, 2020. 2021 GCCS IMPROVEMENTS AS-BUILT SURVEY PROVIDED BY F3
- AND ASSOCIATES, INC. DATED: AUGUST 4, 2021 AND AUGUST 21, 2021.

RECORD DRAWINGS

GUADALUPE RECYCLING AND DISPOSAL FACILITY SAN JOSE, CALIFORNIA 2021 GCCS IMPROVEMENTS



AS-BUILT SITE PLAN

APPENDIX B

GCCS DOWNTIME REPORT

LFG Collection System: January 1 through September 30, 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
04/20/22 16:56	04/20/22 17:32	0.60	Flare A-17 was shutdown during fire damage to the air line. Flare was inspected and restarted
04/23/22 12:56	04/23/22 16:10	3.23	Flare A-17 shutdown during compressor trip event. Flare was inspected and restarted.
04/29/22 10:52	04/29/22 11:54	1.03	Flare A-17 was shutdown to clear condensate slug in line. Flare was inspected and restarted.
05/31/22 10:26	05/31/22 11:12	0.77	Flare A-17 was shut down to replace air filter on compressor. Flare was inspected and restarted.
06/05/22 04:28	06/05/22 05:26	0.97	Flare A-17 shut down during PG&E unplanned power outage. Flare restarted and was inspected on the next day. RCA was filed and was assigned RCA Number 08J18.
06/06/22 10:00	06/06/22 11:06	1.10	Flare A-17 was shut down during inspection and maintenance. Flare was inspected and restarted.
06/13/22 07:54	06/13/22 07:58	0.07	Flare A-17 shut down due to low temperature alarm. Flare was inspected and restarted.
06/13/22 08:08	06/13/22 08:30	0.37	Flare A-17 shutdown during startup sequence. Flare was inspected and restarted.
06/16/22 11:00	06/16/22 14:28	3.47	Flare A-17 was shut down during inspection and maintenance. Flare was inspected and restarted.
06/22/22 07:10	06/22/22 10:22	3.20	Flare A-17 shutdown due to low temperature alarm. Flare was inspected and restarted.
06/27/22 10:12	06/27/22 10:26	0.23	Flare A-17 was shut down to clean flowmeter probe. Flare was inspected and restarted.
07/11/22 07:20	07/11/22 08:38	1.30	Flare A-17 was shut down during inspection and maintenance.Flare was inspected and restarted.
07/11/22 18:36	07/11/22 20:02	1.43	Flare A-17 shutdown during PG&E unplanned power outage. Flare restarted and was inspected on the next day. RCA was filed and was assigned RCA Number 08K15.
07/15/22 13:28	07/15/22 13:40	0.20	Flare A-17 was shut down by electrician during inspection and maintenance. Flare was inspected and restarted.
07/26/22 07:56	07/26/22 12:08	4.20	Flare A-17 was shut down during repair on lateral line. Flare was inspected and restarted.
07/28/22 13:16	07/28/22 13:42	0.43	Flare A-17 was shut down during maintenance on flowmeter. Flare was inspected and restarted.
07/28/22 13:52	07/28/22 14:08	0.27	Flare A-17 was shut down during maintenance on flowmeter. Flare was inspected and restarted.
08/08/22 11:06	08/08/22 11:58	0.87	Flare A-17 shutdown during PG&E unplanned power outage. RCA was filed and RCA Numbe 08K82 was assigned.Flare was inspected and restarted.
08/11/22 10:58	08/11/22 12:38	1.67	Flare A-17 was shut down during field work and lateral repair work. Flare was inspected and restarted.
08/25/22 10:36	08/25/22 15:58	5.37	Flare A-17 was shut down during field work and lateral repair work. Flare was inspected and restarted.
08/26/22 15:36	08/26/22 16:04	0.47	Flare A-17 was shut down during inspection and maintenance. Flare was inspected and restarted.
08/30/22 08:50	08/30/22 10:44	1.90	Flare A-17 was shut down during inspection and maintenance. Flare was inspected and restarted.
08/31/22 07:06	08/31/22 08:26	1.33	Flare A-17 was shut down during inspection and maintenance. Flare was inspected and restarted.
τοτλ	AL DOWNTIME April 1 through September 30, 2022 (HOURS)-	34.47	
TOTAL	DOWNTIME January 1 through September 30, 2022 (HOURS)-	48.10	
	TOTAL PERMITTED DOWNTIME FOR 1 YEAR (HOURS):	240	

APPENDIX C BAAQMD Correspondence



June 10, 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: 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 08J18

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 June 6, 2022, at around 1:45 PM because the landfill gas collection and control system (GCCS) temporarily shut down due to the PG&E power outage (caused due to car-pole accident). The flare was back online within one hour on June 5, 2022, around 5:28 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 June 5, 2022, PG&E power outage via BAAQMD's Reportable Compliance Activity (RCA) notification form submitted on June 6, 2022, ~1:45 PM and was assigned RCA numbers 08J18 (see Attachment B for copy of RCA and submittal).

The unplanned power outage shutdown events noted in RCA form submitted on June 6, 2022, 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. 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 supplier anticipates the unit to be delivered by the end of fourth quarter of 2022. GRDF submitted the backup generator permit application to the BAAQMD on February 10, 2022 (AN 31599 was assigned).

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

Paul Inrique Perez

Enrique Perez District Manager

cc: Erin Phillips, BAAQMD

Attachments:

Attachment A- GRDF flare data for June 5, 2022 Attachment B- Copy of GRDF RCA Form (RCA Number 08J18) Attachment A GRDF flare data for June 5, 2022

	suaualupe Re	Flare	-	,	
		FLARE	TEMP	LFG F	LOW
	F		g F	SC	
	-	MIN	MAX	MIN	MAX
2022/06/05	03:00:00	1550	1565	1637	1663
2022/06/05	03:02:00	1558	1563	1631	1664
2022/06/05	03:04:00	1551	1561	1631	1664
2022/06/05	03:06:00	1549	1559	1634	1661
2022/06/05	03:08:00	1558	1566	1627	1658
2022/06/05	03:10:00	1558	1563	1629	1657
2022/06/05	03:12:00	1553	1561	1628	1661
2022/06/05	03:12:00	1553	1566	1627	1660
2022/06/05	03:14:00	1556	1564	1634	1661
2022/06/05	03:18:00	1553	1556	1630	1663
2022/06/05	03:20:00	1548	1550	1634	1663
2022/06/05	03:22:00	1546	1553	1626	1663
2022/06/05	03:24:00	1544	1535	1633	1661
2022/06/05	03:26:00	1549	1549	1635	1661
2022/06/05		1549	1500	1637	1663
	03:28:00		1578	1634	1659
2022/06/05	03:30:00	1573			
2022/06/05	03:32:00	1536	1573	1632	1661 1663
2022/06/05	03:34:00	1534	1544	1630	
2022/06/05	03:36:00	1544	1563	1635	1667
2022/06/05	03:38:00	1563	1570	1635	1663
2022/06/05	03:40:00	1553	1570	1634	1663
2022/06/05	03:42:00	1539	1553	1637	1661
2022/06/05	03:44:00	1541	1568	1628	1663
2022/06/05	03:46:00	1568	1575	1633	1658
2022/06/05	03:48:00	1563	1575	1632	1658
2022/06/05	03:50:00	1563	1568	1630	1661
2022/06/05	03:52:00	1556	1566	1636	1660
2022/06/05	03:54:00	1551	1558	1636	1667
2022/06/05	03:56:00	1549	1554	1637	1664
2022/06/05	03:58:00	1554	1566	1631	1661
2022/06/05	04:00:00	1565	1571	1633	1663
2022/06/05	04:02:00	1551	1566	1636	1670
2022/06/05	04:04:00	1549	1553	1639	1666
2022/06/05	04:06:00	1544	1549	1639	1666
2022/06/05	04:08:00	1549	1563	1634	1664
2022/06/05	04:10:00	1560	1571	1628	1660
2022/06/05	04:12:00	1568	1573	1634	1666
2022/06/05	04:14:00	1544	1571	1630	1658
2022/06/05	04:16:00	1544	1551	1630	1658
2022/06/05	04:18:00	1539	1544	1633	1669
2022/06/05	04:20:00	1544	1563	1633	1660
2022/06/05	04:22:00	1563	1573	1628	1658
2022/06/05	04:24:00	1566	1573	1630	1660
2022/06/05	04:26:00	1555	1568	1627	1660
2022/06/05	04:28:00				
2022/06/05	04:30:00				
2022/06/05	04:32:00				
2022/06/05	04:34:00				
2022/06/05	04:36:00				
2022/06/05	04:38:00				

Guadalupe Recycling and Disposal Facility-A3294

2022/06/05	04:40:00				
2022/06/05	04:40:00				
	04:42:00				
2022/06/05	04:44:00				
2022/06/05	04:46:00				
2022/06/05	04:48:00				
2022/06/05	04:50:00				
2022/06/05	04:52:00				
2022/06/05	04:54:00				
2022/06/05	04:56:00				
2022/06/05	04:58:00				
2022/06/05	05:00:00				
2022/06/05	05:02:00				
2022/06/05	05:04:00				
2022/06/05	05:06:00				
2022/06/05	05:08:00				
2022/06/05	05:10:00				
2022/06/05	05:12:00				
2022/06/05	05:14:00				
2022/06/05	05:16:00				
2022/06/05	05:18:00				
2022/06/05	05:20:00	104	119	-2	-1
2022/06/05	05:22:00	116	119	-1	0
2022/06/05	05:24:00	114	116	-1	286
2022/06/05	05:26:00	114	1189	286	1880
2022/06/05	05:28:00	1189	1718	1869	2168
2022/06/05	05:30:00	1571	1693	1874	1996
2022/06/05	05:32:00	1557	1574	1859	1900
2022/06/05	05:34:00	1559	1578	1862	1895
2022/06/05	05:36:00	1540	1559	1847	1877
2022/06/05	05:38:00	1533	1540	1835	1871
2022/06/05	05:40:00	1537	1562	1838	1868
2022/06/05	05:42:00	1562	1590	1824	1863
2022/06/05	05:44:00	1537	1591	1824	1863
2022/06/05	05:46:00	1530	1537	1822	1860
2022/06/05	05:48:00	1534	1554	1824	1857
2022/06/05	05:50:00	1554	1567	1827	1856
2022/06/05	05:52:00	1566	1570	1822	1853
2022/06/05	05:54:00	1563	1571	1822	1848
2022/06/05	05:56:00	1546	1571	1818	1853
2022/06/05	05:58:00	1546	1551	1821	1848
2022/06/05	06:00:00	1549	1564	1811	1848
2022/06/05	06:02:00	1559	1565	1810	1844
2022/06/05	06:04:00	1560	1566	1809	1841
2022/06/05	06:06:00	1558	1563	1806	1841
2022/06/05	06:08:00	1559	1563	1800	1839
2022/06/05	06:10:00	1546	1563	1807	1833
2022/06/05	06:12:00	1547	1550	1800	1830
2022/06/05	06:14:00	1548	1561	1800	1834
2022/06/05	06:16:00	1552	1560	1792	1833
2022/06/05	06:18:00	1541	1552	1792	1827
2022/06/05	06:20:00	1546	1599	1799	1828
2022/06/05	06:22:00	1496	1624	1800	1827
2022/06/05	06:24:00	1510	1604	1789	1830
2022/06/05	06:26:00	1527	1603	1789	1822
2022/06/05	06:28:00	1525	1573	1789	1822
2022/06/05	06:30:00	1573	1584	1785	1825
2022/00/05	00.30.00	13/3	104	1,71	1025

2022/06/05	06:32:00	1543	1573	1795	1821
2022/06/05	06:34:00	1539	1554	1792	1821
2022/06/05	06:36:00	1551	1561	1789	1816
2022/06/05	06:38:00	1561	1593	1786	1817
2022/06/05	06:40:00	1547	1594	1791	1817
2022/06/05	06:42:00	1532	1547	1782	1816
2022/06/05	06:44:00	1537	1655	1792	1815
2022/06/05	06:46:00	1486	1633	1783	1821
2022/06/05	06:48:00	1518	1592	1791	1821
2022/06/05	06:50:00	1522	1565	1785	1819
2022/06/05	06:52:00	1564	1586	1781	1822
2022/06/05	06:54:00	1580	1585	1795	1824
2022/06/05	06:56:00	1548	1580	1794	1819
2022/06/05	06:58:00	1513	1551	1794	1824
2022/06/05	07:00:00	1505	1563	1791	1826

Attachment B Copy of GRDF RCA Form for RCA Number 08J18

RCA Notification
Phadnis, Rajan
Perez, Enrique; Azevedo, Becky; Colline, Christian; Erin Phillips
[EXTERNAL] RE: GRDF A3294-RCA for PG&E power outage 6.5.2022
Monday, June 6, 2022 2:21:55 PM
P [

I am confirming receipt, the RCA number for your notification is 08J18

From: Phadnis, Rajan <rphadnis@wm.com>
Sent: Monday, June 6, 2022 1:46 PM
To: RCA Notification <rca@baaqmd.gov>
Cc: Perez, Enrique <pperez3@wm.com>; Azevedo, Becky <Razevedo@wm.com>; Colline, Christian
<CColline@wm.com>; Erin Phillips <ephillips@baaqmd.gov>
Subject: GRDF A3294-RCA for PG&E power outage 6.5.2022

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 power outage on 6.5.2022, at Guadalupe Recycling and Disposal Facility in San Jose, CA (Facility A3294).

Thank you, Rajan Phadnis EP Specialist For 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

June 6, 2022 (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 June 5, 2022, ~ 4:28 AM. GRDF is submitting the breakdown report to Bay Area Air Quality Management District (BAAQMD) on June 6, 2022, at ~1:45 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 June 5, 2022, at ~ 5:28 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

M

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: RCA Form GRDF Facility A3294 Dated 6.6.2022



Reportable Compliance Activity (RCA)

		See back of form	for instructions \rightarrow			
1. X BREAKDOWN RELIEF: <i>District Use Only</i> BREAKDOWN REFERENCE #:						
2. NA MONITOR EXCESS EMISSION or EXCURSION: <i>District Use Only</i> REFERENCE#:						
	S INOPERATIVE: District Use Only R	REFERENCE#:				
4. NA PRESSURE RELIEF DEVICE (PRD): District Use Only PRD REFERENCE#:						
SITE INF	ORMATION AND DESCRIPTION INF	ORMATION (REQUI	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	~ 4:28 AM on 6/5/2022	Clear Time	~5:28 AM on 6/5/2022			
Monitor/device type(s)	►CEM ►GLM ►Para	ametric PRD	► Non-monitor			
Monitor description(s)						
Parameter(s) exceeded or not functioning due to inoperation NOx SO2 CO O2 H2O Opacity Hydrocarbon Breakthrough (VOC) Temperature Wind Speed Wind Direction Steam Other (describe) Power outage						
Unit(s) of Measurement ppm psig Event Description:		 ▶ inches H₂O ▶ Other (describe) 	►mmHg			

This breakdown report is being submitted on 6/6/2022 at ~1:30 PM 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 discussion in the attached cover letter dated 6/6/2022.

District Use Only

Date

General Instructions

- ✓ 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@baaqmd.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 <u>Breakdown Admissions Advisory dated 12/3/04</u>. 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.

- □ Check Box #1.
- 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> <u>discovery</u> 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.

- $\hfill\square$ 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.

Email to ►rca@baaqmd.gov - Telephone ► 415.749.4979 (M-F 8:30 am – 5:00 pm) - After core business hours, email or call ► 415.749.4666 Form Revision Dated: 12-12-18



June 30, 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 08J18 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 June 5, 2022.

A breakdown report (Per Regulation 1, Section 431) was submitted by GRDF at~1:45 PM on June 6, 2022, because the landfill gas collection and control system (GCCS) was temporarily shut down due a PG&E power outage caused due to car-pole accident. The flare was back online at ~5:28 AM on 6/5/2022 (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 June 6, 2022, PG&E power outage and was assigned RCA number 08J18 (see Attachment B).

The unplanned power outage shutdown event on June 5, 2022, noted in RCA form, 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 a purchase order for a permanent generator (delayed due to the COVID-19 emergency and related supply chain disruptions) and the supplier anticipates the unit to be delivered by the

fourth quarter of 2022. GRDF submitted the backup generator permit application to the BAAQMD on February 10, 2022 (AN 31599 was assigned). GRDF will also be working on an 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

Paul Inrigue Perez

Enrique Perez District Manager

cc: Erin Phillips, BAAQMD

Attachments:

Attachment A- GRDF flare data Attachment B- Copy of GRDF RCA Form -Number 08J18 Attachment A GRDF flare data

	suaualupe Re	Flare	-	,	
		FLARE	TEMP	LFG F	LOW
	F		g F	SCFM	
	-	MIN	MAX	MIN	MAX
2022/06/05	03:00:00	1550	1565	1637	1663
2022/06/05	03:02:00	1558	1563	1631	1664
2022/06/05	03:04:00	1551	1561	1631	1664
2022/06/05	03:06:00	1549	1559	1634	1661
2022/06/05	03:08:00	1558	1566	1627	1658
2022/06/05	03:10:00	1558	1563	1629	1657
2022/06/05	03:12:00	1553	1561	1628	1661
2022/06/05	03:12:00	1553	1566	1627	1660
2022/06/05	03:14:00	1556	1564	1634	1661
2022/06/05	03:18:00	1553	1556	1630	1663
2022/06/05	03:20:00	1548	1550	1634	1663
2022/06/05	03:22:00	1546	1553	1626	1663
2022/06/05	03:24:00	1544	1535	1633	1661
2022/06/05	03:26:00	1549	1549	1635	1661
2022/06/05		1549	1500	1637	1663
	03:28:00		1578	1634	1659
2022/06/05	03:30:00	1573			
2022/06/05	03:32:00	1536	1573	1632	1661 1663
2022/06/05	03:34:00	1534	1544	1630	
2022/06/05	03:36:00	1544	1563	1635	1667
2022/06/05	03:38:00	1563	1570	1635	1663
2022/06/05	03:40:00	1553	1570	1634	1663
2022/06/05	03:42:00	1539	1553	1637	1661
2022/06/05	03:44:00	1541	1568	1628	1663
2022/06/05	03:46:00	1568	1575	1633	1658
2022/06/05	03:48:00	1563	1575	1632	1658
2022/06/05	03:50:00	1563	1568	1630	1661
2022/06/05	03:52:00	1556	1566	1636	1660
2022/06/05	03:54:00	1551	1558	1636	1667
2022/06/05	03:56:00	1549	1554	1637	1664
2022/06/05	03:58:00	1554	1566	1631	1661
2022/06/05	04:00:00	1565	1571	1633	1663
2022/06/05	04:02:00	1551	1566	1636	1670
2022/06/05	04:04:00	1549	1553	1639	1666
2022/06/05	04:06:00	1544	1549	1639	1666
2022/06/05	04:08:00	1549	1563	1634	1664
2022/06/05	04:10:00	1560	1571	1628	1660
2022/06/05	04:12:00	1568	1573	1634	1666
2022/06/05	04:14:00	1544	1571	1630	1658
2022/06/05	04:16:00	1544	1551	1630	1658
2022/06/05	04:18:00	1539	1544	1633	1669
2022/06/05	04:20:00	1544	1563	1633	1660
2022/06/05	04:22:00	1563	1573	1628	1658
2022/06/05	04:24:00	1566	1573	1630	1660
2022/06/05	04:26:00	1555	1568	1627	1660
2022/06/05	04:28:00				
2022/06/05	04:30:00				
2022/06/05	04:32:00				
2022/06/05	04:34:00				
2022/06/05	04:36:00				
2022/06/05	04:38:00				

Guadalupe Recycling and Disposal Facility-A3294

2022/06/05	04:40:00				
2022/06/05	04:40:00				
	04:42:00				
2022/06/05	04:44:00				
2022/06/05	04:46:00				
2022/06/05	04:48:00				
2022/06/05	04:50:00				
2022/06/05	04:52:00				
2022/06/05	04:54:00				
2022/06/05	04:56:00				
2022/06/05	04:58:00				
2022/06/05	05:00:00				
2022/06/05	05:02:00				
2022/06/05	05:04:00				
2022/06/05	05:06:00				
2022/06/05	05:08:00				
2022/06/05	05:10:00				
2022/06/05	05:12:00				
2022/06/05	05:14:00				
2022/06/05	05:16:00				
2022/06/05	05:18:00				
2022/06/05	05:20:00	104	119	-2	-1
2022/06/05	05:22:00	116	119	-1	0
2022/06/05	05:24:00	114	116	-1	286
2022/06/05	05:26:00	114	1189	286	1880
2022/06/05	05:28:00	1189	1718	1869	2168
2022/06/05	05:30:00	1571	1693	1874	1996
2022/06/05	05:32:00	1557	1574	1859	1900
2022/06/05	05:34:00	1559	1578	1862	1895
2022/06/05	05:36:00	1540	1559	1847	1877
2022/06/05	05:38:00	1533	1540	1835	1871
2022/06/05	05:40:00	1537	1562	1838	1868
2022/06/05	05:42:00	1562	1590	1824	1863
2022/06/05	05:44:00	1537	1591	1824	1863
2022/06/05	05:46:00	1530	1537	1822	1860
2022/06/05	05:48:00	1534	1554	1824	1857
2022/06/05	05:50:00	1554	1567	1827	1856
2022/06/05	05:52:00	1566	1570	1822	1853
2022/06/05	05:54:00	1563	1571	1822	1848
2022/06/05	05:56:00	1546	1571	1818	1853
2022/06/05	05:58:00	1546	1551	1821	1848
2022/06/05	06:00:00	1549	1564	1811	1848
2022/06/05	06:02:00	1559	1565	1810	1844
2022/06/05	06:04:00	1560	1566	1809	1841
2022/06/05	06:06:00	1558	1563	1806	1841
2022/06/05	06:08:00	1559	1563	1800	1839
2022/06/05	06:10:00	1546	1563	1807	1833
2022/06/05	06:12:00	1547	1550	1800	1830
2022/06/05	06:14:00	1548	1561	1800	1834
2022/06/05	06:16:00	1552	1560	1792	1833
2022/06/05	06:18:00	1541	1552	1792	1827
2022/06/05	06:20:00	1546	1599	1799	1828
2022/06/05	06:22:00	1496	1624	1800	1827
2022/06/05	06:24:00	1510	1604	1789	1830
2022/06/05	06:26:00	1527	1603	1789	1822
2022/06/05	06:28:00	1525	1573	1789	1822
2022/06/05	06:30:00	1573	1584	1785	1825
2022/00/05	00.30.00	13/3	104	1,71	1025

2022/06/05	06:32:00	1543	1573	1795	1821
2022/06/05	06:34:00	1539	1554	1792	1821
2022/06/05	06:36:00	1551	1561	1789	1816
2022/06/05	06:38:00	1561	1593	1786	1817
2022/06/05	06:40:00	1547	1594	1791	1817
2022/06/05	06:42:00	1532	1547	1782	1816
2022/06/05	06:44:00	1537	1655	1792	1815
2022/06/05	06:46:00	1486	1633	1783	1821
2022/06/05	06:48:00	1518	1592	1791	1821
2022/06/05	06:50:00	1522	1565	1785	1819
2022/06/05	06:52:00	1564	1586	1781	1822
2022/06/05	06:54:00	1580	1585	1795	1824
2022/06/05	06:56:00	1548	1580	1794	1819
2022/06/05	06:58:00	1513	1551	1794	1824
2022/06/05	07:00:00	1505	1563	1791	1826

Attachment B Copy of GRDF RCA Form-Numbers 08J18

From:	RCA Notification
То:	<u>Phadnis, Rajan</u>
Cc:	Perez, Enrique; Azevedo, Becky; Colline, Christian; Erin Phillips
Subject:	[EXTERNAL] RE: GRDF A3294-RCA for PG&E power outage 6.5.2022
Date:	Monday, June 6, 2022 2:21:55 PM
•	[EXTERNAL] RE: GRDF A3294-RCA for PG&E power outage 6.5.2022

I am confirming receipt, the RCA number for your notification is 08J18

From: Phadnis, Rajan <rphadnis@wm.com>
Sent: Monday, June 6, 2022 1:46 PM
To: RCA Notification <rca@baaqmd.gov>
Cc: Perez, Enrique <pperez3@wm.com>; Azevedo, Becky <Razevedo@wm.com>; Colline, Christian
<CColline@wm.com>; Erin Phillips <ephillips@baaqmd.gov>
Subject: GRDF A3294-RCA for PG&E power outage 6.5.2022

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 power outage on 6.5.2022, at Guadalupe Recycling and Disposal Facility in San Jose, CA (Facility A3294).

Thank you, Rajan Phadnis EP Specialist For 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

June 6, 2022 (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 June 5, 2022, ~ 4:28 AM. GRDF is submitting the breakdown report to Bay Area Air Quality Management District (BAAQMD) on June 6, 2022, at ~1:45 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 June 5, 2022, at ~ 5:28 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

M

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: RCA Form GRDF Facility A3294 Dated 6.6.2022



Reportable Compliance Activity (RCA)

		See back of form	for instructions \rightarrow			
1. X BREAKDOWN RELIEF: <i>District Use Only</i> BREAKDOWN REFERENCE #:						
2. NA MONITOR EXCESS EMISSION or EXCURSION: <i>District Use Only</i> REFERENCE#:						
	S INOPERATIVE: District Use Only R	REFERENCE#:				
4. NA PRESSURE RELIEF DEVICE (PRD): District Use Only PRD REFERENCE#:						
SITE INF	ORMATION AND DESCRIPTION INF	ORMATION (REQUI	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	~ 4:28 AM on 6/5/2022	Clear Time	~5:28 AM on 6/5/2022			
Monitor/device type(s)	►CEM ►GLM ►Para	ametric PRD	► Non-monitor			
Monitor description(s)						
Parameter(s) exceeded or not functioning due to inoperation NOx SO2 CO O2 H2O Opacity Hydrocarbon Breakthrough (VOC) Temperature Wind Speed Wind Direction Steam Other (describe) Power outage						
Unit(s) of Measurement ppm psig Event Description:		 ▶ inches H₂O ▶ Other (describe) 	►mmHg			

This breakdown report is being submitted on 6/6/2022 at ~1:30 PM 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 discussion in the attached cover letter dated 6/6/2022.

District Use Only

Date

General Instructions

- ✓ 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@baaqmd.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 <u>Breakdown Admissions Advisory dated 12/3/04</u>. 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.

- □ Check Box #1.
- 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> <u>discovery</u> 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.

- $\hfill\square$ 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.

Email to ►rca@baaqmd.gov - Telephone ► 415.749.4979 (M-F 8:30 am – 5:00 pm) - After core business hours, email or call ► 415.749.4666 Form Revision Dated: 12-12-18



July 14, 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: 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 08K15

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 July 12, 2022, at around 11:25 AM because the landfill gas collection and control system (GCCS) temporarily shut down due to the PG&E power outage (caused due to due to a Wire Down Outage – Broken Pole Equipment). The flare was back online on June 11, 2022, around 8:15 PM (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 July 11, 2022, PG&E power outage via BAAQMD's Reportable Compliance Activity (RCA) notification form submitted on July 12, 2022, at around 11:25 AM and was assigned RCA numbers 08K15 (see Attachment B for copy of RCA and submittal).

The unplanned power outage shutdown events noted in RCA form submitted on July 12, 2022, 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. 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 placed purchase order for a permanent generator in October 2021, and the unit was delivered in July 2022 (delayed due to the COVID-19 emergency and related supply chain disruptions). GRDF submitted the backup generator permit application to the BAAQMD on February 10, 2022 (AN 31599 was assigned). GRDF will also be working on an 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

Paul Enrique Perez

Enrique Perez District Manager

cc: Erin Phillips, BAAQMD

Attachments:

Attachment A- GRDF flare data for July 11, 2022 Attachment B- Copy of GRDF RCA Form (RCA Number 08K15) Attachment A GRDF flare data for July 11, 2022

	-	Flare	Disposal i a Data	-	
		FLARE	TEMP	LFG F	LOW
	-	De	g F	SCI	M
	F	MIN	MAX	MIN	MAX
2022/07/11	17:00:00	1553	1573	1529	1550
2022/07/11	17:02:00	1554	1573	1528	1557
2022/07/11	17:04:00	1556	1575	1530	1557
2022/07/11	17:06:00	1555	1559	1528	1554
2022/07/11	17:08:00	1554	1565	1529	1556
2022/07/11	17:10:00	1541	1559	1529	1551
2022/07/11	17:12:00	1541	1556	1533	1557
2022/07/11	17:14:00	1548	1556	1527	1553
2022/07/11	17:16:00	1554	1573	1528	1555
2022/07/11	17:18:00	1564	1570	1533	1553
2022/07/11	17:20:00	1564	1580	1526	1551
2022/07/11	17:22:00	1553	1576	1522	1556
2022/07/11	17:24:00	1553	1558	1526	1554
2022/07/11	17:26:00	1556	1561	1523	1554
2022/07/11	17:28:00	1561	1571	1525	1554
2022/07/11	17:30:00	1560	1566	1524	1548
2022/07/11	17:32:00	1551	1561	1528	1553
2022/07/11	17:34:00	1545	1551	1528	1551
2022/07/11	17:36:00	1551	1568	1526	1550
2022/07/11	17:38:00	1546	1566	1525	1551
2022/07/11	17:40:00	1545	1551	1521	1549
2022/07/11	17:42:00	1545	1559	1528	1547
2022/07/11	17:44:00	1558	1570	1521	1548
2022/07/11	17:46:00	1562	1571	1516	1548
2022/07/11	17:48:00	1561	1570	1519	1545
2022/07/11	17:50:00	1554	1571	1521	1548
2022/07/11	17:52:00	1551	1556	1519	1544
2022/07/11	17:54:00	1553	1563	1521	1550
2022/07/11	17:56:00	1551	1554	1521	1542
2022/07/11	17:58:00	1553	1556	1514	1544
2022/07/11	18:00:00	1553	1566	1516	1545
2022/07/11	18:02:00	1558	1566	1522	1545
2022/07/11	18:04:00	1558	1568	1517	1539
2022/07/11	18:06:00	1558	1568	1515	1539
2022/07/11	18:08:00	1559	1568	1516	1537
2022/07/11	18:10:00	1553	1568	1518	1547
2022/07/11	18:12:00	1553	1566	1513	1543
2022/07/11	18:14:00	1554	1570	1515	1534
2022/07/11	18:16:00	1537	1554	1510	1536
2022/07/11	18:18:00	1537	1561	1510	1548
2022/07/11	18:20:00	1561	1580	1515	1540
2022/07/11	18:22:00	1563	1578	1509	1537
2022/07/11	18:22:00	1541	1563	1513	1534
2022/07/11	18:24:00	1541	1550	1515	1534
2022/07/11	18:28:00	1548	1550	1515	1534

Guadalupe Recycling and Disposal Facility-A3294

2022/07/11	18:30:00	1568	1582	1509	1536
2022/07/11	18:32:00	1563	1582	1507	1531
2022/07/11	18:34:00	1563	1568	1507	1537
2022/07/11	18:36:00				
2022/07/11	18:38:00				
2022/07/11	18:40:00				
2022/07/11	18:42:00				
2022/07/11	18:44:00				
2022/07/11	18:46:00				
2022/07/11	18:48:00				
2022/07/11	18:50:00				
2022/07/11	18:52:00				
2022/07/11	18:54:00				
2022/07/11	18:56:00				
2022/07/11	18:58:00				
2022/07/11	19:00:00				
2022/07/11	19:02:00				
2022/07/11	19:04:00				
2022/07/11	19:06:00				
2022/07/11	19:08:00				
2022/07/11	19:10:00				
2022/07/11	19:12:00				
2022/07/11	19:14:00				
2022/07/11	19:16:00				
2022/07/11	19:18:00				
2022/07/11	19:20:00				
2022/07/11	19:22:00				
2022/07/11	19:24:00				
2022/07/11	19:26:00				
2022/07/11	19:28:00				
2022/07/11	19:30:00				
2022/07/11	19:32:00				
2022/07/11	19:34:00				
2022/07/11	19:36:00				
2022/07/11	19:38:00				
2022/07/11	19:40:00				
2022/07/11	19:42:00		1		
2022/07/11	19:44:00				
2022/07/11	19:46:00				
2022/07/11	19:48:00		1		
2022/07/11	19:50:00				
2022/07/11	19:52:00				
2022/07/11	19:54:00				
2022/07/11	19:56:00				
2022/07/11	19:58:00				
2022/07/11	20:00:00	102	106	0	1
2022/07/11	20:02:00	105	126	0	1443
2022/07/11	20:04:00	126	1860	1443	1865
2022/07/11	20:06:00	1461	1784	1648	1783
2022/07/11	20:08:00	1464	1566	1605	1666
2022/07/11	20:10:00	1566	1599	1583	1627

2022/07/11	20:12:00	1544	1588	1564	1603
2022/07/11	20:14:00	1527	1544	1561	1591
2022/07/11	20:16:00	1530	1578	1555	1588
2022/07/11	20:18:00	1578	1587	1555	1577
2022/07/11	20:20:00	1563	1580	1547	1571
2022/07/11	20:22:00	1550	1563	1541	1569
2022/07/11	20:24:00	1550	1556	1541	1567
2022/07/11	20:26:00	1551	1565	1532	1564
2022/07/11	20:28:00	1550	1563	1531	1558
2022/07/11	20:30:00	1548	1555	1537	1556
2022/07/11	20:32:00	1554	1559	1528	1558
2022/07/11	20:34:00	1558	1565	1529	1553
2022/07/11	20:36:00	1562	1566	1526	1550
2022/07/11	20:38:00	1560	1565	1524	1546
2022/07/11	20:40:00	1555	1565	1517	1547
2022/07/11	20:42:00	1550	1558	1522	1544
2022/07/11 2022/07/11	20:44:00 20:46:00	1553 1548	1560 1555	1517 1513	1538 1542
2022/07/11	20:48:00	1548	1555	1513	1542
2022/07/11	20:50:00	1548	1560	1514	1534
2022/07/11	20:52:00	1558	1565	1503	1530
2022/07/11	20:52:00	1558	1565	1508	1530
2022/07/11	20:56:00	1562	1565	1508	1532
2022/07/11	20:58:00	1559	1566	1503	1528
2022/07/11	20:38:00	1559	1565	1498	1526
		1559	1563	1498	1524
2022/07/11	21:02:00				
2022/07/11	21:04:00	1559	1565	1493	1519
2022/07/11	21:06:00	1559	1568	1495	1523
2022/07/11	21:08:00	1558	1560	1492	1520
2022/07/11	21:10:00	1554	1558	1494	1517
2022/07/11	21:12:00	1553	1558	1492	1523
2022/07/11	21:14:00	1548	1553	1491	1517
2022/07/11	21:16:00	1551	1555	1490	1509
2022/07/11	21:18:00	1553	1562	1485	1515
2022/07/11	21:20:00	1552	1562	1488	1511
2022/07/11	21:22:00	1551	1558	1489	1514
2022/07/11	21:24:00	1554	1559	1487	1512
2022/07/11	21:26:00	1553	1568	1485	1505
2022/07/11	21:28:00	1568	1573	1479	1505

Attachment B Copy of GRDF RCA Form for RCA Number 08K15

From:	RCA Notification
То:	<u>Phadnis, Rajan</u>
Cc:	Perez, Enrique; Azevedo, Becky; Colline, Christian; Erin Phillips
Subject:	[EXTERNAL] RE: GRDF A3294-RCA for PG&E power outage
Date:	Tuesday, July 12, 2022 12:18:36 PM

I am confirming receipt, the RCA for your notification is 08K15

From: Phadnis, Rajan <rphadnis@wm.com>
Sent: Tuesday, July 12, 2022 11:26 AM
To: RCA Notification <rca@baaqmd.gov>
Cc: Perez, Enrique <pperez3@wm.com>; Phadnis, Rajan <rphadnis@wm.com>; Azevedo, Becky
<Razevedo@wm.com>; Colline, Christian <CColline@wm.com>; Erin Phillips
<ephillips@baaqmd.gov>
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 7/11/2022, at Guadalupe Recycling and Disposal Facility in San Jose, CA (Facility A3294).

Thank you, Rajan Phadnis For Guadalupe Recycling and Disposal Facility



Guadalupe Rubbish Disposal Co., Inc. 15999 Guadalupe Mines Road P.O. Box 20957 San Jose, CA 95160

July 12, 2022 (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 June 11, 2022, at ~ 6:36 PM. GRDF is submitting the breakdown report to Bay Area Air Quality Management District (BAAQMD) on June 12, 2022, at ~ 11:25 AM 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 June 11, 2022, at ~8:04 PM 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

FM

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: RCA Form GRDF Facility A3294 Dated 7.12.2022



Reportable Compliance Activity (RCA)

				a de la colo		
			S	ee bac	K OT TORM	for instructions \rightarrow
1. X BREAKDOWN RELIEF: District Use OnlyBREAKDOWN REFERENCE #:						
2. NA MONITOR E	EXCESS EMISSIO	ON or EXCUR	SION: Dis	trict Us	e Only RE	FERENCE#:
	S INOPERATIVE	: District Use	Only REF	ERENC	E#:	
4. NA		E (PRD): <i>Dis</i> t	trict Use O	nly PRI) REFERE	NCE#:
SITE INF	ORMATION AND	DESCRIPTI	ON INFORI	NATION	N (REQUIF	RED)
Company	Guadalupe Rubbis	sh Disposal Co	o., Inc	Site #	•	A3294
Address	15999 Guadalupe Min	es Road, San Jos	se 95120	Source #		S-9
Reported by	R Phadnis			Phone #		510.875.9338
Indicated Excess	-NA			Fax #		-
Allowable Limit	-NA			Averag	ging Time	-
Start Time/Date	~ 6:36 PM on 7/11/20	22		Clear	Time	~ 8:04 PM on 7/11/2022
Monitor/device type(s)	► CEM	►GLM	▶ Parame	tric	▶ PRD	► Non-monitor
Monitor description(s)					-	
Parameter(s) exceeded	or not functioning	g due to inope	ration			
► NO _x ► SO	2 CO	► CO	2	H ₂ S	► TR	S ►NH ₃
$\triangleright O_2$ $\triangleright H_2$	O ∏ ►Opaci	ity 🦳 🕨 Lea	d 🥅 🕨	Gauge	Pressure	► Flow
► Hydrocarbon Breakthrough (VOC) ► Temperature ► Wind Speed						
► Wind Direction ► Steam ★ ► Other (describe) Power outage						
Unit(s) of Measurement						
▶ ppm ▶ ppb		-		▶ inche	s H ₂ O	► mmHg
▶psig ▶pH	► ⁰ Fahre	enheit		► Othe	(describe)	
Event Description:						

This breakdown report is being submitted on 7/11/2022 at ~ 6:36 PM 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 discussion in the attached cover letter dated 7/12/2022.

District Use Only

Date

Time

General Instructions

- ✓ 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.
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- Fill out the "Site Information and Description Information Required" areas of this form and email to <u>rca@baaqmd.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 <u>Breakdown Admissions Advisory dated 12/3/04</u>. 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.

- □ Check Box #1.
- 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> <u>discovery</u> 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.

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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.

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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.
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- 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.

- $\hfill\square$ 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.

Email to ►rca@baaqmd.gov - Telephone ► 415.749.4979 (M-F 8:30 am – 5:00 pm) - After core business hours, email or call ► 415.749.4666 Form Revision Dated: 12-12-18



July 14, 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 08K15 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 July 11, 2022.

A breakdown report (Per Regulation 1, Section 431) was submitted by GRDF at~11:25 AM on July 12, 2022, because the landfill gas collection and control system (GCCS) was temporarily shut down due a PG&E power outage caused due to a Wire Down Outage – Broken Pole Equipment. The flare was back online at ~8:15 PM on 7/11/2022 (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 July 12, 2022, PG&E power outage and was assigned RCA number 08K15 (see Attachment B).

The unplanned power outage shutdown event noted in RCA form on July 11, 2022, 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. 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 placed purchase order for a permanent generator in October 2021, and the unit was delivered in July 2022 (delayed due to the COVID-19 emergency and related supply chain disruptions). GRDF submitted the backup generator permit application to the BAAQMD on February 10, 2022 (AN 31599 was assigned). GRDF will also be working on an 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

Paul Inrique Perez

Enrique Perez District Manager

cc: Erin Phillips, BAAQMD

Attachments:

Attachment A- GRDF flare data for 7.11.2022 Attachment B- Copy of GRDF RCA Form -Number 08K15 Attachment A GRDF flare data for July 11, 2022

	-	Flare	Disposal i a Data	-	
		FLARE	TEMP	LFG F	LOW
	-	De	g F	SCI	M
	F	MIN	MAX	MIN	MAX
2022/07/11	17:00:00	1553	1573	1529	1550
2022/07/11	17:02:00	1554	1573	1528	1557
2022/07/11	17:04:00	1556	1575	1530	1557
2022/07/11	17:06:00	1555	1559	1528	1554
2022/07/11	17:08:00	1554	1565	1529	1556
2022/07/11	17:10:00	1541	1559	1529	1551
2022/07/11	17:12:00	1541	1556	1533	1557
2022/07/11	17:14:00	1548	1556	1527	1553
2022/07/11	17:16:00	1554	1573	1528	1555
2022/07/11	17:18:00	1564	1570	1533	1553
2022/07/11	17:20:00	1564	1580	1526	1551
2022/07/11	17:22:00	1553	1576	1522	1556
2022/07/11	17:24:00	1553	1558	1526	1554
2022/07/11	17:26:00	1556	1561	1523	1554
2022/07/11	17:28:00	1561	1571	1525	1554
2022/07/11	17:30:00	1560	1566	1524	1548
2022/07/11	17:32:00	1551	1561	1528	1553
2022/07/11	17:34:00	1545	1551	1528	1551
2022/07/11	17:36:00	1551	1568	1526	1550
2022/07/11	17:38:00	1546	1566	1525	1551
2022/07/11	17:40:00	1545	1551	1521	1549
2022/07/11	17:42:00	1545	1559	1528	1547
2022/07/11	17:44:00	1558	1570	1521	1548
2022/07/11	17:46:00	1562	1571	1516	1548
2022/07/11	17:48:00	1561	1570	1519	1545
2022/07/11	17:50:00	1554	1571	1521	1548
2022/07/11	17:52:00	1551	1556	1519	1544
2022/07/11	17:54:00	1553	1563	1521	1550
2022/07/11	17:56:00	1551	1554	1521	1542
2022/07/11	17:58:00	1553	1556	1514	1544
2022/07/11	18:00:00	1553	1566	1516	1545
2022/07/11	18:02:00	1558	1566	1522	1545
2022/07/11	18:04:00	1558	1568	1517	1539
2022/07/11	18:06:00	1558	1568	1515	1539
2022/07/11	18:08:00	1559	1568	1516	1537
2022/07/11	18:10:00	1553	1568	1518	1547
2022/07/11	18:12:00	1553	1566	1513	1543
2022/07/11	18:14:00	1554	1570	1515	1534
2022/07/11	18:16:00	1537	1554	1510	1536
2022/07/11	18:18:00	1537	1561	1510	1548
2022/07/11	18:20:00	1561	1580	1515	1540
2022/07/11	18:22:00	1563	1578	1509	1537
2022/07/11	18:22:00	1541	1563	1513	1534
2022/07/11	18:24:00	1541	1550	1515	1534
2022/07/11	18:28:00	1548	1550	1515	1534

Guadalupe Recycling and Disposal Facility-A3294

2022/07/11	18:30:00	1568	1582	1509	1536
2022/07/11	18:32:00	1563	1582	1507	1531
2022/07/11	18:34:00	1563	1568	1507	1537
2022/07/11	18:36:00				
2022/07/11	18:38:00				
2022/07/11	18:40:00				
2022/07/11	18:42:00				
2022/07/11	18:44:00				
2022/07/11	18:46:00				
2022/07/11	18:48:00				
2022/07/11	18:50:00				
2022/07/11	18:52:00				
2022/07/11	18:54:00				
2022/07/11	18:56:00				
2022/07/11	18:58:00				
2022/07/11	19:00:00				
2022/07/11	19:02:00				
2022/07/11	19:04:00				
2022/07/11	19:06:00				
2022/07/11	19:08:00				
2022/07/11	19:10:00				
2022/07/11	19:12:00				
2022/07/11	19:14:00				
2022/07/11	19:16:00				
2022/07/11	19:18:00				
2022/07/11	19:20:00				
2022/07/11	19:22:00				
2022/07/11	19:24:00				
2022/07/11	19:26:00				
2022/07/11	19:28:00				
2022/07/11	19:30:00				
2022/07/11	19:32:00				
2022/07/11	19:34:00				
2022/07/11	19:36:00				
2022/07/11	19:38:00				
2022/07/11	19:40:00				
2022/07/11	19:42:00		1		
2022/07/11	19:44:00				
2022/07/11	19:46:00				
2022/07/11	19:48:00		1		
2022/07/11	19:50:00				
2022/07/11	19:52:00		Ī		
2022/07/11	19:54:00		Ī		
2022/07/11	19:56:00		T		
2022/07/11	19:58:00				
2022/07/11	20:00:00	102	106	0	1
2022/07/11	20:02:00	105	126	0	1443
2022/07/11	20:04:00	126	1860	1443	1865
2022/07/11	20:06:00	1461	1784	1648	1783
2022/07/11	20:08:00	1464	1566	1605	1666
2022/07/11	20:10:00	1566	1599	1583	1627

2022/07/11	20:12:00	1544	1588	1564	1603
2022/07/11	20:14:00	1527	1544	1561	1591
2022/07/11	20:16:00	1530	1578	1555	1588
2022/07/11	20:18:00	1578	1587	1555	1577
2022/07/11	20:20:00	1563	1580	1547	1571
2022/07/11	20:22:00	1550	1563	1541	1569
2022/07/11	20:24:00	1550	1556	1541	1567
2022/07/11	20:26:00	1551	1565	1532	1564
2022/07/11	20:28:00	1550	1563	1531	1558
2022/07/11	20:30:00	1548	1555	1537	1556
2022/07/11	20:32:00	1554	1559	1528	1558
2022/07/11	20:34:00	1558	1565	1529	1553
2022/07/11	20:36:00	1562	1566	1526	1550
2022/07/11	20:38:00	1560	1565	1524	1546
2022/07/11	20:40:00	1555	1565	1517	1547
2022/07/11	20:42:00	1550	1558	1522	1544
2022/07/11 2022/07/11	20:44:00 20:46:00	1553 1548	1560 1555	1517 1513	1538 1542
2022/07/11	20:48:00	1548	1555	1513	1542
2022/07/11	20:50:00	1548	1560	1514	1534
2022/07/11	20:52:00	1558	1565	1503	1530
2022/07/11	20:52:00	1558	1565	1508	1530
2022/07/11	20:54:00	1562	1565	1508	1532
2022/07/11	20:58:00	1559	1566	1503	1528
2022/07/11	20:38:00	1559	1565	1498	1526
2022/07/11		1559	1563	1498	1524
	21:02:00				
2022/07/11	21:04:00	1559	1565	1493	1519
2022/07/11	21:06:00	1559	1568	1495	1523
2022/07/11	21:08:00	1558	1560	1492	1520
2022/07/11	21:10:00	1554	1558	1494	1517
2022/07/11	21:12:00	1553	1558	1492	1523
2022/07/11	21:14:00	1548	1553	1491	1517
2022/07/11	21:16:00	1551	1555	1490	1509
2022/07/11	21:18:00	1553	1562	1485	1515
2022/07/11	21:20:00	1552	1562	1488	1511
2022/07/11	21:22:00	1551	1558	1489	1514
2022/07/11	21:24:00	1554	1559	1487	1512
2022/07/11	21:26:00	1553	1568	1485	1505
2022/07/11	21:28:00	1568	1573	1479	1505
2022/07/11					

Attachment B Copy of GRDF RCA Form for RCA Number 08K15

From:	RCA Notification
То:	<u>Phadnis, Rajan</u>
Cc:	Perez, Enrique; Azevedo, Becky; Colline, Christian; Erin Phillips
Subject:	[EXTERNAL] RE: GRDF A3294-RCA for PG&E power outage
Date:	Tuesday, July 12, 2022 12:18:36 PM

I am confirming receipt, the RCA for your notification is 08K15

From: Phadnis, Rajan <rphadnis@wm.com>
Sent: Tuesday, July 12, 2022 11:26 AM
To: RCA Notification <rca@baaqmd.gov>
Cc: Perez, Enrique <pperez3@wm.com>; Phadnis, Rajan <rphadnis@wm.com>; Azevedo, Becky
<Razevedo@wm.com>; Colline, Christian <CColline@wm.com>; Erin Phillips
<ephillips@baaqmd.gov>
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 7/11/2022, at Guadalupe Recycling and Disposal Facility in San Jose, CA (Facility A3294).

Thank you, Rajan Phadnis For Guadalupe Recycling and Disposal Facility



Guadalupe Rubbish Disposal Co., Inc. 15999 Guadalupe Mines Road P.O. Box 20957 San Jose, CA 95160

July 12, 2022 (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 June 11, 2022, at ~ 6:36 PM. GRDF is submitting the breakdown report to Bay Area Air Quality Management District (BAAQMD) on June 12, 2022, at ~ 11:25 AM 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 June 11, 2022, at ~8:04 PM 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

FM

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: RCA Form GRDF Facility A3294 Dated 7.12.2022



Reportable Compliance Activity (RCA)

				a de la colo		
			S	ee bac	K OT TORM	for instructions \rightarrow
1. X BREAKDOWN RELIEF: District Use OnlyBREAKDOWN REFERENCE #:						
2. NA MONITOR E	EXCESS EMISSIO	ON or EXCUR	SION: Dis	trict Us	e Only RE	FERENCE#:
	S INOPERATIVE	: District Use	Only REF	ERENC	E#:	
4. NA		E (PRD): <i>Dis</i> t	trict Use O	nly PRI) REFERE	NCE#:
SITE INF	ORMATION AND	DESCRIPTI	ON INFORI	NATION	N (REQUIF	RED)
Company	Guadalupe Rubbis	sh Disposal Co	o., Inc	Site #	•	A3294
Address	15999 Guadalupe Min	es Road, San Jos	se 95120	Source #		S-9
Reported by	R Phadnis			Phone	#	510.875.9338
Indicated Excess	-NA			Fax #		-
Allowable Limit	-NA			Averag	ging Time	-
Start Time/Date	~ 6:36 PM on 7/11/20	22		Clear	Time	~ 8:04 PM on 7/11/2022
Monitor/device type(s)	► CEM	►GLM	▶ Parame	tric	▶ PRD	► Non-monitor
Monitor description(s)					-	
Parameter(s) exceeded	or not functioning	g due to inope	ration			
$\square \triangleright NO_x$ $\square \triangleright SO_2$ $\square \triangleright CO$ $\square \triangleright CO_2$ $\square \triangleright H_2S$ $\square \triangleright TRS$ $\square \triangleright NH_3$						
$\blacktriangleright O_2$ $\blacktriangleright H_2O$ $\blacktriangleright Opacity$ $\blacktriangleright Lead$ $\blacktriangleright Gauge Pressure$ $\blacktriangleright Flow$						
► Hydrocarbon Breakthrough (VOC) ► Temperature ► Wind Speed						
► Wind Direction ► Steam ★ Other (describe) Power outage						
Unit(s) of Measurement						
▶ ppm ▶ ppb		-		▶ inche	s H ₂ O	► mmHg
▶psig ▶pH	► ⁰ Fahre	enheit		► Othe	(describe)	
Event Description:						

This breakdown report is being submitted on 7/11/2022 at ~ 6:36 PM 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 discussion in the attached cover letter dated 7/12/2022.

District Use Only

Date

Time

General Instructions

- ✓ 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@baaqmd.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 <u>Breakdown Admissions Advisory dated 12/3/04</u>. 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.

- □ Check Box #1.
- 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> <u>discovery</u> 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.

- $\hfill\square$ 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.

Email to ►rca@baaqmd.gov - Telephone ► 415.749.4979 (M-F 8:30 am – 5:00 pm) - After core business hours, email or call ► 415.749.4666 Form Revision Dated: 12-12-18



August 10, 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: 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 08K82

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 August 8, 2022, at around 1:25 PM because the landfill gas collection and control system (GCCS) temporarily shut down due to the PG&E power outage (caused due to due to a Wire Down Outage). The flare was back online on August 8, 2022, around 11:58 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 August 8, 2022, PG&E power outage via BAAQMD's Reportable Compliance Activity (RCA) notification form submitted on August 8, 2022, at around 1:25 PM and was assigned RCA numbers 08K82 (see Attachment B for copy of RCA and submittal).

The unplanned power outage shutdown events noted in RCA form submitted on August 8, did not result in emissions, and does 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. 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 placed purchase order for a permanent generator in October 2021, and the unit was delivered in July 2022 (delayed due to the COVID-19 emergency and related supply chain disruptions). GRDF submitted the backup generator permit application to the BAAQMD on February 10, 2022 (AN 31599 was assigned). GRDF will also be working on an electrical permit for the Automatic Transfer Switch (ATS) 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

Paul Enrique Perez

Enrique Perez District Manager

cc: Erin Phillips, BAAQMD

Attachments:

Attachment A- GRDF flare data for August 8, 2022 Attachment B- Copy of GRDF RCA Form (RCA Number 08K82) Attachment A GRDF flare data for August 8, 2022

Guadalupe Recycling and Disposal Facility-A3294

		Flare FLARE	Data TEMP	LFG FLOW		
	-		eg F		FM	
	-				-	
2022/08/08	10:00:00	1540	MAX 1551	MIN 1523	1558	
2022/08/08	10:02:00	1544	1551	1523	1550	
2022/08/08	10:02:00	1558	1562	1515	1550	
2022/08/08	10:06:00	1545	1564	1530	1555	
2022/08/08	10:08:00	1545	1569	1530	1555	
2022/08/08	10:10:00	1569	1574	1527	1550	
2022/08/08	10:12:00	1566	1574	1527	1553	
2022/08/08	10:14:00	1556	1566	1525	1553	
2022/08/08	10:14:00	1548	1561	1527	1556	
2022/08/08	10:18:00	1559	1566	1527	1555	
2022/08/08	10:20:00	1555	1566	1527	1555	
2022/08/08	10:22:00	1552	1556	1530	1555	
2022/08/08	10:22:00	1553	1561	1530	1552	
2022/08/08	10:24:00	1545	1553	1520	1556	
2022/08/08		1545	1555	1524	1553	
	10:28:00	1553	1555	1532	1555	
2022/08/08	10:30:00				1555	
2022/08/08	10:32:00	1553	1572	1527		
2022/08/08	10:34:00	1572	1573	1532	1551	
2022/08/08	10:36:00	1557	1572	1527	1552	
2022/08/08	10:38:00	1556	1567	1530	1558	
2022/08/08	10:40:00	1535	1566	1535	1555	
2022/08/08	10:42:00	1533	1543	1533	1556	
2022/08/08	10:44:00	1543	1550	1530	1561	
2022/08/08	10:46:00	1550	1574	1521	1553	
2022/08/08	10:48:00	1574	1576	1532	1559	
2022/08/08	10:50:00	1550	1576	1530	1556	
2022/08/08	10:52:00	1535	1550	1529	1558	
2022/08/08	10:54:00	1535	1555	1523	1547	
2022/08/08	10:56:00	1552	1559	1523	1551	
2022/08/08	10:58:00	1552	1560	1523	1547	
2022/08/08	11:00:00	1560	1565	1515	1550	
2022/08/08	11:02:00	1564	1567	1519	1548	
2022/08/08	11:04:00	1562	1571	1526	1548	
2022/08/08	11:06:00					
2022/08/08	11:08:00					
2022/08/08	11:10:00					
2022/08/08	11:12:00					
2022/08/08	11:14:00					
2022/08/08	11:16:00					
2022/08/08	11:18:00					
2022/08/08	11:20:00					
2022/08/08	11:22:00					
2022/08/08	11:24:00					
2022/08/08	11:26:00					
2022/08/08	11:28:00					
2022/08/08	11:30:00					
2022/08/08	11:32:00					
2022/08/08	11:34:00					
2022/08/08	11:36:00					
2022/08/08	11:38:00					
2022/08/08	11:40:00					
2022/08/08	11:42:00					
2022/08/08	11:44:00					
2022/08/08	11:46:00					
2022/08/08	11:48:00					
2022/08/08	11:50:00					
2022/08/08	11:52:00					
2022/08/08	11:54:00	125	135	1	1	
2022/08/08	11:56:00	130	133	1	2	
2022/08/08	11:58:00	129	199	2	1478	
2022/08/08	12:00:00	199	1651	1478	1859	
2022/08/08	12:02:00	1512	1663	1625	1750	
2022/08/08	12:04:00	1503	1688	1627	1656	
2022/08/08	12:06:00	1519	1640	1612	1647	

2022/08/08	12:08:00	1491	1625	1604	1644
2022/08/08	12:10:00	1529	1655	1612	1650
2022/08/08	12:12:00	1521	1584	1606	1636
2022/08/08	12:14:00	1533	1569	1607	1637
2022/08/08	12:16:00	1569	1578	1612	1633
2022/08/08	12:18:00	1568	1572	1609	1631
2022/08/08	12:20:00	1546	1568	1610	1631
2022/08/08	12:22:00	1536	1546	1606	1631
2022/08/08	12:24:00	1522	1551	1607	1640
2022/08/08	12:26:00	1551	1595	1605	1630
2022/08/08	12:28:00	1568	1595	1607	1637
2022/08/08	12:30:00	1542	1569	1601	1633
2022/08/08	12:32:00	1535	1542	1606	1637
2022/08/08	12:34:00	1533	1570	1604	1632
2022/08/08	12:36:00	1569	1581	1606	1628
2022/08/08	12:38:00	1572	1581	1597	1628
2022/08/08	12:40:00	1555	1572	1607	1632
2022/08/08	12:42:00	1555	1558	1604	1633
2022/08/08	12:44:00	1553	1560	1602	1628
2022/08/08	12:46:00	1559	1562	1600	1628
2022/08/08	12:48:00	1554	1560	1605	1627
2022/08/08	12:50:00	1548	1559	1600	1625
2022/08/08	12:52:00	1557	1564	1604	1629
2022/08/08	12:54:00	1559	1564	1603	1629
2022/08/08	12:56:00	1559	1565	1598	1630
2022/08/08	12:58:00	1554	1565	1604	1630
2022/08/08	13:00:00	1550	1560	1597	1625
2022/08/08	13:02:00	1552	1560	1601	1627
2022/08/08	13:04:00	1547	1555	1603	1628
2022/08/08	13:06:00	1554	1559	1598	1628
2022/08/08	13:08:00	1555	1564	1604	1628
2022/08/08	13:10:00	1557	1565	1598	1625
2022/08/08	13:12:00	1559	1562	1589	1630
2022/08/08	13:14:00	1560	1564	1601	1623
2022/08/08	13:16:00	1559	1564	1601	1627
2022/08/08	13:18:00	1559	1565	1605	1625
2022/08/08	13:20:00	1545	1559	1599	1628
2022/08/08	13:22:00	1549	1559	1595	1628
2022/08/08	13:24:00	1557	1564	1596	1628
2022/08/08	13:26:00	1554	1563	1604	1634
2022/08/08	13:28:00	1550	1554	1592	1627
2022/08/08	13:30:00	1554	1571	1601	1630

Attachment B Copy of GRDF RCA Form for RCA Number 08K82

From:	Phadnis, Rajan
То:	RCA Notification
Cc:	Azevedo, Becky; Perez, Enrique; Colline, Christian; Erin Phillips; Phadnis, Rajan
Subject:	RE: GRDF A3294-RCA for PG&E power outage 8.8.2022-Updated RCA form
Date:	Tuesday, August 9, 2022 10:16:45 AM
Attachments:	GRDC RCA Notification Form Updated-RCA 08K82 8-9-2022.pdf

Thank you.

Please see attached with updated RCA form with details of Clear Time (RCA Number 08K82).

Thanks,

Rajan

From: RCA Notification <rca@baaqmd.gov>
Sent: Monday, August 8, 2022 2:44 PM
To: Phadnis, Rajan <rphadnis@wm.com>
Cc: Azevedo, Becky <Razevedo@wm.com>; Perez, Enrique <pperez3@wm.com>; Colline, Christian
<CColline@wm.com>; Erin Phillips <ephillips@baaqmd.gov>
Subject: [EXTERNAL] RE: GRDF A3294-RCA for PG&E power outage 8.8.2022

Good afternoon I am confirming receipt, and letting you know the RCA for your notification is 08K82

From: Phadnis, Rajan <<u>rphadnis@wm.com</u>>

Sent: Monday, August 8, 2022 1:24 PM

To: RCA Notification <<u>rca@baagmd.gov</u>>

Cc: Azevedo, Becky <<u>Razevedo@wm.com</u>>; Perez, Enrique <<u>pperez3@wm.com</u>>; Colline, Christian <<u>CColline@wm.com</u>>; Erin Phillips <<u>ephillips@baaqmd.gov</u>>

Subject: GRDF A3294-RCA for PG&E power outage 8.8.2022

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 8/8/2022, at Guadalupe Recycling and Disposal Facility in San Jose, CA (Facility A3294).

Thank you, Rajan Phadnis For Guadalupe Recycling and Disposal Facility

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



Reportable Compliance Activity (RCA)

	5	See back of form	for instructions \rightarrow					
1. X BREAKDOV	1. X BREAKDOWN RELIEF: District Use OnlyBREAKDOWN REFERENCE #:							
2. NA MONITOR E	XCESS EMISSION or EXCURSION: Dis	trict Use Only RE	FERENCE#:					
	S INOPERATIVE: District Use Only REF	ERENCE#:						
4. NA	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	~ 11:00 AM on 8/8/2022	Clear Time	~11:58 AM on 8/8/22					
Monitor/device type(s)	► CEM ► GLM ► Parame	etric PRD	► Non-monitor					
Monitor description(s)								
Parameter(s) exceeded or not functioning due to inoperation NOx SO2 CO O2 H2O Opacity Hydrocarbon Breakthrough (VOC) Temperature Wind Speed Wind Direction Steam Other (describe) Power outage								
Unit(s) of Measurement ppm psig pH	 ▶ min/hr > 20% ▶ ⁰Fahrenheit 	 ▶ inches H₂O ▶ Other (describe) 	► mmHg					
This breakdown report is being because the GCCS was tempora	/22 (Assigned RCA Number 08K82) submitted on 8/8/2022 at ~ 11:00 AM by Guadalu arily shut down due to the PG&E power outage. I with BAAQMD regulation 8-34-301.1. Please also	upe Recycling & Disp During the PG&E pow	osal Facility (GRDF) er outage, the GCCS was					

District Use Only

Date

- ✓ 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@baaqmd.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 <u>Breakdown Admissions Advisory dated 12/3/04</u>. 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.

- □ Check Box #1.
- 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> <u>discovery</u> 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.

- $\hfill\square$ 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.

Email to ►rca@baaqmd.gov - Telephone ► 415.749.4979 (M-F 8:30 am – 5:00 pm) - After core business hours, email or call ► 415.749.4666 Form Revision Dated: 12-12-18



Guadalupe Rubbish Disposal Co., Inc. 15999 Guadalupe Mines Road P.O. Box 20957 San Jose, CA 95160

August 8, 2022 (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 August 8, 2022, at ~ 11:00 AM. GRDF is submitting the breakdown report to Bay Area Air Quality Management District (BAAQMD) on August 8, 2022, at ~ 1:15 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.

The shutdown event was unforeseeable & unpreventable at GRDF.

Sincerely, Guadalupe Recycling & Disposal Facility

FM

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: RCA Form GRDF Facility A3294 Dated 8.8.2022



Reportable Compliance Activity (RCA)

l							
			S	ee bac	k of form 1	for instructions \rightarrow	
1. X BREAKDOW	1. X BREAKDOWN RELIEF: District Use OnlyBREAKDOWN REFERENCE #:						
2. NA 🗌 MONITOR E	EXCESS EMISS	ION or EXCUF	RSION: Dis	trict Us	e Only RE	FERENCE#:	
	S INOPERATIVI	E: District Use	Only REF	ERENC	E#:		
4. NA		E (PRD): Dis	trict Use O	nly PRI) REFERE	NCE#:	
SITE INF	ORMATION AN	D DESCRIPTI		MATION	I (REQUIF	RED)	
Company	Guadalupe Rubb	oish Disposal C	o., Inc	Site #	•	A3294	
Address	15999 Guadalupe M	ines Road, San Jo	se 95120	Source #		S-9	
Reported by	R Phadnis			Phone	#	510.875.9338	
Indicated Excess	-NA			Fax #		-	
Allowable Limit	-NA			Averag	ging Time	-	
Start Time/Date	~ 11:00 AM on 8/8/2	2022		Clear	Time		
Monitor/device type(s)	► CEM	►GLM	► Parame	etric	►PRD	► Non-monitor	
Monitor description(s)							
Parameter(s) exceeded	or not functionin	ng due to inope	ration				
$ \begin{array}{ c c c c c c c c c c c c c c c c c c c$							
▶ Wind Direction ▶ Steam X ▶ Other (describe) Power outage							
Unit(s) of Measurement ▶ ppm ▶ psig ▶ pH	o i min/r ▶⁰Fahi	nr > 20% renheit		► inche Other	s H ₂ O · _{(describe})	► mmHg	
Event Description:							

This breakdown report is being submitted on 8/8/2022 at ~ 11:00 AM 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 discussion in the attached cover letter dated 8/8/2022.

District Use Only

Date

Time

General Instructions

- ✓ 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@baaqmd.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 <u>Breakdown Admissions Advisory dated 12/3/04</u>. 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.

- □ Check Box #1.
- 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> <u>discovery</u> 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.

- $\hfill\square$ 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.

Email to ►rca@baaqmd.gov - Telephone ► 415.749.4979 (M-F 8:30 am – 5:00 pm) - After core business hours, email or call ► 415.749.4666 Form Revision Dated: 12-12-18



August 10, 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 08K82 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 August 8, 2022.

A breakdown report (Per Regulation 1, Section 431) was submitted by GRDF at~1:25 PM on August 8, 2022, because the landfill gas collection and control system (GCCS) was temporarily shut down due a PG&E power outage caused due to a Wire Down Outage. The flare was back online at ~11:58 AM on 8/8/2022 (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 August 8, 2022, PG&E power outage and was assigned RCA number 08K82 (see Attachment B).

The unplanned power outage shutdown event noted in RCA form on August 8, 2022, did not result in emissions and does 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. 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 placed purchase order for a permanent generator in October 2021, and the unit was delivered in July 2022 (delayed due to the COVID-19 emergency and related supply chain disruptions). GRDF submitted the backup generator permit application to the BAAQMD on February 10, 2022 (AN 31599 was assigned). GRDF will also be working on an electrical permit for the Automatic Transfer Switch (ATS) 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

Paul Inrique Perez

Enrique Perez District Manager

cc: Erin Phillips, BAAQMD

Attachments:

Attachment A- GRDF flare data for 8.8.2022 Attachment B- Copy of GRDF RCA Form -Number 08K82 Attachment A GRDF flare data for 8.8.2022

Guadalupe Recycling and Disposal Facility-A3294

		Flare FLARE	Data TEMP	LFG FLOW		
	-		eg F		FM	
	-					
2022/08/08	10:00:00	1540	MAX 1551	MIN 1523	1558	
2022/08/08	10:02:00	1544	1551	1523	1550	
2022/08/08	10:02:00	1558	1562	1515	1550	
2022/08/08	10:06:00	1545	1564	1530	1555	
2022/08/08	10:08:00	1545	1569	1530	1555	
2022/08/08	10:10:00	1569	1574	1527	1550	
2022/08/08	10:12:00	1566	1574	1527	1553	
2022/08/08	10:14:00	1556	1566	1525	1553	
2022/08/08	10:14:00	1548	1561	1527	1556	
2022/08/08	10:18:00	1559	1566	1527	1555	
2022/08/08	10:20:00	1555	1566	1527	1555	
2022/08/08	10:22:00	1552	1556	1530	1555	
2022/08/08	10:22:00	1553	1561	1530	1552	
2022/08/08	10:24:00	1545	1553	1520	1556	
2022/08/08		1545	1555	1524	1553	
	10:28:00	1553	1555	1532	1555	
2022/08/08	10:30:00				1555	
2022/08/08	10:32:00	1553	1572	1527		
2022/08/08	10:34:00	1572	1573	1532	1551	
2022/08/08	10:36:00	1557	1572	1527	1552	
2022/08/08	10:38:00	1556	1567	1530	1558	
2022/08/08	10:40:00	1535	1566	1535	1555	
2022/08/08	10:42:00	1533	1543	1533	1556	
2022/08/08	10:44:00	1543	1550	1530	1561	
2022/08/08	10:46:00	1550	1574	1521	1553	
2022/08/08	10:48:00	1574	1576	1532	1559	
2022/08/08	10:50:00	1550	1576	1530	1556	
2022/08/08	10:52:00	1535	1550	1529	1558	
2022/08/08	10:54:00	1535	1555	1523	1547	
2022/08/08	10:56:00	1552	1559	1523	1551	
2022/08/08	10:58:00	1552	1560	1523	1547	
2022/08/08	11:00:00	1560	1565	1515	1550	
2022/08/08	11:02:00	1564	1567	1519	1548	
2022/08/08	11:04:00	1562	1571	1526	1548	
2022/08/08	11:06:00					
2022/08/08	11:08:00					
2022/08/08	11:10:00					
2022/08/08	11:12:00					
2022/08/08	11:14:00					
2022/08/08	11:16:00					
2022/08/08	11:18:00					
2022/08/08	11:20:00					
2022/08/08	11:22:00					
2022/08/08	11:24:00					
2022/08/08	11:26:00					
2022/08/08	11:28:00					
2022/08/08	11:30:00					
2022/08/08	11:32:00					
2022/08/08	11:34:00					
2022/08/08	11:36:00					
2022/08/08	11:38:00					
2022/08/08	11:40:00					
2022/08/08	11:42:00					
2022/08/08	11:44:00					
2022/08/08	11:46:00					
2022/08/08	11:48:00					
2022/08/08	11:50:00					
2022/08/08	11:52:00					
2022/08/08	11:54:00	125	135	1	1	
2022/08/08	11:56:00	130	133	1	2	
2022/08/08	11:58:00	129	199	2	1478	
2022/08/08	12:00:00	199	1651	1478	1859	
2022/08/08	12:02:00	1512	1663	1625	1750	
2022/08/08	12:04:00	1503	1688	1627	1656	
2022/08/08	12:06:00	1519	1640	1612	1647	

2022/08/08	12:08:00	1491	1625	1604	1644
2022/08/08	12:10:00	1529	1655	1612	1650
2022/08/08	12:12:00	1521	1584	1606	1636
2022/08/08	12:14:00	1533	1569	1607	1637
2022/08/08	12:16:00	1569	1578	1612	1633
2022/08/08	12:18:00	1568	1572	1609	1631
2022/08/08	12:20:00	1546	1568	1610	1631
2022/08/08	12:22:00	1536	1546	1606	1631
2022/08/08	12:24:00	1522	1551	1607	1640
2022/08/08	12:26:00	1551	1595	1605	1630
2022/08/08	12:28:00	1568	1595	1607	1637
2022/08/08	12:30:00	1542	1569	1601	1633
2022/08/08	12:32:00	1535	1542	1606	1637
2022/08/08	12:34:00	1533	1570	1604	1632
2022/08/08	12:36:00	1569	1581	1606	1628
2022/08/08	12:38:00	1572	1581	1597	1628
2022/08/08	12:40:00	1555	1572	1607	1632
2022/08/08	12:42:00	1555	1558	1604	1633
2022/08/08	12:44:00	1553	1560	1602	1628
2022/08/08	12:46:00	1559	1562	1600	1628
2022/08/08	12:48:00	1554	1560	1605	1627
2022/08/08	12:50:00	1548	1559	1600	1625
2022/08/08	12:52:00	1557	1564	1604	1629
2022/08/08	12:54:00	1559	1564	1603	1629
2022/08/08	12:56:00	1559	1565	1598	1630
2022/08/08	12:58:00	1554	1565	1604	1630
2022/08/08	13:00:00	1550	1560	1597	1625
2022/08/08	13:02:00	1552	1560	1601	1627
2022/08/08	13:04:00	1547	1555	1603	1628
2022/08/08	13:06:00	1554	1559	1598	1628
2022/08/08	13:08:00	1555	1564	1604	1628
2022/08/08	13:10:00	1557	1565	1598	1625
2022/08/08	13:12:00	1559	1562	1589	1630
2022/08/08	13:14:00	1560	1564	1601	1623
2022/08/08	13:16:00	1559	1564	1601	1627
2022/08/08	13:18:00	1559	1565	1605	1625
2022/08/08	13:20:00	1545	1559	1599	1628
2022/08/08	13:22:00	1549	1559	1595	1628
2022/08/08	13:24:00	1557	1564	1596	1628
2022/08/08	13:26:00	1554	1563	1604	1634
2022/08/08	13:28:00	1550	1554	1592	1627
2022/08/08	13:30:00	1554	1571	1601	1630

Attachment B Copy of GRDF RCA Form-Numbers 08K82

From:	Phadnis, Rajan
То:	RCA Notification
Cc:	Azevedo, Becky; Perez, Enrique; Colline, Christian; Erin Phillips; Phadnis, Rajan
Subject:	RE: GRDF A3294-RCA for PG&E power outage 8.8.2022-Updated RCA form
Date:	Tuesday, August 9, 2022 10:16:45 AM
Attachments:	GRDC RCA Notification Form Updated-RCA 08K82 8-9-2022.pdf

Thank you.

Please see attached with updated RCA form with details of Clear Time (RCA Number 08K82).

Thanks,

Rajan

From: RCA Notification <rca@baaqmd.gov>
Sent: Monday, August 8, 2022 2:44 PM
To: Phadnis, Rajan <rphadnis@wm.com>
Cc: Azevedo, Becky <Razevedo@wm.com>; Perez, Enrique <pperez3@wm.com>; Colline, Christian
<CColline@wm.com>; Erin Phillips <ephillips@baaqmd.gov>
Subject: [EXTERNAL] RE: GRDF A3294-RCA for PG&E power outage 8.8.2022

Good afternoon I am confirming receipt, and letting you know the RCA for your notification is 08K82

From: Phadnis, Rajan <<u>rphadnis@wm.com</u>>

Sent: Monday, August 8, 2022 1:24 PM

To: RCA Notification <<u>rca@baagmd.gov</u>>

Cc: Azevedo, Becky <<u>Razevedo@wm.com</u>>; Perez, Enrique <<u>pperez3@wm.com</u>>; Colline, Christian <<u>CColline@wm.com</u>>; Erin Phillips <<u>ephillips@baaqmd.gov</u>>

Subject: GRDF A3294-RCA for PG&E power outage 8.8.2022

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 8/8/2022, at Guadalupe Recycling and Disposal Facility in San Jose, CA (Facility A3294).

Thank you, Rajan Phadnis For Guadalupe Recycling and Disposal Facility

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



Reportable Compliance Activity (RCA)

	5	See back of form	for instructions \rightarrow					
1. X BREAKDOV	1. X BREAKDOWN RELIEF: District Use OnlyBREAKDOWN REFERENCE #:							
2. NA MONITOR E	XCESS EMISSION or EXCURSION: Dis	trict Use Only RE	FERENCE#:					
	S INOPERATIVE: District Use Only REF	ERENCE#:						
4. NA	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	~ 11:00 AM on 8/8/2022	Clear Time	~11:58 AM on 8/8/22					
Monitor/device type(s)	► CEM ► GLM ► Parame	etric PRD	► Non-monitor					
Monitor description(s)								
Parameter(s) exceeded or not functioning due to inoperation NOx SO2 CO O2 H2O Opacity Hydrocarbon Breakthrough (VOC) Temperature Wind Speed Wind Direction Steam Other (describe) Power outage								
Unit(s) of Measurement ppm psig pH	 ▶ min/hr > 20% ▶ ⁰Fahrenheit 	 ▶ inches H₂O ▶ Other (describe) 	► mmHg					
This breakdown report is being because the GCCS was tempora	/22 (Assigned RCA Number 08K82) submitted on 8/8/2022 at ~ 11:00 AM by Guadalu arily shut down due to the PG&E power outage. I with BAAQMD regulation 8-34-301.1. Please also	upe Recycling & Disp During the PG&E pow	osal Facility (GRDF) er outage, the GCCS was					

District Use Only

Date

- ✓ 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@baaqmd.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 <u>Breakdown Admissions Advisory dated 12/3/04</u>. 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.

- □ Check Box #1.
- 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> <u>discovery</u> 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.

- $\hfill\square$ 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.

Email to ►rca@baaqmd.gov - Telephone ► 415.749.4979 (M-F 8:30 am – 5:00 pm) - After core business hours, email or call ► 415.749.4666 Form Revision Dated: 12-12-18



Guadalupe Rubbish Disposal Co., Inc. 15999 Guadalupe Mines Road P.O. Box 20957 San Jose, CA 95160

August 8, 2022 (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 August 8, 2022, at ~ 11:00 AM. GRDF is submitting the breakdown report to Bay Area Air Quality Management District (BAAQMD) on August 8, 2022, at ~ 1:15 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.

The shutdown event was unforeseeable & unpreventable at GRDF.

Sincerely, Guadalupe Recycling & Disposal Facility

FM

Rajan Phadnis EP Specialist

cc: Erin Phillips, BAAQMD

Attachment: RCA Form GRDF Facility A3294 Dated 8.8.2022



Reportable Compliance Activity (RCA)

l							
			S	ee bac	k of form 1	for instructions \rightarrow	
1. X BREAKDOW	1. X BREAKDOWN RELIEF: District Use OnlyBREAKDOWN REFERENCE #:						
2. NA 🗌 MONITOR E	EXCESS EMISS	ION or EXCUF	RSION: Dis	trict Us	e Only RE	FERENCE#:	
	S INOPERATIVI	E: District Use	Only REF	ERENC	E#:		
4. NA		E (PRD): Dis	trict Use O	nly PRI) REFERE	NCE#:	
SITE INF	ORMATION AN	D DESCRIPTI		MATION	I (REQUIF	RED)	
Company	Guadalupe Rubb	oish Disposal C	o., Inc	Site #	•	A3294	
Address	15999 Guadalupe M	ines Road, San Jo	se 95120	Source #		S-9	
Reported by	R Phadnis			Phone	#	510.875.9338	
Indicated Excess	-NA			Fax #		-	
Allowable Limit	-NA			Averag	ging Time	-	
Start Time/Date	~ 11:00 AM on 8/8/2	2022		Clear	Time		
Monitor/device type(s)	► CEM	►GLM	► Parame	etric	►PRD	► Non-monitor	
Monitor description(s)							
Parameter(s) exceeded	or not functionin	ng due to inope	ration				
$ \begin{array}{ c c c c c c c c c c c c c c c c c c c$							
▶ Wind Direction ▶ Steam X ▶ Other (describe) Power outage							
Unit(s) of Measurement ▶ ppm ▶ psig ▶ pH	o i min/r ▶⁰Fahi	nr > 20% renheit		► inche Other	s H ₂ O · _{(describe})	► mmHg	
Event Description:							

This breakdown report is being submitted on 8/8/2022 at ~ 11:00 AM 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 discussion in the attached cover letter dated 8/8/2022.

District Use Only

Date

Time

General Instructions

- ✓ 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@baaqmd.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 <u>Breakdown Admissions Advisory dated 12/3/04</u>. 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.

- □ Check Box #1.
- 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> <u>discovery</u> 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.

- $\hfill\square$ 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.

Email to ►rca@baaqmd.gov - Telephone ► 415.749.4979 (M-F 8:30 am – 5:00 pm) - After core business hours, email or call ► 415.749.4666 Form Revision Dated: 12-12-18



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

June 1, 2022

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

 Re: Guadalupe Rubbish Disposal Co., Inc., San Jose, California
 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 landfill cell construction activities to be conducted from June 27, 2022, through November 30, 2022, at the Guadalupe Recycling and Disposal Facility (GRDF) Landfill in San Jose, California. This notification is submitted pursuant to Regulation 8, Rule 34, Section 118, "Limited Exemptions for Construction Activities". The work consists of excavation work as part of the new cell construction project to maintain compliance with Regulation 8, Rule 34, and is to be performed during the period of June 27, 2022, through November 30, 2022.

The construction work will include waste and soil excavation and backfilling work for the proposed cell (Module 3 Phase 4). 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; and
- Description of air quality mitigation measures planned.

No significant interruption of the current site LFG extraction and control operations is anticipated due to the work. The construction crew will mobilize to the site on or around June 27, 2022. We anticipate construction activities to conclude by November 30, 2022.

Unless notified otherwise, GRDF 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 pursuant to Regulation 8, Rule 34, Section 118. Please do not hesitate to contact me at (408) 960-0770 with any questions.

Sincerely, Guadalupe Recycling and Disposal Facility

Michael L. Winto

Michael L. Winter District Engineer

CC: Tamiko Endow, BAAQMD Enrique Perez, GRDF Bill Louis, WM

BAAQMD RULE 8-34-118 CONSTRUCTION PLAN Guadalupe Recycling and Disposal Facility EXCAVATION AND BACKFILLING FOR CELL CONSTRUCTION WORK

June 27, 2022, through November 30, 2022

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.

Section 303 requires maintaining the concentration of organic compounds and methane below 500 parts per million by volume (ppmv) 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."

- 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 in waste and backfilling for the cell project.

AFFECTED LANDFILL AREAS

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

AFFECTED LFG COMPONENTS

GRDF will conduct landfill GCCS construction activities in compliance with the Rule 8-34-116 and 8-34-117, if applicable.

Pursuant to Rule 8-34-117, GRDF will take the GCCS wells offline, as necessary. GRDF 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. Excavation and backfilling for this project is independent of the ongoing operations of the GCCS.

REASONS FOR ACTIONS

The proposed construction work is intended to:

• Excavation and backfilling of waste and soil

CONSTRUCTION SCHEDULE

The anticipated construction period will be between June 27, 2022, through November 30, 2022, and is summarized in the table below:

Task	Project Duration
Mobilize crew, equipment, and materials to site	Week 1
Excavation and backfilling	Up to 21 weeks
Clean-up and demobilize crew and materials	Week 1

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. Excavation in waste is independent of ongoing operations of the existing GCCS. Air quality mitigation will be provided during the existing project. 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 excavation and backfilling work.

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

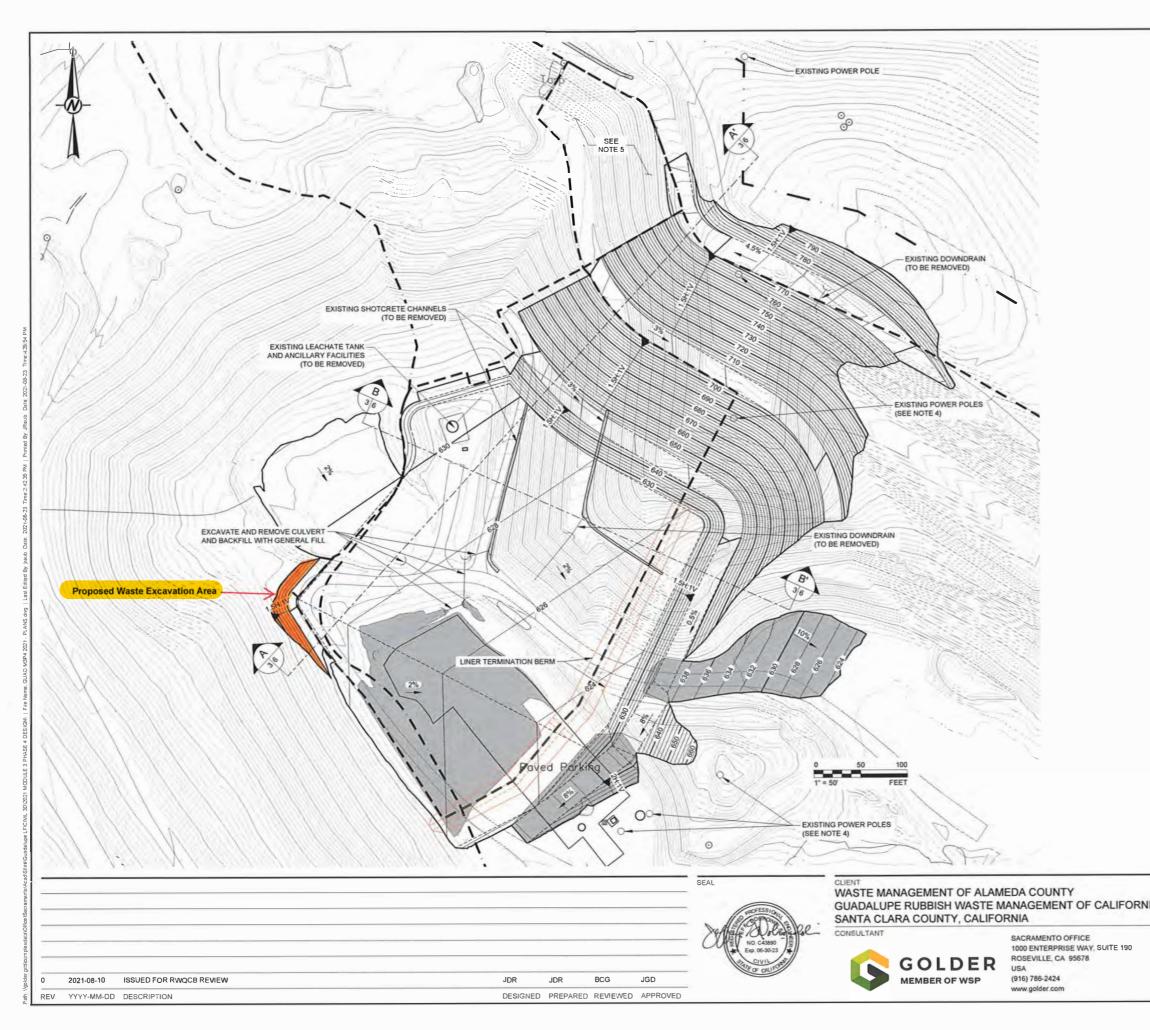
- Minimizing the installation time for each component;
- Minimizing the quantity of open borings or trench excavations at any one time;
- Relocating excavated refuse to the designated waste disposal area immediately and covering the relocated waste daily by no later than the end of each day; and
- Excavations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

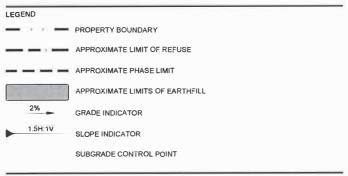
RECORDKEEPING

The following records will be retained during the project:

- Construction start and end dates, and any projected shut down times for individual gas collection system components.
- GCCS downtime and individual well shutdown times will be documented in accordance with the GRDF's Startup, Shutdown, and Malfunction (SSM) Plan.
- Mitigation measures taken to minimize methane emissions and other potential air quality impacts will be documented.

Attachments: Figures 1 – Proposed waste and soil excavation areas





NOTE(S)

- TOPOGRAPHIC CONTOURS PREPARED USING PHOTOGRAMMETRIC METHODS BY MILLER CREEK ASSOCIATES. DATE OF PHOTOGRAPHY: MARCH 26, 2021. DATUM: HORIZONTAL -CA STATE PLANE SYSTEM ZONE 3 NAD 83, VERTICAL NAVD 88.
 CONTRACTOR SHALL NOT ACCESS OR WORK IN THE EXCLUSION ZONE AROUND
- EXISTING POWER POLES AND TRANSMISSION LINE.
- 3. CONTRACTOR TO VERIFY EXISTING LINER LIMIT LOCATIONS.
- POWER POLES WITHIN THE EXCAVATION AREA WILL BE RELOCATED BY OTHERS.
 CONTRACTOR SHALL GRADE EXISTING SLOPE TO MEET LINER SUBGRADE REQUIREMENTS PER TECHNICAL SPECIFICATIONS (SEE DETAIL 2 / SHEET 7).

PROJECT								
GUADALUPE RECYCLING AND DISPOSAL FACILITY 2021 MODULE 3, PHASE IV BASE LINER DESIGN								
TITLE SUBGRADE GRADING PLAN S EXCAVATION AREA	HOWING WASTE							
EXCAVATION AREA								
PROJECT NO.	REV.	3 of 10	DRAWIN					

APPENDIX D

WELL SSM LOG

AFFECTED EQUIPMENT: Wellfield

<table-container>Weished by the sectorWeished by the secto</table-container>	Identify Well & Check	(1) Start of Event	(2) End of Event	(3) Duration	(4) Duration				(7) Date Form	(8) Type of Event	1	(40)	Did Otana Talua Van Faan	(11) Did Event Cause Anv	1
Image: state in the state	Applicable Event	()		. ,		(5) Cause or Reason		(6) Applicable 8-34 Exemption			(9) Procedures Used	(10)	Did Steps Taken Vary From Section 9?		(12) Describe Emission Standard(s) Exceeded
</td <td>Startup Event</td> <td>0/44/00 40-50</td> <td>0/44/00 40-50</td> <td>0.02</td> <td></td> <td></td> <td>X 1</td> <td>16: Well Raising</td> <td>2/14/2022 X</td> <td>Manual (Go to Section 9)</td> <td>Procedure No.</td> <td></td> <td>Yes (Go to Section 11)</td> <td>Yes (Go to Section 12)</td> <td></td>	Startup Event	0/44/00 40-50	0/44/00 40-50	0.02			X 1	16: Well Raising	2/14/2022 X	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
Normage Normage <		2/14/22 10:50	2/14/22 10:52	0.03		Well Located in Active Filling Area.			2/14/2022	Automatic (Go to Section 11)	1 to 3	х	No (Stop)	No (Stop)	
Image Image <t< td=""><td></td><td>4/48/22 40:45</td><td>4/40/00 40:47</td><td>0.02</td><td>Well Raised.</td><td></td><td></td><td>4/18/2022 X</td><td>Manual (Go to Section 9)</td><td>Procedure No.</td><td></td><td>Yes (Go to Section 11)</td><td>Yes (Go to Section 12)</td><td></td></t<>		4/48/22 40:45	4/40/00 40:47	0.02		Well Raised.			4/18/2022 X	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
Normal Part Probability	Shutdown Event	4/18/22 10:45	4/18/22 10:47	0.03			1	17: Gas Collection	4/18/2022	Automatic (Go to Section 11)	1 to 4	х	No (Stop)	No (Stop)	-
Image: image	Well ID Number:228	4/07/00 40:00	4/07/00 40:00	0.02	1		1	13: Inspection and Maintenance	X (107/2022	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
Image: state		4/2//22 12:30	4/27/22 12:52	0.03		Well Located in Active Filling Area.			4/21/2022	Automatic (Go to Section 11)	1 to 3	х	No (Stop)	No (Stop)	
Number Number </td <td></td> <td>540/00 0.00</td> <td>5/40/00 0.00</td> <td>0.02</td> <td>Well Raised.</td> <td>1</td> <td>13: Inspection and Maintenance 16: Well Raising</td> <td>5/40/0000 X</td> <td>Manual (Go to Section 9)</td> <td>Procedure No.</td> <td></td> <td>Yes (Go to Section 11)</td> <td>Yes (Go to Section 12)</td> <td></td>		540/00 0.00	5/40/00 0.00	0.02		Well Raised.	1	13: Inspection and Maintenance 16: Well Raising	5/40/0000 X	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
<table-container> Description Des</table-container>	Shutdown Event Malfunction Event	5/12/22 6:50	5/12/22 6:32	0.03			1	 Gas Collection Construction Activities 	5/12/2022	Automatic (Go to Section 11)	1 to 4	х	No (Stop)	No (Stop)	
Image: Partial state Image: Partia state Image: Partial state <td>Well ID Number:233</td> <td>5/05/00 44 04</td> <td>5/05/00 44 00</td> <td>0.00</td> <td></td> <td></td> <td>X 1</td> <td>13: Inspection and Maintenance 16: Well Raising</td> <td rowspan="4">x</td> <td>Manual (Go to Section 9)</td> <td>Procedure No.</td> <td></td> <td>Yes (Go to Section 11)</td> <td>Yes (Go to Section 12)</td> <td></td>	Well ID Number:233	5/05/00 44 04	5/05/00 44 00	0.00			X 1	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)	
Image: state		5/25/22 11:24	5/25/22 11:26	0.03	531 hours	Well Located in Active Filling Area.	1	17: Gas Collection		Automatic (Go to Section 11)	1 to 3 Procedure No.	х	No (Stop)	No (Stop)	-
No. 1	Well ID Number:233			0.00		Well Raised.	1	13: Inspection and Maintenance		Manual (Go to Section 9)			Yes (Go to Section 11)	Yes (Go to Section 12)	
<table-container> Image: state in the state in the</table-container>	Shutdown Event	6/16/22 14:30	6/16/22 14:32	0.03			1	17: Gas Collection		Automatic (Go to Section 11)		х	No (Stop)	No (Stop)	-
Normal	Well ID Number:230			0.00			1	13: Inspection and Maintenance	x	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
Weil Weil <t< td=""><td>X Shutdown Event Malfunction Event</td><td>6/28/22 8:46</td><td>6/28/22 8:48</td><td>0.03</td><td>510 hours</td><td>Well Located in Active Filling Area</td><td>1</td><td>17: Gas Collection</td><td>6/28/2022</td><td>Automatic (Go to Section 11)</td><td></td><td>x</td><td>No (Stop)</td><td>No (Stop)</td><td>1</td></t<>	X Shutdown Event Malfunction Event	6/28/22 8:46	6/28/22 8:48	0.03	510 hours	Well Located in Active Filling Area	1	17: Gas Collection	6/28/2022	Automatic (Go to Section 11)		x	No (Stop)	No (Stop)	1
Image: image	Well ID Number:230					Well Raised.	1	13: Inspection and Maintenance	×	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
Weil D starts 'F Veil D starts 'F <t< td=""><td>Shutdown Event</td><td>7/19/22 14:35</td><td>//19/22 14:37</td><td>0.03</td><td></td><td></td><td>1</td><td>17: Gas Collection</td><td>7/19/2022</td><td>Automatic (Go to Section 11)</td><td></td><td>х</td><td>No (Stop)</td><td>No (Stop)</td><td>-</td></t<>	Shutdown Event	7/19/22 14:35	//19/22 14:37	0.03			1	17: Gas Collection	7/19/2022	Automatic (Go to Section 11)		х	No (Stop)	No (Stop)	-
N N Control (C) Control (C) N	Well ID Number:176						1	13: Inspection and Maintenance	x	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
Weilesting Weilesting </td <td>X Shutdown Event</td> <td>2/22/22 15:00</td> <td>2/22/22 15:02</td> <td>0.03</td> <td>4 364 hours</td> <td>Well Located in Active Filling Area</td> <td>1</td> <td>17: Gas Collection</td> <td>2/22/2022</td> <td>Automatic (Go to Section 11)</td> <td></td> <td>х</td> <td>No (Stop)</td> <td>No (Stop)</td> <td></td>	X Shutdown Event	2/22/22 15:00	2/22/22 15:02	0.03	4 364 hours	Well Located in Active Filling Area	1	17: Gas Collection	2/22/2022	Automatic (Go to Section 11)		х	No (Stop)	No (Stop)	
Image: state in the state	Well ID Number:176						1	13: Inspection and Maintenance	x	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
Viel Unite 227 Marker 1990 Viel Use 227 kg 0 model is in the first part of the first part o	Shutdown Event	8/23/22 10:45	8/23/22 10:47	0.03			1	17: Gas Collection	8/23/2022	Automatic (Go to Section 11)		х	No (Stop)	No (Stop)	
X X	Well ID Number:222				+		1	13: Inspection and Maintenance		Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
Ver Ver </td <td>X Shutdown Event</td> <td>6/22/22 8:00</td> <td>6/22/22 8:02</td> <td>0.03</td> <td></td> <td>Well Located in Active Filling Area</td> <td>1</td> <td>17: Gas Collection</td> <td>6/22/2022</td> <td>Automatic (Go to Section 11)</td> <td></td> <td>x</td> <td>No (Stop)</td> <td>No (Stop)</td> <td>-</td>	X Shutdown Event	6/22/22 8:00	6/22/22 8:02	0.03		Well Located in Active Filling Area	1	17: Gas Collection	6/22/2022	Automatic (Go to Section 11)		x	No (Stop)	No (Stop)	-
Image: series Image: s	Well ID Number:222					Well Raised.	1	13: Inspection and Maintenance	8/1/2022	Manual (Go to Section 9)			Yes (Go to Section 11)	Yes (Go to Section 12)	
Name 2/3 (Marker Form) 71/32 (1 s.0) (3 marker form) 71/32 (1	Shutdown Event	8/1/22 14:35	8/1/22 14:37	0.03			1	17: Gas Collection		Automatic (Go to Section 11)		x	No (Stop)	No (Stop)	-
x x	Well ID Number:223						1	13: Inspection and Maintenance	x	Manual (Go to Section 9)	1 to 3 Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
Weil D Number/22 Statuber Field Main out for the section of Main out for the sectin of Main out for the section of Main out for the section of Main	X Shutdown Event	7/13/22 15:00	7/13/22 15:02	0.03	1 179 hours		1	17: Gas Collection		Automatic (Go to Section 11)		x	No (Stop)	No (Stop)	1
Mathem Mathm Mathm Mathm <td>Well ID Number:223</td> <td></td> <td></td> <td></td> <td></td> <td>1</td> <td>13: Inspection and Maintenance</td> <td>Manual (Go to Section 9)</td> <td></td> <td>Yes (Go to Section 11)</td> <td>Yes (Go to Section 12)</td> <td></td>	Well ID Number:223						1	13: Inspection and Maintenance		Manual (Go to Section 9)			Yes (Go to Section 11)	Yes (Go to Section 12)	
Wall D Number 228 (Mathous Newst Mathous Newst Ma	Shutdown Event	8/31/22 10:30	8/31/22 10:32	0.03			1	17: Gas Collection		Automatic (Go to Section 11)		x	No (Stop)	No (Stop)	-
X X	Well ID Number:225						1	13: Inspection and Maintenance	9/20/2022 X	Manual (Go to Section 9)			Yes (Go to Section 11)	Yes (Go to Section 12)	
Weil D Kumber 25 Shirtup Event Maliance for eve	X Shutdown Event	9/20/22 10:30	9/20/22 10:32	0.03	74 haven	Wall I control in Anti-in Cilling	1	17: Gas Collection		Automatic (Go to Section 11)		x	No (Stop)	No (Stop)	
A listing rest Mation for strain Mation for	Well ID Number:225					Well Raised.	1	13: Inspection and Maintenance	9/23/2022 X	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
Weil D Number 224 Startup Event Maturcino Event 8/1/22 10:30 8/1/22 10:30 8/1/22 10:30 8/1/22 10:30 0.03 113: inspection and Maintenance Maturcino Activities 8/1/22 10:30 8/1/22 10:30 0.03 Veil D Number 224 Startup Event Maturcino Event 9/1/22 0:30 0.03 0.03 1/1/2 0:01 0.03 113: inspection and Maintenance Maturcino Activities 9/1/22 0:01 0.03 0.03 No (Stop) No (Stop) Startup Event Maturcino Event 9/1/22 0:01 0.03 0.03 113: inspection and Maintenance Maturcino Activities 9/1/22 0:01 0.03 No (Stop) No (Stop) No (Stop) Startup Event Maturcino Event 9/1/22 0:02 9/1/22 0:01 0.03 7/12 hours (G1 davs) 113: inspection and Maintenance Weil Raised. 9/1/22 0:01 No (Stop) No (Stop) No (Stop) No (Stop) Startup Event Maturcino Event 9/1/22 0:01 9/1/22 0:01 0.03 7/12 hours (G1 davs) 113: inspection and Maintenance Weil Raised. 9/1/22 0:01 No (Stop) No (Stop) No (Stop) No (Stop) No (Stop) Maturcino Event Maturcino Event 9/1/22 0:01 0.03 0.03 7/12 hours (G1 davs) 113: inspection and Maintenance Weil Raised.	Shutdown Event	9/23/22 9:00	9/23/22 9:02	0.03			1	17: Gas Collection		Automatic (Go to Section 11)		x	No (Stop)	No (Stop)	-
Image: Name of the series o	Well ID Number:224						1	13: Inspection and Maintenance	x	Manual (Go to Section 9)	Procedure No.	1	Yes (Go to Section 11)	Yes (Go to Section 12)	
Weil D Number 224 Startup Event Maturcition Event 9-3022 23.59 10/122 0.01 0.03 (61 days) Weil Raise(n) 112: Inspection and Maintenance (17: Gas Collection 9-302022 (16: Weil Raising) Natural (Go to Section 9) Procedure No. 1 to 4 Veil Section 100	X Shutdown Event	8/1/22 10:30	8/1/22 10:32	0.03	1,453 hours (61 days)	Well Located in Active Filling Area	1	17: Gas Collection	8/1/2022	Automatic (Go to Section 11)		x	No (Stop)	No (Stop)	1
Statutown Event Mafunction Event 9/02/2 2/3 / 3 10/1/2 0.01 0.03 0.03 117: Gas Collection 9/02/2 / 3 4 Automatic (Go to Section 11) 1 to 4 X No (Stop) No (Stop) Well D Number 223 Mafunction Event 9/1/22 8:20 9/1/22 8:20 9/1/22 8:20 9/1/22 8:20 0.03 7/12 hours (30 days) Mafunction Activities 9/1/20 (Go to Section 12) X Manual (Go to Section 9) Procedure No. 1 to 3 Vest (Go to Section 12) Vest (Go to Section 12	Well ID Number:224					Weil Located in Active Filling Area. Well Raised.	1	13: Inspection and Maintenance	9/30/2022 X	Manual (Go to Section 9)	Brooduro No		Yes (Go to Section 11)	Yes (Go to Section 12)	
Weil D Number 223 Startup Event Mafunction Event 9/1/22 8:20 9/1/22 8:20 9/1/22 8:20 9/1/22 8:20 9/1/22 8:20 9/1/22 8:20 0.03 Yes (Go to Section 1) Ves (Go to Section 1) <thves (go="" 1)<="" section="" th="" to=""></thves>	Shutdown Event	9/30/22 23:59	10/1/22 0:01	0.03			1	17: Gas Collection		Automatic (Go to Section 11)		x	No (Stop)	No (Stop)	1
X Statution Event Mature file Mature file Ma	Well ID Number:223						1	13: Inspection and Maintenance	,		Procedure No.		Yes (Go to Section 11)	Yes (Go to Section 12)	
Weil D Number:223 Main Line Specifie and Maintenance Main Line Sp	X Shutdown Event	9/1/22 8:20	9/1/22 8:22	0.03		Wall Loosted in Anti- Elling A	1	17: Gas Collection	9/1/2022	Automatic (Go to Section 11)		x	No (Stop)	No (Stop)	-
Shrulp Event Maturction Event Naturction Event 9/30/22 23:59 10/1/22 0:01 0.03 0.03 10: // 1	Well ID Number:223						X 11	13: Inspection and Maintenance	9/30/2022 X	Manual (Go to Section 9)		-	Yes (Go to Section 11)	Yes (Go to Section 12)	
Mature tool Event	Shutdown Event	9/30/22 23:59	10/1/22 0:01	0.03				17: Gas Collection		Automatic (Go to Section 11)		x		No (Stop)	-
Stratup Event Well DNumber242 9/7/22 9:30 9/7/22 9:32 0.03 Proceeding for this inspection Proceeding for this inspection Proceeding for this inspection Proceed	Well ID Number:242						1	13: Inspection and Maintenance	x			-	Yes (Go to Section 11)	Yes (Go to Section 12)	
Maturation Event 566 hours Well Dcated in Active Hilling Area. 118: Construction Activities Active Hilling Area. 118: Construction Activities Well Daumber:242 (24 days) Well Raised. 113: Inspection and Maintenance X Manual (Go to Section 9) Yes (Go to Section 11) Yes (Go to Section 12)	X Shutdown Event	9/7/22 9:30	9/7/22 9:32	0.03			1	17: Gas Collection	9/7/2022			x			-
	Well ID Number:242					Well Located in Active Filling Area. Well Raised.	1	13: Inspection and Maintenance	x	Manual (Go to Section 9)	Procedure No. 1 to 4		,		
		9/30/22 23:59	10/1/22 0:01	0.03			1	17: Gas Collection	9/30/2022	. , ,		x	, ,	. ,	-

N/A = Not Applicable Offline Wells

(a) STANDARD OPERATING PROCEDURES

Shutdown	
Procedure No.	Procedure
1.	Ensure that there is no unsafe conditions present, contact manager immediately
2.	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
3.	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.	Procedure
1.	Ensure that there is no unsafe conditions present
2.	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.

- d. 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 NO TYPICAL RESPONSE ACTIONS
LFG Collection and Control S	System			
Blower or Other Gas Mover Equipment	Applies vacuum to welfield 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	1. Repair breakages in extraction piping 2. Clean flame arrestor 3. Repair blockages in extraction piping 4. Verify automatic valve operation, compressed air/nitrogen supply 5. Notify power tuility, 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, etc. -Collection piping blockages -Problems due to settlement (e.g. pipe separation, deformation, development of low points)	12. Repair leaks or breaks in lines or wellheads 13. Follow procedures for loss of LFG flow/blower malfunction 14. Repair blockages in collection piping 15. Repair settlement in collection piping 16. Re-install, repair, or replace piping
Blower or Other Gas Mover Equipment And Control Device	Collection and control of LFG	Loss of electrical power	Force majeure/Act of God (e.g., lightning, flood, 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	17. Check/reset breaker 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 conditions at control device	Problems with temperature -monitoring equipment Problems/failure of -thermocouple and/or thermocouple wiring -Change of LFG flow -Change of LFG quality -Problems with air louvers -Problems with air/luel controls -Change in atmospheric conditions	 26. Check/repair temperature monitoring equipment 27. Check/repair thermocouple and/or wiring 28. Follow procedures for loss of flow/blower malfunction 29. Check/adjust louvers 30. Check/adjust air/fuel controls
LFG Control Device	Combusts LFG Measures and records gas flow from collection	Loss of Flame Malfunctions of Flow Monitoring/Recording	Problems/failure of thermocouple Loss/change of LFG flow Loss/change of LFG flow Problems with air/fuel controls Problems/failure of flame sensor Problems with temperature monitoring Problems with orffice plate, pitot tube, or other in line flow measuring device	31. Check/repair temperature monitoring equipment 32. Check/repair thermocouple 33. Follow procedures for loss of flow/blower malfunction 34. Check/adjustrepair flame sensor 36. Check/adjustrepair flame sensor 36. Check/adjustrepair flow measuring device and/or wiring
Recording Device	system to control	Device	-Problems with device controls and/or wiring -Problems with chart recorder	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	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 pilot light system -Problems with air louvers -Problems with air louvers -Problems with thermocouple -Problems with thermocouple -Problems with flarme 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 diagnosis 47. Open manual louvers 48. Clean pitot orflice 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".

APPENDIX E

FLARE SSM LOG

AFFECTED EQUIPMENT: A-9 Flare

Completed By: Tino Robles/Carlos Cruz/Rajan Phadnis

Guadalupe Recycling & Disposal Facility, San Jose, CA

SSMP REPORT - Ap													
Identify Flare & Check Applicable Event		(2) End of Event Date and Time	(3) Duration	(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?		1) Did Event Cause Any hission Limit Exceedance	(12) Describe Emission Standard(s) Exceeded
Component: A-9 Flare	Date and Time	Date and Time	or Event (Hours)	Shuldown (Hours)		113: Inspection and Maintenance	Completed	Manual (Go to Section 8)		Yes (Go to Section 10)	<u> </u>	Yes (Go to Section 11)	
X Shutdown Event	4/01/22 00:00	4/01/22 00:02	0.03			116: Well Raising 117: Gas Collection	4/1/2022		Procedure 1 to 3	. ,		. ,	
Malfunction Event				4,392.00	Flare shutdown during reporting period.			Automatic (Go to Section 10)		No (Stop)		No (Stop)	
Component: A-9 Flare Startup Event	9/30/22 23:59	10/01/22 00:05	0.10		Landfill gas diverted to flare A-17.	113: Inspection and Maintenance 116: Well Raising	10/1/2022	Manual (Go to Section 8)	Procedure	Yes (Go to Section 10)		Yes (Go to Section 11)	
Shutdown Event Malfunction Event	3/30/22 23:33	10/0 //22 00:03	0.10			117: Gas Collection 118: Construction Activities		Automatic (Go to Section 10)	1 to 4	No (Stop)		No (Stop)	

 TOTAL DOWNTIME April 1, 2022 Through September 30, 2022
 4392.0

 TOTAL RUNTIME April 1, 2022 Through September 30, 2022
 0.0

 TOTAL HOURS April 1, 2022 Through September 30, 2022(HOURS):
 4392.0

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/Carlos Cruz/Rajan Phadnis

Guadalupe Recycling & Disposal Facility, San Jose, CA

SSMP REPORT - April 1	, 2022 Through Se	San Jose, CA eptember 30, 2022										
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-17 Flare						X 113: Inspection and Maintenance		X Manual (Go to Section 8)		Yes (Go to Section 10)	Yes (Go to Section 11)	
X Shutdown Event	4/20/22 16:56	4/20/22 17:00	0.07			116: Well Raising 117: Gas Collection	4/20/2022		Procedure 1 to 3	. ,	, ,	
Malfunction Event				0.60	Flare A-17 was shutdown during fire damage to the air line. Flare was	118: Construction Activities		Automatic (Go to Section 10)	1 10 5	X No (Stop)	No (Stop)	
Component: A-17 Flare X Startup Event				0.00	inspected and restarted.	X 113: Inspection and Maintenance 116: Well Raising		X Manual (Go to Section 8)	Procedure	Yes (Go to Section 10)	Yes (Go to Section 11)	
Shutdown Event	4/20/22 17:32	4/20/22 17:36	0.07			117: Gas Collection	4/20/2022	Automatic (Go to Section 10)	1 to 4	X No (Stop)	No (Stop)	
Malfunction Event Component: A-17 Flare						118: Construction Activities X 113: Inspection and Maintenance		Fillerindale (Colice Coolierinie)		х но (окор)		
Startup Event	4/23/22 12:56	4/23/22 12:58	0.03			116: Well Raising	4/23/2022	Manual (Go to Section 9)	Procedure No.	Yes (Go to Section 11)	Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	4/23/22 12.30	4/23/22 12.30	0.03		Flare A-17 shutdown during	117: Gas Collection	4/23/2022	X Automatic (Go to Section 11)	1 to 3	No (Stop)	X No (Stop)	
Component: A-17 Flare				3.23	compressor trip event. Flare was inspected and restarted.	118: Construction Activities X 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	4/23/22 16:10	4/23/22 16:16	0.10		inspecied and restaned.	116: Well Raising 117: Gas Collection	4/23/2022		Procedure No. 1 to 4		168 (00 to 060tion 12)	
Malfunction Event						117: Gas Collection 118: Construction Activities		Automatic (Go to Section 11)	1 to 4	X No (Stop)	No (Stop)	
Component: A-17 Flare						X 113: Inspection and Maintenance		X Manual (Go to Section 8)	Procedure	Yes (Go to Section 10)	Yes (Go to Section 11)	
X Shutdown Event	4/29/22 10:52	4/29/22 10:56	0.07			116: Well Raising 117: Gas Collection	4/29/2022		1 to 3	X No (Stop)	Ni- (01)	
Malfunction Event				1.03	Flare A-17 was shutdown to clear condensate slug in line. Flare was	118: Construction Activities		Automatic (Go to Section 10)	-	X No (Stop)	No (Stop)	
Component: A-17 Flare X Startup Event					inspected and restarted.	X 113: Inspection and Maintenance 116: Well Raising		X Manual (Go to Section 8)	Procedure	Yes (Go to Section 10)	Yes (Go to Section 11)	
Shutdown Event	4/29/22 11:54	4/29/22 11:58	0.07			117: Gas Collection	4/29/2022	Automatic (Go to Section 10)	1 to 4	X No (Stop)	No (Stop)	
Malfunction Event Component: A-17 Flare						118: Construction Activities X 113: Inspection and Maintenance		, ,		,		
Startup Event	5/31/22 10:26	5/31/22 10:30	0.07			116: Well Raising	5/31/2022	X Manual (Go to Section 8)	Procedure	Yes (Go to Section 10)	Yes (Go to Section 11)	
X Shutdown Event Malfunction Event	0.01122 10.20	0/0//22 10:00			Flare A-17 was shut down to replace ai	117: Gas Collection 118: Construction Activities		Automatic (Go to Section 10)	1 to 3	X No (Stop)	No (Stop)	
Component: A-17 Flare				0.77	filter on compressor. 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	5/31/22 11:12	5/31/22 11:16	0.07		inspected and restarted.	116: Well Raising 117: Gas Collection	5/31/2022	, ,	Procedure 1 to 4	. ,	, ,	
Malfunction Event						118: Construction Activities		Automatic (Go to Section 10)	1 10 4	X No (Stop)	No (Stop)	
Component: A-17 Flare Startup Event						X 113: Inspection and Maintenance		Manual (Go to Section 9)	Procedure No.	Yes (Go to Section 11)	Yes (Go to Section 12)	
X Shutdown Event	6/05/22 04:28	6/05/22 04:32	0.07		Flare A-17 shut down during PG&E unplanned power outage. Flare	117: Gas Collection	6/5/2022	X Automatic (Go to Section 11)	1 to 3	No (Stop)	X No (Stop)	
Malfunction Event Component: A-17 Flare				0.97	restarted and was inspected on the nex			. ,		,		
X Startup Event	6/05/22 05:26	6/05/22 05:30	0.07		day. RCA was filed and was assigned RCA Number 08J18.	116: Well Raising	6/5/2022	X Manual (Go to Section 9)	Procedure No.	Yes (Go to Section 11)	Yes (Go to Section 12)	
Shutdown Event Malfunction Event	0/03/22 03:20	0/03/22 03:30	0.07		NOA Number 00310.	117: Gas Collection 118: Construction Activities	0/3/2022	Automatic (Go to Section 11)	1 to 4	X No (Stop)	No (Stop)	
Component: A-17 Flare				1		X 113: Inspection and Maintenance		X Manual (Go to Section 8)		Yes (Go to Section 10)	Yes (Go to Section 11)	
Startup Event	6/06/22 10:00	6/06/22 10:04	0.07			116: Well Raising 117: Gas Collection	6/6/2022	, ,	Procedure	. ,	, ,	
X Shutdown Event Malfunction Event				1.10	Flare A-17 was shut down during inspection and maintenance. Flare was	119: Construction Activities		Automatic (Go to Section 10)	1 to 3	X No (Stop)	No (Stop)	
Component: A-17 Flare				1.10	inspected and restarted.	X 113: Inspection and Maintenance 116: Well Raising		X Manual (Go to Section 8)	Procedure	Yes (Go to Section 10)	Yes (Go to Section 11)	
X Startup Event Shutdown Event	6/06/22 11:06	6/06/22 11:10	0.07			110: Well Kaising 117: Gas Collection	6/6/2022	Automatic (Go to Section 10)	1 to 4	X No (Stop)	No. (01)	
Malfunction Event						118: Construction Activities		· · ·		X No (Stop)	No (Stop)	
Component: A-17 Flare Startup Event			0.07			X 113: Inspection and Maintenance	6/13/2022	Manual (Go to Section 9)	Procedure No.	Yes (Go to Section 11)	Yes (Go to Section 12)	
X Shutdown Event	6/13/22 07:54	6/13/22 07:58	0.07		Flare A-17 shut down due to low	117: Gas Collection	0/13/2022	X Automatic (Go to Section 11)	1 to 3	No (Stop)	X No (Stop)	
Malfunction Event Component: A-17 Flare				0.07	temperature alarm. Flare was	118: Construction Activities X 113: Inspection and Maintenance		X Manual (Carta Carting C)		No. (0. 1. 0. 1/1. 11)	V (0- 1- 0t 10)	
X Startup Event	6/13/22 07:58	6/13/22 08:02	0.07		inspected and restarted.	116: Well Raising	6/13/2022	X 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	X No (Stop)	No (Stop)	
Component: A-17 Flare				1		X 113: Inspection and Maintenance		Manual (Go to Section 9)		Yes (Go to Section 11)	Yes (Go to Section 12)	
X Shutdown Event	6/13/22 08:08	6/13/22 08:12	0.07			116: Well Raising 117: Gas Collection	6/13/2022	, ,	Procedure No. 1 to 3	. ,	, ,	
Malfunction Event				0.37	Flare A-17 shutdown during startup sequence. Flare was inspected and	118: Construction Activities		X Automatic (Go to Section 11)	1 10 0	No (Stop)	X No (Stop)	
Component: A-17 Flare X Startup Event					restarted.	X 113: Inspection and Maintenance 116: Well Raising		X Manual (Go to Section 9)	Procedure No.	Yes (Go to Section 11)	Yes (Go to Section 12)	
Shutdown Event	6/13/22 08:30	6/13/22 08:34	0.07			117: Gas Collection	6/13/2022	Automatic (Go to Section 11)	1 to 4	X No (Stop)	No (Stop)	
Malfunction Event Component: A-17 Flare						118: Construction Activities X 113: Inspection and Maintenance		, ,		,		
Startup Event	6/16/22 11:00	6/16/22 11:04	0.07			116: Well Raising	6/16/2022	X Manual (Go to Section 8)	Procedure	Yes (Go to Section 10)	Yes (Go to Section 11)	
X Shutdown Event Malfunction Event		3/10/22 11:04			Flare A-17 was shut down during	117: Gas Collection 118: Construction Activities		Automatic (Go to Section 10)	1 to 3	X No (Stop)	No (Stop)	
Component: A-17 Flare				3.47	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	6/16/22 14:28	6/16/22 14:32	0.07		anapootou anu rostandu.	116: Well Raising 117: Gas Collection	6/16/2022	1 · · · · · · · · · · · · · · · · · · ·	Procedure 1 to 4	. ,		
Malfunction Event						118: Construction Activities		Automatic (Go to Section 10)	1 10 4	X 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/Carlos Cruz/Rajan Phadnis

Guadalupe Recycling & Disposal Facility, San Jose, CA

SSMP REPORT - April 1															
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?		1) Did Event Cause Any nission Limit Exceedance	(12) Describe Emission Standard(s) Exceeded
Component: A-17 Flare	-					X 113: Inspection and Maintenance			Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
Startup Event X Shutdown Event	6/22/22 07:10	6/22/22 07:14	0.07			116: Well Raising 117: Gas Collection	6/22/2022	+-	Automatic (Oc. 1: Oc. 1) - (4)	1 to 3		N= (0+)	x	No (01)	-
Malfunction Event				3.20	Flare A-17 shutdown due to low temperature alarm. Flare was	118: Construction Activities		X	Automatic (Go to Section 11)			No (Stop)	^	No (Stop)	
Component: A-17 Flare X Startup Event	·				inspected and restarted.	X 113: Inspection and Maintenance 116: Well Raising		X	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
Shutdown Event	6/22/22 10:22	6/22/22 10:26	0.07			117: Gas Collection	6/22/2022		Automatic (Go to Section 11)	1 to 4	×	No (Stop)		No (Stop)	
Malfunction Event Component: A-17 Flare						118: Construction Activities X 113: Inspection and Maintenance			. ,				-		
Startup Event	6/27/22 10:12	6/27/22 10:16	0.07			116: Well Raising	6/27/2022	×	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
X Shutdown Event Malfunction Event	0/2//22 10:12	0/2//22 10:10	0.07		Flare A-17 was shut down to clean	117: Gas Collection 118: Construction Activities	GENEOLE		Automatic (Go to Section 10)	1 to 3	X	No (Stop)		No (Stop)	
Component: A-17 Flare				0.23	flowmeter probe. Flare was inspected and restarted.	X 113: Inspection and Maintenance		×	Manual (Go to Section 8)		-	Yes (Go to Section 10)		Yes (Go to Section 11)	
X Startup Event Shutdown Event	6/27/22 10:26	6/27/22 10:30	0.07		and restance.	116: Well Raising 117: Gas Collection	6/27/2022	Ļ	. ,	Procedure 1 to 4		, ,	1	, , ,	-
Malfunction Event						117: Gas Collection 118: Construction Activities			Automatic (Go to Section 10)	1 to 4	X	No (Stop)		No (Stop)	
Component: A-17 Flare	-					X 113: Inspection and Maintenance		X	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
X Shutdown Event	7/11/22 07:20	7/11/22 07:24	0.07		Flare A-17 was shut down during	116: Well Raising 117: Gas Collection	7/11/2022	-	Automatic (Go to Section 10)	1 to 3	x	No (Stop)	-	No (Stop)	-
Malfunction Event				1.30	Flare A-17 was shut down during inspection and maintenance.Flare was	118: Construction Activities			Automatic (Go to Section 10)		^	NO (Stop)		ino (Stop)	
Component: A-17 Flare X Startup Event					inspected and restarted.	X 113: Inspection and Maintenance 116: Well Raising	7/11/2022	×	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
Shutdown Event	7/11/22 08:38	7/11/22 08:42	0.07			117: Gas Collection	//11/2022		Automatic (Go to Section 10)	1 to 4	X	No (Stop)		No (Stop)	
Malfunction Event Component: A-17 Flare				1		118: Construction Activities X 113: Inspection and Maintenance		-			-	,			
Startup Event	7/11/22 18:36	7/11/22 18:40	0.07		Flare A-17 shutdown during PG&E	116: Well Raising	7/11/2022		Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	2	Yes (Go to Section 12)	
X Shutdown Event Malfunction Event	111122 10.00	1711122 10.10			unplanned power outage. Flare	117: Gas Collection 118: Construction Activities		X	Automatic (Go to Section 11)	1 to 3		No (Stop)	X	No (Stop)	
Component: A-17 Flare				1.43	restarted and was inspected on the next day. RCA was filed and was assigned	X 113: Inspection and Maintenance		×	Manual (Go to Section 9)			Yes (Go to Section 11)		Yes (Go to Section 12)	
X Startup Event Shutdown Event	7/11/22 20:02	7/11/22 20:06	0.07		RCA Number 08K15.	116: Well Raising 117: Gas Collection	7/11/2022	<u> </u>		Procedure No. 1 to 4		, ,	-	, , ,	-
Malfunction Event						118: Construction Activities			Automatic (Go to Section 11)	1 10 4	X	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event	-					X 113: Inspection and Maintenance		X	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
X Shutdown Event	7/15/22 13:28	7/15/22 13:32	0.07		Flare A-17 was shut down by	117: Gas Collection	7/15/2022		Automatic (Go to Section 10)	1 to 3	x	No (Stop)	-	No (Stop)	-
Malfunction Event				0.20	electrician during inspection and	118: Construction Activities		_	Automatic (Go to Section 10)		^	No (Stop)		No (Stop)	
Component: A-17 Flare X Startup Event	7/45/00 40.40	7/45/00 40:44	0.07		maintenance. Flare was inspected and restarted.	X 113: Inspection and Maintenance 116: Well Raising	7/15/0000	×	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
Shutdown Event	7/15/22 13:40	7/15/22 13:44	0.07			117: Gas Collection	7/15/2022		Automatic (Go to Section 10)	1 to 4	X	No (Stop)		No (Stop)	
Malfunction Event Component: A-17 Flare						118: Construction Activities X 113: Inspection and Maintenance			Manual (Os to Os ation O)		-	X (0- 1- 0- 1- 10)			
Startup Event	7/26/22 07:56	7/26/22 08:00	0.07			116: Well Raising	7/26/2022	Ĺ	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)	'	Yes (Go to Section 11)	
X Shutdown Event Malfunction Event					Flare A-17 was shut down during repair	117: Gas Collection 118: Construction Activities			Automatic (Go to Section 10)	1 to 3	X	No (Stop)		No (Stop)	
Component: A-17 Flare				4.20	on lateral line. Flare was inspected and restarted	X 113: Inspection and Maintenance		x	Manual (Go to Section 8)		1	Yes (Go to Section 10)		Yes (Go to Section 11)	
X Startup Event Shutdown Event	7/26/22 12:08	7/26/22 12:12	0.07			116: Well Raising 117: Gas Collection	7/26/2022	-		Procedure 1 to 4		, ,	-	. ,	-
Malfunction Event						118: Construction Activities			Automatic (Go to Section 10)	1 10 4	X	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event	-					X 113: Inspection and Maintenance		X	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
X Shutdown Event	7/28/22 13:16	7/28/22 13:20	0.07		Flare A-17 was shut down during	117: Gas Collection	7/28/2022		Automatic (Go to Section 10)	1 to 3	x	No (Stop)	1	No (Stop)	
Malfunction Event Component: A-17 Flare				0.43	maintenance on flowmeter. Flare was	118: Construction Activities X 113: Inspection and Maintenance		-	. ,		<u>^</u>	,	-		
X Startup Event	7/28/22 13:42	7/28/22 13:46	0.07		inspected and restarted.	116: Well Raising	7/28/2022	×	Manual (Go to Section 8)	Procedure		Yes (Go to Section 10)		Yes (Go to Section 11)	
Shutdown Event Malfunction Event	1120/22 13.42	1120/22 13.40	0.07			117: Gas Collection 118: Construction Activities	1120/2022		Automatic (Go to Section 10)	1 to 4	X	No (Stop)		No (Stop)	
Component: A-17 Flare				1		X 113: Inspection and Maintenance			Manual (Go to Section 8)		-	Yes (Go to Section 10)		Yes (Go to Section 11)	
Startup Event	7/28/22 13:52	7/28/22 13:56	0.07			116: Well Raising	7/28/2022	Ļ	Manual (Go to Section 6)	Procedure		168 (00 to dection 10)	1	165 (00 to 06010111)	-
X Shutdown Event Malfunction Event					Flare A-17 was shut down during	117: Gas Collection 118: Construction Activities			Automatic (Go to Section 10)	1 to 3	X	No (Stop)		No (Stop)	
Component: A-17 Flare				0.27	maintenance on flowmeter. 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	7/28/22 14:08	7/28/22 14:12	0.07			116: Well Raising 117: Gas Collection	7/28/2022	-		Procedure 1 to 4			+		-
Malfunction Event						118: Construction Activities			Automatic (Go to Section 10)		<u> </u>	No (Stop)		No (Stop)	
Component: A-17 Flare Startup Event	-					X 113: Inspection and Maintenance	a (a (a a a -		Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)		Yes (Go to Section 12)	
X Shutdown Event	8/08/22 11:06	8/08/22 11:10	0.07		Flare A-17 shutdown during PG&E unplanned power outage. RCA was	117: Gas Collection	8/8/2022	+x	Automatic (Go to Section 11)	1 to 3		No (Stop)	×	No (Stop)	1
Malfunction Event Component: A-17 Flare				0.87	filed and RCA Number 08K82 was	118: Construction Activities X 113: Inspection and Maintenance			. ,		-	,	<u>+</u> ^		
X Startup Event	8/08/22 11:58	8/08/22 12:02	0.07		assigned.Flare was inspected and restarted.	116: Well Raising	8/8/2022	X	Manual (Go to Section 9)	Procedure No.		Yes (Go to Section 11)	1	Yes (Go to Section 12)	
Shutdown Event	0/00/22 11.08	0/00/22 12.02	0.07		restanceu.	117: Gas Collection	0/0/2022		Automatic (Go to Section 11)	1 to 4	X	No (Stop)		No (Stop)	
Malfunction Event	1			1	1	118: Construction Activities	1	1	1		1		1		<u> </u>

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/Carlos Cruz/Rajan Phadnis

Guadalupe Recycling & Disposal Facility, San Jose, CA

SSMP REPORT - April 1	, 2022 Through Se													
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 9?	(11) Did Event Cause Any Emission Limit Exceedance	(12) Describe Emission Standard(s) Exceeded
Component: A-17 Flare Startup Event X Shutdown Event Malfunction Event	8/11/22 10:58	8/11/22 11:02	0.07	1.67	Flare A-17 was shut down during lateral repair work. Flare was inspected	X 113: Inspection and Maintenance 116: Well Raising 117: Gas Collection 118: Construction Activities	8/11/2022	x	Manual (Go to Section 8) Automatic (Go to Section 10)	Procedure 1 to 3	x	Yes (Go to Section 10) No (Stop)	Yes (Go to Section 11) No (Stop)	
Component: A-17 Flare X Startup Event Shutdown Event Malfunction Event	8/11/22 12:38	8/11/22 12:42	0.07	1.07	and restarted.	X 113: Inspection and Maintenance 116: Well Raising 117: Gas Collection 118: Construction Activities	8/11/2022	x	Manual (Go to Section 8) Automatic (Go to Section 10)	Procedure 1 to 4	x	Yes (Go to Section 10) No (Stop)	Yes (Go to Section 11) No (Stop)	
Component: A-17 Flare Startup Event X Shutdown Event Malfunction Event	8/25/22 10:36	8/25/22 10:40	0.07	- 5.37	Flare A-17 was shut down during lateral repair work. Flare was inspected	X 113: Inspection and Maintenance 116: Well Raising 117: Gas Collection 118: Construction Activities	8/25/2022	×	Manual (Go to Section 8) Automatic (Go to Section 10)	Procedure 1 to 3	x	Yes (Go to Section 10) No (Stop)	Yes (Go to Section 11) No (Stop)	
Component: A-17 Flare X Startup Event Shutdown Event Malfunction Event	8/25/22 15:58	8/25/22 16:02	0.07	5.37	and restarted.	X 113: Inspection and Maintenance 116: Well Raising 117: Gas Collection 118: Construction Activities	8/25/2022	x	Manual (Go to Section 8) Automatic (Go to Section 10)	Procedure 1 to 4	x	Yes (Go to Section 10) No (Stop)	Yes (Go to Section 11) No (Stop)	
Component: A-17 Flare Startup Event X Shutdown Event Malfunction Event	8/26/22 15:36	8/26/22 15:40	0.07	0.47	Flare A-17 was shut down during inspection and maintenance. Flare was	X 113: Inspection and Maintenance 116: Well Raising 117: Gas Collection 118: Construction Activities	8/26/2022	х	Manual (Go to Section 8) Automatic (Go to Section 10)	Procedure 1 to 3	x	Yes (Go to Section 10) No (Stop)	Yes (Go to Section 11) No (Stop)	
Component: A-17 Flare X Startup Event Shutdown Event Malfunction Event	8/26/22 16:04	8/26/22 16:08	0.07	0.47	inspected and restarted.	X 113: Inspection and Maintenance 116: Well Raising 117: Gas Collection 118: Construction Activities	8/26/2022	×	Manual (Go to Section 8) Automatic (Go to Section 10)	Procedure 1 to 4	x	Yes (Go to Section 10) No (Stop)	Yes (Go to Section 11) No (Stop)	
Component: A-17 Flare Startup Event X Shutdown Event Malfunction Event	8/30/22 08:50	8/30/22 08:54	0.07	- 1.90	Flare A-17 was shut down during inspection and maintenance. Flare was	X 113: Inspection and Maintenance 116: Well Raising 117: Gas Collection 118: Construction Activities	8/30/2022	x	Manual (Go to Section 8) Automatic (Go to Section 10)	Procedure 1 to 3	x	Yes (Go to Section 10) No (Stop)	Yes (Go to Section 11) No (Stop)	
Component: A-17 Flare X Startup Event Shutdown Event Malfunction Event	8/30/22 10:44	8/30/22 10:48	0.07	- 1.90	inspected and restarted.	X 113: Inspection and Maintenance 116: Well Raising 117: Gas Collection 118: Construction Activities	8/30/2022	x	Manual (Go to Section 8) Automatic (Go to Section 10)	Procedure 1 to 4	x	Yes (Go to Section 10) No (Stop)	Yes (Go to Section 11) No (Stop)	
Component: A-17 Flare Startup Event X Shutdown Event Malfunction Event	8/31/22 07:06	8/31/22 07:10	0.07	1.33	Flare A-17 was shut down during inspection and maintenance. Flare was	X 113: Inspection and Maintenance 116: Well Raising 117: Gas Collection 118: Construction Activities	8/31/2022	x	Manual (Go to Section 8) Automatic (Go to Section 10)	Procedure 1 to 3	x	Yes (Go to Section 10) No (Stop)	Yes (Go to Section 11) No (Stop)	
Component: A-17 Flare X Startup Event Shutdown Event Malfunction Event	8/31/22 08:26	8/31/22 08:30	0.07	1.33	inspected and restarted.	X 113: Inspection and Maintenance 116: Well Raising 117: Gas Collection 118: Construction Activities	8/31/2022	x	Manual (Go to Section 8) Automatic (Go to Section 10)	Procedure 1 to 4	x	Yes (Go to Section 10) No (Stop)	Yes (Go to Section 11) No (Stop)	

TOTAL DOWNTIME April 1, 2022 Through September 30, 2022 (HOURS): TOTAL RUNTIME April 1, 2022 Through September 30, 2022 (HOURS): TOTAL HOURS April 1, 2022 Through September 30, 2022(HOURS): 34.47 4333.5 4368.0

(a) STANDARD OPERATING PROCEDURES

Shutdown	
Procedure No.	Procedure
1.	Ensure that there is no unsafe conditions present, contact manager immediately
2.	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
3.	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.	Procedure
1.	Ensure that there is no unsafe conditions present
2.	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
	c. Alarms are cleared
	d. 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 NO TYPICAL RESPONSE ACTIONS
		EVENT		
LFG Collection and Control S		Loss of LFG Flow/Blower	-Flame arrestor fouling/deterioration	1. Repair breakages in extraction piping
Blower or Other Gas Mover Equipment	Applies vacuum to wellfield to extract LFG and transport to control device	Loss of LFG Flow/blower Malfunction	riame arrestor rouning/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. Kepair 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	Conduits for extractions	Collection well and pipe	-Break/crack in header or lateral piping	12. Repair leaks or breaks in lines or wellheads
Collection Piping	and movement of LFG flow	failures	Leaks at wellheads, valves, flanges, Test ports, seals, couplings, etc. -Collection piping blockages -Problems due to settlement (e.g. pipe separation, deformation, development of low points)	 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			16. Re-install, repair, or replace piping
Equipment And Control Device	LFG	Loss of electrical power	Force majeure/Act of God (e.g., lightning, flood, 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	 Check/repair electrical panel components Check/repair transformer Check/repair motor starter Check/repair motor starter Check/repair electrical line Test amperage to various equipment Contact electricity supplier Contact/contract electrician 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/fuel controls -Change in atmospheric conditions	 Check/repair thermocouple and/or wiring Follow 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 Problems with temperature monitoring	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 36. Check/adjust LFG collectors
Flow Monitoring/	Measures and records	Malfunctions of Flow	-Problems with orifice plate, pitot tube, or other in	37. Check/adjust/repair flow measuring device and/or
Recording Device	gas flow from collection system to control	Monitoring/Recording Device	line flow measuring device -Problems with device controls and/or wiring -Problems with chart recorder	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	40. Check/adjust/repair thermocouple 41. Check/adjust/repair controller and/or wiring 42. Check/adjust/repair clectrical 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 flate insulation -Problems with plat light system -Problems with air louvers -Problems with air/fuel controllers -Problems with thermocouple -Problems with thermocouple -Problems with thermocouple -Problems with flate 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. Refill propane supply 51. Check/repair pilot sparking system

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

APPENDIX F

TEMPERATURE DEVIATION / INOPERATIVE MONITOR / MISSING DATA REPORT

EMPERATURE DEVIATIO	ON/ INOPERATIVE MONI	TOR/MISSING DATA REPOR	T - From April 1, 2022 Through September 30, 2022			
lare A-9			······································			
REPORT PREPARED BY:		Rajan Phadnis			DATE:	October 1, 2022
TEMPERATURE SENSING	B 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 or	ccurred in April 2022		1
			No deviations, inoperative monitors, or missing data or	ccurred in May 2022		
			No deviations, inoperative monitors, or missing data or	ccurred in June 2022		
			No deviations, inoperative monitors, or missing data o	ccurred in July 2022		
			No deviations, inoperative monitors, or missing data occ	curred in August 2022		
			No deviations, inoperative monitors, or missing data occu	rred in September 2022		
	°F= degrees Fahrenheit		· · · · · · · · · · · · · · · · · · ·			

NOTES:

COMMENTS:

scfm= standard cubic feet per minute

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.

. , ,	Disposal Facility, San Jo					
EMPERATURE DEVIAT	TION/ INOPERATIVE MOI	NITOR/MISSING DATA REPO	RT - From April 1, 2022 Through September 30, 2022			
Flare A-17 (previously d	lesignated as A-14)					
REPORT PREPARED BY	Y:	Rajan Phadnis			DATE:	October 1, 2022
TEMPERATURE SENSIN	NG DEVICE:	Thermocouple			MODEL:	Thermo-Electric
START DATE & TIME	END DATE & TIME	DURATION (HOURS)	TEMP (°F)/ FLOW (scfm)	CAUSE	EXPLANATION	ACTION TAKEN
1			No deviations, inoperative monitors, or missing data or			
			No deviations, inoperative monitors, or missing data of	ccurred in May 2022		
			No deviations, inoperative monitors, or missing data or	ccurred in June 2022		
			No deviations, inoperative monitors, or missing data o	ccurred in July 2022		
			No deviations, inoperative monitors, or missing data occ	curred in August 2022		
			No deviations, inoperative monitors, or missing data occu	rred in September 2022		
	°F= degrees Fahrenheit					

NOTES:

scfm= standard cubic feet per minute

COMMENTS:

The A-17 Flare combustion zone 3-hour average temperature did not drop below the 1,449°F limit established in the February 16, 2022 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

APPENDIX G

COVER INTEGRITY MONITORING REPORTS

LOCATION: Guadalupe Rubbish Disposal Company, Inc. INSPECTION DATE: April 26, 2022 TECHNICIAN: Tino Robles

COVER & VEGETATION	Y	ES	NO	COMMENTS
Settling of cap			X	
Dead vegetation			X	
Erosion on cap system			X	
Erosion on side slopes			X	
Ponding of water on cap			X	
Surface cracking			X	
Acceptable vegetation		X		
Exposed waste			X	
REPAIR AREAS:				
Location Description (cell and near-by wells)	Date of Re	pair	Desc	ription of Repair (add soil, water)
Note: Monthly cover integrity monitoring is perform	ed pursuant to BAAQ	MD Reg	gulation 8-34-5	501.4

LOCATION:Guadalupe Rubbish Disposal Company, Inc.INSPECTION DATE:May 20 and 31, 2022TECHNICIAN:Tino Robles

COVER & VEGETATION	YES	NO	COMMENTS
Settling of cap		X	
Dead vegetation		X	
Erosion on cap system		X	
Erosion on side slopes		X	
Ponding of water on cap		X	
Surface cracking	X		Near front face
Acceptable vegetation	X		
Exposed waste		X	
REPAIR AREAS:			
Location Description (cell and near-by wells)	Date of Repair	Desc	ription of Repair (add soil, water)
Near front face of Landfill	5.31.2022	Added soil and	compacted

LOCATION: Guadalupe Rubbish Disposal Company, Inc. INSPECTION DATE: June 27, 2022 TECHNICIAN: Carlos Cruz

COVER & VEGETATION	YES	NO	COMMENTS	
Settling of cap		X		
Dead vegetation		X		
Erosion on cap system		X		
Erosion on side slopes		X		
Ponding of water on cap		X		
Surface cracking		X		
Acceptable vegetation	X			
Exposed waste		X		
REPAIR AREAS:				
Location Description (cell and near-by wells)	Date of Repair	Description of Repair (add soil, water)		

LOCATION: Guadalupe Rubbish Disposal Company, Inc. INSPECTION DATE: July 27, 2022

TECHNICIAN: Carlos Cruz

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	X			
Exposed waste		X		
REPAIR AREAS:				
Location Description (cell and near-by wells)	Date of Repair	Description of Repair (add soil, water)		

LOCATION: Guadalupe Rubbish Disposal Company, Inc. INSPECTION DATE: August 29, 2022 TECHNICIAN: Carlos Cruz

COVER & VEGETATION	YES	NO	COMMENTS	
Settling of cap		Х		
Dead vegetation		X		
Erosion on cap system		X		
Erosion on side slopes		X		
Ponding of water on cap		X		
Surface cracking		X		
Acceptable vegetation	X			
Exposed waste		X		
REPAIR AREAS:				
Location Description (cell and near-by wells)	Date of Repair	Description of Repair (add soil, water)		

LOCATION: Guadalupe Rubbish Disposal Company, Inc. INSPECTION DATE: •September 23, 2022 TECHNICIAN: Carlos Cruz

COVER & VEGETATION	YES	NO	COMMENTS	
Settling of cap		X		
Dead vegetation		X		
Erosion on cap system		X		
Erosion on side slopes		X		
Ponding of water on cap		X		
Surface cracking		X		
Acceptable vegetation	X			
Exposed waste		X		
REPAIR AREAS:				
Location Description (cell and near-by wells)	Date of Repair	Description of Repair (add soil, water)		

APPENDIX H

SURFACE EMISSIONS AND COMPONENT LEAK MONITORING REPORTS



July 11, 2022

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

Re: Second 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 Second 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).

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.
 - If the re-monitoring event shows the exceedance is corrected, the location shall be re-monitored within 1 month of the initial exceedance.
 - 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 re-monitoring 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.

SECOND QUARTER 2022 SEM AND COMPONENT LEAK RESULTS

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

Instantaneous Surface Emissions Monitoring Results

The Instantaneous surface monitoring was performed on April 13, 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 was one exceedance location of 500 ppm_v as methane detected on April 13, 2022. Corrective actions to initiate repairs of the exceedances were completed within five days for all locations (April 14, 2022).

Ten-Day Re-Monitoring Results

The 10-day re-monitoring event was completed on April 14, 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 May 9, 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 April 12, 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 April 12, 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 April 13, 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.

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

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

2022 QUARTER: 2

PERFORMED BY: RES

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Flag Number	Grid Number	Date of Monitoring	Concentration of Emission (ppmv)	Comments
1	90	4/13/2022	1,500	Well 112
Notes: Please refer	to field data sheets fo	r details		

Table A.2Instantaneous Landfill Surface Emissions MonitoringExceedance and Monitoring Logs (NSPS/BAAQMD 8-34)

 2022 QUARTER:
 2

 INITIAL MONITORING PERFORMED BY:
 RES

 FOLLOW-UP MONITORING PERFORMED BY:
 WM-Tino Robles

 LANDFILL NAME:
 Guadalupe Recycling & Disposal Facility

Initi	al Monitoring	Event	Corr	Corrective action within 5 days 1st 10-day Follow-Up		/-Up	1st 3	0-day Follow	/-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	4/13/2022	1,500	4/14/2022	Becs tuned and added soil & compacted	4/14/2022	19		5/9/2022	4		112

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

 2022 QUARTER:
 2

 INITIAL MONITORING PERFORMED BY:
 RES

 FOLLOW-UP MONITORING PERFORMED BY:
 WM-Tino Robles

 LANDFILL NAME:
 Guadalupe Recycling & Disposal Facility

Init	ial Monitoring Event	· · · · · · · · · · · · · · · · · · ·			2nd Re-	mon Event -	10 Days		
Exceedance	Monitoring	Monitoring Field Monitoring No Exced. Exced. Monitoring No Exced. Exce		Exced.					
Grid ID No.	Date	Reading	Date	<500 ppm	>500 ppm	Date	<500 ppm	>500 ppm	Comments
90	4/13/2022	1,500	4/14/2022	19	-				185

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

2022 QUARTER: Q2 INITIAL MONITORING PERFORMED BY: RES FOLLOW-UP MONITORING PERFORMED BY: Tino Robles LANDFILL NAME: Guadalupe

LANDFI	LL NAME:	Guadalup	e		Wind Direct Wind Spee			Wind Di Wind Sp		IW	
Initia	Monitoring	g Event	Cor	rective 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	WELL
1	4/13/2022	1,500	4/14/2022	Becs increase to fully open/added & pack soil	4/14/2022	19		5/9/2022	4		112

Personnel:	LEISTWADS	DNISLFANDMANY	
	RICICIENOS	NILL BEALLS	
	celvin onfiz		Cal. Gas Exp. Date: <u>6-9-23</u>
Date: 9	1-13-22 Instrument L	Jsed: +VA1000	Grid Spacing: 25'

Temperature: <u>36</u> Precip: <u>D</u> Upwind BG: <u>2.6</u> Downwind BG: <u>2.2</u>

GRID ID	STAFF	START	STOP	STOP TOC TIME PPM	WIN	D INFORM	REMARKS	
	INITIALS				AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	KEHAKKO
1	Lw	0550	0605	22	10	6	7	
2	RL	0550	0685	14	6	Ś	7	
3	PA	0550	0605	18	10	G	7	
4	20	0850	0605	26	6	8	7	
5	NB	0550	0605	39	6	8	T	
6	LW	0605	0620	31	4	10 10	5	
2	Re	0605	0620	24	4	10	5	
8	PA	0605	0620	39	4	6	5	
9	20	0605	0620	22	4	6	56	
10	NB	0685	0620	44	45	4		
11	LW	0620	0635	30		5	4	
12	RL	0620	0631	26	5	5	4	
13	Øß	0620	0635	51	5	5	4	
15	-00	0620	0635	22	5	55	4	
16	ND	0820	0635	37	5	5	4	
19	LW	0635	0650	26	5	6	5	
20	RL	0635	0650	20	5	6	5	
21	DA	6635	0650	58	5	6	555	
24	00	0635	0650	21	5	4	5	
25	NO	0635	8650	27	5	V	5	
26	LW	0650	0705	31	4	6	6	
29	RC	0650	2010	16	et	10	6	
30	PA	0650	0705	22	4	6	6	
3/	20	0650	0705	26	4	6	Ý	
35	NB	0650	0705	15	4	6	4	
36	LW	6705	0720	39	4	6	5	
32	RL	2050	0)20	52	4	6	5	
41	DA	0705	0728	30	4	6	555	
42	C0	0705	0720	51	4	U	5	
43	NB	0705	-0720	30	4	6	5	

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Personnel	LEISHWADE	PWIGHTANDERSON	
	PILICIENOS	NILL BENICO	
	- CELVIN ONFIZ		Cal. Gas Exp. Date: 6-9-23

Date <u>4-13-22</u> Instrument Used: <u>4VA 1000</u> Grid Spacing: <u>25'</u>

Temperature: <u>U2</u> Precip: <u>0</u> Upwind BG: <u>2.6</u> Downwind BG: <u>2.2</u>

GRID ID	STAFF	START	STOP	тос	WIN	REMARKS		
	INITIALS	TIME TIME		PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	KLIMARKO
47	LW	0720	0735	17	5	6	5	
48	RL	0720	6735	21	5	6	5	
49	OA	0720	0735	37	5	6	5	
50	20	0720	0735	36		6	5	
54	NO	0720	0735	32	5	6	5	
55	LW	0735	0750	34	554	5	5	
59	RL	0735	0750	49	4	6	5	
60	DA	0735	0750	38	4	5	5	
61	Co	0735	0750	43	4	5	5	
64	NO	0735	0750	71	4	5	55	
65	cw	6750	0805	37	6	8	6	
66	KL	0750	2080	21	6	G	6	
67	DA	0750	0805	106	6	G	6	
69	-60	0750	0805	22	6	5	6	4
70	NB	0750	0805	84	6	S		
71	L.	0805	0820	29	4	6	5	
72	ne	0885	0822	35	4	6	5	
73	DA	2080	0820	26	4	6	5	
74	00	0805	0820	21	4	6	55	
75	NB	0805	0820	44	4	6	5	
76	6	0820	0835	66	4	5	6	
77	RL	0820	0835	91	4	5	6	
78	DA	0820	2890	32	4	5	6	
79	00	0820	0825	35	4	5	6	
80	NB	0820	0835	49	4	5	4	
81	4	0832	0850	70	5	7	5	
82	RC	0835	0850	25	5	7	55	
83	DA	0835	0850	21	5	7	5	
84	Lo	0835	0850	82		1	5	
86	NB	0835	0850	41	5	1	16	

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	RICICI	UADE Enos Norti	7.	NICKO	<i>lenks</i>	_	<u><u><u></u></u></u>	5 5 1021		
		o L Pri	-				Cal. Gas	Exp. Date: 6-9-23		
ate: 4	-13-22	Instru	ment Use	d: tu	41000	Gri	d Spacing:	25'		
emperat	ure: <u>4</u> 4	2 Pre	cip:	3 Up	wind BG:	2.6	Downw	vind BG: 2.2		
GRID ID	STAFF	START	STOP	тос	WIN	ID INFORM	ATION	REMARKS		
	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT			
87	LW	0850	0905	14	5	6	5			
90	RL	0850	0905	1500	5	b		WE1/112		
91	DA	0850	0805	11	5	6	55			
92	CD	0850	0805	14		6	5			
95	NB		6905		55	6	55			
99	w	0205	0920	14	6	E	1			
101	RL	0805	0920	22	6	T	7			
103		0805		14	6	8	1			
104	CO	0905	0920		6	G	1			
105	NB	0503	0820	21	6	8	7			
							11			
		1		1						
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	71									
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2							Cal Gas	Eva Data:				
								Exp. Date:				
ate: <u>4</u> -	-13-22	Instrum	nent Used		_	Gri	d Spacing:					
emperat	ure:	Prec	cip:	Upi	wind BG:		Downv	vind BG:				
GRID ID	STAFF	START	STOP	тос	WIN	ID INFORM	ATION	REMARKS				
85	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	NEL HAILO				
						1	-	Active-these				
88				_				1				
89												
93								1				
94.												
96 97					1.5	1.2.2.1						
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98							8					
100						1						
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14					1			STEEP SlopES				
17 18												
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22	-											
27												
32												
38												
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51					1							
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23				2-2-2-2				NOWASTEINPlac				
28					1			1				
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34						1000						
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52			C									
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								xp. Date:		
oate: 4	-13-22	_ Instrum	nent Used	:		Gri	d Spacing: _			
			Upwind BG: Downwind BG:							
GRID ID	STAFF	START	STOP	TOC PPM	WIND INFORMATION			REMARKS		
	INITIALS	TIME	TIME		AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	REFINING		
57 58					1					
62										
68								V		
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GUADALUPE LANDFILL - MONITORING POINTS FOR SEM - UPDATED ON 11-09-2021

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NOTES	WAS 2019 PW2					WAS 2019 PW3											LCRS SOUTH					WAS 2019 PW15													WAS 2019 PW4						WAS 2019 PW10	WAS 2019 PW8	
READING (PPM)	22	17	24	51	26	15	61	51	22	35	27	52	32	18	26	14	50	51	29	17	22	3 to	72	29	36	34	2 4	17	49	38	25	15	77	21	53	106	85	114	25	33	22	16	00
DATE	4-13-21																																										
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	50	50	55	55	55	59	60	60	60	60	60	61	62	62	62	65	65	65	65	CC .
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	-121.8981348	-121.8986237	111 0075753
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			37.2144877	37.2147005								37.2141842						37.2141842	
POINT TYPE		LFG Collector - Standard		LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard		LFG Collector - Standard		LFG Collector - Standard	LFG Collector - Standard		LFG Collector - Standard	Leachate Riser or Sump (LR)	LFG Collector - Standard	LFG Collector - Standard	LFG Collector - Standard		LFG Collector - Standard		LFG Collector - Standard	Condensate Sump or Drain (CS)			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	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	LC-241	LC-243	100 /11
Point ID	60102	51832	54151	54151	49167	60099		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	60106	60108	1 4 4 C 4
No.	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	90

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

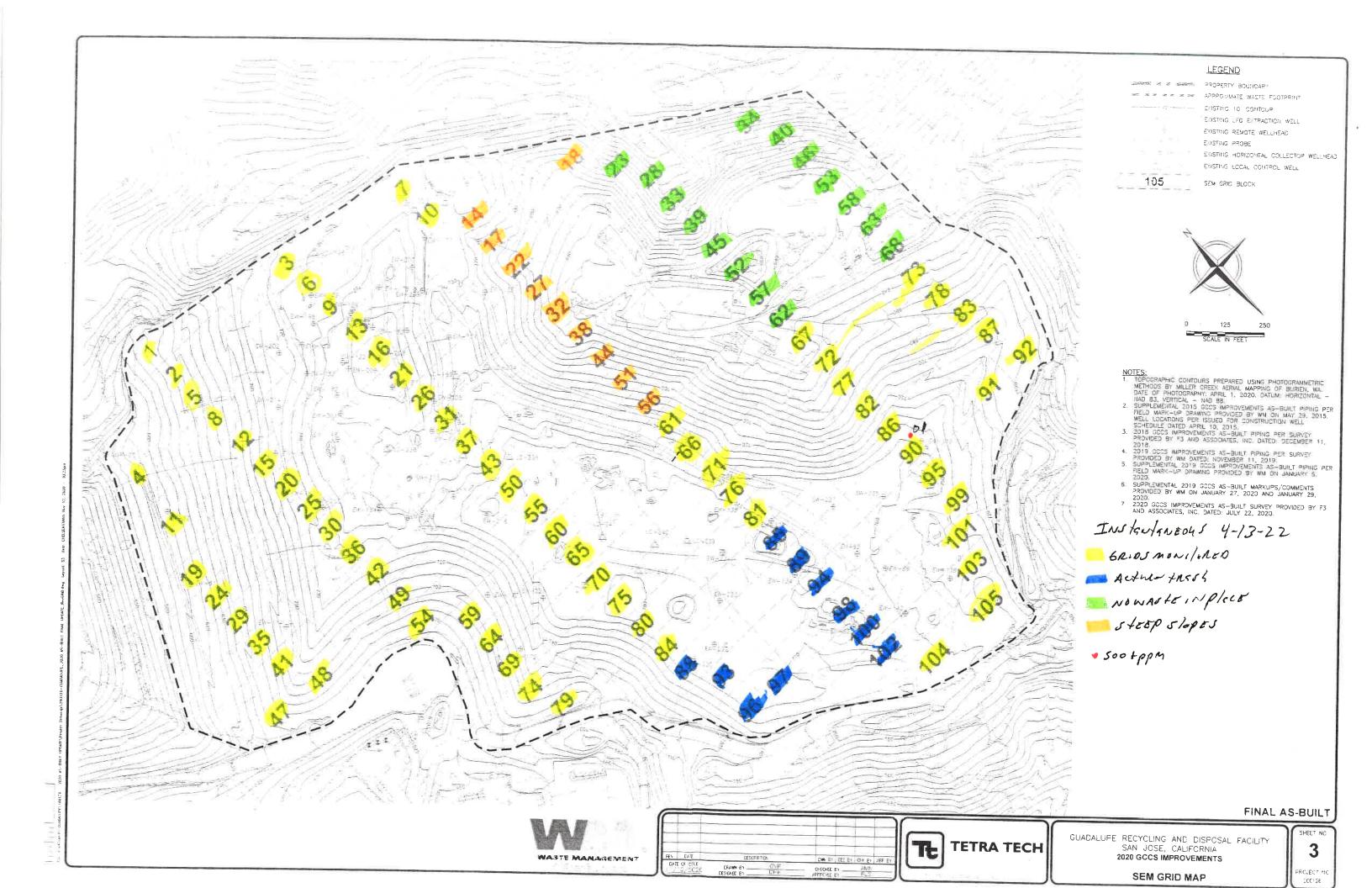
NOTES		WAS 2019 PW11			WAS 2019 PW13			WAS 2019 PW14		WAS 2019 PW239						Actur	Active						<i>→</i>				404.05	みんチッピ	Active	Active	
READING (PPM)	35		5.5	22	8 4 WAS		44		33		39	70	26	65	25	5								0051	21	()					
DATE	1-13-22	1																						1							
SEM GRID BLOCK NO.	66	66	67	69	70	71	75	75	76	76	81	81	81	84	84	85	88	88	88	88	68	89	68	90	90	90	94	98	100	102	
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	
LATITUDE	37.2139737	37.2142127		37.21412	37.2138042	37.2138179	37.2136797	37.2138288	37.2136061	37.2134243	37.2132002	Lump.	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			37.2119331	37.2119254	37.2118093	I
POINT TYPE	LFG Collector - Standard	LFG Collector - Standard		LFG Collector - Standard	LFG Colfector - 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	
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	
No.	87	88	89	90	91	92	93	94	95	96	97	98	66	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	

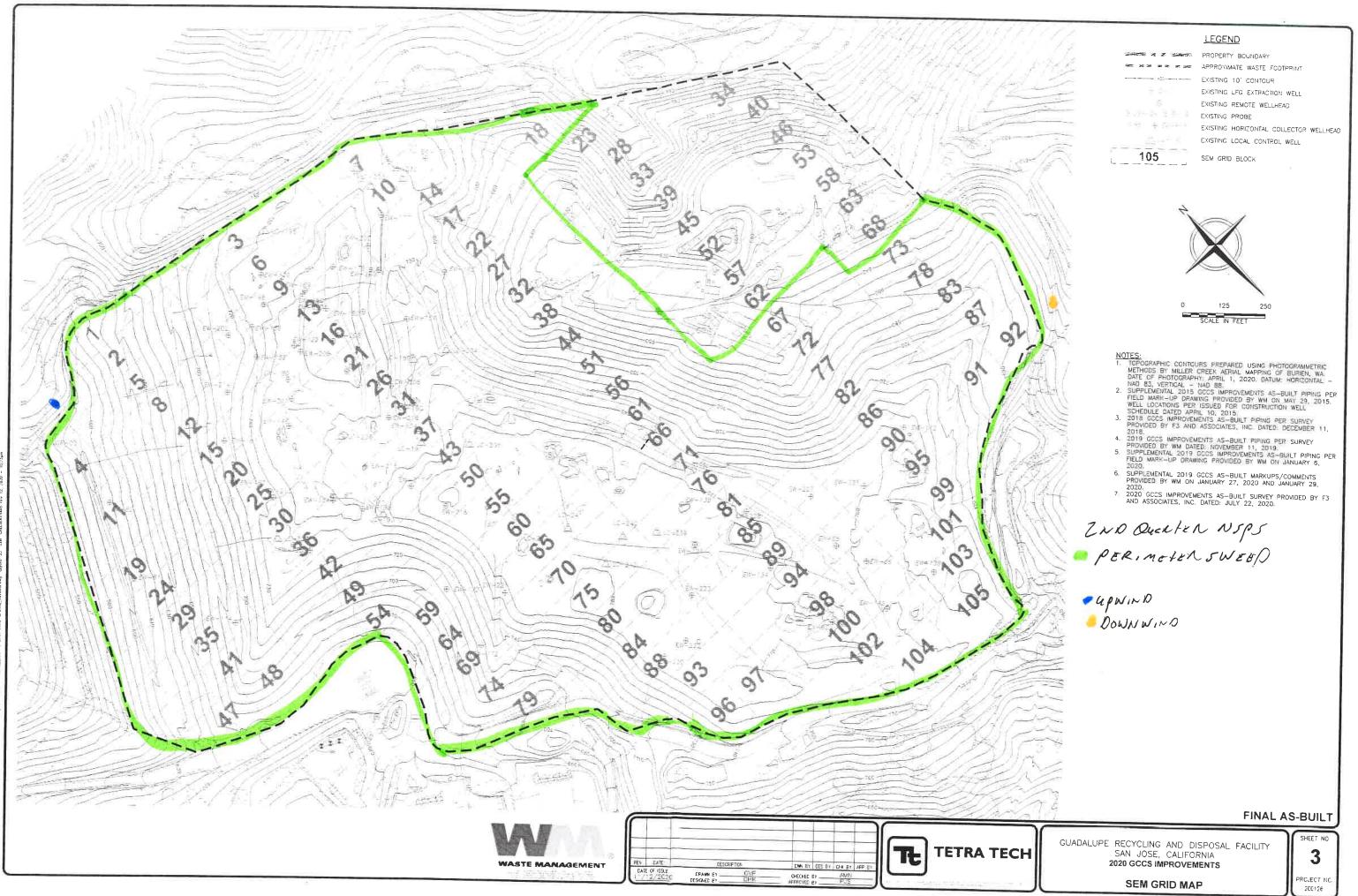
GUADALUPE LANDFILL - MONITORING POINTS FOR SEM - UPDATED ON 11-09-2021

11/12/2021 Page 3 of 3

Site: Gueogly 5

Pages				Its																										-
Page of				Comments			WE1/1/2																							
				itoring	Excd.	>500 ppm																								
				30-Day Follow-up Monitoring	No Excd.	<500 ppm																								
				30-Day	Date	Monitored																								
				nt - 10 Days	Excd.	>500 ppm																								
				Second Re-Monitoring Event - 10 Days	No Excd.	<500 ppm					19															-				
				Second Re-	Date	Monitored																								
				t - 10 Days	Excd.	>500 ppm																								
				E.	1.1.1	<500 ppm																								
				First Re-M	Date	Monitored																								
22	5 E				Date	Monitored	4-13-21																							
ZN0 2022	LEISHWAL	+UA1000	Joobbu	Initial Monitoring Event	Field Reading	(mdd)	200																							
			Calibration Standard:	I Mor	-		+																							
Quarter / Year:	Technician:	Instrument:	Calibration	i	Nimber			5	ó	ó	0	0	0	0	ó	0	0	-0	ò	0	ó	ò	-0	-0	-	0	ó	0	0-	-0





4. A PROFERSY AND A CONTRACT OF A CONTRACT OPPONENT DOWNER DOWNERS 2014 CONTRACT OF A CONTRACT OF A CONTRACT A CONTRACT OF A CONTRACT A CONTRACT OF A CON

Attachment B

Integrated Surface Emission Monitoring Event Records

Table B.1Integrated Landfill Surface MonitoringExceedances and Monitoring Log

2022 QUARTER:2INITIAL MONITORING PERFORMED BY:RESFOLLOW-UP MONITORING PERFORMED BY:NALANDFILL 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						

Personnel	LEISHWADE	Owisht ANDERSON	
	RICK IEMIS	NILL BENKS	
	Calvin ortiz		Cal. Gas Exp. Date: 6-9-23

Date: <u>4-12-22</u> Instrument Used: <u>4041000</u> Grid Spacing: <u>251</u>

Temperature: 64 Precip: 0 Upwind BG: 2.6 Downwind BG: 2.2

GRID	STAFF	START	STOP	тос	WIN	ID INFOR	MATION	REMARKS
ID	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	REMARKS
1	62	1100	1125	4.71	3	5	12	
2	RL	1100	112	5.18	3	5	12	
3	DA	1100	1125	5.06	3		12	
4	<i>co</i>	1100	1125	4.77	3	555	12	
5	ND	1100	1125	5.30	3	5	12	
4	LN	1125	1150	5.21	2	4	.12	
7	RL	1125	1150	6.14	2	4	12	
\$	PA	1125	1150	5.49	2	4	12	
9	00	1125	1150	5-12	2 2 2	4	12	
10	all	1125	1150	7.31	2	4	12.	
11	11	1150	1215	4.65	33	5	12	
12	RL	1150	1215	4-18	3		12	
13	DA	1150	1215	4,30	3	55	12	
15	60	1150	1215	5-51	3	5	12	
16	NB	1150	1215	6.07	3	55	12	
19	w	1215	1240	4.25	2	4	12	
20	NL	1215	1240	5.32	2	4	12	
21	DA	1215	1240	5-80	2	4	12	
24	62	1215	1240	4.35	2	4	12	
25	NO	1215	1240	6.95	2	4	12	
26	6	1240	1305	5.50	2	4 4	12	
29	pu .	1240	1305	4.07	2	4	12	
30	DA	1240	1305	5.75	2	4	12	
31	cd	1240	130	6.24	2	4	12	
35	NB	1240	1305	4.98	2	4	12	
36	LW	1305	1330	5.64	3	5	12	
37	nc	1305	1330	6.11	3	5	12	
11	04 20	1325	1330	5.22	33	5	12	
12		1305	1330	7.18	3	555	12	
43	NO	1305	1330	6-69	3	5	12	

Page _____ of _____

Personnel:	LEISHWANE	Owight ANDERSON	
	RICKIEMOS	NICIC BONICS	
	celvin ortin		Cal. Gas Exp. Date: 6-9-23

Date: 4-12-22 Instrument Used: 4VA 1060 Grid Spacing: 251

Temperature: <u>66</u> Precip: <u>0</u> Upwind BG: <u>7.6</u> Downwind BG: <u>2.2</u>

GRID	STAFF	START	STOP	тос	MIM	ND INFOR	MATION	REMARKS
ID	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	REPIARKS
47	LW	1330	1355	4.55	3	5	12	
48	RL	1330	1355	5.39	3	5	12	
49	DA	1330	1355	6.03	3	5	12	
50	00	1330	1355	5-58		5	12	
54	NB	1330	1355	4.27	33	5	12	
55	4	1355	1420	5.80	4	Ť	. 12	
59	pl	1355	1420	5.35	4	7	12	
10	DA	1355	1420	6.79	4	7	12	
61	60	1355	1420	6.04	4	7	12	
64	NB	1355	1420	5.50	4	7	12	
65	in	1420	1445	637	3	5	12	
66	RL	1420	1445	6.59	3	5	12	
67	DA	1420	1445	7.34	3	5	12	
69	00	1420	1445	6.54	3	5	12	
70	ND	1920	1445	7.18	3	5	12	
71	w	1445	1512	5.40	4	6	12.	
72	RL	1495	1510	6.27	4	6	12	
73	DA	1445	1510	6.92	4	6	12	
74	62	1445	1510	5.20	4	6	12	
75	NA	1445	1510	6.35	4	ú	2	
7-6	20	1510	1835	5-37		2	12	
77	RL	1510	1535	6.61		2	2	
78	PA	1510	1535	5.98	1	2	12	
79	< 2	1510	1535	6.11	1	2	12	
80	ma	1510	1535	5.47		2	12	
81	Lu	1535	1600	6.10	3	5	13	
28	NU	1535	1600	4.25	3	555	13	
83	PA	152	1600	4.07	3	5	13	
84	60	1535	1600	5.21	3	5	13	
84	NB	1535	1600	5-46	3	5	13	

Page _____ of _____

2 < 2 < 1 < 1 < 1 < 1 < 1 < 1 < 1 < 1 <	Instrum Precession START TIME /600	cip: D STOP TIME /625 /625 /625 /625 /625 /625 /650 /650 /650	+UA100 Upwind TOC PPM 4.16 4.21 5.06 4.25 3.25 3.25 3.16 4.50	₽ BG:	_ Grid S	Spacing:	
emperature:GRID IDSTAF INITIA 87 UV 90 RL 90 RL 91 $0A$ 72 $C0$ 72 $C0$ 72 L^0 79 L^0 79 L^0 70 RL	 Precession START TIME 1600 1600	cip: D STOP TIME /625 /625 /625 /625 /625 /625 /650 /650 /650	Upwind TOC PPM 4.16 4.21 5.06 4.75 3.2J 3.16 4.50 3.77 3.77 3.45	BG: AVG SPEED 2, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2,	Z. 6 ND INFOR MAX. SPEED 4 4 4 4 4 7 7 7 7 7 7	Downwind RMATION DIRECTION 16 POINT 12 12 12 12 12 12 12 12 12 12	BG: Z.2
GRID STAF ID INITIA 87 LW 90 RL 71 DA 72 LP 75 NB 79 LW 10/ RL 03 DA 04 CD	START TIME /600 /600 /600 /600 /600 /600 /600 /60	STOP TIME /625 /625 /625 /625 /625 /650 /650 /650 /650	TOC PPM 4.16 4.21 5.06 4.75 3.2J 3.16 4.50 3.77 3.77 3.45	WI AVG SPEED 2 2 2 2 2 2 2 2 2 2 2 2 2	ND INFOR SPEED 4 4 4 4 4 4 7 7 7 7	RMATION DIRECTION 16 POINT 12	
ID INITIA 87 LNI 90 RL 71 DA 72 Lo 75 NB 79 Lm 01 RL 03 DA 04 CD	LS TIME /600 //600 //600 //600 //600 //600 //600 //600 //600 /	TIME /625 /625 /625 /625 /625 /625 /650 /650 /650 /650	PPM 4.16 4.21 5.06 4.75 3.2J 3.16 4.50 3.77 3.77 3.45	AVG SPEED 2. 2. 2. 2. 2. 2. 2. 2. 2. 2.	MAX. SPEED 4 4 4 4 4 7 7 7 7	DIRECTION 16 POINT 12 12 12 12 12 12 12 12 12 12 12 12 12	REMARKS
87 LN 90 RL 71 DA 72 CD 75 NB 79 LN 01 RL 03 DA 04 CD	1600 1600 1600 1600 1600 1625 1625 1625 1625	1625 1625 1625 1625 1625 1625 1650 1650 1650	4.16 4.21 5.06 4.75 3.2J 3.16 4.50 3.77 3.77 3.45	SPEED 2 2 2 2 2 2 2 2 2 2	SPEED 4 4 4 4 4 7 7 7 7	16 POINT 2 2 2 2 2 2 2 2 2 2	
90 RL 91 DA 92 CD 92 NB 97 LW 101 RL 03 DA 04 CD	1600 1600 1600 1600 1600 1625 1625 1625 1625	1625 1625 1625 1625 1625 1650 1650 1650	4.21 5.06 4.75 3.2J 3.16 4.50 3.77 3.77 J.45	2, 2, 2, 2, 2, 2,	444777777		
71 DA 72 CD 75 NB 79 LW 101 RL 03 DA 04 CD	1600 1600 1600 1625 1625 1625 1625	1625 1625 1625 1650 1650 1650 1650	4.21 5.06 4.75 3.2J 3.16 4.50 3.77 3.77 J.45	2, 2, 2, 2, 2, 2,	444777777	$ \begin{array}{c} $	
12 20 12 20 13 11B 19 21 10 RL 03 04 04 20	1600 1600 1625 1625 1625 1625 1625	1625 1625 1650 1650 1650 1650	5.06 4.75 3.2J 3.16 4.50 3.77 3.45	22	4 4 7 7 7 7 7 7	12 12 12 12 12 12 12 12 12	
75 NB 79 LW 01 RL 03 DA 04 CD	1600 1625 1625 1625 1625	1625 1650 1650 1650 1650	4.75 3.25 3.16 4.50 3.77 7.45	2	4 4 7 7 7 7 7 7		
79 LW D/ RL 03 DA 04 CD	1625 1625 1625 1625	1625 1650 1650 1650 1650	3.25 3.16 4.50 3.77 7.45	-	4 7 7 7 7	12 12 12 12 12 12	
0/ RL 03 DA 04 CD	1625 1625 1825	1650 1650 1650	3.16 4.50 3.77 7.45	50555	1 7 7 7 7	12 12 12	
03 DA 04 CD	1625	1650	3.77 3.45	5000	77	12 12 12	
04 60	1825	1650	3.45	555	77	12	
				55	7	12	
	1625	1650	4.17	5	1		
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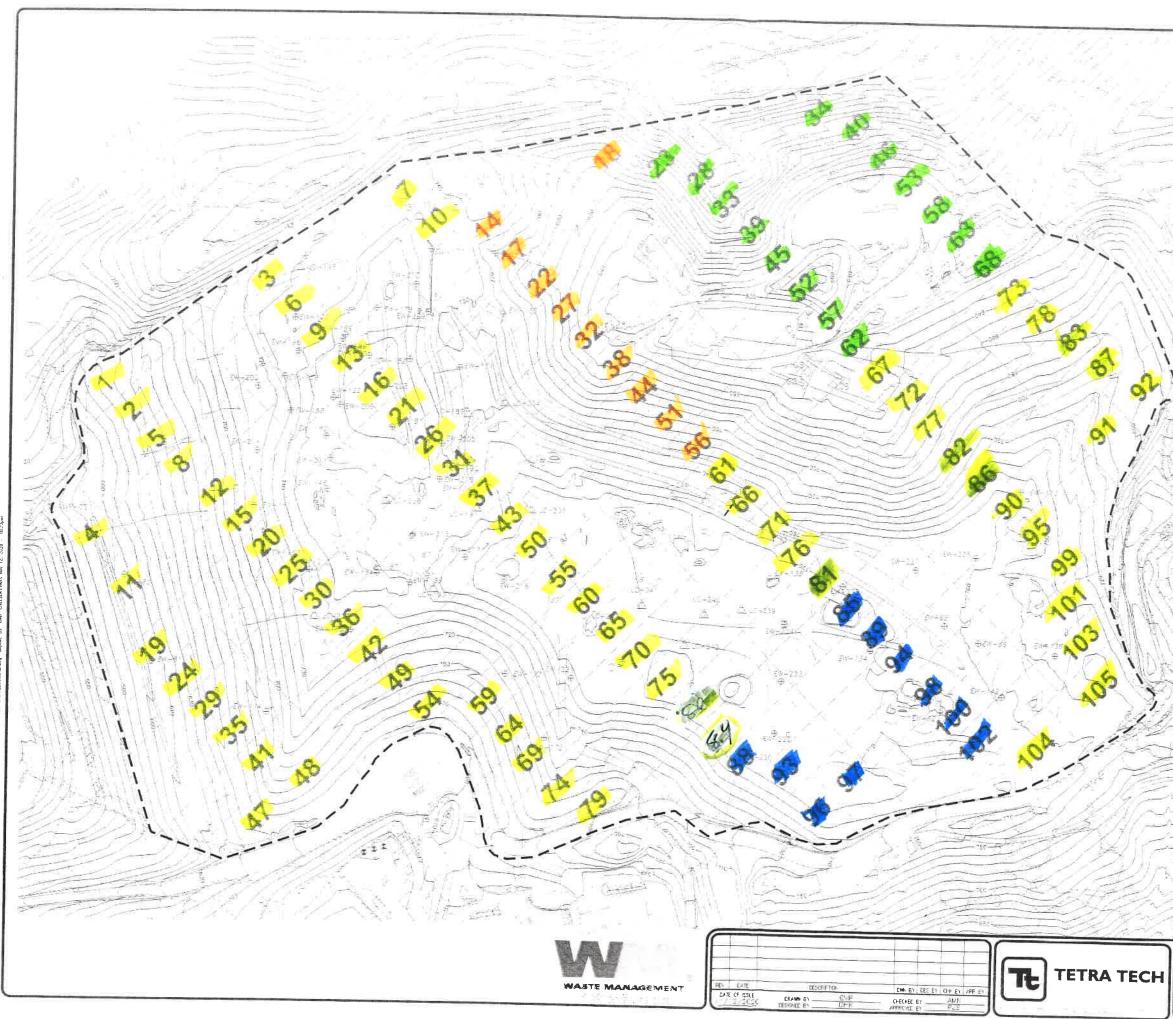
Page ______ of _____

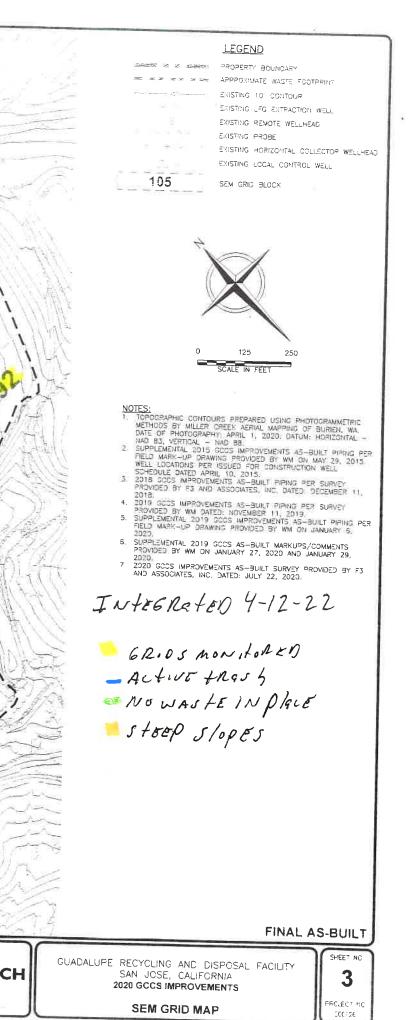
1.1								xp. Date:
Date: <u>4</u>	12-22	Instrume	nt Used: _			_ Grid S	Spacing:	
Femperat	ure:	Precip	:	_ Upwinc	BG:		Downwin	d BG:
GRID	STAFF	START	STOP	тос	WIN	D INFOR	MATION	DEMARKE
ID	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	REMARKS
85								Active-Hass.
88								
89							1	
93	-				1			
94								
96								
97								
98								
100								
102						1		V
14 18					1			StEEP Slopes
				C				1 '
17 22				1				
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30								
34 39								
40								
45								
9-3 46						-		
7-6 52								
53						1.1.1		

Page _/___ of _____

-							Cal. Gas Exp.	
te: <u>4</u> .	-12-22	Instrume	nt Used: _			_Grid S	pacing:	
mperat	ure:	Precip	:	_ Upwinc	I BG:		Downwind I	3G:
GRID	STAFF	START	STOP	тос	WIN	D INFOR	MATION	REMARKS
ID	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	
57								1
58								
3								
8					1			
								- Har
_								
		_						
				1				
			1					
				1				
						-		

Page _____ of ____





SEM GRID MAP

Attachment C

Component Leak Monitoring Event Records

Table C.1AB-32 Component Leak MonitoringSummary of Component Leaks Greater than 500 ppmv

2022 QUARTER:

INITIAL MONITORING PERFORMED BY: RES

2

FOLLOW-UP MONITORING PERFORMED BY: NA

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Location	Initial Monitoring			С	Corrective Action	10-Day Remonitoring		
	Date	TOC (ppmv)	Tech	Date	Description	Date	TOC (ppmv)	Tech
Flare Station A-9	4/13/2022	ND	RES	NA	NA	NA	NA	NA
Flare Station A-14	4/13/2022 ND RES		NA	NA	NA	NA	NA	

ND= No Exceedances

Table C.2BAAQMD Component Leak MonitoringSummary of Component Leaks Greater than 1,000 ppmv

2022 QUARTER:

INITIAL MONITORING PERFORMED BY: RES

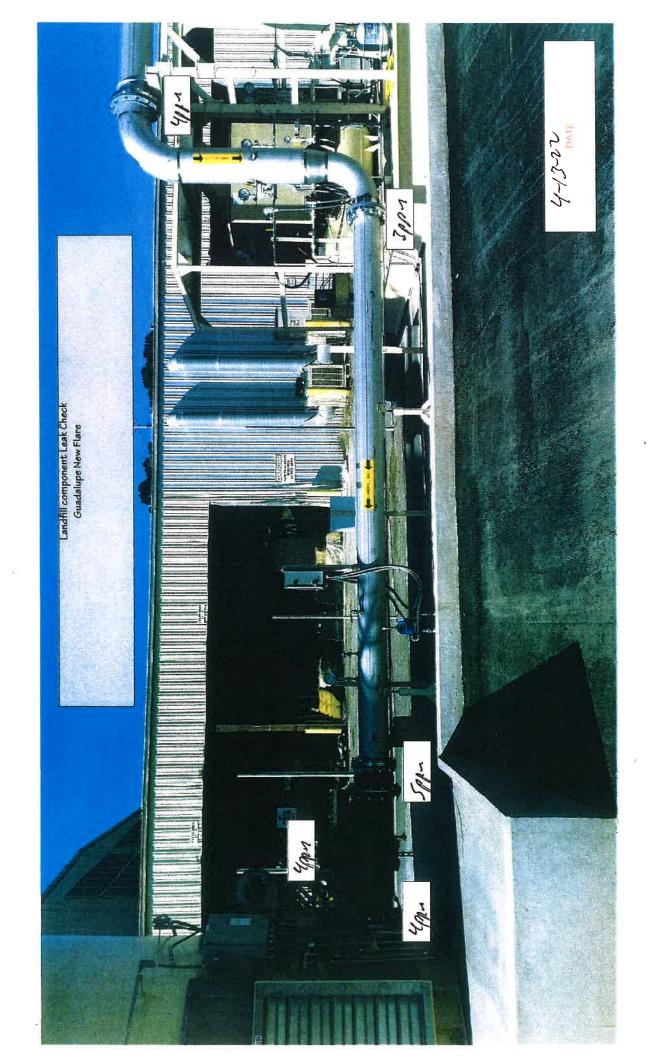
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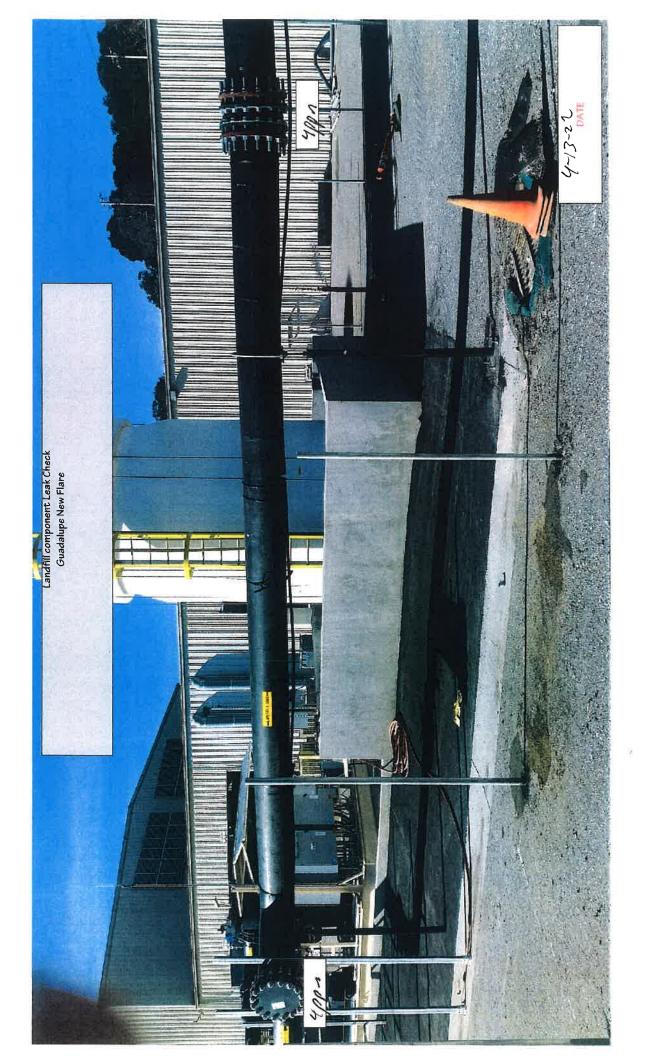
FOLLOW-UP MONITORING PERFORMED BY: NA

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Location	Initial Monitoring			C	Corrective Action	7-Day Remonitoring		
	Date	TOC (ppmv)	Tech	Date	Description	Date	TOC (ppmv)	Tech
Flare Station A-9	4/13/2022	ND	RES	NA	NA	NA	NA	NA
Flare Station A-14	4/13/2022 ND RES		NA	NA	NA	NA	NA	

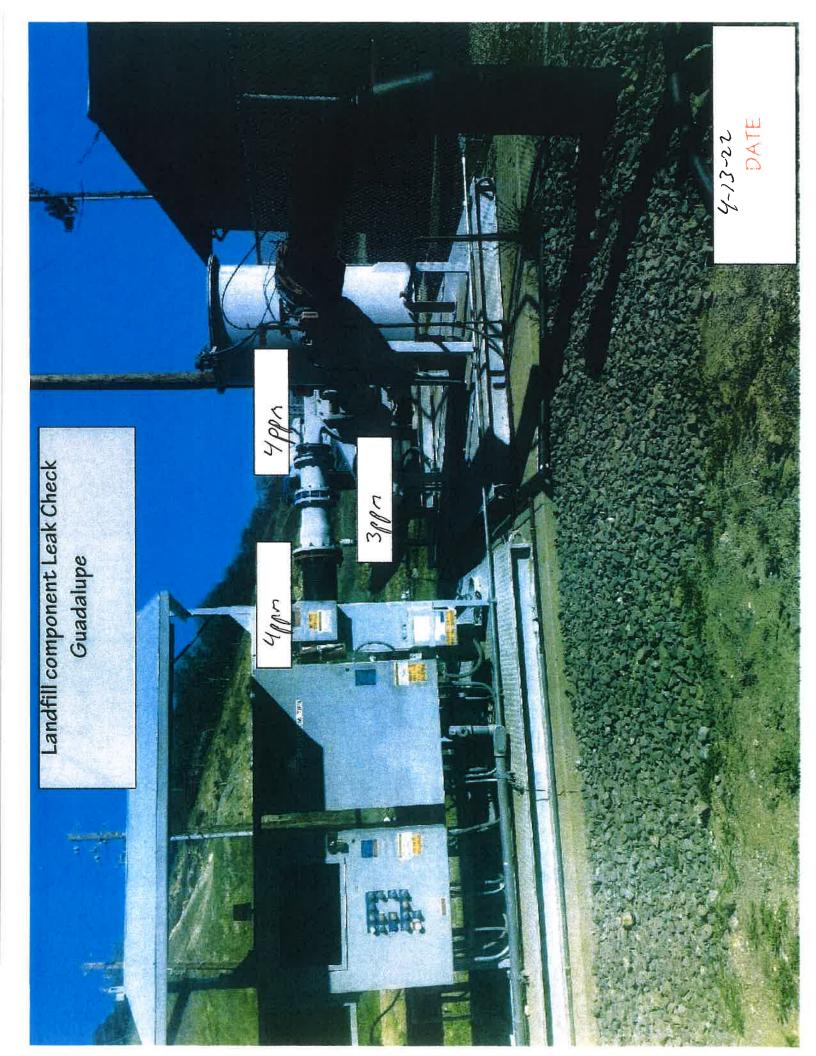
ND= No Exceedances

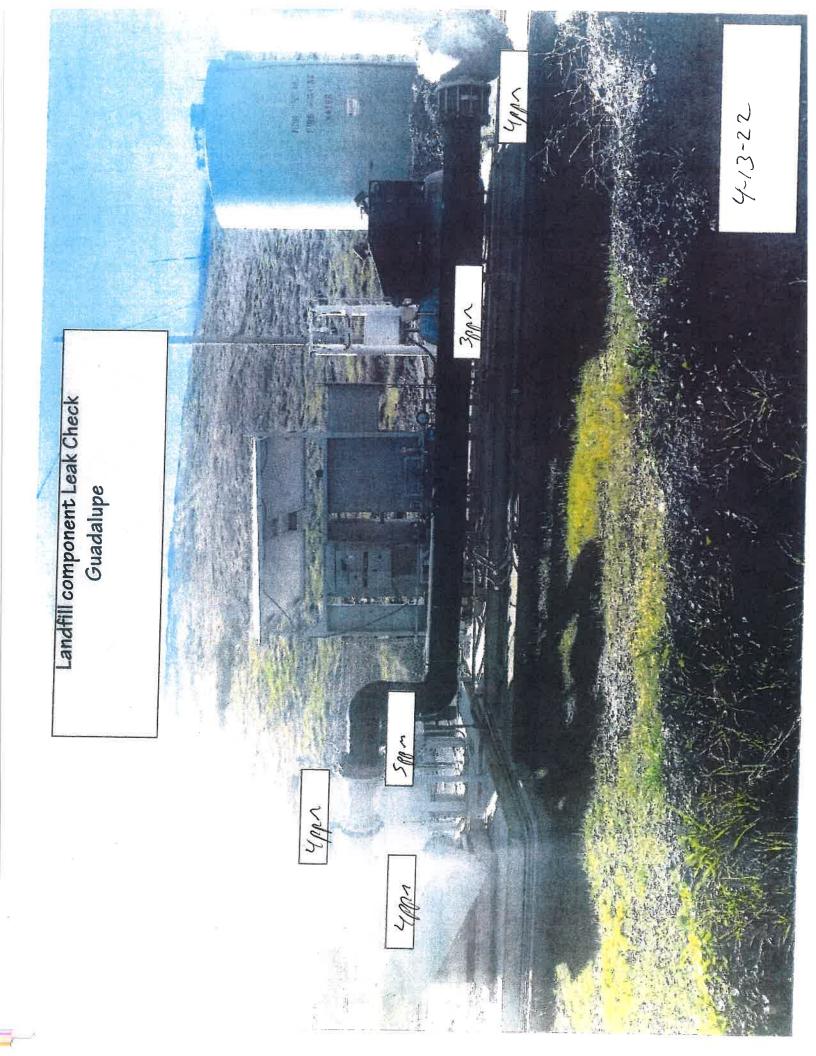












LANDFILL NAME: 600 09/602 QUARTERLY LFG COMPONENT LEAK MONITORING

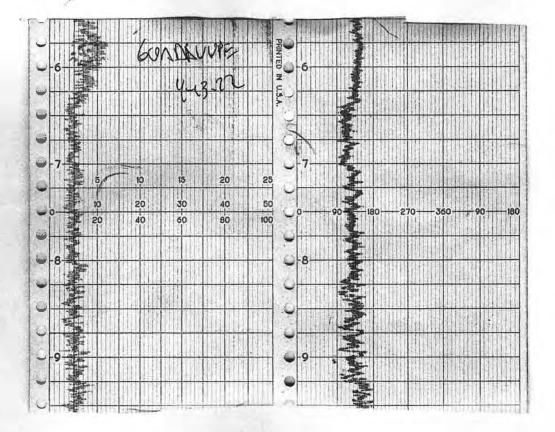
INSTRUMENT FID MAKE: Thermo Environr MODEL: TVA 1000 S/N: /の3 63 46 773

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

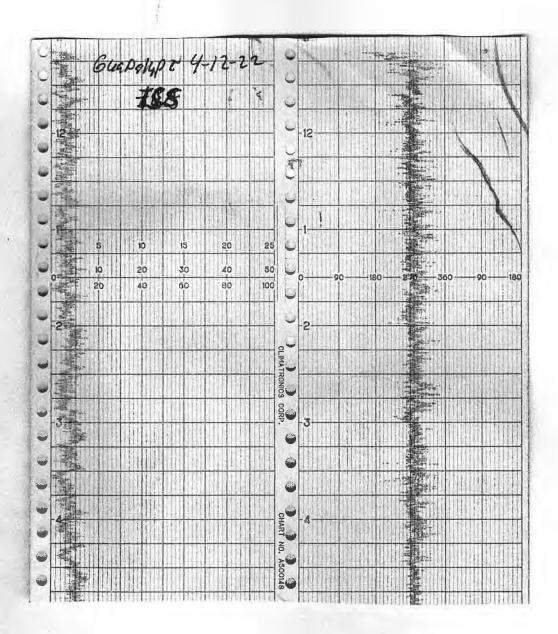
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Attachment D Weather Station Data

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	U.1.3
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
4	EAST (E)	078.8	<u>090.0</u>	101.3
5	EAST-SOUTHEAST (ESE)	101.3	112.5	123.8
6	SOUTHEAST (SE)	123.8	135.0	146.3
7	SOUTH-SOUTHEAST (SSE)	146.3	157.5	168.8
8	SOUTH (S)	168.8	180.0	191.3
9	SOUTH-SOUTHWEST (SSW)	191.3	202.5	213.8
6	SOUTHWEST (SW)	213.8	225.0	236.3
11	WEST-SOUTHWEST (WSW)	236,3	247.5	258.8
12	WEST (W)	258.8	<u>270.0</u>	281.3
13	WEST-NORTHWEST (WNW)	281.3	292.5	303.8
4	NORTHWEST (NW)	30.1.8	315.0	326.3
5	NORTH-NORTHWEST (NNW)	326.3	337.5	348.8

865 Via Lata = Colton, California 92324 = (909) 422-1001 Fax (909) 422-0707

Attachment E

Calibration Records

T. ISS T

CALIBRATION PROCEDURE AND BACKGROUND REPORT - INSTANTANEOUS

LANDFILL NAME 640	-Oslyr	INSTRUMEN	IT MAKE HIJERAD
MODEL JUA1000	EQUIPMENT #:	10	SERIAL # 1036346773
MONITORING DATE	9-13-22	TIME	0545

Calibration Procedure:

- 1. Allow instrument to zero itself while introducing air
- 2. Introduce calibration gas into the probe. Stabilized reading = $\frac{500}{2}$ 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 Valu (Upwind + Dow 2	
2.6	ppm	2.2	ppm	2.4	ppm

Background Value = $2 \cdot 9$ ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading Calibration Gas	Using	90% of the Stabil Reading	ized	Time to Reach Stabilized Read switching from Calibration Gas	ling after Zero Air to
#1	496	ppm	446	ppm	5	1.
#2	502	ppm	452	ppm	5	
#3	500	ppm	450	ppm	ک	
	Calculate Response T	ime (<u>1</u> - 3	<u>+2+3</u>)		ک	#DIV/0!
					Must be less that	n 30 seconds

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Zer	ro Air (A)	Meter Reading Calibration Ga		Calculate Precision [STD – (B)]
#1	0.12	ppm	496	ppm	4	
#2	0.08	ppm	502	ppm	2	
#3	0.09	ppm	50.0	ppm	0	
Calculate Precision	[STD-B1] + [ST	D-B2] + [5 3	<u>STD-B31</u> X <u>1</u> X 500	100 1	0.40	#DIV/0!
					Must be less than	10%

Performed By LEISLUNDE

Date/Time 4-13-72-0545



CALIBRATION PROCEDURE AND BACKGROUND REPORT - INSTANTANEOUS

LANDFILL NAME GueDalupt		NSTRUMENT	T MAKE	+ HERNO
MODEL HUA 1000 EQUIPMENT #	11		SERIA	L#: 1636346772
MONITORING DATE 4-13-22		TIME:	054	\$

Calibration Procedure:

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

Background Determination Procedure

Upwind Backg Reading: (Highest in 30 se		Downwind Back Reading: (Highest in 30 seco	-	Background Valu (Upwind + Dow 2	
2.6	ppm	2.2	ppm	2.4	ppm

Background Value = 2. 4 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading U Calibration Gas	lsing	90% of the Stabil Reading	ized	Time to Reach Stabilized Read switching from Calibration Gas	ling after Zero Air to
#1	507	ppm	457	ppm	6	
#2	500	ppm	450	ppm	L	
#3	500	ppm	450	ppm	6	
	Calculate Response Tin	ne (<u>1</u> - 3	+2+3)		6	#DIV/0!
					Must be less tha	n 30 seconds

CALIBRATION PRECISION RECORD

Calibration Gas Standard = 500 ppm

Measurement #	Meter Reading for Ze	ro Air (A)	Meter Reading Calibration Ga		Calculate Precision [STD – (B)]
#1	0.11	ppm	507	ppm	7	
#2	0.09	ppm	500	ppm	0	
#3	0.07	ppm	50.0	ppm	0	
Calculate Precision	[STD-B1] + [S	TD-B2] + [S 3	<u>STD-B31</u> X <u>1</u> X 500	100 1	0.46	#DIV/0!
					Must be less than	n 10%

Performed By _____ Rullinos

Date/Time 4-13-22-0545

154

CALIBRATION PROCEDURE AND BACKGROUND REPORT - INSTANTANEOUS

LANDFILL NAME 66	coslypr		NTMAKE + HERNO
MODEL JUAIONO	EQUIPMENT #:	12	SERIAL # 1036246741
	4-13-22	TIME	0545

Calibration Procedure:

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

Background Determination Procedure

Reading:	Upwind Background Reading: (Highest in 30 seconds)		ground onds)	Background Value: (Upwind + Downwind) 2	
2.6	ppm	2.2	ppm	2-4	ppm

Background Value = 2.4 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	49-6 ppm	446	ppm	4	
#2	Sil ppm	452	ppm	4	
#3	Juo ppm		ppm	4	
	Calculate Response Time (1	+2+3)		4	#DIV/0!
				Must be less that	in 30 seconds

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Zer			i for is (B)	Calculate Precision [STD – (B)]		
#1	0.15	ppm	496	ppm	4		
#2	0-12	ppm	502	ppm	2		
#3	0.06	ppm	500	ppm	D		
Calculate Precision	[STD-B1] + [ST	D-B2] + [\$ 3	<u>STD-B31</u> X <u>1</u> X 500	100 1	0-40 #DIV/0		
					Must be less than 10%		

Performed By DwightANDONSO

Date/Time 4-13-22-0545



CALIBRATION PROCEDURE AND BACKGROUND REPORT - INSTANTANEOUS

LANDFILL NAME 640091	pr -	INSTRUMEN	тмаке 7.	Henn
MODEL FUAIOCO	EQUIPMENT #:			1102746775
MONITORING DATE: 4-13-	22	TIME	0545	

Calibration Procedure:

- 1. Allow instrument to zero itself while introducing air.
- 2. Introduce calibration gas into the probe. Stabilized reading = $\frac{50^{\circ}}{2}$ ppm
- 3. Adjust meter settings to read 500 ppm.

Background Determination Procedure

Upwind Backg Reading: (Highest in 30 se		Downwind Back Reading: (Highest in 30 seco		Background Value: (Upwind + Downwind 2	
2.6	ppm	2.2	ppm	2.9	ppm

Background Value = 2.9 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	509 P	pm	459	ppm	4	
#2	489 P	pm	449	ppm	4	
#3	500 P	pm	450	ppm	4	
	4	#DIV/0!				
					Must be less th	an 30 seconds

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Zero Air (A)		Meter Reading for Calibration Gas (B)		Calculate Precision [STD – (B)]
#1	0.15	ppm	509	ppm	5
#2	0.10	ppm	499	ppm	1
#3	0.05	ppm	580	ppm	D
Calculate Precision	[STD-B1] + [ST	D-B2] + [: 3	<u>STD-B31</u> X <u>1</u> 2 500		0-66 #DIV/0!
					Must be less than 10%

Performed By Celvin ontil Date/Time 4-13-22-0545

124

CALIBRATION PROCEDURE AND BACKGROUND REPORT - INSTANTANEOUS

LANDFILL NAME 645DSlup5	INSTRUMENT MAKE: +Honno
MODEL LUAIOU EQUIPMENT#	16 SERIAL # 1102746776
MONITORING DATE: 4-13-22	TIME: 0545

Calibration Procedure:

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

Background Determination Procedure

Upwind Background	Downwind Background	Background Value:
Reading:	Reading:	(Upwind + Downwind)
(Highest in 30 seconds)	(Highest in 30 seconds)	2
Z.6 ppm	Z. 2 ppm	2.4 ppm

Background Value = 2.4 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	489 ppm	439	ppm	6	
#2	Se 2 ppm	452	ppm	6	
#3	<i>500</i> ppm	450	ppm	6	
	Calculate Response Time (<u>1</u> 3	+2+3)		#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			
#1	0-17	ppm	489	ppm	11	
#2	0.11	ppm	502	ppm	2	
#3	0-10	ppm	500	ppm	0	
Calculate Precision	[STD-B1] + [ST	1D-B2] + [5 3	<u>51D-B3</u> X <u>1</u> X 500	<u>100</u> 1	0.86	#DIV/0!
					Must be less that	п 10%

Performed By Nicle Bracks

Date/Time 4-13-22-6545

12123

CALIBRATION PROCEDURE AND BACKGROUND REPORT - INTEGRATED

LANDFILL NAME 6400.	slups	INSTRUME	NT MAKE 41	HERRO
MODEL fur A 1000	EQUIPMENT #:	10	SERIAL #	1036346773
MONITORING DATE 4	-12-22	TIME	1100	

Calibration Procedure:

1

- 1 Allow instrument to zero itself while introducing air
- Introduce calibration gas into the probe Stabilized reading = 2^{5} ppm 2
- 3. Adjust meter settings to read 25 ppm,

Background Determination Procedure

Upwind Background	Downwind Background		Background Valu	
Reading:	Reading:		(Upwind + Down	
(Highest in 30 seconds)	(Highest in 30 seconds)		2	
2.6 ppm	2.2	ppm	2.4	ppm

Background Value = 2, 9 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #			90% of the Stabilized Reading		Time to Reach 9 Stabilized Readi switching from 2 Calibration Gas	ng after
#1	24 P		21.6	ppm	4	
#2	24	ppm	21.6	ppm	4	
#3	25	ppm	22.5	ppm	4	
Calculate Response Time (<u>1+2+3</u>) 3					4	#DIV/0!
					Must be less than	30 seconds

CALIBRATION PRECISION RECORD

Measurement #	ent # Meter Reading for Zero Air (A) Meter Reading for Calibration Gas (B)		Calculate Precision [STD – (E			
#1	0.1/	ppm	24	ppm	1	
#2	0.04	ppm	25	ppm	6	
#3	0.04	ppm	21	ppm	۵	
Calculate Precision [STD-B1] + [STD-B2] + [STD-B3] X 1 X 100 3 25 1				ノーJ Must be less than	#DIV/0!	

Performed By LEISHWADE

Date/Time 4-12-22 1100

CALIBRATION PROCEDURE AND BACKGROUND REPORT - INTEGRATED

LANDFILL NAME 6440	5/412	INSTRUME	INT MAKE + 4/21 Ma 0
MODEL HVAINCO	EQUIPMENT #:	11	SERIAL # 1636346772
	4-12-22	TIME	1100

Calibration Procedure:

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

Background Determination Procedure

Upwind Backgr Reading: (Highest in 30 se	- N	Downwind Background Reading: (Highest in 30 seconds)		Background Valu (Upwind + Dow 2	1.50
2.6	ppm	2:2	ppm	2.4	ppm

Background Value = 2.4 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	ent # Stabilized Reading Using 90% of the Stabilized Calibration Gas Reading		Time to Reach 9 Stabilized Read switching from Calibration Gas	ing after Zero Air to		
#1	23	ppm	20.7	ppm	1 5	
#2	25	ppm	22.5	ppm	5	
#3	25	ppm	22.5	ppm	5	
	5	#DIV/0!				
					Must be less than	1 30 seconds

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Ze	ero Air (A)	Meter Reading Calibration Gas		Calculate Precision [ST	D – (B)]
#1	0.10	ppm	23	ppm	Z	
#2	0.0%	ppm	25	ppm	0	
#3	0.04	ppm	25	ppm	δ	
Calculate Precisio	on [STD-B1] + [S	<u>TD-B2] + [</u> 1 3	<u>STD-B3]</u> X <u>1</u> X 25	<u>100</u> 1	Z - 6 Must be less than 1	#DIV/0!

Performed By R. Cli Lormos

Date/Time 4-12-22 -1/00

CALIBRATION PROCEDURE AND BACKGROUND REPORT - INTEGRATED

LANDFILL NAME 644	DalyAL	INSTRUMEN	IT MAKE +HERRO
MODEL FUAIO00	EQUIPMENT #:	12	SERIAL # 1636246741
	4-12-22	TIME	1100

Calibration Procedure.

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

Background Determination Procedure

Upwind Background	Downwind Background		Background Valu	Sec. VI	
Reading:	Reading:		(Upwind + Down		
(Highest in 30 seconds)	(Highest in 30 seconds)		2		
Z.G ppm	2-2	ppm	2.4	ppm	

Background Value = Z - 4 ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement # Stabilized Reading Using Calibration Gas						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	7			
#3	25	ppm	225	ppm	6			
	6	#DIV/0!						
					Must be less than	1 30 seconds		

CALIBRATION PRECISION RECORD

Measurement #	Meter Reading for Ze	ro Air (A)	Meter Reading Calibration Ga		Calculate Precision [STD – (B)]
#1	0-16	ppm	24	ppm	1
#2	0.09	ppm	21	ppm	b
#3	0.05	ppm	21	ppm	δ
Calculate Precisio	on [STD-B1] + [S	<u>TD-B2] + [</u> 1 3	<u>STD-B3]</u> X <u>1</u> X 25	(<u>100</u> 1	/3 #DIV/0 Must be less than 10%

an al Ing

CALIBRATION PROCEDURE AND BACKGROUND REPORT - INTEGRATED

LANDFILL NAME 64009	4112		IT MAKE +HERNO
MODEL LUAI000		13	SERIAL # 1162746775
MONITORING DATE: 4-	12-22	TIME	(100

Calibration Procedure;

8 ¹

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

Background Determination Procedure

Upwind Backgro Reading: (Highest in 30 sec		Downwind Background Reading: (Highest in 30 seconds)		Background Valu (Upwind + Dow 2	
2.6	ppm	2.2	ppm	2.4	ppm

Background Value = 2Y ppm

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading Using Calibration Gas		90% of the Stabiliz Reading	ed	Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas	
#1	23	ppm	20.7	ppm	5	
#2	24	ppm	21.6	ppm	5	
#3	25	ppm	22.5	ppm	5	
	Calculate Response Ti	me (<u>1</u> 3	+2+3)		#DIV/0! Must be less than 30 seconds	

CALIBRATION PRECISION RECORD

Calibration Gas Standard = 25 ppm

Measurement #	Meter Reading for Ze			for s (B)	Calculate Precision [STD – (B)]	
#1	0.05	ppm	23	ppm	2	
#2	0.04	ppm	24	ppm	1	
#3	0-03	ppm	21	ррт	δ	
Calculate Precisio	on [STD-B1] + [S	3 3	<u>STD-B3]</u> X <u>1</u> X 25	<u>100</u> 1	4.0	#DIV/0!
					Must be less that	an 10%

Performed By ______CGLUIN ORFil

Cate/Time 4-12-22 -1100

124 _ <u>k</u>< er latter

CALIBRATION PROCEDURE AND BACKGROUND REPORT - INTEGRATED

LANDFILL NAME GUGDG/4/5			INSTRUMENT MAKE +HOLDO			
MODEL	LUA1000	EQUIPMENT #	16	SERIAL # 1162746776		
MONITOP	RING DATE	4-12-22	TIME	1/00		

Calibration Procedure:

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

Background Determination Procedure

Upwind Backgr		Downwind Background		Background Value:	
Reading:		Reading:		(Upwind + Downwind)	
(Highest in 30 se		(Highest in 30 seconds)		2	
2.6	ppm	2.2	ppm	2.4	ppm

2.4 ppm Background Value =

INSTRUMENT RESPONSE TIME RECORD

Measurement #	Stabilized Reading Using Calibration Gas			Time to Reach 90% of Stabilized Reading after switching from Zero Air Calibration Gas	
#1	24 ppm	21.6	ppm	5	
#2	25 ppm	22.5	ppm	5	
#3	ZS ppm	22.5	ppm	5	
	Calculate Response Time (1 3	+2+3)		~	#DIV/0!
				Must be less than	30 seconds

CALIBRATION PRECISION RECORD

Calibration Gas Standard = 25 ppm

Measurement #			Meter Reading for Calibration Gas (B)		Calculate Precision [STD – (B)]	
#1	0.1/	ppm	24	ppm	1	
#2	0.08	ppm	21	ppm	0	
#3	0-06	ppm	25	ppm	Ð	
Calculate Precision [STD-B1] + [STD-B2] + [STD-B3] X 3		<u>STD-B3</u>] X <u>1</u> X 25	<u>100</u> 1	1.3 Must be less than	#DIV/0!	

Performed By NICLE BENILS

Date/Time 4-12-22 -1100



Site:					
Purpose: Operator:	i M				
Date: 4-1-22		Time:(0730		
Model # <u>+ 1000</u> Serial # <u>#10 103634</u>	6273				
INSTRUMENT INTEGRITY CHECKLIST		INSTRUMENT CALIBRATION			
Battery test	6	CALIBRATION CHECK			
Reading following ignition	éass/Fail ୧୦୨୦ ppm	Calibration Gas (ppm)	Actual (ppm)	% Accuracy	
Leak test	Pass / Fail / NA	500	509	100%	
Clean system check (check valve chatter)	Pass / Fail / NA	Calibration Gas, pp		500	
H ₂ supply pressure gauge (acceptable range 9.5 - 12)	Pass / Fail / NA	90% of Calibration Time required to a 1.		450 Bas ppm	
Date of last factory calibration	4-1-22	2. (d 3	4	1	
Factory calibration record w/instrument within 3 months	Pase / Fail	Average <u>5</u> , Equal to or less tha Instrument calibrat		Ø N _gas.	

Comments:

465



Site:	
Purpose:	
Operator:	
Date: 4-1-22	Time:
Model #	
Serial # #11 1036346774	

INSTRUMENT INTEGRITY	CHECKLIST	INST	RUMENT CALIBR	ATION	
Battery test	Pass / Fail	CALIBRATION CHECK Calibration Actual %			
Reading following ignition	_2.7 ppm	Gas (ppm)	Actual (ppm)	% Accuracy	
Leak test	Fass / Fail / NA	500	500	100%	
Clean system check (check valve chatter)	Pass / Fail / NA	RESPONSE TIME Calibration Gas, ppm 500			
H ₂ supply pressure gauge (acceptable range 9.5 - 12)	Rass / Fail / NA	90% of Calibration Gas nom USO			
Date of last factory calibration	4-1-22	2.	10/5		
Factory calibration record w/instrument within 3 months	ase / Fail			Ø N _gas.	

Comments:



Site:				
Purpose:	М			
Date: 4-1-22	Time:			
Model # <u>+ へん1000</u> Serial # <u></u>	16741			
INSTRUMENT INTEGRITY CHECKLIST		INSTRUMENT CALIBRATION		
Battery test Reading following ignition	Pass / Fail	C Calibration Gas (ppm)	ALIBRATION CHE Actual (ppm)	CK % Accuracy
Leak test	Fass / Fail / NA	500	SOO RESPONSE TIME	100%
Clean system check (check valve chatter)	Rass / Fail / NA	Calibration Gas, 90% of Calibratio	n Gas, ppm	100 1150
H ₂ supply pressure gauge (acceptable range 9.5 - 12)	(Cass / Fail / NA		attain 90% of Cal C 6 6	Sas ppm
Date of last factory calibration Factory calibration record w/instrument within 3 months	Pass / Fail	3	γ <u>7-3</u> han 30 seconds?	() N

Instrument calibrated to <u>CH4</u> gas.

Comments:

465



Site:				
Purpose:				
Operator:	u/m			
Date: 4-1-22		Time:(0645	
Model # /000				
Serial # <u># 13 110 27 il</u>	6775			
INSTRUMENT INTEGRI	TY CHECKLIST	INSTR	UMENT CALIBR	ATION
Battery test	Pars / Fail	CA Calibration Gas (ppm)	LIBRATION CHE Actual (ppm)	%
Reading following ignition	<u>7</u>) ppm	5'00	Soo	Accuracy

	തി	CALIBRATION CHECK		ĸ
Battery test	Pass / Fail	Calibration	Actual	%
Reading following ignition	_7,) ppm	Gas (ppm)	(ppm)	Accuracy
Leak test	Pass / Fail / NA	500	500	100%
	6.	RESPONSE TIME		
Clean system check (check valve chatter)	Pass / Fail / NA	Calibration Gas, p		500
Li europerezza	\bigcirc	90% of Calibration	n Gas, ppm4	50
H ₂ supply pressure gauge (acceptable range 9.5 - 12)	Rass / Fail / NA	Time required to a 1.	attain 90% of Cal Ga կ	as ppm
Date of last factory calibration	4-1-27	2 3	4	101
Factory calibration record	Pass / Fail	Average 4	1,6	~
w/instrument within 3 months		Equal to or less the Instrument calibration		Ø N gas.

Comments:

465



.6				
Site:				
Purpose:	0.1			
Operator:	M			
Date: 4-1-22		Time:	0600	
Model # 1000				
Serial # #16 1102741	276			
INSTRUMENT INTEGRA	Y CHECKLIST	INST	RUMENT CALIBR	ATION
Battery test Rass / Fail			ALIBRATION CHE	
Datterytest	Rass / Fail	Calibration	Actual	%
Reading following ignition	2,3 ppm	Gas (ppm)	(ppm)	Accuracy
Leak test	Pass / Fail / NA	500	SOD	100,
	U		RESPONSE TIME	Ē
Clean system check	Pass / Fail / NA			0
(check valve chatter)	\smile	Calibration Gas, p		200_
H ₂ supply pressure gauge	(Pass / Fail / NA	90% of Calibratio		450
(acceptable range 9.5 - 12)			attain 90% of Cal (Gas ppm
		1	<u>S</u>	
Date of last factory calibration	4-1-22	2. 3.	S	÷
			5	
	10			
Factory calibration record	Pass / Fail	Average 5	i no	
Factory calibration record	Pass / Fail		han 30 seconds?	(*) N

Comments:

CUSTOMER: _____ RES VAL #10 1036346773 SERIAL NUMBER TECHNICIAN: 4-1-22 DATE:

GAS CALIBRATION CHECK (PERFORMED AT ROOM TEMPERATURE)

	FI	D	
METHANE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)
100	100	99	+/- 25
500	500	4901	+/- 125
10000	10000	10,000	+/- 2500
< 1	ZERO GAS	0,61	< 3
	Pli	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

All measurement standards are calibrated at scheduled intervals by the National Institute of Standards and Technology (NIST), or against certified standards, which are traceable to the National Institute of Standards and Technology.

CUSTOMER: Pies UNAT #11 SERIAL NUMBER: _____ /0363 46779 M ____ DATE: <u>4-1-27</u> TECHNICIAN:

GAS CALIBRATION CHECK (PERFORMED AT ROOM TEMPERATURE)

	FI	D	
METHANE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)
100	100	(00	+/- 25
500	500	400	+/- 125
10000	10000	10,000	+/- 2500
< 1	ZERO GAS	0.68	< 3
	Pli		
ISOBUTYLENE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)
50	50	1	+/- 12.5
100	100		+/- 25
500	500		+/- 125
< 1	ZERO GAS	/	< 3

All measurement standards are calibrated at scheduled intervals by the National Institute of Standards and Technology (NIST), or against certified standards, which are traceable to the National Institute of Standards and Technology.

RES Unt CUSTOMER: 036246741 SERIAL NUMBER: TECHNICIAN: DATE: 4-1-22

GAS CALIBRATION CHECK (PERFORMED AT ROOM TEMPERATURE)

	FI	D	
METHANE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)
100	100	100	+/- 25
500	500	500	+/- 125
10000	10000	(0,000	+/- 2500
< 1	ZERO GAS	0,71	< 3
	Pl	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

All measurement standards are calibrated at scheduled intervals by the National Institute of Standards and Technology (NIST), or against certified standards, which are traceable to the National Institute of Standards and Technology.

Rizs Vart #14 CUSTOMER: SERIAL NUMBER: 1036346711 DATE: ____ Mil 4-1-27 TECHNICIAN:

GAS CALIBRATION CHECK (PERFORMED AT ROOM TEMPERATURE)

	FI	D	
METHANE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)
100	100	100	+/- 25
500	500	501	+/- 125
10000	10000	14,000	+/- 2500
< 1	ZERO GAS	0.62	< 3
	PII	D	
ISOBUTYLENE GAS NOMINAL (ppm)	CALIBRATION GAS_(ppm)	TVA READING (ppm)	TOLERANCE (ppm)
50	50	1	+/- 12.5
100	100		+/- 25
500	500	/	+/- 125
< 1	ZERO GAS	/	< 3

All measurement standards are calibrated at scheduled intervals by the National Institute of Standards and Technology (NIST), or against certified standards, which are traceable to the National Institute of Standards and Technology.

MES Vat # CUSTOMER: 11027467 SERIAL NUMBER: TECHNICIAN: 4-1-22 DATE:

GAS CALIBRATION CHECK (PERFORMED AT ROOM TEMPERATURE)

	FI	D	
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)	
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

All measurement standards are calibrated at scheduled intervals by the National Institute of Standards and Technology (NIST), or against certified standards, which are traceable to the National Institute of Standards and Technology.



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CERTIFICATE OF ANALYSIS

Composition Air - Zero THC Oxygen Nitrogen

Certification < 2 PPM 20.9% Balance

Analytical Accuracy

± 2%

Lot

19-6779

Mfg. Date: 4/3/2019 Parent Cylinder ID 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 Methane Air Certification 25 ppm Balance Analytical Accuracy ± 5%

Lot # 17-6074

Mfg. Date: 10/16/2017 Parent Cylinder ID Number: 17161

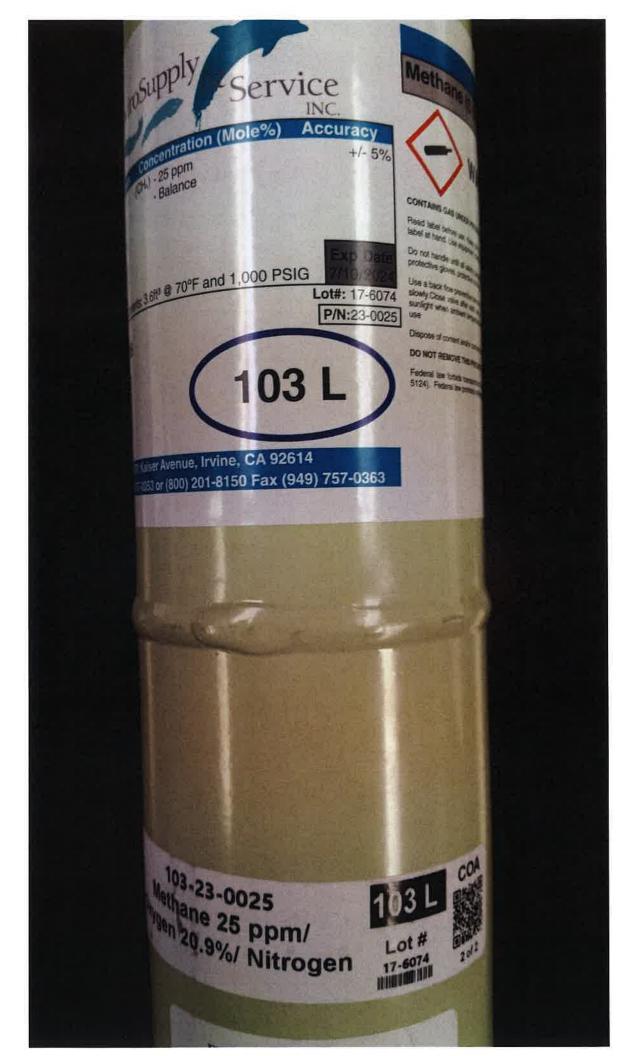
Method of Preparation:

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

<u>Composition</u> Methane Air

Certification 25 ppm Balance Analytical Accuracy ± 5%

Lot # 17-6074

Mfg. Date: 10/16/2017 Parent Cylinder ID Number: 17161

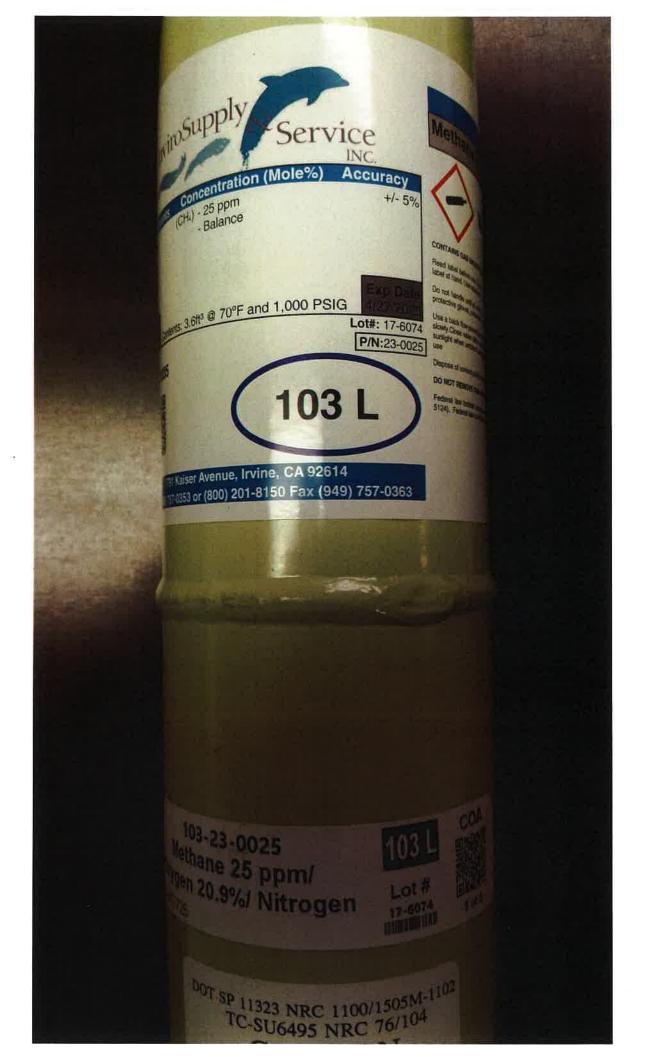
Method of Preparation:

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



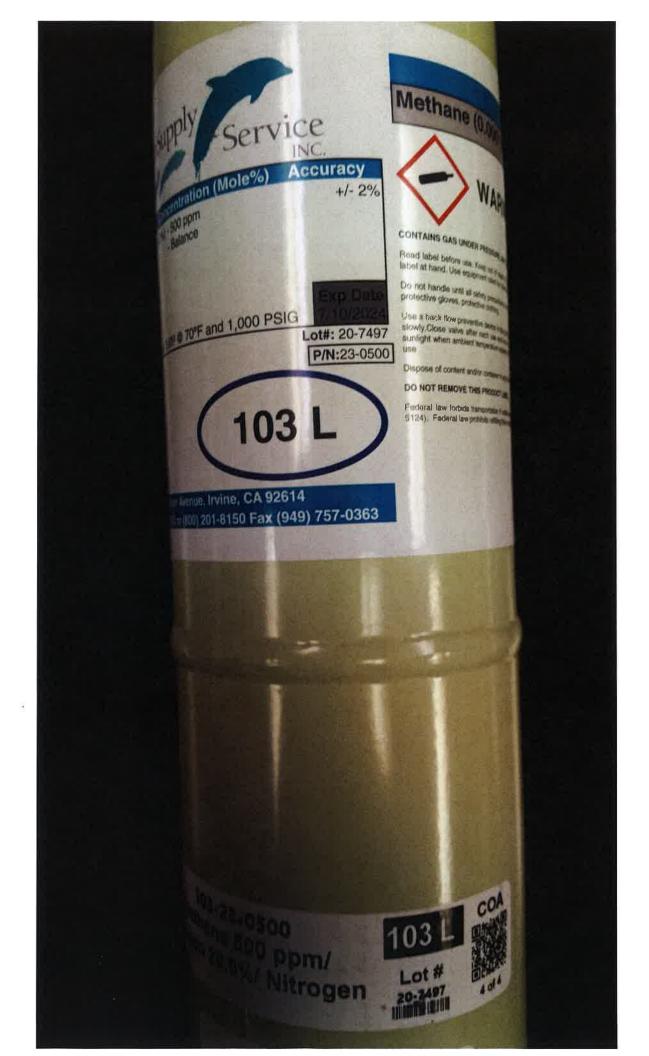
Intermountain Specialty Gases

520 N. Kings Road Nampa, ID 83687 (USA) Phone (800) 552-5003, Fax (208) 466-9143 <u>www.isgases.com</u>



CERTIFICATE OF ANALYSIS

Composition		Certification	Analytical Accuracy (+/-)
Methane		500 ppm	2%
Oxygen Nitrogen		20.9 % Balance UHI	2%
Lot #	20-7497		
Mfg. Date: Expiration Date: Transfill Date:	7/10/2020 see cylinder		
Parent Cylinder ID Number:	TWC001763		
Method of Prepar	ation:		
Gravimetric/Pressu	re Transfilled		
Method of Analys			
The parent mix was		cally and is traceabl	e to the NIST by certified weights (ID
27		Analysis By: Title: Certificate Date:	Tony Janquart Quality Assurance Manager 7/10/2020





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CERTIFICATE OF ANALYSIS

Composition Methane Air

Certification 500 ppm Balance Analytical Accuracy ± 2%

Lot # 19-6955

Mfg. Date: 7/24/2019 Parent Cylinder ID Number: 001763

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



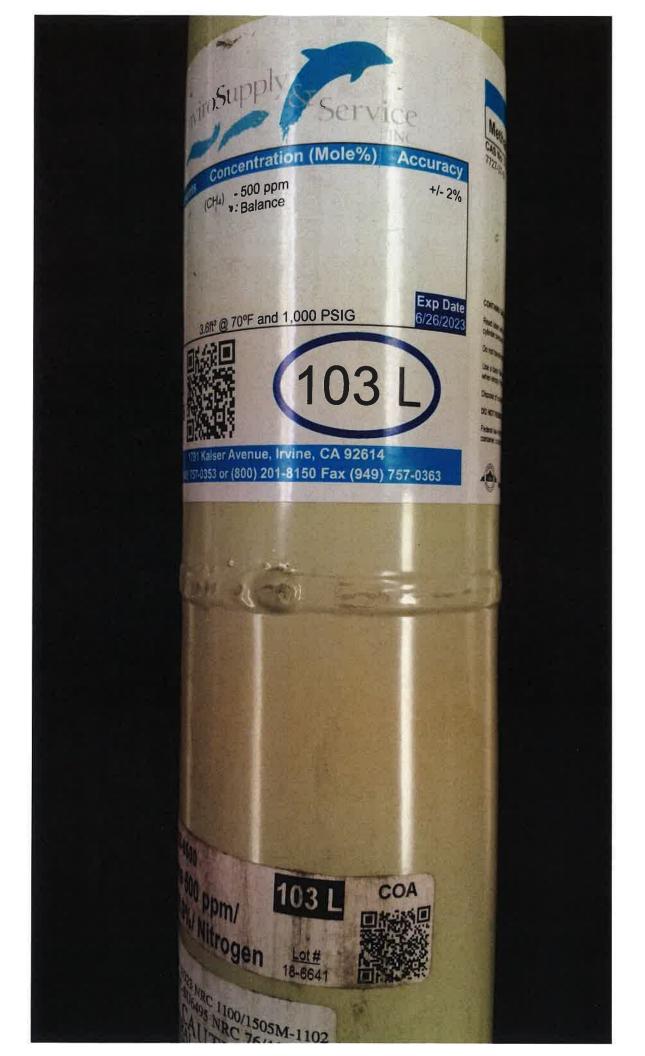
Intermountain Specialty Gases

520 N. Kings Road Nampa, ID 83687 (USA) Phone (800) 552-5003, Fax (208) 466-9143 <u>www.isgases.com</u>



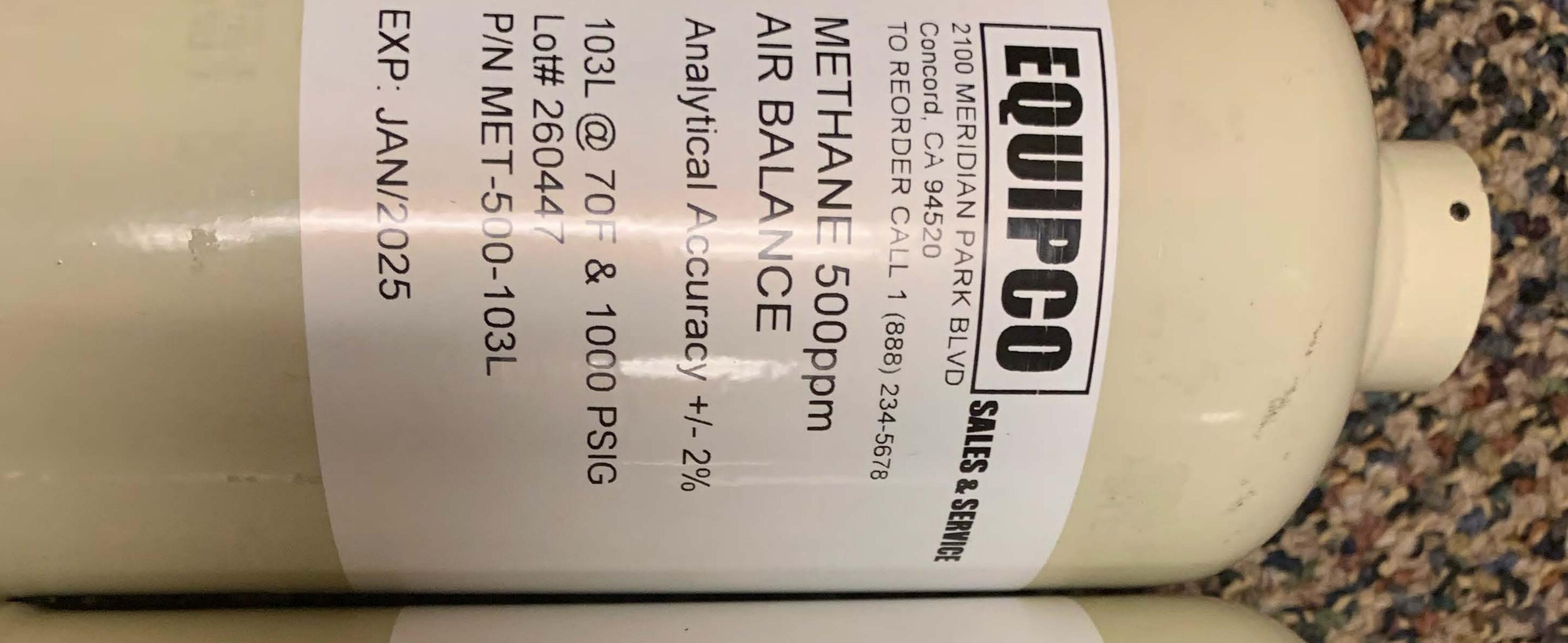
CERTIFICATE OF ANALYSIS

Composition		Certification	Analytical Accuracy (+/-)
Methane		500 ppm	2%
Oxygen		20.9 %	2%
Nitrogen		Balance UHI	
Lot #	18-6641		
Mfg. Date:	12/18/2018		
Expiration Date:			
Transfill Date:	see cylinder		
Parent Cylinder ID	001763		
Number:			
Method of Prepar	ation		
Gravimetric/Pressu			
Method of Analys			
		cally and is traceabl	e to the NIST by certified weights (ID
#CA10814) used to	calibrate the scale.		
	2		
在 大规模的 人名法			
		Analysis By: Title: Certificate Date:	Tony Janquart Quality Assurance Manager 12/18/2018



EXP: J

103L @





CALIBRATION PROCEDURE AND BACKGROUND DETERMINATION REPORT

Landfill Name: Guadluft	Date: 5 9 22	
Time: SS AM PM		201
Instrument Make: TVA-6006	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 = 501 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):

_____ ppm (a) ______ ppm (b)

Calculate Background Value:

 $\frac{(a) + (b)}{2} \quad \text{Background} = \underbrace{15}_{\text{ppm}}$

Performed By:

CALIBRATION PROCEDURE AND BACKGROUND DETERMINATION REPORT

Landfill Name Cuntalipe	Date: 4/14/22	_
Time: 730 AM PM		
Instrument Make: TVA 1000B	Model: THermal	_ S/N: 09178538411

Calibration Procedure

- 1. Allow instrument to internally zero itself while introducing zero air.
- 2. Introduce the calibration gas into the probe.

Stable Reading = 504 ppm

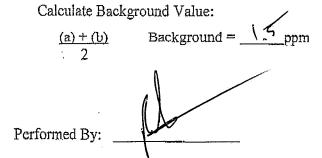
3. Adjust meter to read 500 ppm.

Background Determination Procedure

1. Upwind Reading (highest in 30 seconds):

2. Downwind Reading (highest in 30 seconds):

	1	_ ppm (a)
••••••	\mathcal{V}	ppm (b)



CALIBRATION PRECISION TEST RECORD

Date: 9 Landfill Name: Krb+ Expiration Date (3 months): \nearrow 122 Time: US AM _____ PM Model: Theymal s/N: 0928538411 Instrument Make: TVA 1000B Measurement #1: Meter Reading for Zero Air: _____ ppm (a) Meter Reading for Calibration Gas: 50 \ ppm (b) Measurement #2: Meter Reading for Zero Air: _____ ppm (c) Meter Reading for Calibration Gas: _____ ppm (d) ppm (d) Measurement #3: Meter Reading for Zero Air:Oppm (e)Meter Reading for Calibration Gas:502ppm (f) Calculate Precision: $\frac{\{|(500) - (b)| + |(500) - (d)| + |(500) - (f)|\}}{3} \times \frac{1}{500} \times 100$ _____ % (must be < than 10%)

Performed By:

RESPONSE TIME TEST RECORD

Date: Expiration Date (3 months): 7 Time: 645 AM PM VA 1000B Model: THERMAL S/N: 092853411 Instrument Make: Measurement #1: Stabilized Reading Using Calibration Gas: ppm 90% of the Stabilized Reading: Hee ppm Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas: seconds (a) Measurement #2: Stabilized Reading Using Calibration Gas: ppm 90% of the Stabilized Reading: ppm Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas: u seconds (b) Measurement #3: Stabilized Reading Using Calibration Gas: ppm US 90% of the Stabilized Reading: ppm Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas: seconds (c) Calculate Response Time: (a) + (b) + (c) =_____ seconds (must be less than 30 seconds) 3

Performed By:



October 5, 2022

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

Re: Third 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 Third 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).

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.
 - If the re-monitoring event shows the exceedance is corrected, the location shall be re-monitored within 1 month of the initial exceedance.
 - 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 re-monitoring 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.

THIRD QUARTER 2022 SEM AND COMPONENT LEAK RESULTS

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

Instantaneous Surface Emissions Monitoring Results

The Instantaneous surface monitoring was performed on September 12, 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 no exceedance locations of 500 ppm_v as methane detected on September 12, 2022. No corrective actions were required during this monitoring period.

Ten-Day Re-Monitoring Results

The 10-day re-monitoring event was not required during this monitoring period. All locations during initial monitoring were observed at less than 500 ppm_v.

One-Month Re-Monitoring Results

The 1-month re-monitoring event was not required during this monitoring period. All locations during initial monitoring 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 September 13, 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 September 13, 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 September 12, 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.

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

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

2022 QUARTER: 3

PERFORMED BY: RES

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Flag Number	Grid Number	Date of Monitoring	Concentration of Emission (ppmv)	Comments
None				
Notes: Please refer	to field data sheets fo	r details		

Table A.2Instantaneous Landfill Surface Emissions MonitoringExceedance and Monitoring Logs (NSPS/BAAQMD 8-34)

 2022 QUARTER:
 3

 INITIAL MONITORING PERFORMED BY:
 RES

 FOLLOW-UP MONITORING PERFORMED BY NA

 LANDFILL NAME:
 Guadalupe Recycling & Disposal Facility

Initi	al Monitoring	Event	Corr	ective action within 5 days	1st 1	0-day Follow	/-Up	1st 3	0-day Follow	/-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
None											

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

2022 QUARTER:

INITIAL MONITORING PERFORMED BY: RES

3

FOLLOW-UP MONITORING PERFORMED BY: NA

LANDFILL NAME:

Guadalupe Recycling & Disposal Facility

Init	ial Monitoring Event		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
None									

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

2022 QUARTER:3INITIAL MONITORING PERFORMED BY:RESFOLLOW-UP MONITORING PERFORMED BY:NALANDFILL 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					

Personnel: LEICHWADE	Dwight Anoshoo ~	
NILIL BEAKS	JOSHRIZO	
LELVINORTIZ		Cal. Gas Exp. Date: 7-10-24

Date: 9-12-22 Instrument Used: 10A1000 Grid Spacing: 251

Temperature: $\underline{\$9}$ Precip: $\underline{0}$ Upwind BG: $\underline{7.2}$ Downwind BG: $\underline{2.6}$

GRID ID	STAFF	START	STOP	тос	WIN	D INFORM	ATION	REMARKS
(l	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	KEMARKO
1	lw	1130	1145	39	1		10	
2	NB	1120	1145	25			10	
3	CD	1130	1145	23	1	1	10	
4	DA	1130	1145	16	III		10	
5	Th	1130	1145	39	II	1	16	
8	LW	1145	1200	41	4	2	16	
11	NB	1145	1200	14		2	16	
19	CO	1145	1200	13	li	2	16	
24	DA	1145	1200	11	1	2	10	
29	In	1145	1200	17		2	16	
31	LW	1200	1215	54	2	2	10	
35	NP	1200	1215	16	2	2	10	
3-6	CD	1200	1215	58	2	2	10	
32	-DA	1200	1215	44	2	2	10	
41	Th	1200	1215	20	2	2	10	
42	W	1215	1230	60	1		16	
43	NB	1215	1230	51			16	
47	DR	1215	1230	20		1	16	
48	62	1215	1230	37			110	
49	yn	1215	1230	39		1.	10	
50	Lw	1230	1245	32		2	16	
54	NB	1233	1245	60	1	2	16	
55	00	1230	1245	44		2	16	
59	OR	1230	1245	29	1	2	16	
60	7n	1230	1245	43	1	2	16	
6/	Lw	1245	1300	25			16	
64	NB	124-5	1300	19		1	16	
65	DA	1245	1300	25	1	Í	16	
66	CD	1245	1300	48			16	
67	In	1245	1300	41		1	16	

Attach Calibration Sheet Attach site map showing grid ID

Page _____ of _____

Personnel: LEISHWADE NICKBENKS	DwightALBERSTL	
NICKBENKS CELVENORTIZ	7084 N 620	Cal. Gas Exp. Date: 7-10-29
Date: 9-12-22 Instrument Us	sed: +VAIOTO Gr	rid Spacing:75

Temperature: <u>9</u> Precip: <u>O</u> Upwind BG: <u>Z. Z</u> Downwind BG: <u>Z. 6</u>

GRID ID	STAFF	START	STOP	тос	WIN	ID INFORM	ATION	REMARKS
	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	REMARKS
69	Lu	1300	1315	19		2		
70	NB	1300	1315	57	1	2	1	
7/	DA	1300	1315	25	1	2	1	
72	20	1300	1315	31	1	2		
73	Jh	1300	1315	24		2	1	
74	Lu	1315	1330	27	2	3	10	
76	NB	1315	1330	45	2	<u>3</u> 3	10	
77	CD	1315	1330	21	2	3	10	
78	DA	1311	1330	17	2	3	10	
79	In	1315	1330	20	2	3	10	
82	LW	1330	1345	36	1		10	
83	NB	1330	1345	29	1		16	
86	DA	1330	1345	20	li	1	16	
87	-CD	1330	1345	17			16	
90	in	1330	1345	14			16	
91	LW.	1345	1400	21	1	2	2	
92	NB	1345	1400	16	1	2	2	
94	DA	1345	1400	51	1	2	2	
95	05	1345	1400	18		2	2	
98	m	1345	1400	39	1	2	2	
99	Lw	1410	1415	16	2	2	2	
100	AVA	1400	1415	2>	2	2	2	
181	OA	1400	1415	19	2	2	2	
102	CD	1400	1415	21	2	2	2	
103	in	1400	1415	18	2	2	2	
184	LW	1415	1430	21	4	6	16	
125	NO	1415	1430	17	4	6	16	
							17	

Attach Calibration Sheet Attach site map showing grid ID

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								Exp. Date:
ate: _9	-12-22	Instrur	nent Used	l:		Gri	d Spacing	
emperat	ure:	Prec	cip:	Up	wind BG		Downv	vind BG:
GRID ID	STAFF	START	STOP	тос	WIN	D INFORM	IATION	REMARKS
	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	KEMAKKS
55								Activo-Insus
80								1
81								
84						12100		
85.			4			1		
88								
85								
73								
76						V		
92								4
67								Dintstackfill - construction
								1
9								
ID	4					N		
12								
3								
15					1.1.1			
6								
18								
20			-				-	
2/				1		12-1		
25	1							
26								
38			1					
14								Steep Slopes
7								
22						1.00		
2>				1.1				
32								
38			100 C				(4

Attach Calibration Sheet Attach site map showing grid ID

1_of_2_ Page

330

. 0	10 20							Exp. Date:
ate: <u>9</u>	-1666	Instrur	nent Used	i		Grid	d Spacing:	·
emperat	ure:	Prec	cip:	Up	wind BG:		Downv	vind BG:
GRID ID	STAFF	CTART	~~~~~	TOC	WIN	D INFORM	IATION	
GRID ID	INITIALS	START TIME	STOP TIME	TOC PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	REMARKS
14								1
51								
56								V
23								NO WASTE INPK.
28								
33			•.					
34								
39							-	
40								
45			-					
4-6								
52								
53								
58	-							
63	-							
68								
00								
			-					
						-		
							1-0-0	
							-	
	1							1
		1 - 1 - 1						

Attach Calibration Sheet Attach site map showing grid ID

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NOTES			LCRS NORTH	Hetwe stack pick	Active 1	Acture U	1 1	V V		r r	WAS 2019 PW6 540, 160, 66	WAS 2019 PW7		construction stockoult								consurces to was fallent	-						F				Stockpile - CONSTAUMON					*	Stockpill coust rection			1	WAS 2019 PW1A
READING (PPM)	16	r	a										14								27									24	16	13											
DATE	9-12-22	2									The second	-			and the second s																							1					
SEM GRID BLOCK NO.	1	£	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		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 Coltector - Standard	LFG Collector - Standard	LFG Colfector - Standard	LFG 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	LC-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	m	4	2	9	7	∞	6	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43

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

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NOTES	WAS 2019 PW2					WAS 2019 PW3											LCRS SOUTH					WAS 2019 PW15													WAS 2019 PW4						WAS 2019 PW10	WAS 2019 PW8	
(PPM)	24 WI	50	29	55	21	19 WI	34	1>	58	16	29	44	27	16	49	21	15 LCI	60	62	63	26	200 WI	12	1.5	56	31	62	44	19	20	31	12	63		in いろへ	110	85	146	29		M Jr		00
DATE	9-12-27	1																									-				10-					1		1	-			1	
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	50	50	55	55	55	59	60	60	60	60	60	61	62	62	62	65	65	65	65	66
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	-121.8981348	-121.8986237	111 0075753
LATITUDE	37.2155189	37.2158282		37.2157522	37.2158131	37.2158817		37.2156196	37.2155737	37.2153905	37.2154869	37.2153568	37.215772	37.215772	37.2152815		37.2152234		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	37.214152	37.2141842	
POINT TYPE	LFG Collector - Standard	LFG Collector - Standard		LFG Collector - Standard	LFG Collector - Standard	LFG Coltector - Standard		LFG Collector - Standard	LFG Colfector - Standard	LFG Collector - Standard	Leachate Riser or Sump (LR)	LFG Collector - Standard		LFG Collector - Standard	Condensate Sump or Drain (CS)				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	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	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	60106	60108	
No.	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	99	67	68	69	70	71	72	73	74	75	76	11	78	62	80	81	82	83	84	85	

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

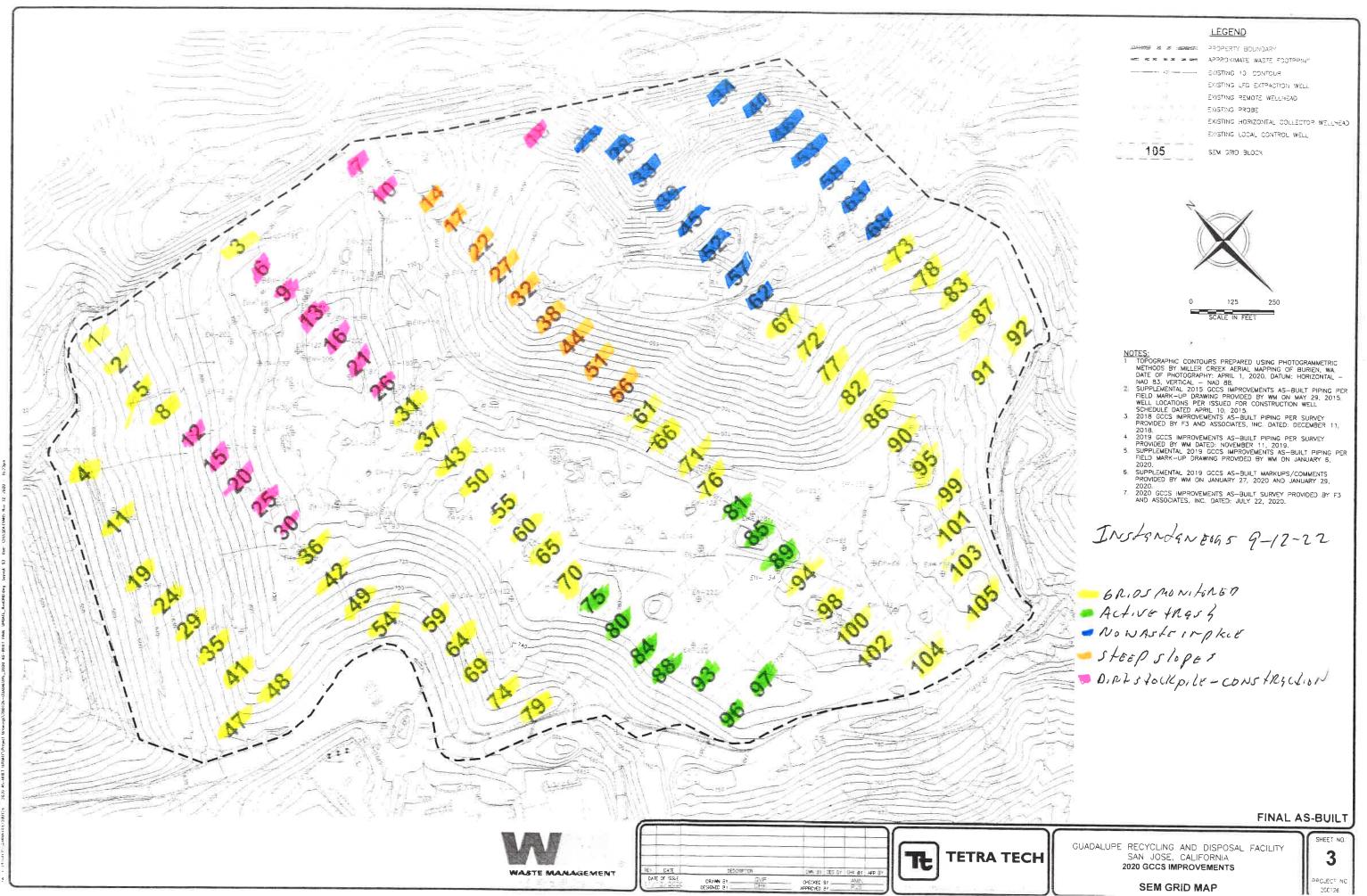
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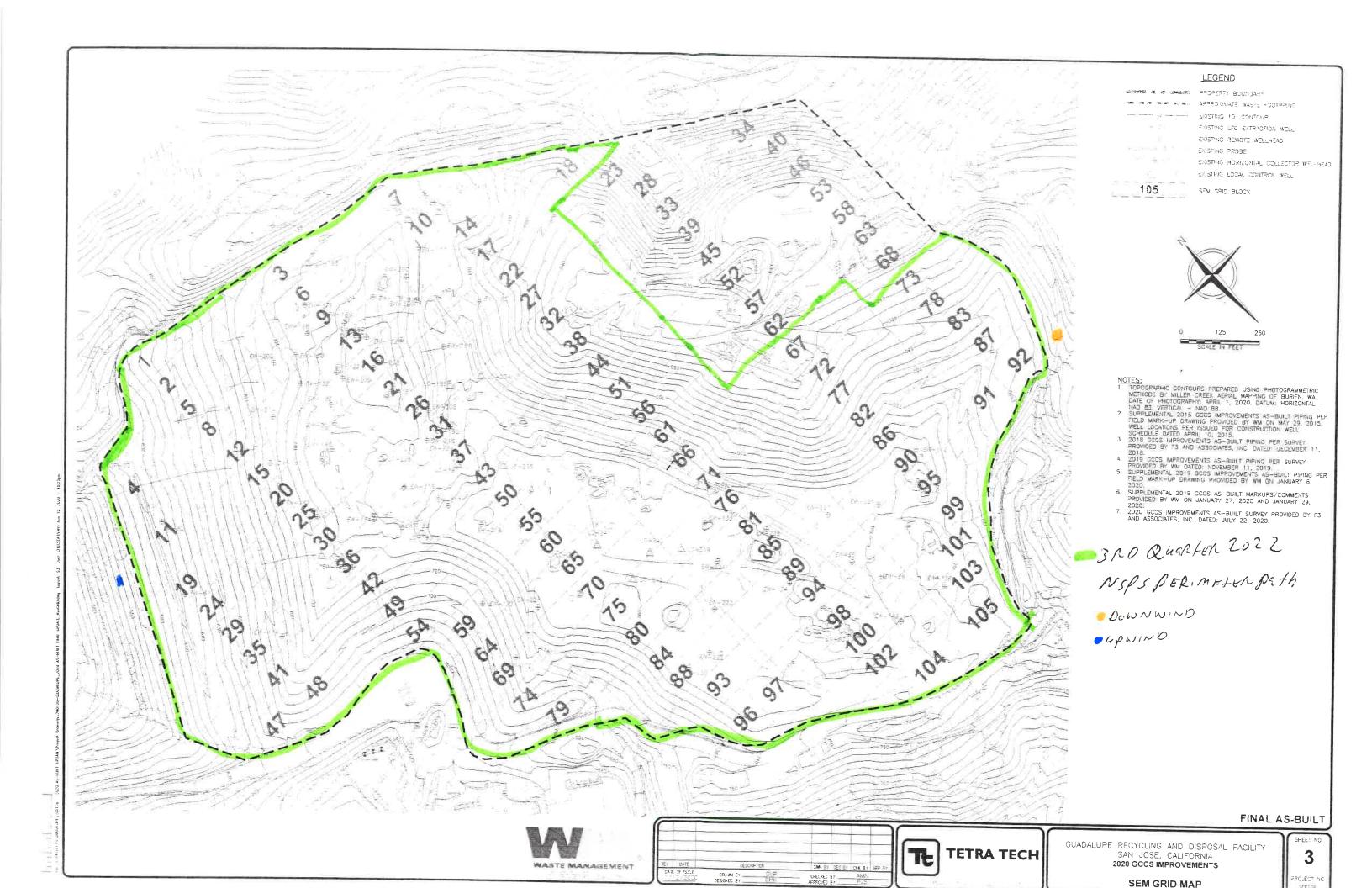
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NOTES		WAS 2019 PW11			WAS 2019 PW13		Hesterton	WAS 2019 PW14 /		WAS 2019 PW239	Achive - 2 Kerl		J.	active-Anes 6	1	4	/			1			w.								
READING (PPM)	31	18	15	19	32	25			55	21														11	191	g,	15	65	2>	12	
DATE	9-12-21	-	1				121 14				1.00												100 E						5 0 8		
SEM GRID BLOCK NO.	66	66	67	69	70	71	75	75	76	76	81	81	81	84	84	85	88	88	88	88	89	89	89	90	90	90	94	98	100	102	
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	
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	37.2119254	37.2118093	
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	
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	
No.	87	88	89	90	91	92	93	94	95	96	97	98	66	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	

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

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Attachment B

Integrated Surface Emission Monitoring Event Records

Table B.1Integrated Landfill Surface MonitoringExceedances and Monitoring Log

2022 QUARTER:3INITIAL MONITORING PERFORMED BY:RESFOLLOW-UP MONITORING PERFORMED BY:NALANDFILL 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						

Personnel: LEISH WADE	Dwight ANDERSON	
NICK BENKS	Jos 4 1920	
cilvin offic		Cal. Gas Exp. Date: _7-10-24

Date: <u>9-13-22</u> Instrument Used: <u>4041000</u> Grid Spacing: <u>25'</u>

Temperature: <u>65</u> Precip: <u>O</u> Upwind BG: <u>2.2</u> Downwind BG: <u>2.6</u>

GRID	STAFF	START	STOP	тос	NIW	ND INFOR	MATION	REMARKS
ID	INITIALS	TIME	TIME	РРМ	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	REMARKS
1	Lw	0525	0550	5.10	3	3	10	
2	NB	0525	6550	4.66	3	3	10	
3	60	0525	6550	5.03	3	3	10	
4	DA	0525	0550	4.21	3	3	10	
5	JA	0525	8558	5.16	3	3	10	
8	lw	0550	0615	5.41	3	5	- 10	
11	NO	0550	0615	3.77	3	5	10	
19	PA	0550	0615	3.21	3	5	10	
24	CO	0550	0615	3.76	3	5	10	
29	jn	5550	0615	4.03	3	5	10	
31	LW	0615	0640	6.27		6	lo	
35	NB	0615	0640	5.41	4	6	10	
36	CD	0615	0640	5.22	4	10	10	
37	PA	0615	6640	4.98	4	6	10	
41	Jh	0615	0640	4.06	4	6	10	
42	LW	0640	2050	5.40	4	10	10	
43	NO	0640	2010	6.21	4	6	10	
47	DA	0640	2550	5.02	4	4	10	
48	00	0640	2050	4-66	4	6	10	
49	JL	0640	0705	7.11	4	6	10	
50	21	2050	6730	5.54	3	4	14	
54	ND	6705	0770	4.28	3	4	14	
55	60	2050	0730	5.31	3	4	14	
59	DA	0725	0730	5-18	3	4	14	
60	In	3705	0230	4.62	3	4	14	
61	U	0730	0755	5.08	3	3	14	
64	ND	0730	0755	6-24	3	3	14	
65	0)	0730	0755	5.92	3		14	
66	DA	0730	6755	6.11	3	33	14	
67	71	0)30	220	5.74	3	3	14	

Attach Calibration Sheet

Attach site map showing grid ID

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Personnel: LEISHWARE	DWight ANDENSON	
NICH BERKS	Josh REZO	
Licono pictio		_ Cal. Gas Exp. Date: <u>7-10-29</u>

Date: 9-13-22 Instrument Used: +VA1000 Grid Spacing: 25/

Temperature: <u>69</u> Precip: <u>0</u> Upwind BG: <u>2.2</u> Downwind BG: <u>2.6</u>

GRID	STAFF	START	STOP	тос	WIN	D INFOR	MATION	REMARKS
ID	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	REMARKS
69	LW	0755	0820	5.50	3	5	14	
70	NB	6755	0820	7.24	3	5	14	
71	(0)	0755	0820	5.36	3	5	14	
72	DA	0755	0820	6.03	3	5	14	
73	JA	2250	0820	4.91	3	5	14	
74	2m	0820	0845	7.15	3	いいす	. 14	
76	NB	0820	0845	6.84	3	4	14	
77	60	0520	082	5.14	3	4	14	
78	DA	OFZO	0845	4.07	3		14	
79	9n	0820	0845	6-52	3	4	14	
82	Lw	0845	0910	4.25	3	4	14	
83	NO	0845	0910	3.61	3	4	14	
86	CD	0845	0910	4.12	3	4	14	
87	DZ	6845	0910	4.71	3	4	14	
90	m in	0845	0910	5.15	3	4	14	
91		0910	0935	4.32	2	3	16	
92	NB	0710	0935	4.16	2	3	16	
74	CD	0910	0935	6.50	2	3	16	
95	PA	0910	0935	4.34	2	3	16	
98	gh .	0510	0925	5.97	2	3	16	
99	lw	0935	1000	4.20	1	2	16	
100	NB	0975	1000	5.65		2	16	
101	DA	2535	1000	5.27		2	16	
102	20	0935	1000	4.80	1	2	16	
103	In	0935	1000	4-11	1	2	16	
104	en	1000	1625	4,66		3	16	
105	NB	1000	1025	3.70	1	3	16	
						1		
			-					

Attach Calibration Sheet

Attach site map showing grid ID

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	12						Cal. Gas Ex		
ate: <u>9</u>	-13-22	Instrume	nt Used: _			_ Grid S	Spacing:		
emperat	ure:	Precip	:	Upwind	BG:		Downwin	d BG:	
GRID	STAFF	START	STOP	тос	WIN	D INFOR	MATION	DEM	
ID	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	KEM	ARKS
75								ACTIVE	-+Ars
80									
81			-						
84									
85									
88		-							
85									
73									
76									
77	· · · · · · · · · · · · · · · · · · ·							V	
67			1					DIRLSto	ERECT
9								1	
10			-						
12									
3									
5									_
16									
6				-					
20		E/							
21 25						-			
2.6									
10									
						-		V	
4								steep.	Slope)
2					-				
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32 38					-	-			_

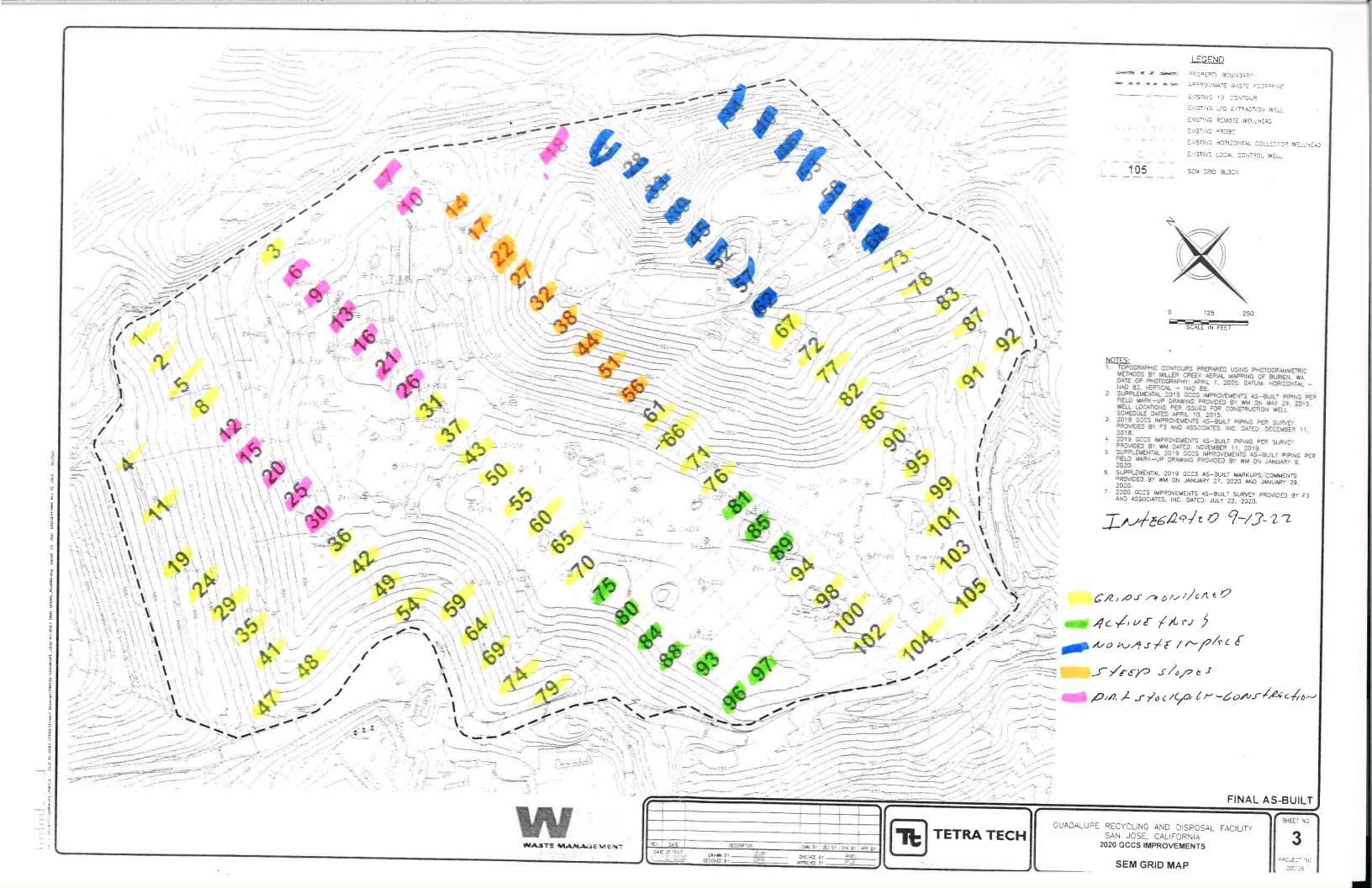
Attach Calibration Sheet Attach site map showing grid ID

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ato 9	-13-22	Inchaster	ne lles d					(p. Date:
mperat	ure:	Precip		_ Upwind	BG:		Downwin	d BG:
GRID	STAFF	START	STOP	тос	WIN	ID INFOR	MATION	REMARKS
ID	INITIALS	TIME	TIME	PPM	AVG SPEED	MAX. SPEED	DIRECTION 16 POINT	
44		-						1
51								
16 23						-		Y
28					-	-		NOWAStEINPS
2 7					-			
33							•	
79								
D								
15						-	-	
16								
-2						22-1		A
							(Free 1 2)	
57							(
18						-		
52								
3		-			-			
18								A
					1			
							-	

Attach Calibration Sheet Attach site map showing grid ID

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Attachment C

Component Leak Monitoring Event Records

Table C.1AB-32 Component Leak MonitoringSummary of Component Leaks Greater than 500 ppmv

2022 QUARTER:

INITIAL MONITORING PERFORMED BY: RES

3

FOLLOW-UP MONITORING PERFORMED BY: NA

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Location	l	nitial Monitorin	g	С	Corrective Action	10-	Day Remonito	ring
Location	Date	TOC (ppmv)	Tech	Date	Description	Date	TOC (ppmv)	Tech
Flare Station A-9	9/12/2022	ND	RES	NA	NA	NA	NA	NA
Flare Station A-14	9/12/2022	ND	RES	NA	NA	NA	NA	NA

ND= No Exceedances

Table C.2BAAQMD Component Leak MonitoringSummary of Component Leaks Greater than 1,000 ppmv

2022 QUARTER:

INITIAL MONITORING PERFORMED BY: RES

3

FOLLOW-UP MONITORING PERFORMED BY: NA

LANDFILL NAME: Guadalupe Recycling & Disposal Facility

Location	1	nitial Monitorin	g	С	corrective Action	7-[Day Remonitor	ing
Location	Date	TOC (ppmv)	Tech	Date	Description	Date	TOC (ppmv)	Tech
Flare Station A-9	9/12/2022	ND	RES	NA	NA	NA	NA	NA
Flare Station A-14	9/12/2022	ND	RES	NA	NA	NA	NA	NA

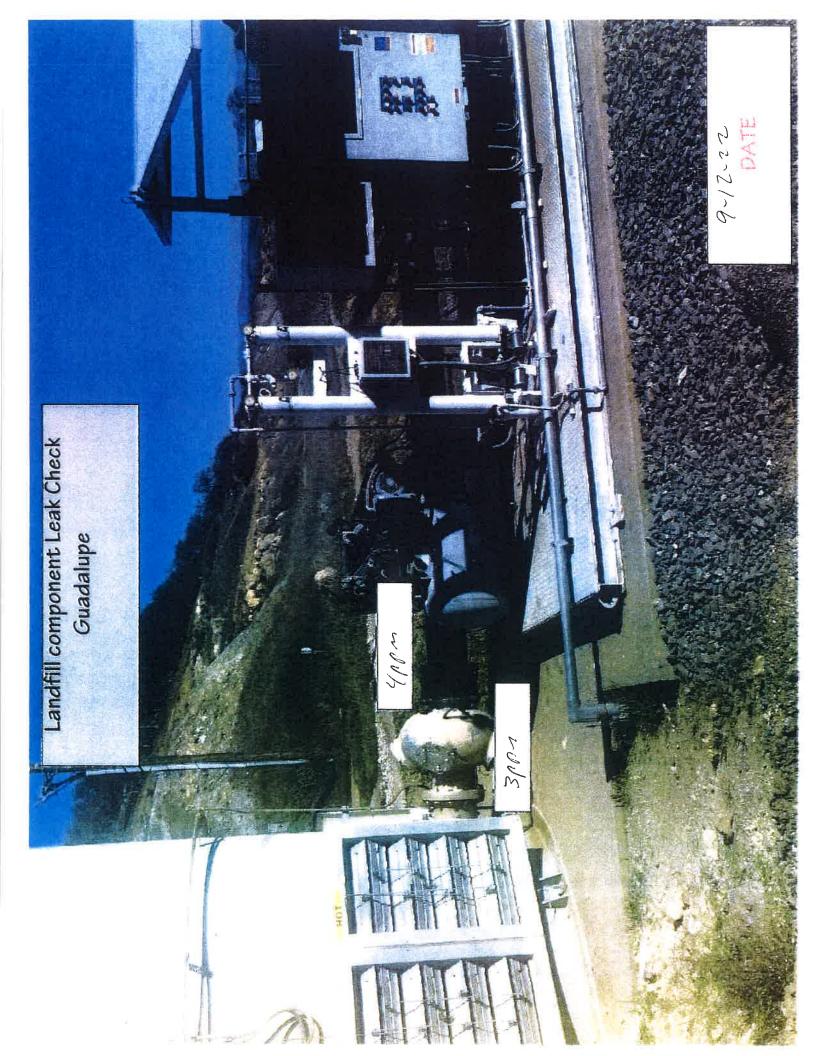
ND= No Exceedances

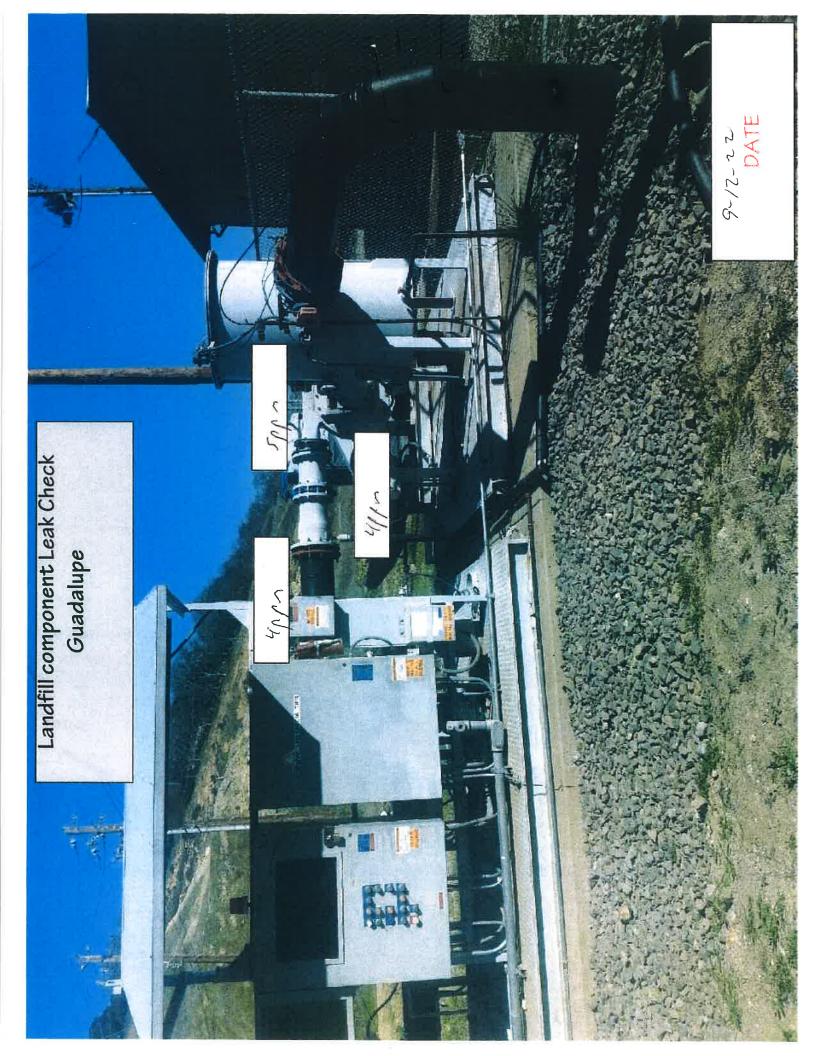
LANDFILL NAME: *Girst Dr lie p t* QUARTERLY LFG COMPONENT LEAK MONITORING

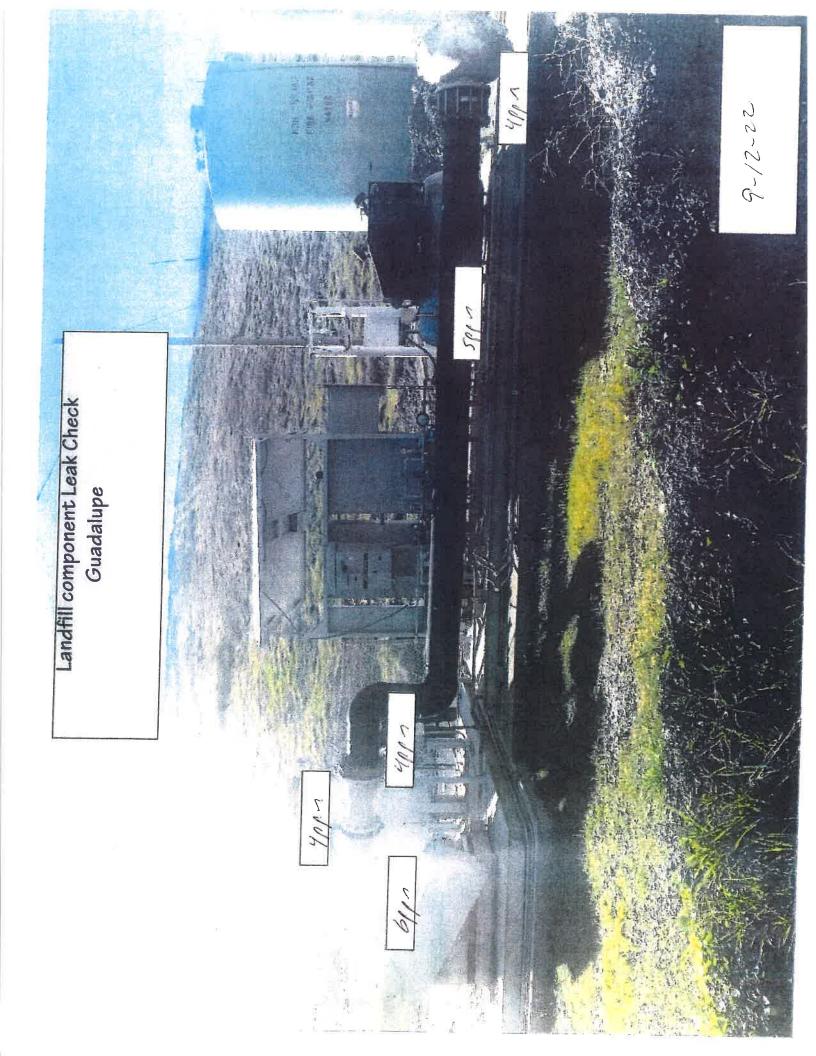
INSTRUMENT FID MAKE: Thermo Environr MODEL: TVA 1000 S/N: ノッご くン ダら ア ス 3

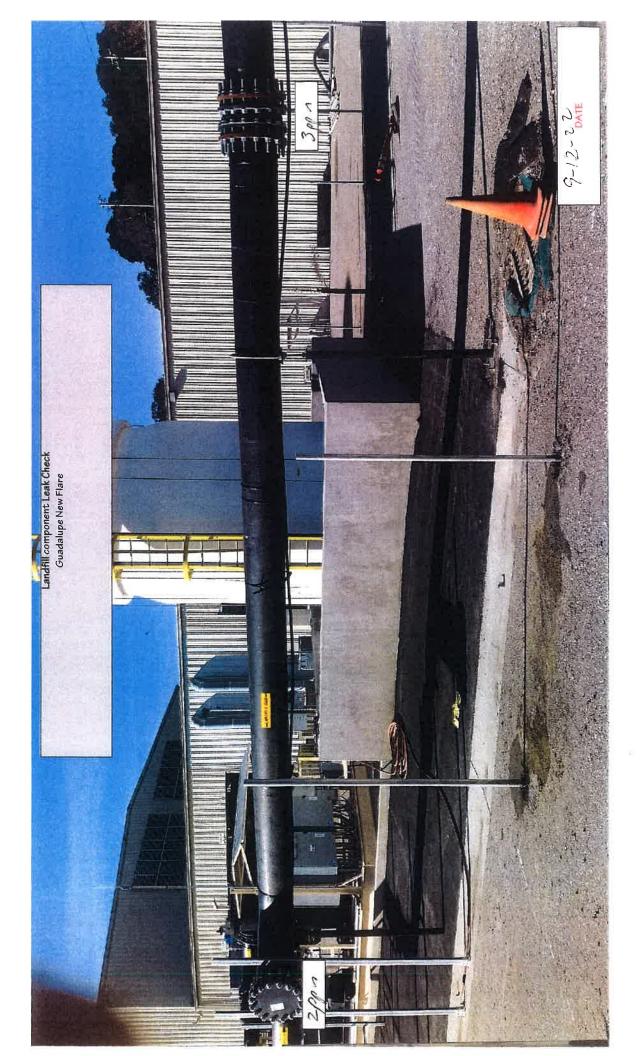
DATE OF SAMPLING: \hat{Q} -/ 2 - 2 \mathcal{C} TECHNICIAN: \mathcal{L} \mathcal{E} \mathcal{G} \hat{A} λ $\lambda \rho$ \mathcal{P}

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)
NOEXLERDENCED							
In the event that an exce	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.	e intiate corrective act	ion and re-monitor	the exceedance location	within 7 days of th	ne 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 a 4, Subarticle 6, Section 95464(b)(1)(B).	lances at any compor	ient containing lan	ny component containing landfill gas, pursuant to CARB Title 17 of California Code of Regulations Subchapter 10, Article	tB Title 17 of Calife	omia Code of Regulation	is Subchapter 10, Article
NOTE: Leaks over 1,000	NOTE: Leaks over 1,000 ppmv methane are exceedances at	edances at any comp	onent containing la	any component containing landfill gas, pursuant to BAAQMD Regulation 8-34-301.2.	AQMD Regulation	ו 8-34-301.2.	







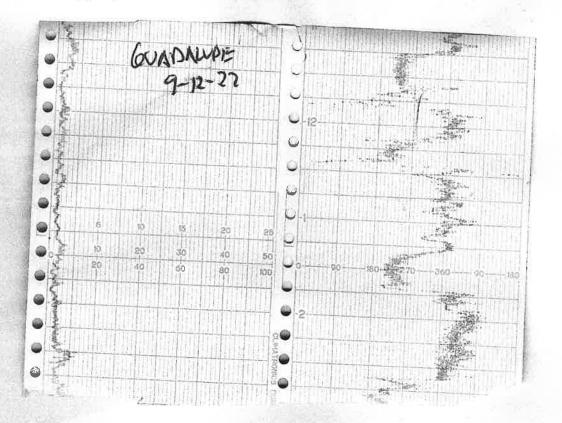




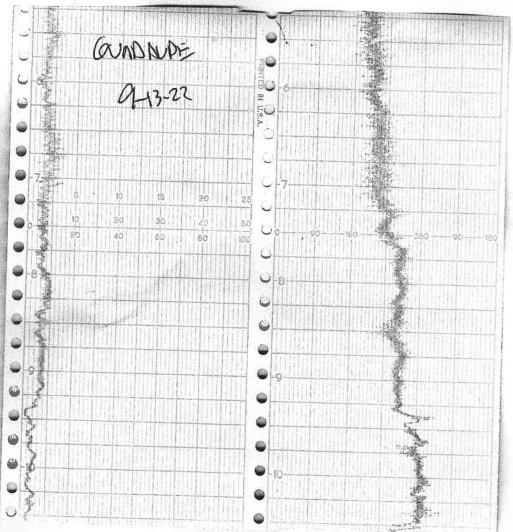


Attachment D Weather Station Data

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	U.1.3
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
4	EAST (E)	078.8	<u>090.0</u>	101.3
5	EAST-SOUTHEAST (ESE)	101.3	112.5	123.8
6	SOUTHEAST (SE)	123.8	135.0	146.3
7	SOUTH-SOUTHEAST (SSE)	146.3	157.5	168.8
8	SOUTH (S)	168.8	180.0	191.3
9	SOUTH-SOUTHWEST (SSW)	191.3	202.5	213.8
16	SOUTHWEST (SW)	213.8	225.0	236.5
11	WEST-SOUTHWEST (WSW)	236,3	247.5	258.8
12	WEST (W)	258.8	<u>270.0</u>	281.3
13	WEST-NORTHWEST (WNW)	281.3	292.5	303.8
14	NORTHWEST (NW)	30.1.8	315.0	326.3
5	NORTH-NORTHWEST (NNW)	326.3	337.5	348.8

865 Via Lata Colton, California 92324 (909) 422-1001 Fax (909) 422-0707

Attachment E

Calibration Records



Site:		
Ригрозе:		
Operator:M		
Date: 9-10-22	Time:	0900
Model #		
Serial # 10 1036346773		

INSTRUMENT INTEGRITY	CHECKLIST	INSTR		TION
Battery test	Fass / Fail		LIBRATION CHEC	
ballery lest	ass / Fall	Calibration Gas (ppm)	Actual	%
Reading following ignition	2.4 ppm		(ppm)	Accuracy
Leak test	Fass / Fail / NA	500	Suo	100
	ass / rail / NA		RESPONSE TIME	
Clean system check	Pass / Fail / NA			
(check valve chatter)	$\mathcal{O}^{\mathcal{O}}$	Calibration Gas, p	ma	500
	^	90% of Calibration		440
H ₂ supply pressure gauge	Pass / Fail / NA		ttain 90% of Cal G	
(acceptable range 9.5 - 12)	Ċ,	1.		
	29-22	2.	6	
Date of last factory calibration	pa-ce	3. (0	
	6			
Factory calibration record	eass / Fail		10	()
w/instrument within 3 months		Equal to or less th		CY N
		Instrument calibra	ted to <u>UMM</u>	_gas,

Comments:



SURFACE	EMISSION	MONITORING	INSTRUMENT
	CALIB	RATION LOG	

Site:			
Purpose:			
Operator: M			
Date:9-10-27	Time:	0915	
Model # 1000			
Serial # 11 1036 346 774			
INSTRUMENT INTEGRITY CHECKLIST	INST	RUMENT CALIBRA	TION
Battery test Fail	C, Calibration Gas (ppm)	ALIBRATION CHEC Actual (ppm)	ж % Accuracy
Reading following ignition <u>1,1</u> ppm	- 900	Commission and the	
Leak test Pass / Fail / NA	700	çou	600
Clean system check (check valve chatter)	Calibration Gas, 90% of Calibratio		500
H ₂ supply pressure gauge (acceptable range 9.5 - 12)	Time required to 1.	attain 90% of Cal G	
Date of last factory calibration 7-9-22	2. 3.	2	
Factory calibration record w/instrument within 3 months	Average Equal to or less the line transformed to a libration of the	han 30 seconds?	Ø N gas.

Comments:

4



Site:				
Purpose:				
Operator:	4 M			
Date:9-10-21		Time:	0930	
Model # 100	0			
Serial # 12 1036	246741			
	TY CHECKLIST	INST	RUMENT CALIBR	ATION
Potton toot			ALIBRATION CHE	
Battery test	Pass / Fail	Calibration Gas (ppm)	Actual (ppm)	% Accuracy
Reading following ignition	ppm	Cus (ppin)	(ppin)	Accuracy
		Soo	500	100
Leak test	Pass / Fail / NA		RESPONSE TIME	
Clean system check	Pass / Fail / NA		RESPONSE HIVI	_
(check valve chatter)		Calibration Gas, p	opm	500
	C h	90% of Calibratio		450
H ₂ supply pressure gauge	Rass / Fail / NA	Time required to	attain 90% of Cal 0	Gas ppm
(acceptable range 9.5 - 12)		1 6	2	

1.

2.

3. Average

-11

Rass / Fail

6

6

1

Equal to or less than 30 seconds?

6.3

Instrument calibrated to <u>CH4</u> gas.

Date of last factory calibration

Factory calibration record w/instrument within 3 months

Comments:

465

 $\langle \mathcal{V} \rangle$

Ν



Purpose:				
	14			
Operator:	//			
Date: 9-10-22		Time:	0945	
Model # 1000				
Serial # <u> </u>	46775			
INSTRUMENT INTEGRITY	CHECKLIST	INSTR		ATION
	0		LIBRATION CHE	СК
Battery test	Pass / Fail	Calibration	Actual	%
Reading following ignition	2.2 ppm	Gas (ppm)	(ppm)	Accuracy
	6	560	540	100
eak test	eas / Fail / NA		RESPONSE TIME	:
Clean system check	Pass / Fail / NA			
check valve chatter)	Ŭ	Calibration Gas, p		500
H ₂ supply pressure gauge	Págs / Fail / NA	90% of Calibration	n Gas, ppm	150
acceptable range 9.5 - 12)	0	1. 1.		as hhiu
Date of last factory calibration	7-9.72	2. 7		
and of fast factory calloration		3. <u>k</u>	>	
Factory calibration record	Pass / Fail	Average (g		
w/instrument within 3 months	_	Equal to or less th Instrument calibra		(Y) N gas.
Comments:				

465



Site:				
Purpose:				
Operator:	101			
Date: <u>9-10-22</u>	-	Time:	(070	
Model # <u> </u>	77.6			
INSTRUMENT INTEGRITY	CHECKLIST	INSTR		ATION
Battery test Reading following ignition	Pass / Fail	CA Calibration Gas (ppm)	LIBRATION CHE Actual (ppm)	CK % Accuracy
Leak test Clean system check	eass / Fail / NA		SØØ RESPONSE TIME	
(check valve chatter) H ₂ supply pressure gauge (acceptable range 9.5 - 12)	Cass/Fail/NA	Calibration Gas, p 90% of Calibration Time required to a 1.	Gas, ppm	500 450 Sas ppm
Date of last factory calibration Factory calibration record w/instrument within 3 months	Pass) Fail	3. Average <u>9</u> Equal to or less th Instrument calibra	an 30 seconds?	gas.

Comments:

MES UN + #10 CUSTOMER: 2467 SERIAL NUMBER: ()51 TECHNICIAN: -9-27 DATE:

GAS CALIBRATION CHECK (PERFORMED AT ROOM TEMPERATURE)

	FI	D	
METHANE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)
100	100	(00)	+/- 25
500	500	500	+/- 125
10000	10000	10,000	+/- 2500
< 1	ZERO GAS	(0,69	< 3
	PI		
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	1	< 3

All measurement standards are calibrated at scheduled intervals by the National Institute of Standards and Technology (NIST), or against certified standards, which are traceable to the National Institute of Standards and Technology.



CUSTOMER:	MAS vat # 11
SERIAL NUMBER:	1036346774
	Muit DATE: 1-9-27

GAS CALIBRATION CHECK (PERFORMED AT ROOM TEMPERATURE)

	El	D	
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	0,52	< 3
	PI	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

All measurement standards are calibrated at scheduled intervals by the National Institute of Standards and Technology (NIST), or against certified standards, which are traceable to the National Institute of Standards and Technology.

MES Valt #12 CUSTOMER: 1036246741 SERIAL NUMBER: Warts DATE: <u>9-9-17</u> TECHNICIAN:

GAS CALIBRATION CHECK (PERFORMED AT ROOM TEMPERATURE)

	Fi	D	
METHANE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)
100	100	100	+/- 25
500	500	503	+/- 125
10000	10000	(0,000	+/- 2500
< 1	ZERO GAS	0,46	< 3
	Pil)	
ISOBUTYLENE GAS NOMINAL (ppm)	CALIBRATION GAS.(ppm)	TVA READING (ppm)	TOLERANCE (ppm)
50	50	1	+/- 12.5
100	100		+/- 25
500	500		+/- 125
< 1	ZERO GAS		< 3

All measurement standards are calibrated at scheduled intervals by the National Institute of Standards and Technology (NIST), or against certified standards, which are traceable to the National Institute of Standards and Technology.

CUSTOMER:RES VAIT #1	3
SERIAL NUMBER:	
TECHNICIAN: <u>Muset</u>	DATE: <u>7-9-22</u>

GAS CALIBRATION CHECK (PERFORMED AT ROOM TEMPERATURE)

	FI	D	
METHANE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)
100	100	99	+/- 25
500	500	500	+/- 125
10000	10000	10,000	+/- 2500
< 1	ZERO GAS	059	< 3
	Pil	D	
ISOBUTYLENE GAS NOMINAL (ppm)	CALIBRATION GAS_(ppm)	TVA READING (ppm)	TOLERANCE (ppm)
50	50	1	+/- 12.5
100	100		+/- 25
500	500		+/- 125
< 1	ZERO GAS	/	< 3

All measurement standards are calibrated at scheduled intervals by the National Institute of Standards and Technology (NIST), or against certified standards, which are traceable to the National Institute of Standards and Technology.

CUSTOMER:	-16
SERIAL NUMBER:	
TECHNICIAN:	DATE: <u>7-9-27</u>

GAS CALIBRATION CHECK (PERFORMED AT ROOM TEMPERATURE)

	FI	D	
METHANE GAS NOMINAL (ppm)	CALIBRATION GAS (ppm)	TVA READING (ppm)	TOLERANCE (ppm)
100	100	100	+/- 25
500	500	501	+/- 125
10000	10000	(0,021	+/- 2500
< 1	ZERO GAS	0,69	< 3
	PII	D	
ISOBUTYLENE GAS NOMINAL (ppm)	CALIBRATION GAS_(ppm)	TVA READING (ppm)	TOLERANCE (ppm)
50	50	0	+/- 12.5
100	100	/	+/- 25
500	500	- /	+/- 125
< 1	ZERO GAS	-/	< 3

All measurement standards are calibrated at scheduled intervals by the National Institute of Standards and Technology (NIST), or against certified standards, which are traceable to the National Institute of Standards and Technology.

Intermountain Specialty Gases

520 N. Kings Road Nampa, ID 83687 (USA) Phone (800) 552-5003, Fax (208) 466-9143 www.isgases.com



	CERTIF	ICATE OF AN	ALYSIS	
Composition		Certification	Analytic	al Accuracy (+/-)
Composition		centitication	Analytica	II Accuracy (17-)
Oxygen		20.9 %		2%
Nitrogen		Balance UHP		270
Lot #	20-7421			
Mfg. Date:	5/20/2020			
Expiration Date:				
Transfill Date:	see cylinder			
Parent Cylinder II Number:	^D NY02268			
Method of Prepa	ration:			
Gravimetric/Press	sure Transfilled		8	
Method of Analy	sis		19.5 white a light state of the	
		trically and is traceable	to the NIST by ce	rtified weights (ID
1.11.1.1	to calibrate the scale			initia weights (ID
,				
		Analysis By:	Tony Janquart	Managan

Analysis Dy.Tony sandTitle:Quality AsCertificate Date:5/20/2020

Tony Janquart Quality Assurance Manager 5/20/2020





INTERMOUNTAIN SPECIALTY GASES

520 N. Kings Road • Nampa • Idaho • 83687 800-552-5003 • www.isgases.com

CERTIFICATE OF ANALYSIS

Composition Methane Air

Certification 25 ppm Balance Analytical Accuracy ± 5%

Lot

17-6074

Mfg. Date: 10/16/2017 Parent Cylinder ID Number: 17161

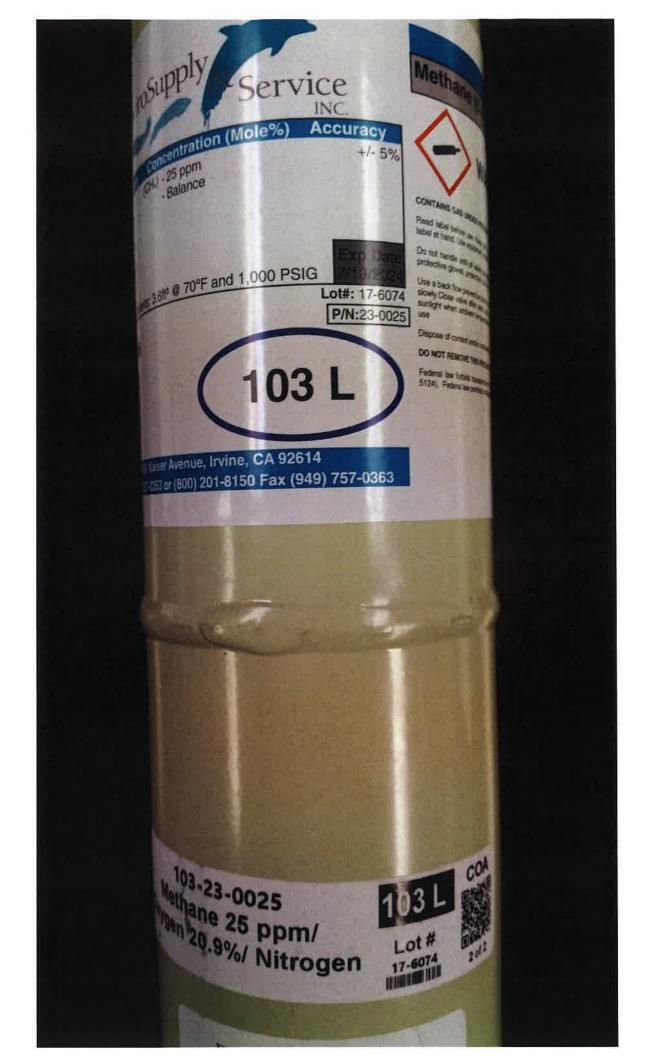
Method of Preparation:

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

520 N. Kings Road • Nampa • Idaho • 83687 800-552-5003 • www.isgases.com

CERTIFICATE OF ANALYSIS

Composition Methane Air

Certification 25 ppm Balance Analytical Accuracy ± 5%

Lot # 17-6074

Mfg. Date: 10/16/2017 Parent Cylinder ID Number: 17161

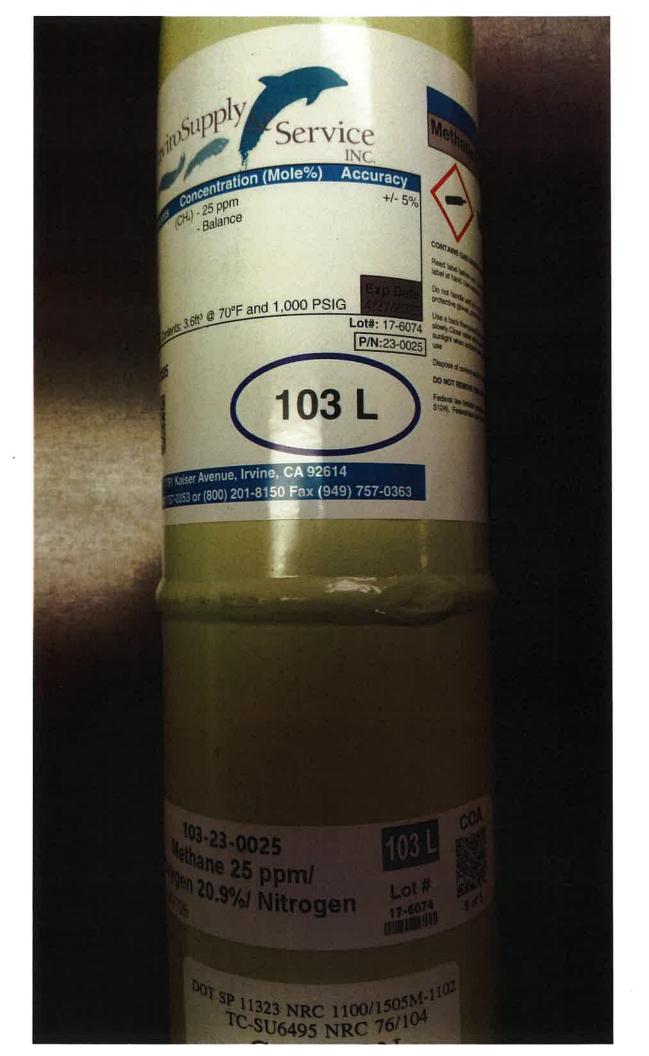
Method of Preparation:

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



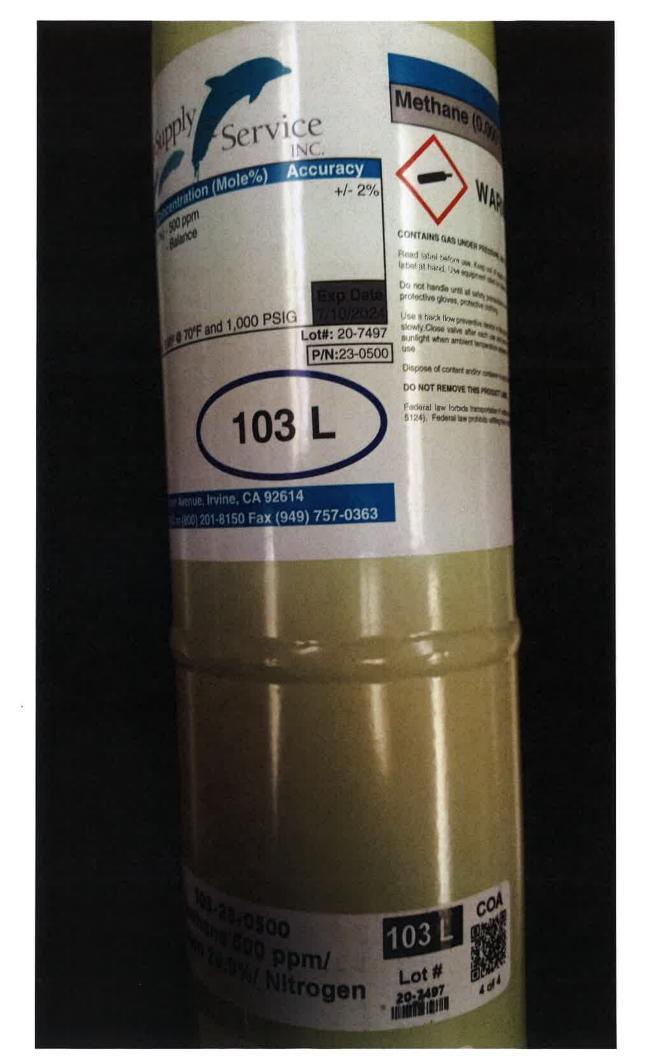
Intermountain Specialty Gases

520 N. Kings Road Nampa, ID 83687 (USA) Phone (800) 552-5003, Fax (208) 466-9143 <u>www.isgases.com</u>



CERTIFICATE OF ANALYSIS

<u>Composition</u>		Certification	Analytical Accuracy (+/-)
Methane		500 ppm	2%
Oxygen Nitrogen		20.9 % Balance UHI	2% P
Lot #	20-7497		
Mfg. Date:	7/10/2020		
Expiration Date:	1. 1		
Transfill Date:	see cylinder		
Parent Cylinder ID Number:	TWC001763		
Method of Prepar	ation:		
Gravimetric/Pressu			
Method of Analys			
		cally and is traceabl	e to the NIST by certified weights (ID
#CA10814) used to	o calibrate the scale.		
	123		
		Current and the second second	
			가지, 2014년 2019년(11년) 11년(11년) 11년(11년) 11년(11년) 11년(11년) 11년(11년) 11년(11년) 11년(11년) 11년(11년) 11년(11년) 11년(11년) 11년(11년)
25		Analysis By: Title: Certificate Date:	Tony Janquart Quality Assurance Manager 7/10/2020





INTERMOUNTAIN SPECIALTY GASES

520 N. Kings Road • Nampa • Idaho • 83687 800-552-5003 • www.isgases.com

CERTIFICATE OF ANALYSIS

Composition Methane Air

Certification 500 ppm Balance Analytical Accuracy ± 2%

Lot # 19-6955

Mfg. Date: 7/24/2019 Parent Cylinder ID Number: 001763

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

520 N. Kings Road Nampa, ID 83687 (USA) Phone (800) 552-5003, Fax (208) 466-9143 <u>www.isgases.com</u>



CERTIFICATE OF ANALYSIS

Composition		Certification	Analytical Accuracy (+/-)
Methane		500 ppm	2%
Oxygen		20.9 %	2%
Nitrogen		Balance UHI	D
Lot#	18-6641	Cale Cale Cal	
Mfg. Date:	12/18/2018		
Expiration Date:			
Transfill Date:	see cylinder		
Parent Cylinder ID Number:	001763		
Method of Prepar	ation:		
Gravimetric/Pressu	re Transfilled		
Mathead of Amalua		and the St Rotes IN	2 Pay and wind to be a first the second second
Method of Analys		cally and is traccal	e to the NIST by certified weights (ID
	o calibrate the scale.	cally and is traceau	te to the NIST by certified weights (ID
	.81		
		Analysis By: Title: Certificate Date:	Tony Janquart Quality Assurance Manager 12/18/2018





Calibration Gases & Equipment ...

CERTIFICATE OF ANALYSIS

Premier Safety & Service

46400 Continental Drivve Chesterfield ,MI 48047

Lot Number9-326-80Norlab Part#J1971500PACylinder Size103 LiterNumber of Cyl1

Customer Pari# N/A

Component Methane Air Reported Concentration 500 ppm Balance
 Cust Number
 07152

 Order Number
 62891146

 FO Number
 04548169

Date on Manufacture 1. Expires Analytical Accuracy

 $\frac{1}{2}$

12/31/2019 12/2022 +/- 2 %

Requested Concentration 500 ppm Balance

Storage:

Keep away from heat, flames, and sparks. Store and use with adequate ventilation. Close valve when not in use and when empty. Never allow cylinder temperature to exceed 125 degrees F.

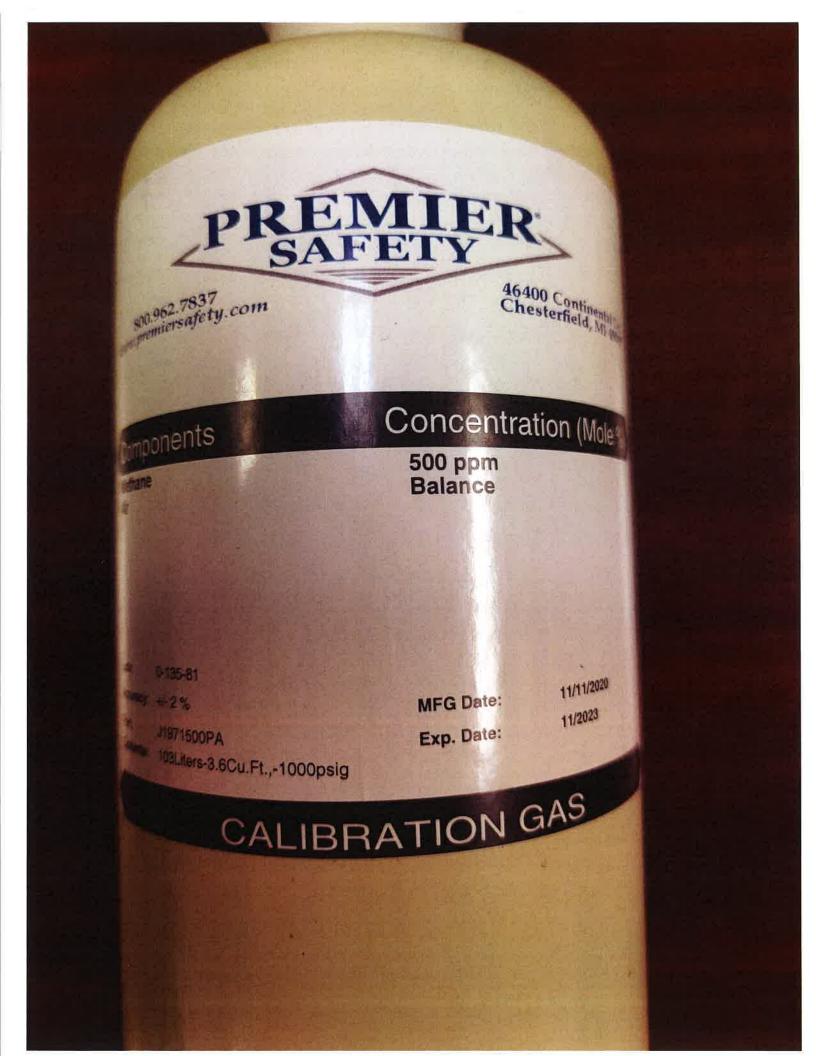
The cylinders in this lot were transfilled from cylinders prepared gravimetrically and traceable to the NIST by the certified weights used to calibrate the scale. The transfilled cylinders were then analyzed against standards traceable to the NIST by weights or SRMs. NIST Traceable Numbers 20180519 and 20180224

Approved:

David Reed Lab Technician Date Signed: 12/

12/31/2019

898 W GOWEN ROAD • BOISE, IDAHO 83705 Phone (208) 336-1643 • Fax (208) 331-3038 • 800-657-6672





Calibration Gases & Equipment

CERTIFICATE OF ANALYSIS

Premier Safety & Service

33596 Sterling Pond Blvd Sterling Hights MI 48312

Lot Number 2-154-85 Norlab Part# J1002 Cylinder Size 103 Liter Number of Cyl 1

Air

Customer Part# N/A

Component Oxygen T.H.C. (as Methane) Nitrogen

Reported Concentration Zero Grade 20.9 % < 1.0 ppm Balance

Cust Number 07152 Order Number 69679439 PO Number 04906817

Date on Manufacture 6/13/2022 Expires 06/2025 Analytical Accuracy Certified

Concentration

Requested

Zero Grade

20.9 %

< 1.0 ppm

Balance

Storage:

Keep away from heat, flames, and sparks. Store and use with adequate ventilation. Close valve when not in use and when empty. Never allow cylinder temperature to exceed 125 degrees F.

Minor constituents tested with standards traceable to NIST by mass or comparison to SRM's (Standard Reference Materials).

NIST Traceable Numbers are available upon request.

Approved:

cher l

Date Signed:

6/13/2022

David Reed Lab Technician

> 898 W. GOWEN ROAD . BOISE, IDAHO 83705 Phone (208) 336-1643 • Fax (208) 331-3038 • 800-657-6672

800.962.7837 suppremiersafety.com

Concentration (Mr

33396 Sterling House

PREMIER

Drygen TH.C. (as Methane) Morgen

components

Zero Grade 20.9 % < 1.0 ppm Balance

2-154-85 Certified J1002 103Liters-3.6Cu.Ft.,-1000psig

MFG Date: Exp. Date:

6/13/2022 06/2025

CALIBRATION GAS





Calibration Gases & Equipment

CERTIFICATE OF ANALYSIS

Premier Safety & Service

33596 Sterling Pond Blvd Sterling Hights MI 48312

Lot Number2-108-80Norlab Part#J1971500PACylinder Size103 LiterNumber of Cyl1

Customer Part# N/A

Cust Number 07152 Order Number 69671309 PO Number 08361523

Date on Manufacture6/10/2022Expires06/2025Analytical Accuracy+/- 2 %

Component Methane Air Reported Concentration 500 ppm Balance Requested Concentration 500 ppm Balance

Storage:

Keep away from heat, flames, and sparks. Store and use with adequate ventilation. Close valve when not in use and when empty. Never allow cylinder temperature to exceed 125 degrees F.

The cylinders in this lot were transfilled from cylinders prepared gravimetrically and traceable to the NIST by the certified weights used to calibrate the scale. The transfilled cylinders were then analyzed against standards traceable to the NIST by weights or SRMs. NIST Traceable Numbers are available upon request.

Approved:

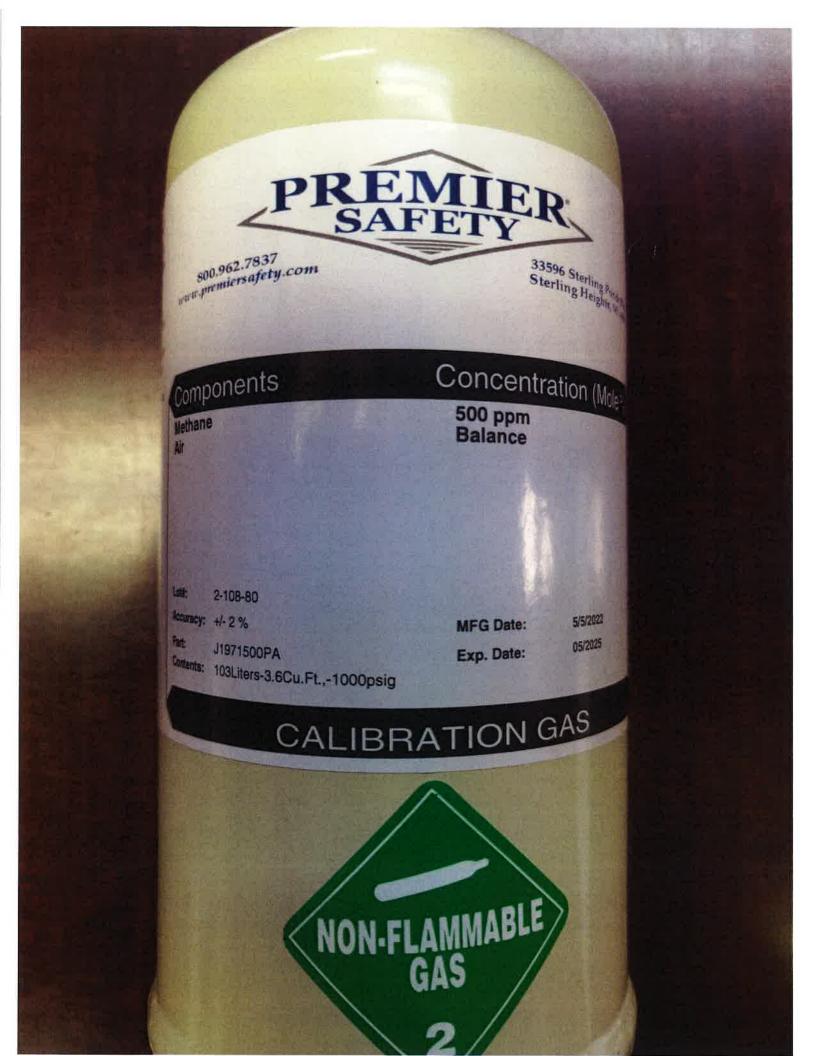
Dielen

Date Signed:

6/10/2022

David Reed Lab Technician

> 898 W. GOWEN ROAD • BOISE, IDAHO 83705 Phone (208) 336-1643 • Fax (208) 331-3038 • 800-657-6672



APPENDIX I

MONTHLY SOLID WASTE PLACEMENT TOTALS

Guadalupe Recycling & Disposal Facility, San Jose, CA Solid Waste Placement Totals

April 1, 2022 through September 30, 2022

Month	Decomposed Waste Disposed in tons	During Reporting Period
Apr-22	15,780	
May-22	15,605	
Jun-22	14,671	88,526
Jul-22	14,219	00,520
Aug-22	13,789	
Sep-22	14,462	

APPENDIX J

WELLFIELD MONITORING LOGS

Guadalupe Recycling & Disposal Facility, San Jose, CA

Wellfield Monitoring Report -April 6, 7, 11, 12, 13, and 18, 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	4/6/2022 9:08	51.0	42.3	0.0	6.7	129.8	129.2	-27.3	-27.4
GDLC0189	4/11/2022 11:09	46.9	42.0	0.0	11.1	129.0	129.5	-3.0	-10.7
GDLC0190	4/11/2022 11:20	42.5	39.8	0.0	17.7	125.1	127.3	-7.0	-19.7
GDLC0191	4/12/2022 10:10	28.4	35.4	0.0	36.2	109.0	109.2	-5.6	-5.6
GDLC0192	4/12/2022 10:22	48.9	44.6	0.0	6.5	126.8	127.3	-7.9	-13.1
GDLC0193	4/11/2022 12:53	51.0	42.0	0.0	7.0	126.8	130.3	-1.0	-5.4
GDLC0196	4/11/2022 9:58	44.8	35.9	0.0	19.3	90.0	90.1	-1.5	-1.4
GDLC0197	4/11/2022 9:32	40.3	35.3	0.0	24.4	129.6	130.6	-1.4	-2.4
GDLC0232	4/11/2022 9:52	37.6	35.2	0.0	27.2	113.5	113.5	-0.9	-0.9
GDLC0233	4/11/2022 10:05	32.1	32.8	0.0	35.1	75.7	76.7	-1.6	-1.7
GDLC0234	4/11/2022 10:42	40.7	35.7	0.0	23.6	111.4	115.7	-0.2	-0.9
GDLC0235	4/12/2022 10:02	48.8	43.7	0.0	7.5	124.3	124.4	-29.9	-29.9
GDLC0236	4/11/2022 13:17	37.5	38.5	0.0	24.0	120.5	123.5	-1.2	-1.9
GDLC0237	4/11/2022 13:52	45.2	42.6	0.0	12.2	127.2	127.3	-6.3	-8.0
GDLC0238	4/11/2022 10:58	35.9	37.1	0.0	27.0	109.0	109.1	-0.1	-0.1
GDLC0239	4/13/2022 9:45	24.3	28.2	0.0	47.5	96.8	96.8	-0.4	-0.4
GDLC0240	4/13/2022 9:32	45.1	36.8	0.0	18.1	119.0	118.9	-4.0	-6.1
GDLC0241	4/12/2022 9:48	54.1	43.9	0.0	2.0	126.1	126.0	-4.0	-5.0
GDLC0242	4/6/2022 10:35	57.3	42.7	0.0	0.0	82.7	82.9	-40.8	-40.9
GDLC0243	4/12/2022 9:42	38.8	39.5	0.0	21.7	115.7	113.2	-3.2	-0.7
GDLC0244	4/11/2022 10:51	38.2	35.7	0.0	26.1	106.7	108.8	-0.1	-0.2
GUAD0062	4/7/2022 9:50	46.6	39.0	0.0	14.4	96.4	96.4	-5.1	-5.3
GUAD0065	4/7/2022 10:05	51.3	41.5	0.0	7.2	109.7	109.6	-37.5	-37.5
GUAD0066	4/7/2022 10:12	41.1	33.9	0.0	25.0	106.4	107.2	-4.6	-8.3
GUAD0081	4/12/2022 11:16	57.4	41.4	0.0	1.2	98.7	98.6	-40.7	-40.6
GUAD0082	4/12/2022 11:10	49.1	34.9	0.0	16.0	100.7	100.3	-18.9	-30.7
GUAD0112	4/7/2022 10:23	34.5	32.3	0.0	33.2	122.5	122.7	-0.3	-0.3
GUAD0114	4/6/2022 10:19	54.5	44.2	0.0	1.3	72.7	79.9	-43.5	-44.0
GUAD0122	4/6/2022 8:37	57.1	42.9	0.0	0.0	130.7	130.2	-38.0	-38.9
GUAD0124	4/12/2022 10:06	55.7	44.3	0.0	0.0	120.4	121.0	-14.1	-14.1
GUAD0129	4/12/2022 9:52	59.3	40.7	0.0	0.0	101.6	101.7	-18.1	-19.8
GUAD0131	4/14/2022 9:49	58.6	41.4	0.0	0.0	110.5	111.0	-43.0	-40.6
GUAD0134	4/18/2022 10:42	59.2	40.4	0.3	0.1	81.3	82.1	-0.7	-0.6
GUAD0135	4/13/2022 9:41	54.7	41.3	0.0	4.0	128.4	128.4	-4.8	-5.3
GUAD0138	4/7/2022 10:15	25.8	26.8	0.0	47.4	94.3	94.3	-1.0	-1.0
GUAD0142	4/7/2022 10:09	46.7	38.2	0.0	15.1	104.6	104.6	-4.4	-5.0
GUAD0146	4/11/2022 13:22	55.2	43.3	0.0	1.5	130.1	130.6	-25.8	-29.2
GUAD0147	4/11/2022 9:45	46.5	38.1	0.0	15.4	112.6	115.0	-9.5	-14.7
GUAD0151	4/11/2022 10:32	55.2	39.1	0.0	5.7	130.3	130.5	-22.0	-20.5
GUAD0152	4/6/2022 9:12	56.0	43.5	0.0	0.5	127.3	127.0	-32.8	-31.9
GUAD0154	4/11/2022 13:10	62.7	37.1	0.2	0.0	84.8	89.5	-9.2	-10.2
GUAD0161	4/11/2022 13:38	54.9	41.4	0.0	3.7	128.3	130.6	-14.6	-17.0
GUAD0162	4/11/2022 13:44	55.2	43.5	0.0	1.3	129.5	129.9	-36.8	-36.7
GUAD0172	4/12/2022 9:27	60.2	39.8	0.0	0.0	106.9	109.5	-0.6	-2.4
GUAD0173	4/12/2022 9:20	56.5	39.7	0.0	3.8	115.9	120.5	-0.3	-1.0

GUAD0176					Offline f	or filling			
GUAD0177	4/11/2022 10:09	46.3	38.8	0.0	14.9	126.3	126.3	-33.8	-32.7
GUAD0178	4/6/2022 8:22	50.5	34.7	3.0	11.8	91.7	87.4	-39.8	-36.3
GUAD0179	4/6/2022 8:29	32.7	31.2	0.0	36.1	111.6	111.4	-0.5	-0.4
GUAD0180	4/6/2022 8:46	48.3	43.1	0.0	8.6	128.3	129.3	-34.4	-36.1
GUAD0181	4/6/2022 8:50	52.8	44.5	0.0	2.7	130.4	130.1	-35.7	-35.1
GUAD0183	4/12/2022 10:00	56.1	42.9	0.0	1.0	119.8	119.8	-30.3	-30.3
GUAD0184	4/12/2022 9:56	44.7	39.7	0.0	15.6	128.3	128.3	-36.7	-37.1
GUAD0185	4/11/2022 13:58	50.4	40.0	0.0	9.6	128.0	130.8	-3.3	-4.2
GUAD0186	4/11/2022 12:49	50.3	40.2	0.1	9.4	130.2	130.1	-33.9	-33.9
GUAD0187	4/12/2022 10:26	56.5	43.5	0.0	0.0	122.8	123.2	-26.3	-27.3
GUAD0198	4/6/2022 8:33	45.0	37.5	0.0	17.5	121.8	123.6	-2.0	-3.3
GUAD0199	4/6/2022 8:25	51.5	38.1	0.0	10.4	129.8	130.1	-13.4	-17.2
GUAD0200	4/6/2022 9:04	56.4	43.6	0.0	0.0	130.7	130.2	-27.6	-27.7
GUAD0201	4/11/2022 10:45	54.3	43.4	0.0	2.3	115.6	116.6	-28.8	-29.2
GUAD0202	4/6/2022 10:11	40.2	33.5	0.0	26.3	125.0	125.1	-2.3	-2.7
GUAD0203	4/11/2022 9:37	53.1	41.5	0.0	5.4	116.9	116.9	-28.0	-28.0
GUAD0204	4/11/2022 10:14	56.3	43.7	0.0	0.0	110.4	116.2	-29.8	-29.9
GUAD0205	4/11/2022 11:12	43.0	41.9	0.0	15.1	129.8	130.5	-0.7	-1.3
GUAD0207	4/6/2022 9:00	41.3	41.6	0.0	17.1	130.5	130.3	-0.9	-1.3
GUAD0208	4/6/2022 8:54	40.0	41.3	0.0	18.7	128.4	129.6	-0.1	-0.8
GUAD0209	4/6/2022 8:42	43.4	44.5	0.0	12.1	121.3	127.9	-0.1	-1.6
GUAD0211	4/11/2022 13:26	45.5	39.9	0.0	14.6	114.4	118.9	-0.6	-0.7
GUAD0213	4/11/2022 13:49	51.3	43.4	0.0	5.3	127.0	127.1	-22.2	-24.0
GUAD0214	4/11/2022 13:30	41.7	40.2	0.0	18.1	126.2	126.2	-8.7	-10.1
GUAD0215	4/11/2022 13:14	45.0	39.1	0.0	15.9	130.1	130.7	-1.3	-3.0
GUAD0216	4/11/2022 11:17	44.4	40.5	0.0	15.1	129.3	129.8	-0.9	-1.8
GUAD0217	4/12/2022 10:14	46.3	41.6	0.0	12.1	119.2	128.7	-0.5	-3.8
GUAD0218	4/12/2022 10:17	47.7	41.7	0.0	10.6	105.6	125.4	-0.5	-4.0
GUAD0219	4/12/2022 9:09	51.9	37.7	0.0	10.4	121.6	123.2	-2.1	-4.4
GUAD0220	4/14/2022 9:43	50.6	41.7	0.1	7.6	124.7	124.9	-23.9	-25.5
GUAD0221	4/12/2022 9:38	38.8	35.4	0.0	25.8	117.7	117.4	-2.2	-1.8
GUAD0222	4/13/2022 9:56	20.9	29.1	0.0	50.0	109.1	109.1	-0.5	-0.4
GUAD0223	4/13/2022 9:53	39.9	42.7	0.0	17.4	126.9	127.1	-1.2	-1.4
GUAD0224	4/13/2022 9:49	28.0	38.5	0.0	33.5	108.2	107.4	-0.3	-0.3
GUAD0225	4/7/2022 10:19	35.4	33.7	0.0	30.9	123.6	123.2	-2.3	-1.1
GUAD0226	4/13/2022 9:36	58.8	41.2	0.0	0.0	117.9	117.7	-0.8	-0.6
GUAD0227	4/7/2022 9:58	37.5	38.1	0.0	24.4	121.8	121.7	-3.2	-2.0
GUAD0228	4/7/2022 10:01	31.4	34.5	0.0	34.1	114.2	114.2	-0.7	-0.7
GUAD0230	4/13/2022 10:03	31.6	32.9	0.0	35.5	112.6	110.7	-1.6	-0.4
GUADH11L	4/12/2022 11:25	58.5	40.9	0.2	0.4	67.1	66.9	-2.4	-8.1
GUADH12L	4/13/2022 12:40	53.3	35.0	1.0	10.7	73.0	72.9	-2.3	-2.3

Wells 114, 123, 134, 135, 149, 151, 154, 156, 158, 161, 162, 181, 182, 185, 186, 199, 200, 209, 217 and 218 are approved to operate at a temperature HOV of 145°F.

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 -May 2, 9, 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	5/9/2022 9:23	50.7	40.8	0.0	8.5	128.8	129.1	-22.3	-22.2
GDLC0189	5/13/2022 11:42	34.1	36.8	0.0	29.1	129.8	129.2	-13.4	-4.7
GDLC0190	5/13/2022 11:28	25.5	32.9	0.0	41.6	128.7	126.9	-22.0	-6.6
GDLC0191	5/2/2022 8:58	19.7	31.6	0.0	48.7	106.7	107.1	-4.9	-4.9
GDLC0192	5/2/2022 9:13	46.0	44.9	0.0	9.1	128.3	128.3	-13.2	-13.1
GDLC0193	5/13/2022 9:18	26.7	31.0	0.0	42.3	129.8	124.6	-4.7	-2.9
GDLC0196	5/9/2022 9:13	44.2	36.9	0.0	18.9	96.8	97.1	-1.5	-1.6
GDLC0197	5/9/2022 8:19	35.0	33.7	0.0	31.3	128.9	125.8	-4.6	-1.4
GDLC0232	5/9/2022 9:10	44.3	38.2	0.0	17.5	112.6	114.9	-0.8	-2.4
GDLC0233	5/9/2022 9:16	39.2	34.7	0.5	25.6	77.2	77.3	-1.6	-1.5
GDLC0234	5/9/2022 8:49	24.1	29.3	0.0	46.6	115.6	113.1	-1.6	-0.6
GDLC0235	5/2/2022 8:47	45.2	43.0	0.0	11.8	124.4	124.4	-37.6	-37.6
GDLC0236	5/13/2022 10:38	21.0	30.2	0.0	48.8	127.1	125.3	-5.1	-1.9
GDLC0237	5/13/2022 9:41	37.1	36.9	0.0	26.0	127.3	127.8	-8.8	-5.2
GDLC0238	5/9/2022 8:43	24.5	30.5	0.1	44.9	109.6	108.5	-0.2	-0.1
GDLC0239	5/2/2022 9:37	25.4	30.5	0.0	44.1	110.9	108.0	-1.4	-0.4
GDLC0240	5/2/2022 10:19	45.3	38.9	0.0	15.8	117.5	118.3	-1.3	-1.8
GDLC0241	5/2/2022 8:31	52.1	43.6	0.0	4.3	125.8	125.7	-4.8	-1.9
GDLC0242	5/2/2022 10:15	58.4	41.6	0.0	0.0	84.9	84.4	-45.0	-44.8
GDLC0243	5/2/2022 9:23	47.9	42.6	0.0	9.5	115.7	115.9	-4.5	-4.5
GDLC0244	5/9/2022 8:38	29.2	33.0	0.0	37.8	115.5	113.1	-0.8	-0.2
GUAD0062	5/2/2022 11:03	42.5	40.5	0.0	17.0	96.0	95.9	-5.3	-5.6
GUAD0065	5/2/2022 11:39	50.8	41.0	0.0	8.2	109.5	109.3	-40.7	-40.3
GUAD0066	5/2/2022 11:23	35.4	33.4	0.0	31.2	110.8	110.0	-11.9	-9.2
GUAD0081	5/13/2022 12:17	55.3	41.6	0.0	3.1	105.1	105.3	-46.2	-46.8
GUAD0082	5/13/2022 12:13	44.7	35.2	0.0	20.1	100.4	100.4	-42.6	-42.3
GUAD0112	5/2/2022 11:54	44.7	35.0	0.0	20.3	122.4	123.2	-0.2	-0.2
GUAD0114	5/13/2022 8:57	53.3	43.2	0.0	3.5	74.7	76.0	-46.4	-47.2
GUAD0122	5/12/2022 14:55	56.0	41.7	0.0	2.3	129.4	128.8	-35.3	-34.8
GUAD0124	5/2/2022 8:53	40.3	39.2	0.0	20.5	122.8	123.0	-9.7	-9.4
GUAD0129	5/2/2022 8:35	59.5	40.5	0.0	0.0	102.3	102.4	-7.1	-3.8
GUAD0131	5/2/2022 8:04	57.8	39.7	0.0	2.5	116.6	116.7	-44.4	-44.4
GUAD0134	5/2/2022 10:57	52.9	46.3	0.0	0.8	115.1	115.0	-0.2	-0.2
GUAD0135	5/2/2022 9:42	53.7	42.3	0.0	4.0	129.8	129.5	-3.9	-3.9
GUAD0138	5/2/2022 11:27	25.1	27.6	0.0	47.3	92.9	92.8	-1.4	-1.3
GUAD0142	5/2/2022 11:12	42.7	37.3	0.0	20.0	103.8	104.0	-3.9	-4.1
GUAD0146	5/13/2022 10:26	56.7	43.3	0.0	0.0	128.5	128.0	-29.9	-30.0
GUAD0147	5/9/2022 8:31	55.0	38.8	0.0	6.2	114.1	113.9	-14.6	-13.4
GUAD0151	5/9/2022 9:28	58.5	39.5	0.0	2.0	130.0	130.4	-12.0	-12.3
GUAD0152	5/12/2022 15:27	56.8	43.0	0.2	0.0	124.5	124.9	-26.6	-26.1
GUAD0154	5/13/2022 9:33	58.7	35.7	0.8	4.8	79.5	77.7	-33.3	-33.8
GUAD0161	5/13/2022 9:58	51.7	41.2	0.0	7.1	129.1	129.4	-23.3	-23.3
GUAD0162	5/13/2022 9:52	53.1	43.9	0.0	3.0	130.0	130.5	-40.8	-41.5
GUAD0172	5/2/2022 8:01	40.2	32.5	0.0	27.3	111.0	110.7	-4.7	-3.3
GUAD0173	5/2/2022 8:11	31.2	30.7	0.0	38.1	121.7	120.1	-2.0	-1.3

GUAD0176					Offline f	or filling			
GUAD0177	5/9/2022 9:19	51.2	39.5	0.0	9.3	127.0	127.0	-28.4	-24.6
GUAD0178	5/12/2022 15:34	54.7	41.9	0.8	2.6	103.7	104.3	-39.3	-38.8
GUAD0179	5/12/2022 14:46	24.8	27.9	0.0	47.3	110.5	110.7	-0.4	-0.4
GUAD0180	5/12/2022 15:02	48.2	42.5	0.0	9.3	129.7	129.8	-31.7	-32.4
GUAD0181	5/12/2022 15:10	54.6	45.4	0.0	0.0	130.3	130.7	-33.6	-36.2
GUAD0183	5/2/2022 8:44	56.0	44.0	0.0	0.0	123.8	123.8	-37.6	-37.5
GUAD0184	5/2/2022 8:40	44.8	39.1	0.0	16.1	127.8	127.9	-42.5	-32.7
GUAD0185	5/13/2022 9:06	48.5	39.5	0.0	12.0	129.7	128.3	-2.8	-2.8
GUAD0186	5/13/2022 9:23	39.7	40.0	0.0	20.3	128.6	128.6	-33.1	-33.4
GUAD0187	5/2/2022 9:16	55.5	44.3	0.0	0.2	123.7	123.8	-35.1	-35.1
GUAD0198	5/12/2022 14:50	43.4	36.1	0.0	20.5	124.9	124.2	-4.1	-2.9
GUAD0199	5/12/2022 14:41	46.5	37.4	0.1	16.0	129.6	129.7	-21.3	-18.8
GUAD0200	5/12/2022 15:23	57.3	42.7	0.0	0.0	129.8	129.8	-22.2	-22.2
GUAD0201	5/9/2022 8:51	48.7	39.7	0.0	11.6	116.9	117.1	-23.4	-23.0
GUAD0202	5/13/2022 8:37	44.0	34.6	0.0	21.4	122.2	123.6	-0.9	-1.4
GUAD0203	5/9/2022 8:24	52.8	42.1	0.0	5.1	118.0	118.0	-21.3	-20.5
GUAD0204	5/9/2022 9:04	55.8	44.2	0.0	0.0	113.4	113.4	-23.2	-23.0
GUAD0205	5/13/2022 11:38	26.7	34.9	0.0	38.4	130.2	127.9	-3.1	-2.0
GUAD0207	5/12/2022 15:19	29.0	34.7	0.0	36.3	130.9	130.3	-1.1	-0.3
GUAD0208	5/12/2022 15:13	24.6	33.5	0.0	41.9	127.1	126.3	-0.6	-0.4
GUAD0209	5/12/2022 14:59	24.1	33.9	0.0	42.0	129.8	129.0	-0.3	-0.2
GUAD0211	5/13/2022 10:21	25.5	33.2	0.0	41.3	123.9	123.4	-0.8	-0.7
GUAD0213	5/13/2022 9:48	45.1	42.5	0.0	12.4	130.2	129.5	-29.3	-24.8
GUAD0214	5/13/2022 10:06	38.8	38.2	0.0	23.0	126.6	125.9	-11.3	-6.3
GUAD0215	5/13/2022 11:18	26.4	33.4	0.0	40.2	130.5	129.5	-3.9	-1.7
GUAD0216	5/13/2022 11:33	24.9	31.9	0.0	43.2	129.2	129.1	-3.3	-2.0
GUAD0217	5/2/2022 9:03	26.1	34.7	0.0	39.2	127.9	127.6	-4.4	-2.8
GUAD0218	5/2/2022 9:09	25.1	32.7	0.0	42.2	128.9	128.9	-3.5	-2.6
GUAD0219	5/2/2022 8:16	36.5	35.8	0.0	27.7	122.3	121.0	-2.5	-2.3
GUAD0220	5/2/2022 9:20	48.4	42.2	0.0	9.4	125.2	125.2	-32.4	-32.4
GUAD0221	5/2/2022 8:22	34.3	34.7	0.0	31.0	117.1	117.4	-2.1	-2.0
GUAD0222	5/2/2022 9:54	29.7	31.2	0.0	39.1	111.9	110.0	-0.5	-0.3
GUAD0223	5/2/2022 9:50	39.6	41.1	0.0	19.3	127.1	126.7	-1.8	-0.8
GUAD0224	5/2/2022 9:45	29.2	42.2	0.0	28.6	109.8	109.7	-0.4	-0.4
GUAD0225	5/2/2022 11:47	50.8	36.7	0.0	12.5	116.8	121.0	-0.4	-1.0
GUAD0226	5/2/2022 10:24	57.8	42.2	0.0	0.0	118.6	118.1	-0.4	-0.4
GUAD0227	5/2/2022 12:02	46.3	36.5	0.0	17.2	112.6	117.1	-0.4	-0.6
GUAD0228	5/12/2022 8:28	34.0	30.9	0.3	34.8	105.4	103.4	-0.8	-0.6
GUAD0230	5/2/2022 10:11	50.5	38.1	0.0	11.4	109.7	112.3	-0.2	-0.9
GUADH11L	5/13/2022 12:21	57.5	40.3	0.3	1.9	78.1	77.7	-1.8	-2.1
GUADH12L	5/13/2022 12:08	52.4	31.4	1.4	14.8	92.7	92.7	-1.3	-1.5

Wells 114, 123, 134, 135, 149, 151, 154, 156, 158, 161, 162, 181, 182, 185, 186, 199, 200, 209, 217 and 218 are approved to operate at a temperature HOV of 145°F.

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 -June 1, 2,	6 7 and 9 2022
Weinield Worntoring Report -June 1, 2,	0, 7, and 3, 2022

		CH4 CO2 O2				Initial	Adjusted	,	1
Device Name	Date Time	(Methane) (%)	(Carbon Dioxide)(%)	(Oxygen) (%)	Balance Gas(%)	Temperature (oF)	Temperature (oF)	Initial Static Pressure("H2O)	Adjusted Static Pressure("H2O)
GDLC0188	6/6/2022 13:30	43.6	38.0	1.4	17.0	129.3	128.3	-27.71	-13.17
GDLC0189	6/7/2022 7:30	42.3	36.0	1.6	20.1	135.1	132.8	-2.15	-0.87
GDLC0190	6/7/2022 7:43	35.4	32.3	2.6	29.7	127.8	129.1	-4.67	-9.77
GDLC0191	6/9/2022 7:07	19.9	30.9	0.1	49.1	115.5	116.5	-5.32	-9.62
GDLC0192	6/9/2022 7:25	43.7	41.7	0.6	14.0	128.9	129	-12.32	-10.01
GDLC0193	6/1/2022 12:27	42.4	36.7	0.0	20.9	130.7	129.4	-2.32	-0.95
GDLC0196	6/7/2022 9:01	31.9	29.9	0.1	38.1	99.5	99.2	-0.72	-0.81
GDLC0197	6/9/2022 13:58	43.5	36.2	0.0	20.3	130.4	130.4	-0.33	-0.32
GDLC0232	6/7/2022 8:57	32.5	33.8	0.2	33.5	117.4	116.8	-3.07	-1.00
GDLC0233	6/17/2022 8:07	30.8	28.0	2.3	38.9	115.3	110.1	-8.07	-3.03
GDLC0234	6/7/2022 7:48	32.0	30.9	1.2	35.9	115.8	117.4	-0.35	-0.63
GDLC0235	6/9/2022 7:18	42.0	41.0	0.9	16.1	126.1	125.3	-34.86	-28.62
GDLC0236	6/1/2022 13:49	34.7	34.4	0.0	30.9	125.5	124.7	-0.22	-0.09
GDLC0237	6/1/2022 12:46	46.8	40.8	0.0	12.4	126.6	127.8	-2.05	-2.99
GDLC0238	6/9/2022 12:49	37.8	36.0	0.0	26.2	110.9	111.3	-0.16	-0.12
GDLC0239	6/9/2022 12:21	24.2	27.5	0.1	48.2	111.3	110.5	-0.48	-0.41
GDLC0240	6/9/2022 12:17	50.1	36.7	0.2	13.0	119.8	119.8	-2.3	-2.76
GDLC0241	6/9/2022 10:23	55.4	42.6	0.2	1.8	126.0	126.1	-1.81	-2.49
GDLC0242	6/9/2022 10:40	53.6	38.3	1.2	6.9	89.2	89.1	-45.12	-45.56
GDLC0243	6/9/2022 7:43	43.8	40.3	0.3	15.6	119.5	119.5	-3.69	-4.80
GDLC0244	6/9/2022 12:53	36.5	35.1	0.0	28.4	115.4	116.1	-0.19	-0.75
GUAD0062	6/9/2022 13:06	44.1	37.0	0.1	18.8	96.9	96.9	-4.62	-4.68
GUAD0065	6/9/2022 14:49	49.7	34.5	1.5	14.3	111.6	111.8	-37.45	-36.59
GUAD0066	6/2/2022 8:05	37.7	32.6	0.0	29.7	108.0	107.8	-5.26	-4.61
GUAD0081	6/7/2022 11:14	46.3	38.6	0.7	14.4	111.6	111.5	-43.78	-43.69
GUAD0082	6/7/2022 11:07	33.7	30.7	0.7	34.9	102.7	101.7	-33.11	-11.44
GUAD0112	6/2/2022 7:40	37.3	33.5	0.0	29.2	124.1	124	-0.15	-0.18
GUAD0114	6/7/2022 10:10	50.8	43.6	0.2	5.4	101.6	102	-45.7	-45.53
GUAD0122	6/6/2022 12:44	54.0	40.5	0.2	5.3	129.4	129.2	-34.51	-33.74
GUAD0124	6/9/2022 7:03	42.2	38.7	0.2	18.9	125.2	125.1	-11.48	-11.42
GUAD0129	6/9/2022 10:27	59.3	38.2	0.1	2.4	104.1	104.1	-3.52	-5.90
GUAD0131	6/1/2022 11:50	58.0	41.3	0.0	0.7	117.4	117.4	-42.23	-39.87
GUAD0134	6/9/2022 13:02	53.6	41.7	0.0	4.7	119.0	119	-0.01	-0.02
GUAD0135	6/9/2022 12:29	51.8	39.2	0.3	8.7	129.6	129.5	-3.9	-3.90
GUAD0138	6/2/2022 7:56	25.3	27.7	0.0	47.0	93.8	93.8	-0.8	-0.79
GUAD0142	6/2/2022 8:15	45.5	37.0	0.0	17.5	104.8	104.7	-4.13	-3.91
GUAD0146	6/1/2022 13:41	54.8	41.2	0.0	4.0	128.7	129.8	-30.34	-30.63
GUAD0147	6/7/2022 8:43	37.7	30.6	3.3	28.4	116.1	95.1	-19.46	-5.69
GUAD0151	6/7/2022 9:23	56.5	37.1	0.0	6.4	130.8	130.1	-21.51	-21.51
GUAD0152	6/6/2022 13:35	53.5	40.3	0.6	5.6	125.1	126.5	-32.22	-32.02
GUAD0154	6/9/2022 13:48	52.5	39.5	0.7	7.3	130.0	130.3	-25.88	-25.53
GUAD0161	6/1/2022 13:17	51.0	40.6	0.0	8.4	129.9	130.5	-23.49	-23.48
GUAD0162	6/1/2022 13:09	52.3	43.5	0.0	4.2	130.6	129.5	-38.84	-39.25
GUAD0172	6/1/2022 11:03	57.8	38.6	0.0	3.6	111.5	111.5	-1.72	-2.13
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GUAD0176	Offline for filling										
GUAD0177	6/7/2022 8:52	42.1	36.8	0.6	20.5	127.3	127.3	-38.85	-38.80		
GUAD0178	6/6/2022 13:45	43.3	32.3	4.0	20.4	105.3	92.2	-40.26	-5.43		
GUAD0179	6/6/2022 12:29	34.2	31.3	0.0	34.5	113.0	114.8	-0.07	-0.99		
GUAD0180	6/6/2022 13:02	47.4	41.6	0.1	10.9	129.6	128.3	-31.26	-27.41		
GUAD0181	6/6/2022 13:09	50.3	42.4	0.4	6.9	127.1	124.9	-37.19	-36.45		
GUAD0183	6/9/2022 7:12	53.4	40.9	0.9	4.8	125.7	125.7	-35.31	-35.15		
GUAD0184	6/9/2022 10:33	42.6	38.7	0.6	18.1	129.8	125.4	-24.47	-8.52		
GUAD0185	6/1/2022 12:37	50.1	40.6	0.0	9.3	129.9	129.3	-2.27	-2.28		
GUAD0186	6/1/2022 12:31	43.1	40.1	0.0	16.8	128.6	128.1	-38.19	-38.19		
GUAD0187	6/9/2022 7:30	53.7	39.8	1.1	5.4	124.0	124	-34.64	-34.69		
GUAD0198	6/6/2022 12:38	45.4	36.3	0.0	18.3	78.6	77.6	-1.87	-0.99		
GUAD0199	6/6/2022 12:20	50.4	38.3	0.1	11.2	130.5	130.5	-11.59	-11.57		
GUAD0200	6/6/2022 13:21	54.2	41.0	0.0	4.8	130.9	130.8	-26.78	-26.84		
GUAD0201	6/7/2022 8:26	44.3	36.2	3.3	16.2	101.7	89.1	-7.15	-4.93		
GUAD0201	6/7/2022 9:18	53.8	41.7	0.4	4.1	116.8	111.9	-26.63	-18.69		
GUAD0202	6/7/2022 10:19	41.6	34.0	0.0	24.4	125.9	125.2	-1.78	-1.20		
GUAD0203	6/2/2022 9:44	49.8	40.6	0.1	9.5	119.2	119.5	-30.02	-29.90		
GUAD0204	6/7/2022 9:50	53.6	41.6	0.2	4.6	118.3	121.7	-25.39	-33.96		
GUAD0205	6/7/2022 7:34	41.5	38.2	1.1	19.2	134.5	133.4	-0.53	-0.44		
GUAD0207	6/6/2022 12:14	51.0	40.4	0.2	8.4	127.5	134.5	0.04	-0.32		
GUAD0207	6/6/2022 15:20	46.0	36.9	0.4	16.7	130.3	128.2	-0.43	-0.19		
GUAD0207	6/6/2022 15:27	45.8	39.4	0.2	14.6	128.9	128.7	-0.09	-0.09		
GUAD0207	6/6/2022 15:29	41.7	37.9	0.6	19.8	129.9	130.1	-0.14	-0.14		
GUAD0207	6/7/2022 7:18	44.5	37.3	0.5	17.7	127.8	118.3	-0.86	-3.79		
GUAD0207	6/7/2022 7:22	43.2	33.8	1.9	21.1	130.1	126.9	-0.3	-0.27		
GUAD0208	6/6/2022 13:16	41.0	39.1	0.0	19.9	130.5	129.8	-0.16	-0.10		
GUAD0209	6/9/2022 13:52	41.2	36.0	0.0	22.8	130.3	130.3	-0.08	-0.06		
GUAD0211	6/1/2022 13:32	34.3	35.5	0.0	30.2	116.6	116.6	-0.1	-0.11		
GUAD0213	6/1/2022 13:00	48.5	42.7	0.0	8.8	130.5	130.2	-22.94	-22.92		
GUAD0214	6/1/2022 13:24	45.4	39.4	0.0	15.2	127.7	127.6	-5.33	-5.99		
GUAD0215	6/1/2022 13:54	42.8	38.0	0.0	19.2	129.2	129.1	-0.16	-0.12		
GUAD0216	6/7/2022 7:39	39.5	34.8	1.4	24.3	136.8	136.5	-0.69	-0.63		
GUAD0217	6/9/2022 6:57	42.3	38.7	0.1	18.9	131.3	132	-1.0	-1.60		
GUAD0218	6/9/2022 6:52	38.5	37.9	0.1	23.5	125.7	128.9	-0.97	-2.49		
GUAD0218	6/9/2022 7:34	38.6	37.8	0.0	23.6	130.6	130	-3.46	-2.53		
GUAD0219	6/1/2022 11:28	55.7	38.8	0.0	5.5	118.8	124	-0.42	-1.34		
GUAD0220	6/9/2022 7:39	45.9	39.6	0.8	13.7	125.9	125.9	-32.27	-32.22		
GUAD0221	6/1/2022 11:42	40.6	35.2	0.0	24.2	119.3	119.4	-1.42	-1.57		
GUAD0222	6/9/2022 12:39	41.9	37.4	0.0	20.7	113.7	113.7	-0.16	-0.15		
GUAD0223	6/9/2022 12:42	47.2	43.7	0.0	9.1	125.3	127.3	-0.22	-0.31		
GUAD0224	6/9/2022 12:32	39.6	40.3	0.0	20.1	105.4	110.7	-0.03	-0.04		
GUAD0225	6/2/2022 7:50	41.1	36.5	0.0	22.4	124.0	123.2	-1.59	-0.86		
GUAD0226	6/9/2022 12:25	57.7	39.0	0.1	3.2	122.1	122.1	-0.15	-0.12		

GUAD0227	6/2/2022 7:30	43.8	38.8	0.0	17.4	121.4	121.6	-1.16	-1.39
GUAD0228	6/2/2022 8:30	41.6	35.8	0.0	22.6	111.0	109	-0.24	-0.24
GUAD0230	6/9/2022 8:50	43.7	35.2	0.2	20.9	113.6	113.7	-1.14	-1.73
GUADH11L	6/7/2022 11:22	39.5	27.4	2.9	30.2	83.8	83.8	-1.84	-1.70
GUADH12L	6/7/2022 14:52	60.8	27.9	1.2	10.1	109.5	110.5	-1.63	-1.58

Wells 114, 123, 134, 135, 149, 151, 154, 156, 158, 161, 162, 181, 182, 185, 186, 199, 200, 209, 217 and 218 are approved to operate at a temperature HOV of 145°F.

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 -July 6, 7, 14, 18, 19, and 26, 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	7/7/2022 9:05	52.2	42	0.7	5.1	129.6	129.9	-7.62	-26.85
GDLC0189	7/14/2022 9:49	49.5	41.2	1.3	8	129.8	129	-0.96	-1.95
GDLC0190	7/7/2022 8:13	48.4	41	0.7	9.9	129.4	129.9	-8.91	-14.74
GDLC0191	7/7/2022 10:12	18.8	26.2	2.9	52.1	119.7	115	-7.09	-1.7
GDLC0192	7/7/2022 7:34	43.4	40.4	1.7	14.5	129.1	125.6	-8.77	-2.27
GDLC0193	7/6/2022 7:13	50.5	41	0.5	8	128.1	128	-0.9	-0.9
GDLC0196	7/7/2022 12:16	41.9	33.7	0.3	24.1	101.1	99.1	-2.6	-1.73
GDLC0197	7/19/2022 8:08	45.6	38.6	0	15.8	127.8	125.2	-0.72	-0.58
GDLC0232	7/7/2022 12:00	41	35.3	0.2	23.5	107.3	105.6	-1.86	-1.76
GDLC0233	7/14/2022 10:48	48.7	35.1	0.5	15.7	97.1	97.2	0.1	0.11
GDLC0233	7/18/2022 13:09	55.8	37.1	0	7.1	118	118	-3.39	-4.21
GDLC0234	7/7/2022 8:31	33.9	33.7	0.3	32.1	118	111.3	-0.92	-0.03
GDLC0235	7/8/2022 10:32	40.5	39.2	1.5	18.8	123.5	118.8	-3.1	-1.93
GDLC0236	7/6/2022 8:30	44	37.7	0.6	17.7	122	124.5	-0.23	-0.22
GDLC0237	7/6/2022 7:44	45.1	40.2	1.2	13.5	127.8	127.8	-3.37	-3.36
GDLC0238	7/8/2022 7:34	29.5	32.8	0.9	36.8	112.1	108.7	-1.88	-1.65
GDLC0239	7/5/2022 9:23	26.1	30.2	0.3	43.4	108.7	107.2	-0.38	-0.31
GDLC0240	7/5/2022 10:07	43.1	36.8	0.9	19.2	120	119.8	-4.03	-1.82
GDLC0241	7/5/2022 10:12	52.2	41.9	0.4	5.5	126.3	126.2	-2.61	-3.9
GDLC0242	7/5/2022 10:30	52.4	37.5	1.7	8.4	91.1	91.4	-39.76	-39.73
GDLC0243	7/5/2022 10:27	37.8	38	0.3	23.9	119.7	118.4	-4.28	-0.9
GDLC0244	7/8/2022 7:52	26.9	31	1.8	40.3	118.2	113.2	-2.71	-1.66
GUAD0062	7/19/2022 9:07	48.5	39.4	0	12.1	96.9	96.9	-3.22	-4.65
GUAD0065	7/19/2022 7:37	55.1	41.2	0	3.7	109.3	109.1	-39.98	-40.08
GUAD0066	7/5/2022 8:56	43	32.6	0.5	23.9	104.7	97.6	-2.64	-1.11
GUAD0081	7/18/2022 13:54	53.6	42.8	0	3.6	107	108	-41.11	-41
GUAD0082	7/8/2022 12:17	50.7	34.7	1.6	13	104.9	105	-5.48	-21.19
GUAD0082	7/14/2022 8:23	44.4	35.3	1.1	19.2	93.2	93	0.02	0.01
GUAD0082	7/18/2022 13:31	51.8	37.2	0	11	97.7	103.9	-1.08	-10.86
GUAD0112	7/8/2022 7:21	31.6	28.8	1.6	38	127.8	126.1	-2.85	-1.94
GUAD0114	7/18/2022 12:54	51.6	44.9	0	3.5	96.2	99.6	-41.8	-41.41
GUAD0122	7/7/2022 10:56	45.7	34.9	3.1	16.3	129.2	125.8	-34.23	-24.49
GUAD0124	7/19/2022 13:13	46.1	38.7	0	15.2	127.6	127.6	-9.11	-9.12
GUAD0129	7/5/2022 10:17	57.9	37.6	0.6	3.9	108	108	-7.28	-7.44
GUAD0131	7/6/2022 9:27	47.1	33.7	3.5	15.7	117.7	117.7	-33.87	-33.95
GUAD0134	7/8/2022 11:06	54.1	41.4	0.5	4	117	108.7	-0.03	-0.01
GUAD0135	7/5/2022 9:38	51.7	37.3	1.8	9.2	130	129.8	-3.46	-3.6
GUAD0138	7/5/2022 9:00	29.1	26.7	0.6	43.6	95.5	95	-0.66	-0.56
GUAD0142	7/5/2022 9:08	48.5	36.1	0.6	14.8	104.4	102	-2.49	-1.47
GUAD0146	7/6/2022 8:13	48.2	36.7	2.9	12.2	128.4	130.5	-26.41	-26.38
GUAD0147	7/7/2022 9:36	56.6	43	0	0.4	78	116.4	-0.06	-7.51
GUAD0151	7/7/2022 8:59	51.1	32.9	2.3	13.7	129.8	129.8	-18.54	-16.59
GUAD0152	7/7/2022 11:46	47.4	36.5	1.8	14.3	126.4	118.3	-31.65	-13.97
GUAD0154	7/19/2022 13:02	57.4	41.9	0	0.7	129.1	129.7	-31.7	-31.56
GUAD0161	7/8/2022 11:56	41.4	31.8	3.4	23.4	130	129.9	-21.11	-19.76

GUAD0162	7/19/2022 13:07	54.4	41.9	0	3.7	130.6	129.9	-36.3	-36.74
GUAD0172	7/8/2022 10:09	42.7	33.9	1.1	22.3	112.3	110.3	-4.2	-2.81
GUAD0173	7/8/2022 10:16	38.3	33.7	1	27	122.9	120.3	-2.84	-1.98
GUAD0176		10.0			Offline f		100		10.10
GUAD0177	7/7/2022 11:54	43.2	34.1	1.8	20.9	127	126	-29.32	-10.48
GUAD0178	7/14/2022 11:24	45.9	35.8	2.8	15.5	105.4	105.4	-7.44	-7.4
GUAD0179	7/14/2022 11:11	28.7	27.4	1	42.9	115.5	114.6	-1.78	-0.52
GUAD0180	7/6/2022 8:05	46.4	38	2.7	12.9	127.2	127.8	-24.12	-24.15
GUAD0180	7/7/2022 11:03	48.4	39.4	1.5	10.7	129.8	92	-25.83	-9.52
GUAD0181	7/14/2022 10:27	36.6	32.3	3.2	27.9	129.8	123.6	-10.63	-10.04
GUAD0181	7/14/2022 15:03	45	37.5	1.8	15.7	126.8	129.6	-20.22	-13.65
GUAD0183	7/8/2022 11:38	49.8	37.9	1.8	10.5	81.4	83.9	-6.37	-28.69
GUAD0184	7/8/2022 11:31	48.5	40.3	1.4	9.8	129.6	128.5	-3.94	-1.99
GUAD0185	7/6/2022 7:37	52.2	40.8	0.6	6.4	128.5	128.6	-2.25	-4.02
GUAD0186	7/6/2022 8:24	44.8	39.3	1	14.9	122.1	130	-7.5	-30.75
GUAD0187	7/7/2022 7:28	52.7	39.1	1.7	6.5	124	124.1	-30.93	-30.88
GUAD0198	7/7/2022 10:48	52.8	40.2	0.2	6.8	112.8	121.7	-2.17	-4.6
GUAD0199	7/7/2022 10:41	50.8	38.1	0.8	10.3	129.5	128.8	-11.7	-9.63
GUAD0200	7/7/2022 10:26	51.7	38.6	1.5	8.2	129.8	129.8	-26.83	-26.83
GUAD0201	7/7/2022 8:42	49.9	41	1.5	7.6	118.4	123.3	-14.31	-28.66
GUAD0202	7/8/2022 8:50	43.5	33.9	1.7	20.9	124.6	120.1	-2.56	-2.14
GUAD0203	7/19/2022 12:43	54.9	41.1	0.3	3.7	120.4	120.5	-25.42	-25.49
GUAD0204	7/7/2022 9:24	50.7	40.3	1.4	7.6	122.7	124	-0.24	-7.51
GUAD0205	7/7/2022 8:21	53.6	45.1	0.3	1	129.9	128.9	-0.56	-1.98
GUAD0207	7/7/2022 10:34	50.7	42.1	0.2	7	129.8	130.5	-1.75	-2.71
GUAD0208	7/14/2022 10:08	34.3	37	0.9	27.8	129.7	128.6	-0.17	-0.23
GUAD0209	7/19/2022 8:41	45.8	44.2	0	10	114.1	130.4	-0.14	-0.47
GUAD0211	7/6/2022 7:56	42.8	39.1	0.6	17.5	121	120.4	-0.25	-0.25
GUAD0213	7/6/2022 7:51	46.1	39.1	1.9	12.9	129.7	129.3	-18.96	-18.95
GUAD0214	7/8/2022 9:09	39.1	34.8	1.9	24.2	128	124.4	-10.27	-4.69
GUAD0215	7/6/2022 9:10	50.2	41.7	0.2	7.9	126.2	129.8	-0.16	-2.28
GUAD0216	7/7/2022 8:04	48.4	41.7	0.3	9.6	130.2	129.6	-0.75	-1.4
GUAD0217	7/6/2022 8:58	42	39.6	0.6	17.8	128.4	129.7	-1.67	-1.66
GUAD0218	7/7/2022 7:52	35.9	38.1	0.3	25.7	126.5	115.1	-0.98	-0.6
GUAD0219	7/7/2022 7:12	46.9	38.4	0.7	14	123.8	112.1	-2.32	-1.22
GUAD0220	7/7/2022 7:42	42.6	36.6	2.4	18.4	126.1	109.1	-29.94	-9.01
GUAD0221	7/6/2022 9:19	36	34.9	0.3	28.8	118.7	119.8	-1.43	-2.64
GUAD0222		1	1	1	Offline f	or filling	1		
GUAD0223	7/5/2022 9:53	41.2	41.7	0.2	16.9	128.1	127.6	-1.5	-0.64
GUAD0224	7/5/2022 9:44	39.6	42.1	0.3	18	114.9	114.4	-0.32	-0.24
GUAD0224	7/14/2022 14:15	37.6	40.5	0.4	21.5	114	114.4	-0.03	-0.03
GUAD0225	7/5/2022 8:46	42.6	35.9	0.4	21.1	120.2	117.1	-0.21	-0.15
GUAD0226	7/19/2022 9:38	58.1	41.9	0	0	110.5	110.3	0.85	0.84
GUAD0226	7/19/2022 13:18	58.8	41.2	0	0	107.8	107.9	1.08	1.09
GUAD0226	7/19/2022 13:19	58.6	41.1	0	0.3	109.7	110.1	1.03	1.05
GUAD0226	7/26/2022 6:49	64.8	31.9	3.3	0	78.6	81.3	0.89	0.9
GUAD0226	7/26/2022 12:45	54.9	39.2	0.1	5.8	122	122.6	-2.69	-3.77
GUAD0227	7/19/2022 7:44	49.7	40.4	0	9.9	121	121.2	-1.07	-1.2
GUAD0228	7/5/2022 9:29	46.4	36.9	0.2	16.5	98.2	105.1	-0.09	-0.06

GUAD0230	7/19/2022 14:36	59.1	38.7	0	2.2	108.5	107.7	-0.34	-0.87
GUADH11L	7/14/2022 7:39	49.7	35.4	3	11.9	83.8	84.3	-2.42	-2.38
GUADH12L	7/7/2022 13:38	62.4	35.8	0.3	1.5	109.5	109.5	-1.56	-1.71

Wells 114, 123, 134, 135, 149, 151, 154, 156, 158, 161, 162, 181, 182, 185, 186, 199, 200, 209, 217 and 218 are approved to operate at a temperature HOV of 145°F.

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 -August 4, 5, 8, 9, 11, 23, and 31, 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	8/9/2022 10:12	48.1	41.4	0.0	10.5	128.9	128.5	-20.54	-20.23
GDLC0189	8/9/2022 9:43	48.5	42.8	0.0	8.7	125.1	126.2	-2.11	-3.01
GDLC0190	8/9/2022 9:20	37.3	37.9	0.0	24.8	129.8	129.1	-14.01	-7.64
GDLC0191	8/11/2022 14:38	32.7	35.9	0.1	31.3	126.9	127.5	-1.61	-1.71
GDLC0192	8/5/2022 10:05	52.9	44.9	0.0	2.2	122.2	126.8	-0.55	-3.73
GDLC0193	8/5/2022 10:56	45.8	41.8	0.0	12.4	130.8	130.5	-0.49	-0.47
GDLC0196	8/9/2022 8:07	60.4	39.6	0.0	0.0	70.8	91	-0.04	-1.73
GDLC0197	8/9/2022 14:08	48.5	39.6	0.0	11.9	127.8	128.8	-0.13	-0.23
GDLC0232	8/9/2022 8:22	57.6	42.4	0.0	0.0	66.3	105.7	-0.08	-0.56
GDLC0233	8/9/2022 8:16	55.2	40.5	0.0	4.3	116.3	116.5	-3.51	-4.54
GDLC0234	8/5/2022 14:06	47.6	39.3	0.0	13.1	109.2	111.4	0.04	-0.05
GDLC0234	8/5/2022 14:13	47.6	39.2	0.0	13.2	114.8	115.5	-0.43	-0.23
GDLC0235	8/5/2022 9:58	49.0	44.3	0.0	6.7	125.2	128.1	-3.5	-14.61
GDLC0236	8/8/2022 8:58	33.3	35.9	0.0	30.8	121.1	121.6	-0.72	-0.71
GDLC0237	8/8/2022 8:31	43.6	41.5	0.0	14.9	128.7	128.2	-4.09	-2.94
GDLC0238	8/5/2022 13:35	44.9	38.3	0.0	16.8	111.6	113.2	0.24	-0.13
GDLC0238	8/5/2022 13:37	43.7	38.2	0.0	18.1	113.2	113.2	-0.29	-0.21
GDLC0239	8/5/2022 8:58	26.1	29.9	0.0	44.0	110.1	105.5	-1.31	-0.28
GDLC0240	8/5/2022 8:51	52.9	40.5	0.0	6.6	119.4	119.6	-1.36	-2.24
GDLC0241	8/5/2022 9:20	55.3	43.4	0.0	1.3	126.4	126.3	-3.7	-4.68
GDLC0242	8/5/2022 8:46	57.3	42.7	0.0	0.0	87.7	88.3	-34.89	-35.12
GDLC0243	8/5/2022 9:28	49.2	42.0	0.0	8.8	117.5	118.3	-0.59	-1.31
GDLC0244	8/5/2022 13:55	44.2	38.9	0.0	16.9	112.8	115.6	-0.17	-0.12
GUAD0062	8/5/2022 6:28	54.2	39.1	0.0	6.7	96	96.2	-3.56	-4.65
GUAD0065	8/5/2022 7:53	57.5	42.5	0.0	0.0	111.1	111.5	-30.89	-30.01
GUAD0066	8/5/2022 7:58	59.8	40.2	0.0	0.0	108.7	108.7	-15.95	-15.95
GUAD0081	8/4/2022 14:30	54.6	42.7	0.0	2.7	107.5	107.7	-0.07	-0.26
GUAD0082	8/4/2022 14:17	49.8	37.9	0.0	12.3	104.5	104.6	-13.71	-13.75
GUAD0112	8/5/2022 7:37	47.9	36.4	0.0	15.7	125.6	124.9	-0.59	-0.34
GUAD0114	8/9/2022 7:37	53.3	46.7	0.0	0.0	97.3	97.6	-33.98	-33.21
GUAD0122	8/9/2022 7:14	56.6	43.4	0.0	0.0	122.7	121.6	-2.88	-7.57
GUAD0124	8/9/2022 13:25	46.9	40.5	0.0	12.6	127.9	128	-4.75	-4.75
GUAD0129	8/5/2022 9:15	59.3	40.7	0.0	0.0	107.3	107.8	-8.6	-10.39
GUAD0131	8/4/2022 14:49	57.5	40.1	0.0	2.4	118.7	118.6	-31.22	-33.48
GUAD0134	8/5/2022 6:45	56.5	43.5	0.0	0.0	115.2	115.4	-0.03	-0.04
GUAD0134	8/5/2022 13:07	58.0	41.3	0.1	0.6	117.4	117.3	0.34	0.35
GUAD0134	8/5/2022 13:17	58.0	42.0	0.0	0.0	117.6	117.6	0.35	0.36
GUAD0134	8/11/2022 12:55	58.2	41.1	0.2	0.5	127.1	126.7	-6.05	-2.15
GUAD0135	8/5/2022 8:16	55.2	41.7	0.0	3.1	129.8	129.6	-4.22	-4.2
GUAD0138	8/5/2022 7:21	52.3	30.9	0.0	16.8	89.6	88.8	-0.4	-0.31
GUAD0142	8/5/2022 7:06	58.6	41.1	0.0	0.3	101.1	103.4	-0.83	-1.54
GUAD0146	8/8/2022 8:53	56.3	43.7	0.0	0.0	129.9	130.3	-20.06	-22.87
GUAD0147	8/9/2022 10:32	2022 10:32 57.4 40.1		0.0	2.5	117.1	117.2	-8.56	-8.47
GUAD0151	8/9/2022 9:55 59.1 39.		39.4	0.0	1.5	128.7	128.6	-4.3	-5.86
GUAD0152	8/11/2022 9:20	56.1	43.9	0.0	0.0	114.4	121.5	-5.76	-20.7

		00.0	40.0			407.0	100 5	5.40	7.40
GUAD0154	8/11/2022 9:11	60.0	40.0	0.0	0.0	127.3	126.5	-5.18	-7.13
GUAD0161	8/11/2022 14:57	55.4	40.6	0.0	4.0	123	122.1	-10.15	-10.75
GUAD0162	8/11/2022 15:02	54.9	42.9	0.0	2.2	128.5	128.4	-25.29	-25.44
GUAD0172	8/9/2022 12:48	57.8	39.8	0.0	2.4	110.1	111.8	-0.37	-0.41
GUAD0173	8/9/2022 12:56	57.1	41.4	0.0	1.5	117.8	121.9	-0.14	-0.42
GUAD0176	8/23/2022 10:44	59.0	41.0	0.0	0.0	110.9	113	-2.95	-3.29
GUAD0177	8/9/2022 10:35	56.7	42.8	0.0	0.5	126.1	128.7	-2.91	-18.15
GUAD0178	8/8/2022 14:36	54.3	41.5	0.5	3.7	102.5	116.6	-1.1	-25.43
GUAD0178	8/8/2022 14:40	53.9	41.4	0.2	4.5	111.7	111.7	-27.71	-28.4
GUAD0179	8/9/2022 10:44	46.4	35.4	0.0	18.2	108.2	114.2	0.11	-0.13
GUAD0179	8/9/2022 10:46	38.7	31.6	0.0	29.7	114.9	114.9	-0.39	-0.33
GUAD0180	8/8/2022 14:13	55.6	42.1	0.0	2.3	88	114	2.85	-11.28
GUAD0180	8/8/2022 14:16	55.5	42.8	0.0	1.7	117.1	117.4	-17.34	-17.32
GUAD0181	8/9/2022 6:55	56.6	43.4	0.0	0.0	123.2	124.4	6.48	-1.77
GUAD0181	8/9/2022 6:58	55.3	44.7	0.0	0.0	120.6	120	-2.32	-2.32
GUAD0183	8/5/2022 9:53	55.8	42.2	0.0	2.0	80.9	83.2	-28.68	-32.21
GUAD0184	8/5/2022 9:44	54.5	42.4	0.0	3.1	128.4	130.5	-2.9	-13.3
GUAD0185	8/8/2022 8:21	46.2	37.9	0.0	15.9	129.8	128	-4.33	-2.23
GUAD0186	8/8/2022 8:05	46.7	39.0	0.2	14.1	129.7	129.3	-27.2	-27.39
GUAD0187	8/5/2022 10:10	56.4	43.6	0.0	0.0	124.6	124.7	-29.32	-29.3
GUAD0198	8/8/2022 14:24	55.6	39.8	0.0	4.6	120.9	121	-2.87	-2.8
GUAD0199	8/8/2022 14:30	55.0	40.4	0.0	4.6	130	128.6	-7.97	-9.78
GUAD0200	8/8/2022 14:46	55.5	40.3	0.5	3.7	129.9	127.8	-18.41	-18.31
GUAD0201	8/5/2022 14:19	54.7	42.8	0.0	2.5	125.4	125.5	-19.66	-19.7
GUAD0202	8/9/2022 7:46	58.0	42.0	0.0	0.0	94.5	118.2	0.24	-0.29
GUAD0202	8/9/2022 7:47	58.8	41.2	0.0	0.0	119.4	119.4	-0.45	-0.41
GUAD0203	8/9/2022 14:17	52.5	42.2	0.0	5.3	120.4	120.7	-19.65	-19.85
GUAD0204	8/9/2022 10:21	54.4	43.6	0.0	2.0	122.8	122.8	-21.85	-21.58
GUAD0205	8/9/2022 9:27	37.8	40.2	0.0	22.0	128.4	129	-1.99	-1.35
GUAD0207	8/11/2022 14:47	34.6	37.3	0.0	28.1	125.2	125.2	-0.69	-0.25
GUAD0208	8/8/2022 14:53	39.3	39.1	0.0	21.6	128.8	130.3	-0.19	-0.01
GUAD0209	8/9/2022 7:08	36.6	40.8	0.0	22.6	126	126.7	-0.45	-0.21
GUAD0211	8/8/2022 8:45	54.3	45.0	0.0	0.7	124.7	128.8	-0.17	-0.3
GUAD0213	8/8/2022 8:37	50.2	43.7	0.0	6.1	129.4	128.7	-18.67	-17.93
GUAD0214	8/9/2022 11:17	56.2	42.6	0.0	1.2	120.9	125.7	-0.07	-0.86
GUAD0214	8/9/2022 11:20	57.5	40.7	0.0	1.8	127.4	127.4	-1.68	-1.48
GUAD0215	8/8/2022 10:53	37.3	35.8	0.1	26.8	129.8	128.6	-2.9	-0.96
GUAD0216	8/9/2022 9:14	36.8	37.0	0.0	26.2	128.5	129.1	-1.67	-1.45
GUAD0217	8/5/2022 10:51	48.7	43.3	0.0	8.0	129.9	129.5	-1.29	-0.8
GUAD0218	8/5/2022 10:35	53.2	41.7	0.0	5.1	118.4	125.3	-0.36	-1.56
GUAD0219	8/5/2022 10:41	57.1	42.7	0.0	0.2	124.9	125.3	-0.69	-1.55
GUAD0220	8/5/2022 10:17	56.6	43.4	0.0	0.0	118.1	122.8	-2.26	-7.72
GUAD0221	8/4/2022 14:57	47.7	38.0	0.0	14.3	121	120.8	-2.65	-1.79
GUAD0222	8/1/2022 15:10	54.2	42.9	0.0	2.9	109.5	110.7	-0.08	-0.32
GUAD0223	8/31/2022 10:50	44.1	47.6	0.0	8.3	121.7	122.2	-0.73	-0.74
GUAD0224	8/1/2022 10:17	48.7	44.1	0.0	7.2	116.1	118	-0.07	-0.17
GUAD0225	8/5/2022 7:31	55.3	38.6	0.0	6.1	117.1	121.6	-0.49	-1.12
	5, 5, EVEL 1.01	55.5		0.0					
GUAD0226	8/5/2022 9:07	57.6	42.4	0.0	0.0	123.7	124	-3.71	-5.1

GUAD0228	8/5/2022 8:22	49.4	38.8	0.0	11.8	107.6	111.3	-0.14	-0.29
GUAD0230	8/5/2022 6:53	50.1	41.0	0.0	8.9	112.8	113	-0.86	-1.37
GUADH11L	8/4/2022 14:41	58.5	39.5	0.0	2.0	99.3	98.7	-0.03	-0.25
GUADH12L	8/4/2022 14:10	60.4	39.0	0.0	0.6	119.1	117.6	-0.55	-1.21

Wells 114, 123, 134, 135, 149, 151, 154, 156, 158, 161, 162, 181, 182, 185, 186, 199, 200, 209, 217 and 218 are approved to operate at a temperature HOV of 145°F.

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 -September 1, 6, 7, 8, and 9, 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	9/8/2022 13:33	48.7	40.4	0.0	10.9	129.5	129.7	-14.8	-14.8
GDLC0189	9/8/2022 13:00	46.7	40.8	0.0	12.5	121.6	121.2	-2.4	-1.0
GDLC0190	9/8/2022 12:52	44.0	38.8	0.0	17.2	126.6	127.3	-1.4	-5.5
GDLC0191	9/8/2022 8:19	29.3	35.1	0.0	35.6	118.8	122.2	-3.5	-16.8
GDLC0192	9/8/2022 7:58	51.7	45.9	0.0	2.4	129.1	129.1	-3.7	-5.1
GDLC0193	9/8/2022 8:54	50.6	43.7	0.0	5.7	128.9	128.2	-0.3	-1.4
GDLC0196	9/9/2022 8:51	27.8	31.9	0.8	39.5	113.0	113.0	-1.4	-1.4
GDLC0197	9/9/2022 7:52	38.7	36.5	0.0	24.8	127.3	128.2	-1.2	-0.9
GDLC0232	9/9/2022 8:45	34.3	37.3	0.0	28.4	118.1	117.8	-1.7	-0.8
GDLC0233	9/8/2022 13:57	31.2	31.6	0.1	37.1	117.2	117.1	-4.4	-2.6
GDLC0234	9/8/2022 13:14	42.1	36.6	0.0	21.3	118.2	118.5	-0.1	-0.2
GDLC0235			44.1	0.0	6.1	129.8	129.8	-11.0	-11.0
GDLC0236	9/8/2022 9:36	47.5	40.0	0.0	12.5	129.9	129.1	-0.2	-0.5
GDLC0237	9/8/2022 9:08	49.3	42.7	0.0	8.0	128.2	128.9	-2.0	-2.3
GDLC0238	9/9/2022 12:02	28.8	32.8	0.0	38.4	113.1	113.3	-0.2	-0.2
GDLC0239	9/6/2022 8:51	21.3	39.2	0.0	39.5	115.3	115.3	-0.6	-0.2
GDLC0240	9/6/2022 8:43	43.9	43.7	0.0	12.4	120.1	120.1	-0.5	-0.3
GDLC0241	9/6/2022 9:06	52.1	43.6	0.0	4.3	126.6	126.6	-1.8	-1.8
GDLC0242	9/6/2022 8:32	58.4	41.5	0.0	0.1	97.7	98.2	-0.1	0.0
GDLC0243	9/6/2022 9:11	41.6	40.8	0.0	17.6	120.0	120.1	-1.1	-0.8
GDLC0244	9/9/2022 8:38	45.6	40.7	0.0	13.7	115.3	116.4	-0.6	-0.1
GUAD0062	9/7/2022 6:59	50.8	39.4	0.0	9.8	96.7	96.7	-4.1	-4.1
GUAD0065	9/9/2022 7:42	53.1	42.2	0.0	4.7	114.4	114.4	-0.2	-0.2
GUAD0066	9/6/2022 9:46	34.4	33.2	0.0	32.4	112.6	112.6	-13.6	-12.9
GUAD0081	9/1/2022 8:29	56.7	43.3	0.0	0.0	110.6	110.9	-27.8	-27.8
GUAD0082	9/1/2022 8:23	52.1	36.8	0.1	11.0	102.0	101.7	-11.4	-16.5
GUAD0112	9/9/2022 11:41	36.4	32.2	0.0	31.4	126.8	127.3	-0.8	0.0
GUAD0114	9/8/2022 14:15	50.7	43.8	0.0	5.5	104.9	105.0	-26.0	-25.4
GUAD0122	9/8/2022 10:47	53.9	41.9	0.0	4.2	128.5	128.0	-10.0	-12.5
GUAD0124	9/8/2022 8:12	42.6	39.9	0.0	17.5	129.1	128.9	-16.8	-12.9
GUAD0129	9/7/2022 7:53	60.1	39.9	0.0	0.0	105.3	107.1	-5.1	-5.1
GUAD0131	9/6/2022 8:09	59.4	40.3	0.1	0.2	118.9	118.9	-30.3	-27.0
GUAD0134	9/6/2022 11:00	52.4	41.0	0.1	6.5	124.7	124.7	-1.1	-1.3
GUAD0135	9/6/2022 8:59	50.5	42.0	0.0	7.5	129.4	127.3	-1.0	-1.0
GUAD0138	9/9/2022 13:55	49.3	39.2	0.0	11.5	115.5	115.4	-2.0	-2.0
GUAD0142	9/6/2022 9:39	48.4	37.7	0.0	13.9	105.5	105.8	-2.7	-2.6
GUAD0146	9/8/2022 9:29	54.7	42.6	0.0	2.7	128.2	128.5	-15.9	-15.9
GUAD0147	9/8/2022 13:44	53.2	38.3	0.0	8.5	121.7	122.1	-6.5	-6.5
GUAD0151	9/8/2022 13:27	56.4	37.8	0.0	5.8	126.6	128.1	-7.7	-8.6
GUAD0152	9/9/2022 10:01	55.4	43.2	0.0	1.4	127.8	126.2	-17.5	-19.3
GUAD0154	9/8/2022 9:48	55.6	42.7	0.0	1.7	129.8	127.8	-12.6	-12.2
GUAD0161	9/9/2022 9:05	56.3	41.6	0.0	2.1	128.0	128.4	-10.9	-10.9
GUAD0162	2 9/9/2022 9:10 55.1		44.1	0.0	0.8	124.9	123.0	-21.8	-21.8
GUAD0172			40.4	0.0	0.4	112.5	112.5	-0.6	-0.9
GUAD0173	9/8/2022 7:40	48.9	39.7	0.0	11.4	122.4	122.6	-0.1	-0.2
GUAD0176	9/8/2022 14:13	33.4	33.5	0.0	33.1	114.6	115.2	-3.1	-2.4

	1	1		1	1				1	
GUAD0177	9/8/2022 13:52	47.6	39.2	0.0	13.2	128.9	128.9	-15.3	-15.4	
GUAD0178	9/8/2022 11:03	47.0	36.0	1.9	15.1	118.6	119.2	-23.3	-22.6	
GUAD0179	9/9/2022 9:46	36.2	34.5	0.0	29.3	115.8	116.0	-0.6	-0.4	
GUAD0180	9/8/2022 10:34	52.9	42.2	0.0	4.9	130.7	130.8	-13.6	-13.7	
GUAD0181	9/8/2022 10:23	52.5	43.1	0.0	4.4	126.7	127.5	-6.4	-10.5	
GUAD0183	9/7/2022 11:53	55.5	42.6	0.0	1.9	94.6	94.4	-17.3	-17.3	
GUAD0184	9/7/2022 11:48	46.6	41.3	0.1	12.0	130.7	130.6	-10.4	-5.7	
GUAD0185	9/8/2022 9:02	54.9	43.0	0.0	2.1	120.5	122.4	-0.1	-0.4	
GUAD0186	9/9/2022 10:35	49.3	42.2	0.0	8.5	127.3	127.7	-20.8	-20.8	
GUAD0187	9/8/2022 7:54	56.9	43.1	0.0	0.0	124.5	124.6	-20.8	-20.7	
GUAD0198	9/9/2022 9:38	53.8	40.2	0.0	6.0	122.6	122.6	-3.8	-3.8	
GUAD0199	9/8/2022 10:55	53.2	39.4	0.0	7.4	129.1	129.9	-12.0	-13.1	
GUAD0200	9/8/2022 11:06	52.7	39.2	0.0	8.1	129.1	128.4	-15.3	-15.3	
GUAD0201	9/8/2022 13:17	50.3	40.5	0.0	9.2	119.7	122.7	-15.6	-15.7	
GUAD0202	9/8/2022 14:23	53.6	39.6	0.0	6.8	125.1	125.1	-0.4	-0.5	
GUAD0203	9/9/2022 8:03	54.6	44.1	0.0	1.3	119.5	119.6	-16.6	-16.5	
GUAD0204	9/8/2022 13:41	52.1	41.3	0.0	6.6	124.8	124.5	-16.1	-15.7	
GUAD0205	9/8/2022 12:47	44.1	40.9	0.0	15.0	128.4	128.9	-0.5	-0.1	
GUAD0207	9/9/2022 9:54	41.8	39.1	0.0	19.1	126.2	128.0	-0.2	0.0	
GUAD0208	9/8/2022 10:29	41.3	40.1	0.0	18.6	129.8	129.8	-0.2	-0.3	
GUAD0209	9/8/2022 10:45	44.6	41.8	0.0	13.6	128.0	128.4	-0.1	-0.1	
GUAD0211	9/8/2022 9:25	48.2	43.3	0.0	8.5	129.1	129.1	-0.1	-0.1	
GUAD0213	9/8/2022 9:15	52.5	43.8	0.0	3.7	129.0	129.2	-13.3	-13.2	
GUAD0214	9/9/2022 9:01	54.8	41.9	0.0	3.3	128.3	129.1	-1.4	-3.6	
GUAD0215	9/8/2022 9:43	49.8	42.3	0.0	7.9	129.9	129.1	-0.1	-0.2	
GUAD0216	9/8/2022 12:37	46.2	39.4	0.1	14.3	129.9	129.6	-0.5	-0.3	
GUAD0217	9/8/2022 8:35	45.8	43.0	0.0	11.2	129.1	129.8	-0.9	-0.4	
GUAD0218	9/8/2022 8:26	34.5	37.4	0.0	28.1	128.7	129.2	-2.6	-1.9	
GUAD0219	9/8/2022 7:49	48.4	40.7	0.0	10.9	124.9	124.9	-2.4	-2.4	
GUAD0220	9/8/2022 8:05	53.4	44.1	0.0	2.5	126.5	126.9	-9.8	-12.8	
GUAD0221	9/6/2022 8:17	40.6	36.9	0.0	22.5	120.1	120.8	-1.4	-1.3	
GUAD0222	9/6/2022 11:57	42.5	42.2	0.0	15.3	115.3	115.5	-0.1	-0.1	
GUAD0223		•		-	Offline f	or filling				
GUAD0224	Offline for filling									
GUAD0225	9/6/2022 9:59	38.5	35.1	0.0	26.4	125.3	125.3	-0.1	0.0	
GUAD0226	9/7/2022 7:23	57.2	42.7	0.0	0.1	123.5	123.5	-0.3	-0.2	
GUAD0227	9/6/2022 10:05	36.6	36.2	0.0	27.2	122.5	122.2	-0.6	-0.3	
GUAD0228	9/6/2022 9:27	34.6	35.8	0.0	29.6	118.8	119.3	-0.1	0.0	
GUAD0230	9/6/2022 11:51	32.1	31.0	0.1	36.8	114.5	114.6	-0.5	-0.1	
GUADH11L	9/1/2022 8:44	52.9	38.2	1.6	7.3	88.2	88.4	-7.2	-7.1	
GUADH12L	9/9/2022 11:08	52.0	35.0	0.8	12.2	95.4	95.7	-0.9	-0.9	
	134, 135, 149, 151, 1		404 400 404	400 405		000 017 and				

Wells 114, 123, 134, 135, 149, 151, 154, 156, 158, 161, 162, 181, 182, 185, 186, 199, 200, 209, 217 and 218 are approved to operate at a temperature HOV of 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 April 1, 2022 - September 30, 2022

REPORT PREPARED BY:	Rajan Phadnis
UPDATED DATE:	10/1/2022
LFG MONITORING DEVICE:	GEM
MODEL:	5000
DATE LAST CALIBRATED:	Daily

Wellhead ID.		Gas	Compositio	on (% bv vo	olume)	Initial	Adjusted		Adjusted Static		Duration of Exceedance
Number	Date Time	CH₄	CO2	O ₂	Balance		Temperature(oF)	Pressure ("H ₂ O)	Pressure ("H ₂ O)	Comments	As of the End of Reporting Period (Days)
GUAD0207	6/6/2022 12:14	51.0	40.4	0.2	8.4	127.5	134.5	0.04	-0.32	NSPS/EG CAI;Inc. Flow/Vac.	
GUAD0207	6/6/2022 15:20	46.0	36.9	0.4	16.7	130.3	128.2	-0.43	-0.19	Barely Open;Dec. Flow/Vac.	<1
Well 207 had pre	essure exceedance durin	g initial monito	oring in June 2	2022. Adjustr	nents were mad	le and exceedance wa	as corrected on the sa	ame day.			
GDLC0233	7/14/2022 10:48	48.7	35.1	0.5	15.7	97.1	97.2	0.10	0.11	Barely Open;No Adj. Made	
GDLC0233	7/18/2022 13:09	55.8	37.1	0	7.1	118	118	-3.39	-4.21	NSPS/EG CAI;Barely Open;Inc. Flow/Vac.	4
Well 233 had pre	essure exceedance durin	g initial monito	oring in July 20	022. Adjustm	ents were mad	e and exceedance wa	s corrected.				
GUAD0082	7/14/2022 8:23	44.4	35.3	1.1	19.2	93.2	93	0.02	0.01	Barely Open;No Adj. Made	
GUAD0082	7/18/2022 13:31	51.8	37.2	0	11	97.7	103.9	-1.08	-10.86	NSPS/EG CAI;Barely Open;Inc. Flow/Vac.	4
Well 82 had pres	sure exceedance during	initial monitor	ring in July 202	22. Adjustme	nts were made	and exceedance was	corrected.				
GUAD0226	7/19/2022 9:38	58.1	41.9	0.0	0	110.5	110.3	0.85	0.84	NSPS/EG CAI;Fully Open;Pinched	
GUAD0226	7/26/2022 12:45	54.9	39.2	0.1	5.8	122	122.6	-2.69	-3.77	Barely Open;Inc. Flow/Vac.	7
Well 226 had pre	essure exceedance durin	g initial monito	oring in July 20	022. New late	eral was installe	d and exceedance wa	as corrected.				
GDLC0234	8/5/2022 14:06	47.6	39.3	0	13.1	109.2	111.4	0.04	-0.05	NSPS/EG CAI;Barely Open;Inc. Flow/Vac.	<1
Well 234 had pre	essure exceedance durin	g initial monito	oring in Augus	t 2022. Adjus	stments were m	ade and exceedance	was corrected on the	same day.			
GDLC0238	8/5/2022 13:35	44.9	38.3	0	16.8	111.6	113.2	0.24	-0.13	NSPS/EG CAI;Barely Open;Inc. Flow/Vac.	<1
Well 234 had pre	essure exceedance durin	g initial monito	oring in Augus	t 2022. Adjus	stments were m	ade and exceedance	was corrected on the	same day.	-	·	·
GUAD0134	8/5/2022 13:07	58	41.3	0.1	0.6	117.4	117.3	0.34	0.35	NSPS/EG CAI;Fully Open;No Adj. Made;Pinched	
GUAD0134	8/5/2022 13:17	58	42	0	0	117.6	117.6	0.35	0.36	NSPS/EG CAI;Fully Open;No Adj. Made;Pinched	
GUAD0134	8/11/2022 12:55	58.2	41.1	0.2	0.5	127.1	126.7	-6.05	-2.15	Barely Open;Dec. Flow/Vac.	6
Well 134 had pre	essure exceedance durin	g initial monito	oring in Augus	t 2022. New I	ateral was insta	lled and exceedance	was corrected.				
GUAD0179	8/9/2022 10:44	46.4	35.4	0	18.2	108.2	114.2	0.11	-0.13	NSPS/EG CAI;Barely Open;Inc. Flow/Vac.	<1
Well 179 had pre	essure exceedance durin	g initial monito	oring in Augus	t 2022. Adjus	stments were m	ade and exceedance	was corrected on the	same day.			
GUAD0180	8/8/2022 14:13	55.6	42.1	0	2.3	88	114	2.85	-11.28	NSPS/EG CAI;Barely Open;Inc. Flow/Vac.	<1
	essure exceedance durin	g initial monito	oring in Augus	t 2022. Adjus	stments were m	ade and exceedance	was corrected on the	same day.			
GUAD0181	8/9/2022 6:55	56.6	43.4	0	0	123.2	124.4	6.48	-1.77	NSPS/EG CAI;Barely Open;Inc. Flow/Vac.	<1
Well 181 had pre	essure exceedance durin	g initial monito	oring in Augus	t 2022. Adjus	stments were m	ade and exceedance	was corrected on the	same day.		· · · · · · · · · · · · · · · · · · ·	
GUAD0202	8/9/2022 7:46	58	42	0	0	94.5	118.2	0.24	-0.29	NSPS/EG CAI;Barely Open;Inc. Flow/Vac.	<1
Well 202 had pre	essure exceedance durin	g initial monito	oring in Augus	t 2022. Adjus	stments were m	ade and exceedance	was 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

April 1, 2022 - September 30, 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
April 2022	720.00	720.00	0.00	0	49.9	0	0	0
May 2022	744.00	744.00	0.00	0	49.9	0	0	0
June 2022	720.00	720.00	0.00	0	49.9	0	0	0
July 2022	744.00	744.00	0.00	0	49.9	0	0	0
August 2022	744.00	744.00	0.00	0	49.9	0	0	0
September 2022	720.00	720.00	0.00	0	49.9	0	0	0
April 1, 2022 - September 30, 2022 Totals/Avg:	4,392.0	4,392.0	0.0	0	49.9	0.0	0.0	0.0
2022 TOTALS/ AVERAGE :	6,551.0	6,551.0	0.0	0	49.9	0.0	0.0	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

San Jose, CA

Heat Input Rate

Flare A-9

IONTH: Date	April-22 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
4/1/2022	0.0	49.9	0	0	0	1,013.0	0
4/2/2022	0.0	49.9	0	0	0	1,013.0	0
4/3/2022	0.0	49.9	0	0	0	1,013.0	0
4/4/2022	0.0	49.9	0	0	0	1,013.0	0
4/5/2022	0.0	49.9	0	0	0	1,013.0	0
4/6/2022	0.0	49.9	0	0	0	1,013.0	0
4/7/2022	0.0	49.9	0	0	0	1,013.0	0
4/8/2022	0.0	49.9	0	0	0	1,013.0	0
4/9/2022	0.0	49.9	0	0	0	1,013.0	0
4/10/2022	0.0	49.9	0	0	0	1,013.0	0
4/11/2022	0.0	49.9	0	0	0	1,013.0	0
4/12/2022	0.0	49.9	0	0	0	1,013.0	0
4/13/2022	0.0	49.9	0	0	0	1,013.0	0
4/14/2022	0.0	49.9	0	0	0	1,013.0	0
4/15/2022	0.0	49.9	0	0	0	1,013.0	0
4/16/2022	0.0	49.9	0	0	0	1,013.0	0
4/17/2022	0.0	49.9	0	0	0	1,013.0	0
4/18/2022	0.0	49.9	0	0	0	1,013.0	0
4/19/2022	0.0	49.9	0	0	0	1,013.0	0
4/20/2022	0.0	49.9	0	0	0	1,013.0	0
4/21/2022	0.0	49.9	0	0	0	1,013.0	0
4/22/2022	0.0	49.9	0	0	0	1,013.0	0
4/23/2022	0.0	49.9	0	0	0	1,013.0	0
4/24/2022	0.0	49.9	0	0	0	1,013.0	0
4/25/2022	0.0	49.9	0	0	0	1,013.0	0
4/26/2022	0.0	49.9	0	0	0	1,013.0	0
4/27/2022	0.0	49.9	0	0	0	1,013.0	0
4/28/2022	0.0	49.9	0	0	0	1,013.0	0
4/29/2022	0.0	49.9	0	0	0	1,013.0	0
4/30/2022	0.0	49.9	0	0	0	1,013.0	0
Totals/ Average:	0.0	49.9	0	0	0	1013.0	0
otes:		•		· · · · · · · · · · · · · · · · · · ·		Maximum:	0

Notes:

*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 CH_4 = methane

San Jose, CA

Heat Input Rate

Flare A-9

MONTH:	May-22						
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)/Da
5/1/2022	0.0	49.9	0	0	0	1,013.0	0
5/2/2022	0.0	49.9	0	0	0	1,013.0	0
5/3/2022	0.0	49.9	0	0	0	1,013.0	0
5/4/2022	0.0	49.9	0	0	0	1,013.0	0
5/5/2022	0.0	49.9	0	0	0	1,013.0	0
5/6/2022	0.0	49.9	0	0	0	1,013.0	0
5/7/2022	0.0	49.9	0	0	0	1,013.0	0
5/8/2022	0.0	49.9	0	0	0	1,013.0	0
5/9/2022	0.0	49.9	0	0	0	1,013.0	0
5/10/2022	0.0	49.9	0	0	0	1,013.0	0
5/11/2022	0.0	49.9	0	0	0	1,013.0	0
5/12/2022	0.0	49.9	0	0	0	1,013.0	0
5/13/2022	0.0	49.9	0	0	0	1,013.0	0
5/14/2022	0.0	49.9	0	0	0	1,013.0	0
5/15/2022	0.0	49.9	0	0	0	1,013.0	0
5/16/2022	0.0	49.9	0	0	0	1,013.0	0
5/17/2022	0.0	49.9	0	0	0	1,013.0	0
5/18/2022	0.0	49.9	0	0	0	1,013.0	0
5/19/2022	0.0	49.9	0	0	0	1,013.0	0
5/20/2022	0.0	49.9	0	0	0	1,013.0	0
5/21/2022	0.0	49.9	0	0	0	1,013.0	0
5/22/2022	0.0	49.9	0	0	0	1,013.0	0
5/23/2022	0.0	49.9	0	0	0	1,013.0	0
5/24/2022	0.0	49.9	0	0	0	1,013.0	0
5/25/2022	0.0	49.9	0	0	0	1,013.0	0
5/26/2022	0.0	49.9	0	0	0	1,013.0	0
5/27/2022	0.0	49.9	0	0	0	1,013.0	0
5/28/2022	0.0	49.9	0	0	0	1,013.0	0
5/29/2022	0.0	49.9	0	0	0	1,013.0	0
5/30/2022	0.0	49.9	0	0	0	1,013.0	0
5/31/2022	0.0	49.9	0	0	0	1,013.0	0
Totals/ Average:	0.0	49.9	0	0	0	1013.0	0
lotes:	•	•	•	· I		Maximum:	0

Notes:

*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

/ONTH: Date	June-22 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
6/1/2022	0.0	49.9	0	0	0	1,013.0	0
6/2/2022	0.0	49.9	0	0	0	1,013.0	0
6/3/2022	0.0	49.9	0	0	0	1,013.0	0
6/4/2022	0.0	49.9	0	0	0	1,013.0	0
6/5/2022	0.0	49.9	0	0	0	1,013.0	0
6/6/2022	0.0	49.9	0	0	0	1,013.0	0
6/7/2022	0.0	49.9	0	0	0	1,013.0	0
6/8/2022	0.0	49.9	0	0	0	1,013.0	0
6/9/2022	0.0	49.9	0	0	0	1,013.0	0
6/10/2022	0.0	49.9	0	0	0	1,013.0	0
6/11/2022	0.0	49.9	0	0	0	1,013.0	0
6/12/2022	0.0	49.9	0	0	0	1,013.0	0
6/13/2022	0.0	49.9	0	0	0	1,013.0	0
6/14/2022	0.0	49.9	0	0	0	1,013.0	0
6/15/2022	0.0	49.9	0	0	0	1,013.0	0
6/16/2022	0.0	49.9	0	0	0	1,013.0	0
6/17/2022	0.0	49.9	0	0	0	1,013.0	0
6/18/2022	0.0	49.9	0	0	0	1,013.0	0
6/19/2022	0.0	49.9	0	0	0	1,013.0	0
6/20/2022	0.0	49.9	0	0	0	1,013.0	0
6/21/2022	0.0	49.9	0	0	0	1,013.0	0
6/22/2022	0.0	49.9	0	0	0	1,013.0	0
6/23/2022	0.0	49.9	0	0	0	1,013.0	0
6/24/2022	0.0	49.9	0	0	0	1,013.0	0
6/25/2022	0.0	49.9	0	0	0	1,013.0	0
6/26/2022	0.0	49.9	0	0	0	1,013.0	0
6/27/2022	0.0	49.9	0	0	0	1,013.0	0
6/28/2022	0.0	49.9	0	0	0	1,013.0	0
6/29/2022	0.0	49.9	0	0	0	1,013.0	0
6/30/2022	0.0	49.9	0	0	0	1,013.0	0
Totals/ Average:	0.0	49.9	0	0	0	1013.0	0
otes:						Maximum:	0

Notes:

*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 CH_4 = methane

San Jose, CA

Heat Input Rate

Flare A-9

MONTH:	July-22	-	-				
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)/Da
7/1/2022	0.0	49.9	0	0	0	1,013.0	0
7/2/2022	0.0	49.9	0	0	0	1,013.0	0
7/3/2022	0.0	49.9	0	0	0	1,013.0	0
7/4/2022	0.0	49.9	0	0	0	1,013.0	0
7/5/2022	0.0	49.9	0	0	0	1,013.0	0
7/6/2022	0.0	49.9	0	0	0	1,013.0	0
7/7/2022	0.0	49.9	0	0	0	1,013.0	0
7/8/2022	0.0	49.9	0	0	0	1,013.0	0
7/9/2022	0.0	49.9	0	0	0	1,013.0	0
7/10/2022	0.0	49.9	0	0	0	1,013.0	0
7/11/2022	0.0	49.9	0	0	0	1,013.0	0
7/12/2022	0.0	49.9	0	0	0	1,013.0	0
7/13/2022	0.0	49.9	0	0	0	1,013.0	0
7/14/2022	0.0	49.9	0	0	0	1,013.0	0
7/15/2022	0.0	49.9	0	0	0	1,013.0	0
7/16/2022	0.0	49.9	0	0	0	1,013.0	0
7/17/2022	0.0	49.9	0	0	0	1,013.0	0
7/18/2022	0.0	49.9	0	0	0	1,013.0	0
7/19/2022	0.0	49.9	0	0	0	1,013.0	0
7/20/2022	0.0	49.9	0	0	0	1,013.0	0
7/21/2022	0.0	49.9	0	0	0	1,013.0	0
7/22/2022	0.0	49.9	0	0	0	1,013.0	0
7/23/2022	0.0	49.9	0	0	0	1,013.0	0
7/24/2022	0.0	49.9	0	0	0	1,013.0	0
7/25/2022	0.0	49.9	0	0	0	1,013.0	0
7/26/2022	0.0	49.9	0	0	0	1,013.0	0
7/27/2022	0.0	49.9	0	0	0	1,013.0	0
7/28/2022	0.0	49.9	0	0	0	1,013.0	0
7/29/2022	0.0	49.9	0	0	0	1,013.0	0
7/30/2022	0.0	49.9	0	0	0	1,013.0	0
7/31/2022	0.0	49.9	0	0	0	1,013.0	0
Totals/ Average:	0.0	49.9	0	0	0	1013.0	0
lotes:		•	•	· ·		Maximum:	0

Notes:

*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:	August-22	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
8/1/2022	0.0	49.9	0	0	0	1,013.0	0
8/2/2022	0.0	49.9	0	0	0	1,013.0	0
8/3/2022	0.0	49.9	0	0	0	1,013.0	0
8/4/2022	0.0	49.9	0	0	0	1,013.0	0
8/5/2022	0.0	49.9	0	0	0	1,013.0	0
8/6/2022	0.0	49.9	0	0	0	1,013.0	0
8/7/2022	0.0	49.9	0	0	0	1,013.0	0
8/8/2022	0.0	49.9	0	0	0	1,013.0	0
8/9/2022	0.0	49.9	0	0	0	1,013.0	0
8/10/2022	0.0	49.9	0	0	0	1,013.0	0
8/11/2022	0.0	49.9	0	0	0	1,013.0	0
8/12/2022	0.0	49.9	0	0	0	1,013.0	0
8/13/2022	0.0	49.9	0	0	0	1,013.0	0
8/14/2022	0.0	49.9	0	0	0	1,013.0	0
8/15/2022	0.0	49.9	0	0	0	1,013.0	0
8/16/2022	0.0	49.9	0	0	0	1,013.0	0
8/17/2022	0.0	49.9	0	0	0	1,013.0	0
8/18/2022	0.0	49.9	0	0	0	1,013.0	0
8/19/2022	0.0	49.9	0	0	0	1,013.0	0
8/20/2022	0.0	49.9	0	0	0	1,013.0	0
8/21/2022	0.0	49.9	0	0	0	1,013.0	0
8/22/2022	0.0	49.9	0	0	0	1,013.0	0
8/23/2022	0.0	49.9	0	0	0	1,013.0	0
8/24/2022	0.0	49.9	0	0	0	1,013.0	0
8/25/2022	0.0	49.9	0	0	0	1,013.0	0
8/26/2022	0.0	49.9	0	0	0	1,013.0	0
8/27/2022	0.0	49.9	0	0	0	1,013.0	0
8/28/2022	0.0	49.9	0	0	0	1,013.0	0
8/29/2022	0.0	49.9	0	0	0	1,013.0	0
8/30/2022	0.0	49.9	0	0	0	1,013.0	0
8/31/2022	0.0	49.9	0	0	0	1,013.0	0
Totals/ Average:	0.0	49.9	0	0	0	1013.0	0
lotes:		•	•	· ·		Maximum:	0

Notes:

*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: September-22

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
9/1/2022	0.0	49.9	0	0	0	1,013.0	0
9/2/2022	0.0	49.9	0	0	0	1,013.0	0
9/3/2022	0.0	49.9	0	0	0	1,013.0	0
9/4/2022	0.0	49.9	0	0	0	1,013.0	0
9/5/2022	0.0	49.9	0	0	0	1,013.0	0
9/6/2022	0.0	49.9	0	0	0	1,013.0	0
9/7/2022	0.0	49.9	0	0	0	1,013.0	0
9/8/2022	0.0	49.9	0	0	0	1,013.0	0
9/9/2022	0.0	49.9	0	0	0	1,013.0	0
9/10/2022	0.0	49.9	0	0	0	1,013.0	0
9/11/2022	0.0	49.9	0	0	0	1,013.0	0
9/12/2022	0.0	49.9	0	0	0	1,013.0	0
9/13/2022	0.0	49.9	0	0	0	1,013.0	0
9/14/2022	0.0	49.9	0	0	0	1,013.0	0
9/15/2022	0.0	49.9	0	0	0	1,013.0	0
9/16/2022	0.0	49.9	0	0	0	1,013.0	0
9/17/2022	0.0	49.9	0	0	0	1,013.0	0
9/18/2022	0.0	49.9	0	0	0	1,013.0	0
9/19/2022	0.0	49.9	0	0	0	1,013.0	0
9/20/2022	0.0	49.9	0	0	0	1,013.0	0
9/21/2022	0.0	49.9	0	0	0	1,013.0	0
9/22/2022	0.0	49.9	0	0	0	1,013.0	0
9/23/2022	0.0	49.9	0	0	0	1,013.0	0
9/24/2022	0.0	49.9	0	0	0	1,013.0	0
9/25/2022	0.0	49.9	0	0	0	1,013.0	0
9/26/2022	0.0	49.9	0	0	0	1,013.0	0
9/27/2022	0.0	49.9	0	0	0	1,013.0	0
9/28/2022	0.0	49.9	0	0	0	1,013.0	0
9/29/2022	0.0	49.9	0	0	0	1,013.0	0
9/30/2022	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

Notes:

*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 CH_4 = methane

April 1, 2022 - September 30, 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	Total Runtime (hours)	Average Flow (scfm)	Average CH ₄ (%)*	Total LFG Volume (scf)	Total CH ₄ Volume (scf)	Total MMBTU
April 2022	720.00	(hours) 4.9	715.1	1,972	43.3	84,587,087	36,719,879	37.197
May 2022	744.00	0.8	743.2	1,731	44.2	77,194,323	33,435,618	34,575
June 2022	720.00	9.4	710.6	1,504	44.2	64,116,934	27,717,372	28,718
July 2022	744.00	7.8	736.2	1,388	44.2	61,311,823	27,109,023	27,461
August 2022	744.00	11.6	732.4	1,555	44.2	68,357,411	30,224,229	30,617
September 2022	720.00	0.0	720.0	1,634	44.2	70,583,901	31,208,672	31,614
April 1, 2022 - September 30, 2022 Totals/Avg:	4,392.0	34.5	4,357.5	1,631	44.1	426,151,479	186,414,793	190,183
2022 TOTALS/ AVERAGE :	6,551.0	48.1	6,502.9	1,666	42.6	649,596,600	276,764,828	281,708

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. Starting April 8, 2022, Methane content determined from flare A-17 February 16, 2022 source test.

results.

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:	April-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
4/1/2022	24.0	40.4	1,755	2,527,851	1,022,137	1,013.0	1,035.4
4/2/2022	24.0	40.4	1,749	2,518,670	1,018,424	1,013.0	1,031.7
4/3/2022	24.0	40.4	1,750	2,520,463	1,019,149	1,013.0	1,032.4
4/4/2022	24.0	40.4	1,754	2,525,995	1,021,386	1,013.0	1,034.7
4/5/2022	24.0	40.4	1,771	2,550,203	1,031,175	1,013.0	1,044.6
4/6/2022	24.0	40.4	1,832	2,638,622	1,066,927	1,013.0	1,080.8
4/7/2022	24.0	40.4	1,886	2,715,584	1,098,046	1,013.0	1,112.3
4/8/2022	24.0	44.2	1,886	2,716,133	1,200,938	1,013.0	1,216.6
4/9/2022	24.0	44.2	1,864	2,683,693	1,186,595	1,013.0	1,202.0
4/10/2022	24.0	44.2	1,845	2,656,268	1,174,469	1,013.0	1,189.7
4/11/2022	24.0	44.2	1,886	2,715,622	1,200,712	1,013.0	1,216.3
4/12/2022	24.0	44.2	2,039	2,936,463	1,298,357	1,013.0	1,315.2
4/13/2022	24.0	44.2	2,108	3,035,779	1,342,270	1,013.0	1,359.7
4/14/2022	24.0	44.2	2,087	3,004,903	1,328,618	1,013.0	1,345.9
4/15/2022	24.0	44.2	2,085	3,002,153	1,327,402	1,013.0	1,344.7
4/16/2022	24.0	44.2	2,051	2,953,432	1,305,860	1,013.0	1,322.8
4/17/2022	24.0	44.2	2,057	2,962,624	1,309,924	1,013.0	1,327.0
4/18/2022	24.0	44.2	2,067	2,975,903	1,315,796	1,013.0	1,332.9
4/19/2022	24.0	44.2	2,063	2,970,462	1,313,390	1,013.0	1,330.5
4/20/2022	23.4	44.2	2,103	2,952,833	1,305,595	1,013.0	1,322.6
4/21/2022	24.0	44.2	2,099	3,022,689	1,336,482	1,013.0	1,353.9
4/22/2022	24.0	44.2	2,065	2,973,227	1,314,612	1,013.0	1,331.7
4/23/2022	20.8	44.2	2,116	2,636,402	1,165,685	1,013.0	1,180.8
4/24/2022	24.0	44.2	2,147	3,092,003	1,367,129	1,013.0	1,384.9
4/25/2022	24.0	44.2	2,118	3,050,568	1,348,809	1,013.0	1,366.3
4/26/2022	24.0	44.2	2,108	3,035,751	1,342,257	1,013.0	1,359.7
4/27/2022	24.0	44.2	2,092	3,012,151	1,331,823	1,013.0	1,349.1
4/28/2022	24.0	44.2	2,007	2,889,408	1,277,552	1,013.0	1,294.2
4/29/2022	23.0	44.2	1,918	2,643,027	1,168,614	1,013.0	1,183.8
4/30/2022	24.0	44.2	1,853	2,668,205	1,179,747	1,013.0	1,195.1
Totals/ Average:	715.13	43.3	1,972	84,587,087	36,719,879	1013.0	37,197
Notes:				· · ·		Maximum:	1,385

*Methane content determined from flare A-17 February 18, 2021 and February 16, 2022 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

San Jose, CA

Heat Input Rate

Flare A-17

MONTH:	May-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
5/1/2022	24.0	44.2	1,828	2,632,568	1,163,990	1,013.0	1,179.1
5/2/2022	24.0	44.2	1,804	2,597,295	1,148,394	1,013.0	1,163.3
5/3/2022	24.0	44.2	1,831	2,636,944	1,165,925	1,013.0	1,181.1
5/4/2022	24.0	44.2	1,846	2,658,841	1,175,607	1,013.0	1,190.9
5/5/2022	24.0	44.2	1,823	2,624,693	1,160,508	1,013.0	1,175.6
5/6/2022	24.0	44.2	1,831	2,636,581	1,165,764	1,013.0	1,180.9
5/7/2022	24.0	44.2	1,821	2,621,849	1,159,251	1,013.0	1,174.3
5/8/2022	24.0	44.2	1,787	2,572,975	1,137,641	1,013.0	1,152.4
5/9/2022	24.0	44.2	1,778	2,559,716	1,131,778	1,013.0	1,146.5
5/10/2022	24.0	44.2	1,770	2,548,341	1,126,749	1,013.0	1,141.4
5/11/2022	24.0	44.2	1,780	2,563,465	1,133,436	1,013.0	1,148.2
5/12/2022	24.0	44.2	1,783	2,566,967	1,134,984	1,013.0	1,149.7
5/13/2022	24.0	44.2	1,724	2,483,083	1,097,895	1,013.0	1,112.2
5/14/2022	24.0	44.2	1,685	2,426,635	1,072,937	1,013.0	1,086.9
5/15/2022	24.0	44.2	1,669	2,402,977	1,062,476	1,013.0	1,076.3
5/16/2022	24.0	44.2	1,667	2,400,823	1,061,524	1,013.0	1,075.3
5/17/2022	24.0	44.2	1,665	2,397,568	1,060,085	1,013.0	1,073.9
5/18/2022	24.0	44.2	1,676	2,413,610	1,067,178	1,013.0	1,081.1
5/19/2022	24.0	44.2	1,689	2,432,005	1,075,311	1,013.0	1,089.3
5/20/2022	24.0	44.2	1,673	2,408,653	1,064,986	1,013.0	1,078.8
5/21/2022	24.0	44.2	1,663	2,394,660	1,058,799	1,013.0	1,072.6
5/22/2022	24.0	44.2	1,675	2,411,976	1,066,455	1,013.0	1,080.3
5/23/2022	24.0	44.2	1,694	2,438,651	1,078,250	1,013.0	1,092.3
5/24/2022	24.0	44.2	1,705	2,455,288	1,085,606	1,013.0	1,099.7
5/25/2022	24.0	44.2	1,709	2,461,041	1,088,149	1,013.0	1,102.3
5/26/2022	24.0	44.2	1,674	2,410,109	1,065,630	1,013.0	1,079.5
5/27/2022	24.0	44.2	1,669	2,403,103	1,062,532	1,013.0	1,076.3
5/28/2022	24.0	44.2	1,670	2,404,631	1,063,208	1,013.0	1,077.0
5/29/2022	24.0	44.2	1,661	2,391,665	1,057,475	1,013.0	1,071.2
5/30/2022	24.0	44.2	1,667	2,400,903	1,061,559	1,013.0	1,075.4
5/31/2022	23.2	44.2	1,748	2,436,707	1,077,390	1,013.0	1,091.4
Totals/ Average:	743.23	44.2	1,731	77,194,323	34,131,470	1013.0	34,575
Notes:						Maximum:	1,191

*Methane content determined from February 16, 2022 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

San Jose, CA

Heat Input Rate

Flare A-17

MONTH:	June-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
6/1/2022	24.0	44.2	1,778	2,560,357	1,132,062	1,013.0	1,146.8
6/2/2022	24.0	44.2	1,714	2,468,225	1,091,326	1,013.0	1,105.5
6/3/2022	24.0	44.2	1,673	2,409,583	1,065,397	1,013.0	1,079.2
6/4/2022	24.0	44.2	1,672	2,407,307	1,064,391	1,013.0	1,078.2
6/5/2022	23.0	44.2	1,771	2,447,235	1,082,045	1,013.0	1,096.1
6/6/2022	22.9	44.2	1,640	2,253,816	996,525	1,013.0	1,009.5
6/7/2022	24.0	44.2	1,508	2,171,211	960,001	1,013.0	972.5
6/8/2022	24.0	44.2	1,432	2,061,992	911,710	1,013.0	923.6
6/9/2022	24.0	44.2	1,484	2,136,854	944,810	1,013.0	957.1
6/10/2022	24.0	44.2	1,527	2,199,176	972,366	1,013.0	985.0
6/11/2022	24.0	44.2	1,523	2,193,467	969,841	1,013.0	982.4
6/12/2022	24.0	44.2	1,492	2,148,419	949,923	1,013.0	962.3
6/13/2022	23.6	44.2	1,511	2,135,943	944,407	1,013.0	956.7
6/14/2022	24.0	44.2	1,465	2,110,202	933,026	1,013.0	945.2
6/15/2022	24.0	44.2	1,386	1,995,759	882,425	1,013.0	893.9
6/16/2022	20.5	44.2	1,423	1,753,731	775,412	1,013.0	785.5
6/17/2022	24.0	44.2	1,433	2,063,313	912,294	1,013.0	924.2
6/18/2022	24.0	44.2	1,402	2,018,460	892,462	1,013.0	904.1
6/19/2022	24.0	44.2	1,390	2,002,228	885,285	1,013.0	896.8
6/20/2022	24.0	44.2	1,392	2,004,349	886,223	1,013.0	897.7
6/21/2022	24.0	44.2	1,403	2,019,748	893,032	1,013.0	904.6
6/22/2022	20.8	44.2	1,426	1,779,629	786,863	1,013.0	797.1
6/23/2022	24.0	44.2	1,412	2,033,607	899,159	1,013.0	910.8
6/24/2022	24.0	44.2	1,402	2,019,557	892,947	1,013.0	904.6
6/25/2022	24.0	44.2	1,391	2,003,021	885,636	1,013.0	897.1
6/26/2022	24.0	44.2	1,383	1,991,062	880,348	1,013.0	891.8
6/27/2022	23.8	44.2	1,510	2,153,757	952,284	1,013.0	964.7
6/28/2022	24.0	44.2	1,545	2,225,319	983,925	1,013.0	996.7
6/29/2022	24.0	44.2	1,514	2,180,578	964,143	1,013.0	976.7
6/30/2022	24.0	44.2	1,506	2,169,029	959,036	1,013.0	971.5
Totals/ Average:	710.60	44.2	1,504	64,116,934	28,349,302	1013.0	28,718
Notes:						Maximum:	1,147

*Methane content determined from February 16, 2022 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

San Jose, CA

Heat Input Rate

Flare A-17

MONTH:	July-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
7/1/2022	24.0	44.2	1,503	2,164,640	957,096	1,013.0	969.5
7/2/2022	24.0	44.2	1,491	2,147,596	949,560	1,013.0	961.9
7/3/2022	24.0	44.2	1,497	2,155,714	953,149	1,013.0	965.5
7/4/2022	24.0	44.2	1,494	2,151,396	951,240	1,013.0	963.6
7/5/2022	24.0	44.2	1,459	2,100,646	928,801	1,013.0	940.9
7/6/2022	24.0	44.2	1,458	2,099,658	928,364	1,013.0	940.4
7/7/2022	24.0	44.2	1,453	2,091,902	924,934	1,013.0	937.0
7/8/2022	24.0	44.2	1,391	2,002,783	885,531	1,013.0	897.0
7/9/2022	24.0	44.2	1,357	1,954,066	863,990	1,013.0	875.2
7/10/2022	24.0	44.2	1,369	1,971,679	871,778	1,013.0	883.1
7/11/2022	21.3	44.2	1,448	1,847,576	816,906	1,013.0	827.5
7/12/2022	24.0	44.2	1,442	2,077,013	918,351	1,013.0	930.3
7/13/2022	24.0	44.2	1,388	1,999,405	884,037	1,013.0	895.5
7/14/2022	24.0	44.2	1,337	1,925,484	851,353	1,013.0	862.4
7/15/2022	23.8	44.2	1,322	1,887,820	834,700	1,013.0	845.6
7/16/2022	24.0	44.2	1,348	1,940,460	857,974	1,013.0	869.1
7/17/2022	24.0	44.2	1,327	1,911,333	845,096	1,013.0	856.1
7/18/2022	24.0	44.2	1,332	1,918,340	848,194	1,013.0	859.2
7/19/2022	24.0	44.2	1,355	1,951,847	863,009	1,013.0	874.2
7/20/2022	24.0	44.2	1,353	1,948,260	861,423	1,013.0	872.6
7/21/2022	24.0	44.2	1,355	1,950,787	862,540	1,013.0	873.8
7/22/2022	24.0	44.2	1,352	1,946,583	860,682	1,013.0	871.9
7/23/2022	24.0	44.2	1,346	1,938,011	856,892	1,013.0	868.0
7/24/2022	24.0	44.2	1,338	1,927,016	852,030	1,013.0	863.1
7/25/2022	24.0	44.2	1,327	1,911,572	845,202	1,013.0	856.2
7/26/2022	19.8	44.2	1,394	1,656,585	732,459	1,013.0	742.0
7/27/2022	24.0	44.2	1,397	2,011,987	889,600	1,013.0	901.2
7/28/2022	23.3	44.2	1,378	1,926,116	851,632	1,013.0	862.7
7/29/2022	24.0	44.2	1,371	1,973,650	872,649	1,013.0	884.0
7/30/2022	24.0	44.2	1,336	1,923,732	850,578	1,013.0	861.6
7/31/2022	24.0	44.2	1,318	1,898,166	839,274	1,013.0	850.2
Totals/ Average:	736.17	44.2	1,388	61,311,823	27,109,023	1013.0	27,461
Notes:			, ,			Maximum:	970

Notes:

*Methane content determined from February 16, 2022 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

San Jose, CA

Heat Input Rate

Flare A-17

MONTH:	August-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)/Da
8/1/2022	24.0	44.2	1,334	1,920,343	849,080	1,013.0	860.1
8/2/2022	24.0	44.2	1,354	1,950,277	862,315	1,013.0	873.5
8/3/2022	24.0	44.2	1,346	1,938,932	857,299	1,013.0	868.4
8/4/2022	24.0	44.2	1,339	1,928,717	852,782	1,013.0	863.9
8/5/2022	24.0	44.2	1,466	2,111,323	933,521	1,013.0	945.7
8/6/2022	24.0	44.2	1,553	2,236,143	988,711	1,013.0	1,001.6
8/7/2022	24.0	44.2	1,551	2,233,057	987,346	1,013.0	1,000.2
8/8/2022	23.1	44.2	1,554	2,156,895	953,671	1,013.0	966.1
8/9/2022	24.0	44.2	1,585	2,283,093	1,009,470	1,013.0	1,022.6
8/10/2022	24.0	44.2	1,597	2,299,155	1,016,571	1,013.0	1,029.8
8/11/2022	22.3	44.2	1,619	2,170,101	959,510	1,013.0	972.0
8/12/2022	24.0	44.2	1,642	2,364,512	1,045,469	1,013.0	1,059.1
8/13/2022	24.0	44.2	1,630	2,346,540	1,037,523	1,013.0	1,051.0
8/14/2022	24.0	44.2	1,628	2,344,165	1,036,473	1,013.0	1,049.9
8/15/2022	24.0	44.2	1,628	2,343,850	1,036,333	1,013.0	1,049.8
8/16/2022	24.0	44.2	1,628	2,344,249	1,036,510	1,013.0	1,050.0
8/17/2022	24.0	44.2	1,619	2,331,019	1,030,660	1,013.0	1,044.1
8/18/2022	24.0	44.2	1,612	2,321,666	1,026,525	1,013.0	1,039.9
8/19/2022	24.0	44.2	1,612	2,321,225	1,026,330	1,013.0	1,039.7
8/20/2022	24.0	44.2	1,607	2,314,500	1,023,356	1,013.0	1,036.7
8/21/2022	24.0	44.2	1,590	2,289,221	1,012,179	1,013.0	1,025.3
8/22/2022	24.0	44.2	1,591	2,291,636	1,013,247	1,013.0	1,026.4
8/23/2022	24.0	44.2	1,610	2,318,675	1,025,202	1,013.0	1,038.5
8/24/2022	24.0	44.2	1,608	2,315,558	1,023,824	1,013.0	1,037.1
8/25/2022	18.6	44.2	1,598	1,786,779	790,024	1,013.0	800.3
8/26/2022	23.5	44.2	1,631	2,302,762	1,018,166	1,013.0	1,031.4
8/27/2022	24.0	44.2	1,618	2,329,913	1,030,171	1,013.0	1,043.6
8/28/2022	24.0	44.2	1,604	2,310,273	1,021,487	1,013.0	1,034.8
8/29/2022	24.0	44.2	1,595	2,296,441	1,015,371	1,013.0	1,028.6
8/30/2022	22.1	44.2	1,331	1,765,047	780,416	1,013.0	790.6
8/31/2022	22.7	44.2	1,538	2,091,344	924,688	1,013.0	936.7
Totals/ Average:	732.40	44.2	1,555	68,357,411	30,224,229	1013.0	30,617
lotes:		•				Maximum:	1,059

Notes:

*Methane content determined from February 16, 2022 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

San Jose, CA

Heat Input Rate

Flare A-17

MONTH: September-22

Totals/ Average: Notes:	720.00	44.2	1,634	70,583,901	31,208,672	1013.0 Maximum:	31,614 1,084
9/30/2022	24.0	44.2	1,655	2,383,691	1,053,949	1,013.0	1,067.7
9/29/2022	24.0	44.2	1,634	2,353,583	1,040,637	1,013.0	1,054.2
9/28/2022	24.0	44.2	1,629	2,346,334	1,037,432	1,013.0	1,050.9
9/27/2022	24.0	44.2	1,630	2,347,112	1,037,776	1,013.0	1,051.3
9/26/2022	24.0	44.2	1,646	2,370,055	1,047,920	1,013.0	1,061.5
9/25/2022	24.0	44.2	1,654	2,381,631	1,053,038	1,013.0	1,066.7
9/24/2022	24.0	44.2	1,681	2,420,787	1,070,351	1,013.0	1,084.3
9/23/2022	24.0	44.2	1,670	2,404,169	1,063,003	1,013.0	1,076.8
9/22/2022	24.0	44.2	1,647	2,371,458	1,048,540	1,013.0	1,062.2
9/21/2022	24.0	44.2	1,615	2,325,431	1,028,189	1,013.0	1,041.6
9/20/2022	24.0	44.2	1,622	2,334,971	1,032,407	1,013.0	1,045.8
9/19/2022	24.0	44.2	1,624	2,337,962	1,033,730	1,013.0	1,047.2
9/18/2022	24.0	44.2	1,592	2,291,820	1,013,328	1,013.0	1,026.5
9/17/2022	24.0	44.2	1,660	2,390,866	1,057,121	1,013.0	1,070.9
9/16/2022	24.0	44.2	1,614	2,324,272	1,027,677	1,013.0	1,041.0
9/15/2022	24.0	44.2	1,574	2,266,361	1,002,072	1,013.0	1,015.1
9/14/2022	24.0	44.2	1,580	2,275,143	1,005,954	1,013.0	1,019.0
9/13/2022	24.0	44.2	1,596	2,297,558	1,015,865	1,013.0	1,029.1
9/12/2022	24.0	44.2	1,609	2,317,070	1,024,493	1,013.0	1,037.8
9/11/2022	24.0	44.2	,	2,331,239	1,030,757	1,013.0	1,044.2
9/10/2022	24.0	44.2	1,606 1,619	2,313,180	1,022,773	1,013.0	1,036.1
9/9/2022	24.0	44.2	1,652	2,379,183	1,051,956	1,013.0	1,065.6
9/8/2022	24.0	44.2		2,397,160	1,059,904	1,013.0	1,073.7
9/7/2022	24.0	44.2	1,640 1,665	2,361,392	1,044,089	1,013.0	1,057.7
9/6/2022	24.0	44.2	1,674	2,409,968	1,065,567	1,013.0	1,079.4
9/5/2022	24.0	44.2	1,650	2,376,647	1,050,834	1,013.0	1,064.5
9/4/2022	24.0	44.2	1,634	2,352,315	1,040,076	1,013.0	1,053.6
9/3/2022	24.0	44.2	1,628	2,344,279	1,036,523	1,013.0	1,050.0
9/2/2022	24.0	44.2	1,638	2,358,828	1,042,956	1,013.0	1,056.5
9/1/2022	24.0	44.2	1,680	2,419,436	1,069,754	1,013.0	1,083.7
Date	Runtime (hours)	CH ₄ (%)*	Average Flow (scfm)	Total LFG Volume (scf)	CH₄ Volume (scf)	Heating Value of CH ₄ (BTU/scf)	Heat Inpu (MMBTU)/D

*Methane content determined from February 16, 2022 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

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

October 3, 2022

Ms. Becky Azevedo Guadalupe Recycling & Disposal Facility 15999 Guadalupe Mines Road San Jose, CA 95120

Re: Third 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 Third 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.

Probe ID	Time	CH ₄	Probe Pressure		Condition ped, locked)	Comments
	Time	(%)	(in-H ₂ 0)	Arrival	Departure	Comments
GUADGP01	9/14/2022;7:50 AM	0	0.04	Yes	Yes	
GUADGP02	9/14/2022;7:56 AM	0	-0.01	Yes	Yes	
GUADGP03	9/14/2022;8:04 AM	0	0.01	Yes	Yes	
GUADGP04	9/14/2022;8:47 AM	0	-1.23	Yes	Yes	
GUADGP05	9/14/2022;8:33 AM	0	-0.30	Yes	Yes	
GUADGP6S	9/14/2022;8:17 AM	0	-0.06	Yes	Yes	

Table 1 Monitoring Results

Probe ID	Time	CH ₄ (9() Probe Pressur		Probe Condition (clean, capped, locked)		Comments
		(%)	(in-H ₂ 0)	Arrival	Departure	
GUADGP6D	9/14/2022;8:19 AM	0	-0.06	Yes	Yes	

STRUCTURE FID MONITORING DATA

Analyst: Tino Robles Instrument: TVA 1000	Date: 9/12/2022 Serial #: 0914635772					
Monitored Location	Time	PPM	Comments			
Scale House #1 Occupied Space	12:55 PM	0				
Scale House #1 Electrical Closet	1:00 PM	0				
Scale House #2 Occupied Space	12:45 PM	0				
Scale House #2 Electrical Closet	12:35 PM	0				
Scale House #3 Occupied Space	1:11 PM	0				
Scale House #3 Electrical Closet	1:15 PM	0				
Admin Office Crawl Space	12:20 PM	0				
Admin Office Electrical Closet	12:25 PM	0				
Admin Trailer	12:35 PM	0				
Security Trailer	9:50 AM	0	9-14-22 Monitored			
MRF Scale House	9:55 AM	0	9-14-22 Monitored			
MRF Building East Electrical	10:05 AM	0	9-14-22 Monitored			
Maintenance Building Office Outlet	11:40 AM	0				
Maintenance Building Kitchen Outlet	11:35 AM	0				
Maintenance Building Office Outlet	11:45 AM	0				
Maintenance Building Electrical Room	11:50 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% $CH_4 = 12,500$ 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 Third Quarter 2022 monitoring was conducted by Carlos Cruz on September 14, 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.

Facility Structures

Tino Robles used a Toxic Vapor Analyzer (TVA1000) to monitor buildings and structures to check for the presence of methane on September 12 and 14, 2022. The instrument was calibrated on September 12 and 14, 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 Carlos Cruz on September 12 and 14, 2022.

GENERAL WEATHER CONDITIONS [TITLE 27 §20934(a)(3)]

General weather conditions at the time of monitoring are presented in Table 2.

Description	9/12/2022	9/14/2022
General Conditions	Partly Sunny	Partly Cloudy
Temperature (°F) Low/High	66/79	73/75
Wind Speed (mph)	3.7	14.9
Wind Direction	NNW	NNW
Barometric Pressure ("Hg)	29.97	29.9

Table 2 General Weather Conditions

CLOSING

If you have any questions regarding this notification, please do not hesitate to contact me at rphadnis@wm.com.

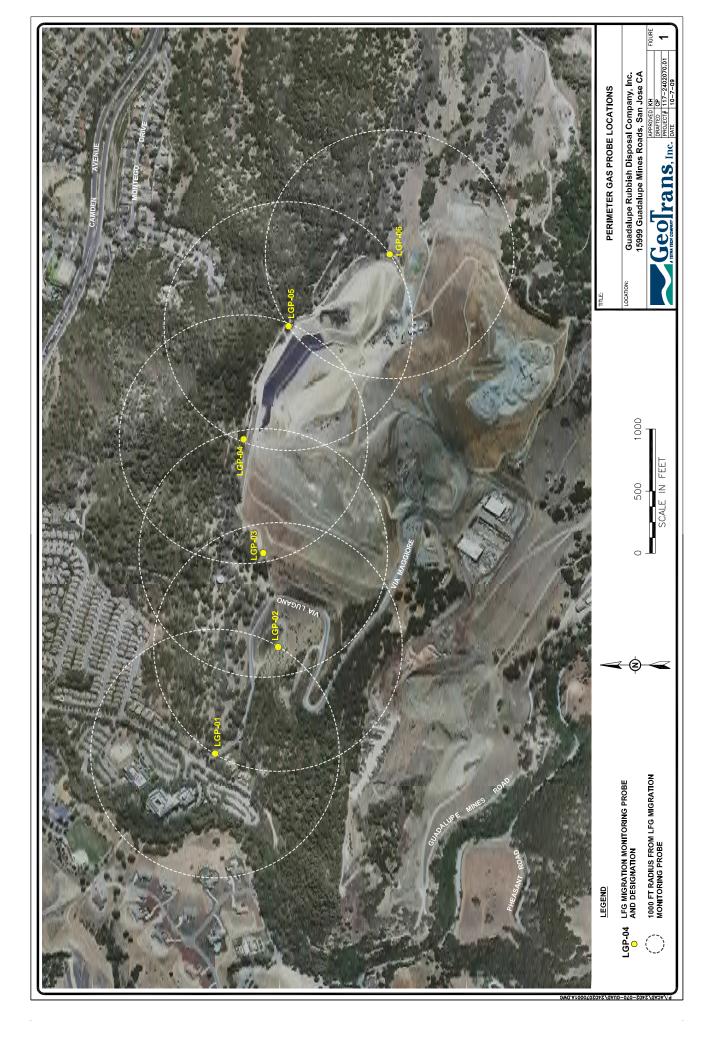
Thank you,

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: Cruz Date<u>: 9/14/22</u> Instrument: <u>Gem5000</u> Serial <u>#: G502649</u> Atmospheric Temperature (Deg F): <u>60</u> Barometric Pressure: 29.49__Inch of HG Wind Speed: <u>5 mph</u> Wind Direction: <u>NW</u> Weather Condition: <u>Sunny</u>

	T .	CH ₄	Probe Pressu		Condition ped, locked)	G (
Probe ID	Time	(%)	re (in-	Arrival	Departure	Comments
GUADGP01	7:50 AM	0	0.04	Yes	Yes	
GUADGP02	7:56 AM	0	-0.01	Yes	Yes	
GUADGP03	8:04 AM	0	0.01	Yes	Yes	
GUADGP04	8:47 AM	0	-1.23	Yes	Yes	
GUADGP05	8:33 AM	0	-0.30	Yes	Yes	
GUADGP6S	8:17 AM	0	-0.06	Yes	Yes	
GUADGP6D	8:19 AM	0	-0.06	Yes	Yes	

Immediately notify compliance personnel of any readings in excess of 5 percent methane.

STRUCTURE FID MONITORING DATA

Analyst: Cruz Instrument: TVA 1000	Date: 9/12/2022 Serial #: 0914635772					
Monitored Location	Time	PPM	Comments			
Scale House #1 Occupied Space	12:55 PM	0				
Scale House #1 Electrical Closet	1:00 PM	0				
Scale House #2 Occupied Space	12:45 PM	0				
Scale House #2 Electrical Closet	12:35 PM	0				
Scale House #3 Occupied Space	1:11 PM	0				
Scale House #3 Electrical Closet	1:15 PM	0				
Admin Office Crawl Space	12:20 PM	0				
Admin Office Electrical Closet	12:25 PM	0				
Admin Trailer	12:35 PM	0				
Security Trailer	9:50 AM	0	9-14-22 Monitored			
MRF Scale House	9:55 AM	0	9-14-22 Monitored			
MRF Building East Electrical	10:05 AM	0	9-14-22 Monitored			
Maintenance Building Office Outlet	11:40 AM	0				
Maintenance Building Kitchen Outlet	11:35 AM	0				
Maintenance Building Office Outlet	11:45 AM	0				
Maintenance Building Electrical Room	11:50 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

LOCATION: Guadalupe Recycling and Disposal Inc.

MANUFACTURER & MODEL NUMBER: Sierra Monitor Corporation Model #0908401174M

CALIBRATED BY/INSTRUMENT USED: Sierra Monitor Corporation

CALIBRATION GAS EXPIRATION DATE: June 16, 2023

	DATE		Methane LEL*	MAINTENANCE
LOCATION	CALIBRATED	SERIAL NUMBER	SENSOR alarm	PERFORMED/ COMMENTS
			10,000 ppm	ON MONITOR CONDITION
Scale House #1	9-12-22	1500700093GAM	Yes	Good Condition
Scale House #2	9-12-22	1500700098GAM	Yes	Good Condition
Scale House #3	9-12-22	1500700101GAM	Yes	Good Condition
Admin. Trailer	9-12-22	1500700097GAM	Yes	Good Condition
Main Office	9-12-22	1500700090GAM	Yes	Good Condition
Materials Yard Trailer	9-14-22	1500700091GAM	Yes	Good Condition
Shop Office #1	9-12-22	1500700010GAM	Yes	Good Condition
Shop Office #2	9-12-22	1500700094GAM	Yes	Good Condition
Shop Office #3	9-12-22	1500700095GAM	Yes	Good Condition
Kitchen #4	9-12-22	1500700092GAM	Yes	Good Condition

*This form must be retained for 12 months after completion

CALIBRATION PROCEDURE AND BACKGROUND DETERMINATION REPORT

Landtill Name: GUADALVPE	Date: Sept (2,202)
Time:AM 12'00 m	
Instrument Make: <u>THERMO</u>	Model: TVA-1000 SIN: 09/4635772

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):
- 2. Downwind Reading (highest in 30 seconds):

ppm (a) ppm (b)

Calculate Background Value: $\frac{(a) + (b)}{2}$ Background = 2 ppm

Performed By: <u>La19</u>

CALIBRATION PROCEDURE AND BACKGROUND DETERMINATION REPORT

. /

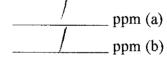
Landfill Name:	Date: <u>Sept 14,2022</u>
Time: <u>9:50</u> AM PM	
Instrument Make: THEAMO Model: TUA	<u>-1060 s/N: 0914635772</u>

Calibration Procedure

- 1. Allow instrument to internally zero itself while introducing zero air.
- 2. Introduce the calibration gas into the probe. Stable Reading = 50 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):



Calculate Background Value: (a) + (b) Background = ppm

Calge Performed By:

CALIBRATION PRECISION TEST RECORD

Landfill Name: Chalalope Date: 7/20/22
Expiration Date (3 months): $10/20/22$
Time: SIS AM PM
Instrument Make: IVA-1000 Model: Therma S/N: 0914635772
Measurement #1:
Meter Reading for Zero Air: ppm (a)
Meter Reading for Calibration Gas: <u>505</u> ppm (b)

Measurement #2:

Measurement #3:

Calculate Precision: $\frac{\left|(500) - (b)\right| + \left|(500) - (d)\right| + \left|(500) - (f)\right|}{3} \times \frac{1}{500} \times \frac{1}{500}$

% (must be < than 10%)

Performed By:

R

RESPONSE TIME TEST RECORD

Date: X 20 20/22 0 Expiration Date (3 months): Time: DIS AM PM Instrument Make: TUA-1000 Model: Thermo S/N: 091463577 Measurement #1: 505 Stabilized Reading Using Calibration Gas: 90% of the Stabilized Reading: ppm ppm Time to Reach 90% of Stabilized Reading after seconds (a) switching from Zero Air to Calibration Gas: Ce Measurement #2: 500 ppm Stabilized Reading Using Calibration Gas: 460 __ ppm 90% of the Stabilized Reading: Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas: 5 seconds (b) Measurement #3: Stabilized Reading Using Calibration Gas: <u>503 ppm</u> 90% of the Stabilized Reading: ppm -0 Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas: 4 seconds (c) Calculate Response Time: _ seconds (must be less than 30 seconds) (a) + (b) + (c) =Performed By:



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

July 7, 2022

Ms. Becky Azevedo Guadalupe Recycling & Disposal Facility 15999 Guadalupe Mines Road San Jose, CA 95120

Re: Second 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 Second 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.

Probe ID Time		Procettra		Probe Condition (clean, capped, locked)		Comments
	Time	(%) (in-H ₂ 0)	Arrival	Departure	Comments	
GUADGP01	6/7/2022; 2:33 PM	0	0.01	Yes	Yes	
GUADGP02	6/7/2022; 2:41 PM	0	-1.38	Yes	Yes	
GUADGP03	6/7/2022; 2:57 PM	0	0.05	Yes	Yes	
GUADGP04	6/7/2022; 2:15 PM	0	-1.13	Yes	Yes	
GUADGP05	6/7/2022; 2:09 PM	0	0.18	Yes	Yes	
GUADGP6S	6/7/2022; 6:34 AM	0	-0.02	Yes	Yes	
GUADGP6D	6/7/2022; 6:35AM	0	-0.02	Yes	Yes	

Table 1 Monitoring Results

STRUCTURE FID MONITORING DATA

Analyst: Tino Robles Instrument: TVA 1000

Date: 6/13/2022 Serial #:0928538411

Monitored Location	Time	PPM	Comments
Scale House #1 Occupied Space	12:55 PM	0	
Scale House #1 Electrical Closet	1:00 PM	0	
Scale House #2 Occupied Space	12:45 PM	0	
Scale House #2 Electrical Closet	12:35 PM	0	
Scale House #3 Occupied Space	1:11 PM	0	
Scale House #3 Electrical Closet	1:15 PM	0	
Admin Office Crawl Space	12:20 PM	0	
Admin Office Electrical Closet	12:25 PM	0	
Admin Trailer	12:35 PM	0	
Security Trailer	12:40 PM	0	
MRF Scale House	1:20 PM	0	
MRF Building East Electrical	11:52 AM	0	
Maintenance Building Office Outlet	11:40 AM	0	
Maintenance Building Kitchen Outlet	11:35 AM	0	
Maintenance Building Office Outlet	11:45 AM	0	
Maintenance Building Electrical Box	11:50 AM	0	
Scale House #1 Occupied Space	12:55 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:

(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

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 Second Quarter 2022 monitoring was conducted by Tino Robles on June 7, 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.

Facility Structures

Tino Robles used a Toxic Vapor Analyzer (TVA1000) to monitor buildings and structures to check for the presence of methane on June 13, 2022. The instrument was calibrated on June 13, 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 June 13 and 15, 2022.

GENERAL WEATHER CONDITIONS [TITLE 27 §20934(a)(3)]

General weather conditions at the time of monitoring are presented in Table 2.

Description	6/7/2022
General Conditions	Partly Sunny
Temperature (°F) Low/High	57/73
Wind Speed (mph)	5.0
Wind Direction	NNW
Barometric Pressure ("Hg)	29.95

Table 2 General Weather Conditions

CLOSING

If you have any questions regarding this notification, please do not hesitate to contact me at rphadnis@wm.com.

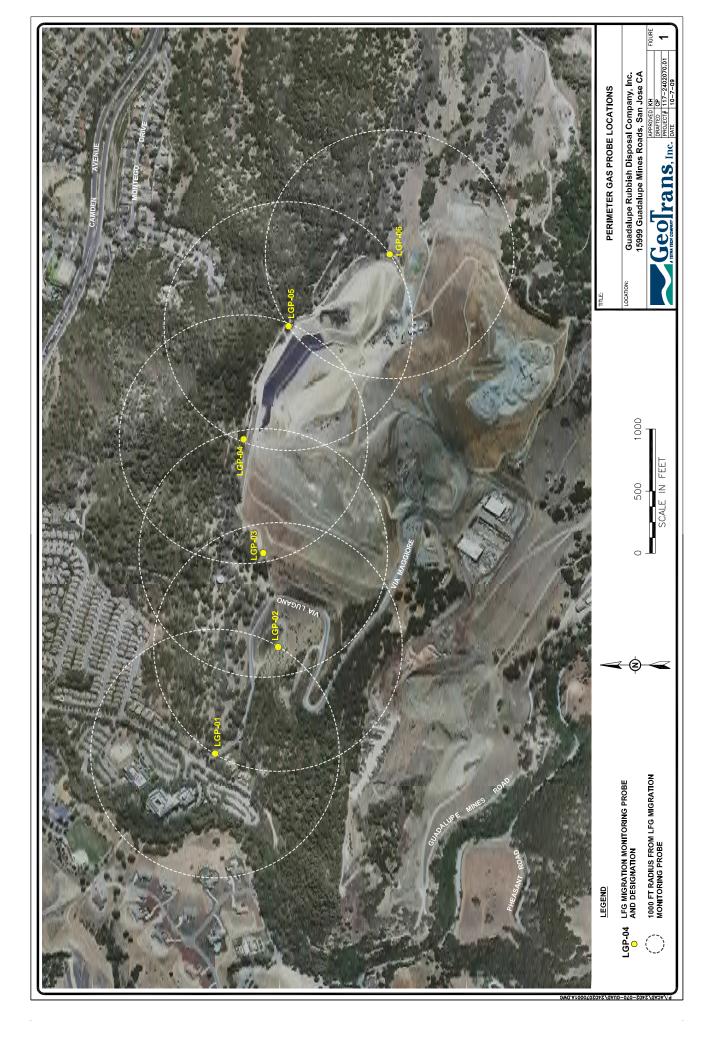
Thank you,

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<u>: 6/7/22</u> Instrument: <u>Gem5000</u> Serial <u>#: G502468</u> Atmospheric Temperature (Deg F): <u>74</u> Barometric Pressure: 30__Inch of HG Wind Speed: <u>15 mph</u> Wind Direction: <u>NW</u> Weather Condition: <u>Sunny</u>

Probe ID	Time CH ₄	Probe Pressu	Probe Condition (clean, capped, locked)		Commonte	
I TODE ID	1 11110	(%)	re (in- H ₂ 0)	Arrival	Departure	Comments
GUADGP01	2:33 PM	0	0.01	Yes	Yes	
GUADGP02	2:41 PM	0	-1.38	Yes	Yes	
GUADGP03	2:57 PM	0	0.05	Yes	Yes	
GUADGP04	2:15 PM	0	-1.13	Yes	Yes	
GUADGP05	2:09 PM	0	0.18	Yes	Yes	
GUADGP6S	6:34 AM	0	-0.02	Yes	Yes	
GUADGP6D	6:35AM	0	-0.02	Yes	Yes	

Immediately notify compliance personnel of any readings in excess of 5 percent methane.

STRUCTURE FID MONITORING DATA

Analyst: Robles Date: 6/13/2022				
Instrument: TVA 1000	ment: TVA 1000 Serial #: 0928538411			
Monitored Location	Time	PPM	Comments	
Scale House #1 Occupied Space	12:55 PM	0		
Scale House #1 Electrical Closet	1:00 PM	0		
Scale House #2 Occupied Space	12:45 PM	0		
Scale House #2 Electrical Closet	12:35 PM	0		
Scale House #3 Occupied Space	1:11 PM	0		
Scale House #3 Electrical Closet	1:15 PM	0		
Admin Office Crawl Space	12:20 PM	0		
Admin Office Electrical Closet	12:25 PM	0		
Admin Trailer	12:35 PM	0		
Security Trailer	12:40 PM	0		
MRF Scale House	1:20 PM	0		
MRF Building East Electrical	11:52 AM	0		
Maintenance Building Office Outlet	11:40 AM	0	· · · · · · · · · · · · · · · · · · ·	
Maintenance Building Kitchen Outlet	11:35 AM	0		
Maintenance Building Office Outlet	11:45 AM	0		
Maintenance Building Electrical Box	11:50 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

LOCATION: Guadalupe Recycling and 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	6-15-22	1500700093GAM	Yes	Good Condition
Scale House #2	6-15-22	1500700098GAM	Yes	Good Condition
Scale House #3	6-15-22	1500700101GAM	Yes	Good Condition
Admin. Trailer	6-15-22	1500700097GAM	Yes	Good Condition
Main Office	6-13-22	1500700090GAM	Yes	Good Condition
MRF Scale House	6-13-22	1500700099GAM	Yes	Good Condition
Materials Yard Trailer	6-13-22	1500700091GAM	Yes	Good Condition
Shop Office #1	6-13-22	1500700010GAM	Yes	Good Condition
Shop Office #2	6-13-22	1500700094GAM	Yes	Good Condition
Shop Office #3	6-13-22	1500700095GAM	Yes	Good Condition
Kitchen #4	6-13-22	1500700092GAM	Yes	Good Condition

*This form must be retained for 12 months after completion

CALIBRATION PROCEDURE AND BACKGROUND DETERMINATION REPORT

Landtill Name: Guadalope	Date: 6/3/22	2
Time: 10 AM PM Instrument Make: TVA (000B	Model: theread	S/N: 0928 535411

Calibration Procedure

- 1. Allow instrument to internally zero itself while introducing zero air.
- 2. Introduce the calibration gas into the probe.

Stable Reading = -504 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):

ppm (a) ppm (b)

Calculate Background Value:

Background = (a) + (b)ppm 2 2 Performed By:

CALIBRATION PRECISION TEST RECORD

Date: 9 Landfill Name: Krb+ Expiration Date (3 months): \nearrow 122 Time: US AM _____ PM Model: Theymal s/N: 0928538411 Instrument Make: TVA 1000B Measurement #1: Meter Reading for Zero Air: _____ ppm (a) Meter Reading for Calibration Gas: 50 \ ppm (b) Measurement #2: Meter Reading for Zero Air: ______ ppm (c) Meter Reading for Calibration Gas: ______ ppm (d) ppm (d) Measurement #3: Meter Reading for Zero Air:Oppm (e)Meter Reading for Calibration Gas:502ppm (f) Calculate Precision: $\frac{\{|(500) - (b)| + |(500) - (d)| + |(500) - (f)|\}}{3} \times \frac{1}{500} \times 100$ _____ % (must be < than 10%)

Performed By:

RESPONSE TIME TEST RECORD

Date: Expiration Date (3 months): 7 Time: 645 AM PM VA 1000B Model: THERMAL S/N: 092853411 Instrument Make: Measurement #1: Stabilized Reading Using Calibration Gas: ppm 90% of the Stabilized Reading: Hee ppm Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas: seconds (a) Measurement #2: Stabilized Reading Using Calibration Gas: ppm 90% of the Stabilized Reading: ppm Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas: u seconds (b) Measurement #3: Stabilized Reading Using Calibration Gas: ppm US 90% of the Stabilized Reading: ppm Time to Reach 90% of Stabilized Reading after switching from Zero Air to Calibration Gas: seconds (c) Calculate Response Time: (a) + (b) + (c) =_____ seconds (must be less than 30 seconds) 3

Performed By:

APPENDIX N

SOURCE TEST SUMMARY AND RESULTS

Guadalupe Rubbish Disposal Facility (GRDF)

Facility # 3294

Compliance Emissions Test Report #20122 Landfill Gas Control Flare- Source A-9

Located at: 15999 Guadalupe Mines Road, San Jose, CA

Prepared For:

Dave Bearden SCS Engineers 3117 Fite Circle, Suite 108 Sacramento, CA 95827 (916) 361-1297 dbearden@scsengineers.com

For Submittal To:

Attn: Gloria Espena & Marco Hernandez Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, CA 94105 gespena@baaqmd.gov & mhernandez@baaqmd.gov sourcetest@baaqmd.gov

Testing Performed On:

April 29th, 2020

Final Report Submitted On:

June 24th, 2020

Performed and Reported by:

Blue Sky Environmental, Inc. 624 San Gabriel Avenue Albany, CA 94706 bluesky@blueskyenvironmental.com Office (510) 525 1261 Cell (510) 508 3469

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 (510) 508-3469.

Mulmomafor

Guy Worthington Principal Project Manager

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- D. Field Data Sheets
- Ε. Strip Charts
- F. Process Information
- G. Calibration Certifications and Quality Assurance Records
- Н. Sample Train Configuration and Stack Diagrams
- Ι. Related Correspondence (Source Test Plan)
- J. K. BAAQMD Permit Conditions
- Flare Flow Meter Calibration Document

SECTION 1. INTRODUCTION

1.1. Summary

Blue Sky Environmental, Inc was contracted to perform emissions testing on the A-9 Landfill Gas (LFG) Flare at Guadalupe Rubbish Disposal Facility. (GRDF), 15999 Guadalupe Mines Road, San Jose, California. This report presents the results of the test program. Table 1 summarizes the source test information. Table 2 summarizes the results compared to the emission limits. The flare met all compliance emission criteria when tested with Condensate On and Condensate Off.

Test Location:	Guadalupe Rubbish Facility (GRDF), 15999 Guadalupe Mines Road, San Jose, California, 95120, Site Number 3294
Source Contact:	Becky Azeredo (408) 960 - 0769
Source Tested:	Enclosed Gas Flare (A-9)
Source Test Date:	April 29th, 2020
Test Objective:	Determine Compliance with BAAQMD Regulation 8, Rule 34, AB32 Landfill Methane Rule and BAAQMD Permit Condition 6188
Test Performed By:	Blue Sky Environmental, Inc 624 San Gabriel Ave., Albany, CA 94706 Guy Worthington (510) 508-3469 <u>Blueskyenvironmental@yahoo.com</u>
Test Parameters:	Landfill GasO2, N2, CO2, BTU, THC, CH4, NMOC, HHV, F-Factor, SulfurSpecies, Volumetric Flow rateFlare EmissionsTHC, CH4, NMOC, NOX, CO, O2, SO2, Volumetric Flow rate.

Table 1. Source Test Information

Condensate On	Average Test Result	Permit Limit	Compliance Status
NO _x , ppmvd @ 15% O ₂	9.5	16	In Compliance
CO, ppmvd @ 15% O ₂	<3.3	134	In Compliance
SO ₂ , ppmvd	55.4	300	In Compliance
NMOC, (ppmvd @ 3% O ₂ as CH ₄)	<0.5	30	In Compliance
NMOC Destruction Efficiency	>99.89	98%	In Compliance
Methane Destruction Efficiency	>99.998	99%	In Compliance
Condensate Off	Average Test Result	Permit Limit	Compliance Status
NO_X , ppmvd @ 15% O_2	8.4	16	In Compliance
CO, ppmvd @ 15% O ₂	<3.4	134	In Compliance
SO ₂ , ppmvd	46.4	300	In Compliance
NMOC, (ppmvd @ 3% O ₂ as CH ₄)	<1.6	30	In Compliance
NMOC Destruction Efficiency	>99.65	98%	In Compliance
Methane Destruction Efficiency	>99.996	99%	In Compliance

 Table 2. Compliance Summary

SECTION 2. SOURCE TEST PROGRAM

2.1. Overview

This performance test was conducted to demonstrate that the LFG flare is operating in accordance with the Bay Area Air Quality Management District (BAAQMD) Title V Permit for Site Number 3294 and BAAQMD Regulation 8, Rule 34. Testing was also performed to demonstrate compliance with the State Landfill Methane Gas Rule AB32 for Flare performance with Condensate On and Condensate Off.

2.2. Pollutants Tested

The following EPA and ASTM sampling and analytical methods were used:

EPA Method 1	Sample and Traverse Point Determination
EPA 3A	O_2, CO_2
EPA 10	СО
EPA 25A	THC, CH4 and NMOC
EPA 7E	NO _X
EPA 18	CH ₄
EPA 19	Flow Rate Calculation, DSCFM
EPA 25C	LFG Gas analysis for NMOC by GC
EPA 4 part 4.16	Moisture Calculated
ASTM 1945/3588	LFG Gas analysis for BTU and F-Factor
ASTM 5504	Sulfur Species, H ₂ S and TRS

2.3. Test Date(s)

Testing was conducted on April 29th, 2020.

2.4. Sampling and Observing Personnel

Testing was performed by Guy Worthington and Timothy Eandi representing Blue Sky Environmental.

Dave Bearden of SCS Engineers was present to operate the Flare and assist in coordinating testing and the collection of process data during testing.

The BAAQMD was notified of the test in a plan submitted by SCS Engineers on behalf of Waste Management dated April 8th, 2020 (NST #5928). A Source Test Protocol acknowledgement was received on April 8th, 2020, but no agency observers were present to witness the testing. A copy of the source test protocol and related email correspondence can be found in Appendix I.

2.5. Source/Process Description

The enclosed LFG flare at GRDF consists of a 70 million British Thermal Units per hour (MMBtu/hr) multiple nozzle burner manufactured by LFG Specialties, Inc. The flare shell is 35 feet high and 9.5 feet in diameter. The inside diameter (ID) is approximately 8.5 feet.

The flare was operated at an average 901 standard cubic feet per minute (SCFM). The flare setpoint was established at 1,645 Degrees Fahrenheit (°F). Methane quality is typically about 46-49 percent (%), and the Oxygen content typically around 1% or less. 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 operating temperature and the LFG flow rate records are contained in Appendix-F. The condensate injection rate was 0.9 gallons per minute (gpm).

The flare was operated at 1,642 - 1,643 °F average (avg.). The average LFG flow rate ranged between 885 – 919 standard cubic feet per minute (scfm).

The LFG methane content ranged between 49.4 and 50.2 percent (%). The average LFG Methane content of the six test runs was 49.9%.

SECTION 3. SAMPLING AND ANALYSIS PROCEDURES

3.1. Port location

The Flare sampling was conducted in the 8 feet 6 inch diameter ID stack (102"), via ports approximately 30 feet above grade, accessible by boom-lift. Four, 4-inch flange ports are available approximately 5 stack diameters downstream from the burners and \sim 2 stack diameters upstream from the exit.

3.2. Point description/Labeling - ports/stack

Blue Sky Environmental, Inc. conducted two perpendicular 8-point traverses per BAAQMD ST-18 and found O₂ stratification about 10% therefore subsequent CEM sampling was conducted with 8-point traverses per port to achieve the required (BAAQMD ST-7, 6.6) representative sampling of the emissions.

The traverse points for the exhaust of the flare with 8 feet 6 inch (102") diameter plus 4 inch ports were 7.3, 14.7, 23.8, 36.9, 73.1, 86.2, 95.3 and 102.7 inches.

3.3. Sample train description

Sampling system diagrams are included in the appendices. Additional descriptive information is included in the following section.

3.4. Sampling procedure description

Three, 30-minute minimum test runs were conducted with the Condensate Injection Off, and three 30-minute test runs with the Condensate Injection On.

Sampling & Traverse Points Selection by EPA Method 1. 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 (O₂, CO₂), 7E (NO_x) and 10 (CO) are 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 CEM test van. The sampling system consists of a stainless steel sample probe, a heated Teflon sample line, glass-fiber particulate filter, glass moisture-knockout condensers in ice, followed by thermoelectric coolers, Teflon sample transfer tubing, diaphragm pump and a stainless steel/Teflon manifold and flow control/delivery system. A constant sample and calibration gas supply pressure of 5 PSI was provided to each analyzer to avoid pressure variable response differences. The entire sampling system was leak checked prior to and at the end of the sampling program. The sampling and analytical system (for EPA Methods) was 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 usually use the calibration gas that most closely matches the stack gas effluent. Along with the Sampling System Bias, the Zero and Calibration Drift values were determined for each test. 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. In addition, the NO_X analyzer NO₂ to NO conversion efficiency check defers to EPA Method 20 section 5.6 for the criteria and procedure.

All calibration gases are EPA Protocol #1. The analyzer data recording system consists of a Honeywell DPR3000 strip chart recorder supported by a Data Acquisition System (DAS).

bystem i enominance onterna	
Instrument Linearity	≤2% Full Scale
Instrument Bias	≤5% Full Scale
System Response Time	$\leq \pm 2$ minutes
NO _X Converter Efficiency (EPA 7E)	≥ 90%
Instrument Zero Drift	≤± 3% Full Scale
Instrument Span Drift	$\leq \pm 3\%$ Full Scale

System Performance Criteria

EPA Method 25A Total Hydrocarbons, Methane and Non-Methane Hydrocarbons. EPA Method 25A employs a heated FID, Teflon sample gas transfer lines to provide a continuous sample to the heated FID Hydrocarbon Analyzer. Heated lines were used if necessary to avoid moisture or hydrocarbon condensation. Calibration gases are selected to fall within 25-35%, 45-55% and 80-90% of Range for Total Hydrocarbon.

Methane in the exhaust is usually determined per EPA Methods (M18). An integrated tedlar bag or SUMMA canister is collected and either analyzed 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. Where the total hydrocarbon numbers are well below detection limits and less than 5 ppm for example, the methane may not be determined separately.

EPA Method 18 (VOC or Methane) is used to measure the Methane and ethane to subtract from the THC of Method 25A. This method is used to determine emissions of volatile organics or Methane analyzed by gas chromatograph/mass spectroscopy (GC/MS). Gaseous emissions are drawn through a teflon sample line to a pre-evacuated 6-Liter SUMMA canister. Sample is drawn into the canister by pre-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 between 20 to 60 minutes. The canister samples are taken to a laboratory and analyzed within 72 hours.

To prevent moisture condensation, a condenser may be used before the canister and the condensate analyzed separately, or the canister can be partially pre-filled with a known quantity zero air or nitrogen, prior to collecting the gas sample, or the system can be heated and kept heated above the condensation point until analysis.

Method 19 (gas) was used to determine stack gas volumetric flow rates using oxygen based F-factors. F-factors are ratios of combustion gas volumes generated from heat input. The heating value of the fuel in Btu per cubic foot is determined from analysis of the fuel gas samples using ASTM D1945/3588 gas chromatography analytical procedures. Total fuel consumption for each source is monitored by a dedicated fuel gas meter. 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 were used to determine emission rates.

Fuel Analysis per ASTM D-1945/3588 and ASTM D-5504 are used for fuel sampling and analysis for F-Factor and BTU determination, fixed gas analysis O₂, CO₂, CO, N₂, H₂, CH₄, C2-C6+, and sulfur compounds, including H2S. Samples may be collected in tedlar bags and analyzed within 24 hours or Silco SUMMA canisters and analyzed within 72 hours. Hydrogen Sulfide, Carbonyl Sulfide, Sulfur Dioxide, Methyl Mercaptan, Ethyl Mercaptan, Dimethyl Sulfide, Carbon Disulfide, Isopropyl Mercaptan, tert-Butyl Mercaptan, n-Propyl Mercaptan, Methylethylsulfide, sec-Butyl Mercaptan, Thiophene, iso-Butyl Mercaptan, Diethyl Sulfide, n-Butyl Mercaptan, Dimethyl Disulfide, 2-Methylthiophene, 3-Methylthiophene, Tetrahydrothiophene, Bromothiophene, Thiophenol, Diethyl Disulfide, Total Unidentified Sulfurs, Total Reduced Sulfurs as H2S.

EPA Method 4-16.4 is an acceptable alternative to EPA Method 4 for the determination of moisture from combustion using F-factors. In this case the mole fraction of the 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 from 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, and 3) the mole fraction from the hydrogen in the fuel. To determine the moisture in the fuel, the sum of the raw fuel analysis before normalization, is subtracted from 100.

ASTM Method 1945/5504/25C Concurrent with the exhaust sampling, Blue Sky collected a total of six 6-L Silco Canisters of the LFG for analysis. The canisters were equipped with a 30 minute flow controller and vacuum gauge to aim for a final internal vacuum of the canister of approximately above 5" of Hg. The samples were collected directly from the inlet line. All the samples were analyzed for NMOC, HHV, F-Factor, Fixed Gases, Sulfur Species (including H₂S and TRS). The inlet volumetric flow rate was continuously measured and recorded by the LFG Flowmeter.

Instrumentation	Parameter	Principle
TECO 42C	NO _X	Chemiluminescence
TECO 42C	NO	Chemiluminescence
TECO 48C	СО	GFC/IR
Ratfisch RS-55	THC	FID
Fuji ZRH	CO ₂	IR
Servomex 1440	O ₂	Paramagnetic

3.5. Instrumentation and Analytical procedures

The following continuous emissions analyzers were used:

The instrument response was recorded on strip charts, but the analyzer data collected on the DAS was used for reporting the results. The averages were corrected for drift using EPA Method 7E equations.

3.6. Comments: Limitations and Data Qualifications

The measured emissions meet the Permit required limits, no deviations from the protocol or abnormalities during the test were observed.

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. <u>APPENDICES</u>

А.	Tabulated Results
В.	Calculations
С.	Laboratory Reports
D.	Field Data Sheets
Е.	Strip Charts
F.	Process Information
G.	Calibration Certifications and Quality Assurance Records
н.	Sample Train Configuration and Stack Diagrams
I.	Related Correspondence (Source Test Plan)
J.	BAAQMD Permit Conditions
K.	Flare Flow Meter Calibration Document

A Tabulated Results

TABLE #1

WM - GRDF Flare A-9 LFG - Condensate On

RUN	1	2	3	AVERAGE	LIMITS
Test Date	4/29/20	4/29/20	4/29/20		
Test Time	1018-1100	1127-1205	1231-1309		
Standard Temp., °F	70	70	70		
Flare Temperature, °F Average	1,643	1,642	1,643	1,643	
Condensate Injection, gpm	0.9	0.9	0.9	0.9	
Fuel Flow Rate, SCFM	885	901	919	902	
Fuel Heat Input, MMBTU/Hr	26.3	26.7	27.4	26.8	1
Exhaust Flow Rate, DSCFM (Method 19)	9,850	10,127	10,365	10,114	
Oxygen, O ₂ , %	12.0	12.1	12.1	12.1	
Carbon Dioxide, CO ₂ , %	7.9	7.9	7.8	7.9	
Water Vapor, H ₂ O, % M4.16	5.6	5.4	5.6	5.5	
NO, ppm	14.6	14.6	14.5	14.6	
NO ₂ , ppm	<1.0	<1.0	<1.0	<1.0	
NO ₂ /NO	< 0.07	< 0.07	< 0.07	< 0.07	
NOx, ppm	14.2	14.2	14.3	14.2	
NOx, ppm @ 15% O ₂	9.4	9.5	9.6	9.5	16
NOx, lbs/hr	0.99	1.03	1.06	1.03	
CO, ppm	<5.0	<5.0	<5.0	<5.0	
CO, ppm @ 15% O ₂	<3.3	<3.3	<3.3	<3.3	134
CO, lbs/hr	< 0.21	< 0.22	< 0.23	< 0.22	
Total Sulfurs as H ₂ S in fuel, ppm	678	641	544	621	
SO ₂ calculated emission, ppm	60.9	57.0	48.3	55.4	300
THC, ppm (25A) wet	<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	< 0.03	< 0.03	< 0.03	< 0.03	
CH ₄ , ppm (M18)	0.9	0.8	0.7	0.8	
CH ₄ , lbs/hr	0.02	0.02	0.02	0.02	
NMOC, ppm as CH ₄	< 0.2	< 0.3	<0.4	< 0.3	
NMOC, lbs/hr as CH ₄	< 0.00	< 0.01	< 0.01	< 0.01	
NMOC, ppm (a) 3% O ₂ as CH ₄	<0.3	<0.5	<0.7	<0.5	30
INLET TNMOC (Method 25C)	2,424	2,843	2,732	2,666	
INLET NMOC, lbs/hr as CH ₄	5.3	6.4	6.2	6.0]
NMOC Removal Efficiency	99.93%	99.90%	99.85%	99.89%	98
INLET CH ₄ , ppm	495,000	494,000	497,000	495,333	
INLET CH ₄ , lbs/hr	1,088	1,104	1,134	1,109	1
CH ₄ Removal Efficiency	>99.998%	>99.998%	>99.998%	>99.998%	99
INLET THC (TOC), ppm as CH ₄	497,424	496,843	499,732	498,000	
INLET THC (TOC), lbs/hr as CH_4	1,093	1,111	1,141	1,115	1
THC (TOC) Removal Efficiency	99.998%	99.998%	99.998%	99.998%	1

< Value = 2% of Analyzer Range

WHERE,

ppm = Parts Per Million Concentration Lbs/hr = Pound Per Hour Emission Rate Tstd. = Standard Temp. (°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) NMOC = Total Non-Methane Organic Carbon as Methane (MW = 16) SO₂ = Sulfur Dioxide as SO₂ (MW = 64.1)

CALCULATIONS,

 $\begin{array}{l} \label{eq:PPM @ 15\% O_2 = ppm * 5.9 / (20.9 - \%O_2) \\ \mbox{PPM @ 3\% O_2 = ppm * 17.9 / (20.9 - \%O_2) \\ \mbox{Lbs/hr = ppm x 8.223 E-05 x DSCFM x MW / Tstd. ^R \\ \mbox{Lbs/day = Lbs/hr * 24 } \\ \mbox{Removal Efficiency = (inlet lbs/hr- outlet lbs/hr) / inlet lbs/hr \\ \mbox{SO_2 emission ppm = H2S in fuel * Fuel Flow/Stack Gas Flow } \end{array}$

TABLE #2

WM - GRDF Flare A-9 LFG - Condensate Off

RUN	1	2	3	AVERAGE	LIMITS
Test Date	4/29/20	4/29/20	4/29/20		
Test Time	1346-1428	1448-1527	1604-1642		
Standard Temp., °F	70	70	70		
Flare Temperature, °F Average	1,642	1,643	1,643	1,643	
Condensate Injection, gpm	0.0	0.0	0.0	0.0	
Fuel Flow Rate, SCFM	913	891	894	899	
Fuel Heat Input, MMBTU/Hr	27.5	26.9	27.0	27.1	
Exhaust Flow Rate, DSCFM (Method 19)	10,738	10,506	10,427	10,557	
Oxygen, O ₂ , %	12.4	12.4	12.3	12.3	
Carbon Dioxide, CO ₂ , %	7.6	7.6	7.6	7.6	
Water Vapor, H ₂ O, % M4.16	5.5	5.5	5.7	5.6	
NO, ppm	12.1	12.3	12.6	12.3	
NO ₂ , ppm	<1.0	<1.0	<1.0	<1.0	1
NO ₂ /NO	< 0.08	< 0.08	< 0.08	< 0.08	
NOx, ppm	11.9	12.1	12.4	12.1	
NOx, ppm @ 15% O ₂	8.2	8.4	8.5	8.4	16
NOx, lbs/hr	0.91	0.91	0.92	0.91	
CO, ppm	<5.0	<5.0	<5.0	<5.0	
CO, ppm @ 15% O ₂	<3.5	<3.5	<3.4	<3.4	134
CO, lbs/hr	< 0.23	< 0.23	< 0.23	< 0.23	
Total Sulfurs as H ₂ S in fuel, ppm	616	583	436	545	
SO ₂ calculated emission, ppm	52.4	49.5	37.4	46.4	300
THC, ppm (25A) wet	<1.0	<1.0	<1.0	<1.0	
THC, ppm dry	<1.1	<1.1	<1.1	<1.1	1
THC, lbs/hr as CH ₄	< 0.03	< 0.03	< 0.03	< 0.03	1
CH ₄ , ppm (M18)	1.5	1.9	1.9	1.8	
CH ₄ , lbs/hr	0.04	0.05	0.05	0.05	
NMOC, ppm as CH ₄	< 0.5	<0.9	<0.9	< 0.8]
NMOC, lbs/hr as CH ₄	< 0.01	< 0.02	< 0.02	< 0.02]
NMOC, ppm (a) 3% O ₂ as CH ₄	<1.0	<1.9	<1.9	<1.6	30
INLET TNMOC (Method 25C)	2,454	2,625	2,608	2,562	
INLET NMOC, lbs/hr as CH ₄	5.6	5.8	5.8	5.7	
NMOC Removal Efficiency	99.76%	99.60%	99.60%	99.65%	98
INLET CH ₄ , ppm	501,000	502,000	502,000	501,667	
INLET CH ₄ , lbs/hr	1,135.3	1,110.9	1,113.7	1,120]
CH ₄ Removal Efficiency	>99.996%	>99.996%	>99.996%	>99.996%	99
INLET THC (TOC), ppm as CH_4	503,454	504,625	504,608	504,229	
INLET THC (TOC), lbs/hr as CH ₄	1,141	1,117	1,119	1,126]
THC (TOC) Removal Efficiency	99.998%	99.998%	99.998%	99.998%	

< Value = 2% of Analyzer Range

WHERE,

ppm = Parts Per Million Concentration Lbs/hr = Pound Per Hour Emission Rate Tstd. = Standard Temp. (°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) NMOC = Total Non-Methane Organic Carbon as Methane (MW = 16) SO₂ = Sulfur Dioxide as SO₂ (MW = 64.1)

CALCULATIONS,

 $\begin{array}{l} \label{eq:PPM @ 15\% O_2 = ppm * 5.9 / (20.9 - \%O_2) \\ \mbox{PPM @ 3\% O_2 = ppm * 17.9 / (20.9 - \%O_2) \\ \mbox{Lbs/hr = ppm x 8.223 E-05 x DSCFM x MW / Tstd. ^R \\ \mbox{Lbs/day = Lbs/hr * 24 } \\ \mbox{Removal Efficiency = (inlet lbs/hr- outlet lbs/hr) / inlet lbs/hr \\ \mbox{SO_2 emission ppm = H2S in fuel * Fuel Flow/Stack Gas Flow } \end{array}$

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

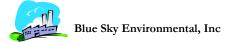
For Submittal to: **Bay Area Air Quality Management District** 375 Beale Street, Suite 600 San Francisco, CA 94105 Attn: Gloria Espena and Marco Hernandez gespena@baaqmd.gov/mhernandez@baaqmd.gov sourcetest@baaqmd.gov

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.

1-lik

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.

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 const application 21927 for Facility 3294; BAAQMD Regulation 8, 34; and the State Landfill Methane Gas Rule under AB32 for 	
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 <u>Flare Emissions</u> 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
CH4 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
CH4 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	O2 and CO2 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.

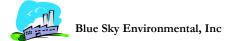
The flare is maintained at a setpoint of 1,500 °F. It is typically operated at ~1,850 standard cubic feet per minute (SCFM) with the condensate on and 1,976 SCFM with the condensate off. Methane quality on average ranges from 44 to 49%, with an oxygen content to be in range of 1-2%. Collected landfill 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 (CO_2) , oxygen (O_2) , methane (CH_4) 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 H_2S 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 NO_2 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	≤2% Full Scale
Instrument Bias	≤5% Full Scale
System Response Time	$\leq \pm 2$ 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.

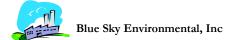
<u>QA/QC</u> procedures require that a minimum of 21 cubic feet of sample is pulled using a leak tight pump. The sample volume is measured with a calibrated dry gas meter. The impingers are immersed in an ice bath to maintain a gas outlet temperature of less than 68°F. Pre-test leak checks are performed 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 CO_2 are flushed through and removed then the NMOC (ROC) fraction is oxidized to form CO_2 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	СО	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

А.	Tabulated Results
В.	Calculations
С.	Laboratory Reports
D.	Field Data Sheets
Е.	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
К.	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:			1	1	
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:					
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 ₂ Emissions:			0.12 1	0.20	
NO, ppmvd	17.6	17.6	16.6	17.2	
NO, ppmvd NO ₂ , ppmvd	<1.0	<1.0	<1.0	<1.0	
NO ₂ /NO Ratio	<0.06	<0.06	<0.06	<0.06	
NOx, ppmvd NOx, ppmvd @ 15% O ₂	17.7	17.4 13.0	16.6 12.3	17.2 12.7	15
	_				15
NOx, lb/hr	2.43	2.48	2.37	2.43	
CO Emissions:	2.4		5 4	5 4	
CO, ppmvd CO, ppmvd @ 15% O ₂	2.6	7.5 5.6	5.1	5.1 3.7	01
	-				81
CO, lb/hr	0.22	0.66	0.44	0.44	
Total Reduced Sulfurs (ASTM 5504): Total Reduced Sulfurs as H ₂ S, ppmv in Fuel	724	770	052	705	
	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):		I	I		
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), lb/hr	1,958	1,975	1,990	1,974	
THC (TOC) Destruction Efficiency, %	>99.97%	>99.97%	>99.97%	>99.97%	>98%

WHERE,

 $\label{eq:product} \begin{array}{l} ppmvd = parts per million concentration by volume expressed on a dry gas basis\\ lb/hr = pound per hour emission rate\\ Tstd. = standard temperature (°R = °F+460)\\ MW = molecular weight\\ DSCFM = dry standard cubic feet per minute\\ NO_X = oxides of nitrogen, reported as NO_2 (MW = 46)\\ CO = carbon monoxide (MW = 28)\\ THC = TOC = total hydrocarbons including CH_4, reported as CH_4 (MW = 16)\\ \end{array}$

CALCULATIONS,

 $\begin{array}{l} ppm \; @\; 15\% \; O_2 = ppm \cdot 5.9 \; / \; (20.9 - \%O_2) \\ ppm \; @\; 3\% \; O_2 = ppm \cdot 17.9 \; / \; (20.9 - \%O_2) \\ lb/hr = ppm \cdot 8.223 \; E{-}05 \cdot DSCFM \cdot MW \; / \; Tstd. \; ^R \\ NMOC, ppm \; as \; CH_4 = THC - CH_4 \\ Destruction \; Efficiency (DE) = (inlet, lb/hr- outlet, lb/hr) \; / \; inlet, lb/hr \\ < Value = 2\% \; of \; Analyzer \; Range \end{array}$

* NMOC permit limits are 30 ppmvd @ 3% O $_2$ or DE >98%

NMOC = non-methane organic compounds, reported as CH4 (MW = 16)

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:			1	11	
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:	5.15	1.00	9.01	0.02	
NO, ppmvd	13.4	12.3	13.1	12.9	
NO, ppmvd NO ₂ , ppmvd	<1.0	<1.0	<1.0	<1.0	
NO ₂ , ppmvd NO ₂ /NO Ratio	<0.07	<0.08	<0.08	<0.08	
NOx, ppmvd	13.4	12.2	13.0	12.9	15
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:			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:					
CH ₄ , ppmv wet (EPA Method ALT-097)	<10.0	<10.0	<10.0	<10.0	
CH4, 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):	•		I	I	
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	<2.3	30*
NMOC, lb/hr	< 0.050	< 0.052	< 0.050	< 0.051	50
Inlet Hydrocarbons (reported as CH ₄):					
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	- 20/0
Inlet CH ₄ , b/hr	2,002	1,987	2,029	2,006	
CH ₄ Destruction Efficiency, %	>99.97%	>99.97%	>99.98%	>99.97%	>99%
					~ 77/0
Inlet THC (TOC), %	444,035	438,077	448,134	443,415	
Inlet THC (TOC), lb/hr	2,011	1,996	2,038	2,015	

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 NO_X = oxides of nitrogen, reported as NO₂ (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% O₂ = ppm · 5.9 / (20.9 - %O₂)

 ppm @. 3% O₂ = ppm · 17.9 / (20.9 - %O₂)

 lb/hr = ppm · 8.223 E-05 · DSCFM · MW / Tstd. °R

 NMOC, ppm as CH₄ = THC - CH₄

 Destruction Efficiency (DE) = (inlet, lb/hr- outlet, lb/hr) / inlet, lb/hr

 < Value = 2% of Analyzer Range</td>

* NMOC permit limits are 30 ppmvd @ 3% O 2 or DE >98%