

BAAQMD Rule 8-34 Semi-Annual Report, Title V Semi-Annual Report, and Title V Annual Certification

City of Sunnyvale Landfill and SMaRT Station®
Sunnyvale, California (Facility No. 5905)

Prepared for:



Sunnyvale

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1. RECEIVED IN ENFORCEMENT: 1/26/2024

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01200220.07 Task 59 | January 2024

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This submittal consisting of the Bay Area Air Quality Management District (BAAQMD) Rule 8-34 Semi-Annual Report, the Title V Semi-Annual Monitoring Report, and the Title V Annual Compliance Certification for the Sunnyvale Landfill in Sunnyvale, California, dated January 2024, was prepared and reviewed by the following:



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Table of Contents

Section	Page
SECTION I. BAAQMD Rule 8-34 Semi-Annual Report.....	1
1.0 Introduction	1
2.0 Site Background Information.....	2
2.1 Existing Permits and Permit Modifications	2
2.2 Existing Landfill Gas Collection and Control System.....	2
3.0 Monitoring and Records	3
3.1 Continuously Monitored Parameters	3
3.1.1 Gas Extraction System Downtime	3
3.1.2 Emission Control System Downtime	4
3.1.3 Individual Well Downtime.....	4
3.1.4 Flow Meter and Temperature Gauge Downtime	5
3.2 Component Leak Quarterly Monitoring.....	5
3.2.1 Third Quarter 2023 Monitoring.....	5
3.2.2 Fourth Quarter 2023 Monitoring.....	5
3.3 Control Efficiency.....	6
3.4 Wellhead and Surface Emissions Monitoring.....	6
3.5 Cover Integrity Monitoring.....	6
3.6 Monthly Landfill Gas Flow Rates	6
3.7 Annual Waste Acceptance Rate and Refuse In Place.....	6
3.7.1 Non-Degradable Waste Areas.....	7
SECTION II. Title V Semi-Annual Report.....	8
SECTION III. Annual Title V Compliance Certification.....	1

Tables

Table 1	Summary of LFG Control System Downtime
Table 2	Summary of Well Downtime
Table 3	Summary Continuous Chart Recorder Data Gaps

Appendices

Appendix A	GCCS Drawings
Appendix B	SCSFS Quarterly LFG Collection System Component Leak/Emissions Testing and Component Emission Monitoring Results
Appendix C	Title V Semi-Annual Report
Appendix D	Title V Annual Compliance Certification
Appendix E	BAAQMD Communication

SECTION I. BAAQMD RULE 8-34 SEMI-ANNUAL REPORT

1.0 INTRODUCTION

This Bay Area Air Quality Management District (BAAQMD) Rule 8-34 Semi-Annual Report for the Sunnyvale Landfill (Landfill) is for the July 1, 2023 through December 31, 2023 reporting period. As approved by the BAAQMD on November 13, 2013, Rule 8-34 reports are synchronized with the reporting periods specified in the Landfill's Initial Major Facility Review (MFR or Title V) Permit, which was issued by the District on September 19, 2013. As such, the semi-annual Reports cover the semi-annual period January 1 through June 30 and July 1 through December 31, with respective reporting deadlines of July 31 and January 31. This semi-annual report was prepared by SCS Engineers (SCS) on behalf of the City of Sunnyvale Environmental Services Department (City) for submittal to the BAAQMD.

The Landfill was originally assigned BAAQMD Plant No. 2253; however, this designation was changed to No. 5905 when it was combined with the SMaRT Station®. This change was made in anticipation of these two facilities being placed under a single Title V permit. The Semi-Annual Report pertains to the landfill gas (LFG) collection and control system (GCCS) operated at the Landfill.

This report includes the following information, as required by BAAQMD Rule 8-34-411 for small design capacity landfills:

- All system and/or component downtime and reasons for the shutdown (8-34-501.1)
- All emission control system downtime and reason for the shutdown (8-34-501.2)
- Continuous temperature monitoring and dates of any excesses (8-34-501.3 and 507)
- Testing performed to satisfy the requirements of this rule (8-34-501.4)
- Monthly landfill gas flow rates and excesses (8-34-501.5)
- Collection and emission control system leak testing and any excesses, action taken to correct excesses, and re-monitored concentrations (8-34-501.6 and 503)
- Annual waste acceptance rate and the current amount of waste in-place (8-34-501.7)
- Records of non-degradable waste if area is excluded from LFG collection (8-34-501.8)
- Continuous flow monitoring (8-34-501.10 and 508)

Information summarizing the monitoring activities associated with the above-listed items is provided in the following sections.

2.0 SITE BACKGROUND INFORMATION

The Sunnyvale Landfill is located in Sunnyvale, California and is owned and operated by the City. The 93-acre site is a closed landfill site.

The Landfill began accepting waste circa 1920. Until about 1957, most combustible wastes received were burned. In the late 1970's, the site was permitted by the State of California to operate as a sanitary landfill.

Filling operations ceased in September 1993. Closure was completed in October 1994 with an estimated 2.29 million Megagrams (Mg) of waste in place. The Landfill comprises 93 acres in four separate hills referred to as the West Hill, Recycle Hill, South Hill, and East Hill. The maximum height of the Landfill is approximately 90 feet.

2.1 EXISTING PERMITS AND PERMIT MODIFICATIONS

The City maintains a BAAQMD Permit to Operate (PTO) (Plant No. 5905) and a Major Facility Review (MFR)/Title V permit for the entire Landfill, the LFG collection system, the LFG flare, and the SMaRT Station. A Title V permit was initially issued on September 19, 2013. The current Title V permit was issued on January 21, 2022.

The City also maintains a BAAQMD Title V Permit (Plant No. 733) to operate the City of Sunnyvale Water Pollution Control Plant (WPCP), which includes a Power Generation Facility (PGF) that utilizes LFG. The WPCP will continue to operate under a separate Title V permit with separate Title V reporting.

LFG is currently collected from all areas of the Landfill where municipal solid waste was placed and diverted to one or both methane-fired internal combustion (IC) engine generators at the PGF or to the flare located within the flare station at the WPCP. Note that the old flare (designated by the BAAQMD as abatement device 8 (A-8) on the Title V Permit) was replaced by a new flare (A-9). Flare A-8 was permanently taken out of service on September 3, 2013. Flare A-9 began operating on September 24, 2013, with a subsequent, initial source test performed on October 2, 2013.

2.2 EXISTING LANDFILL GAS COLLECTION AND CONTROL SYSTEM

The GCCS for the site was installed and became operational in 1987. Several extraction wells were added to the collection system when the final cover was constructed in 1994, and two additional wells were added in 2000.

The gas collection system consists of a header piping network, vertical extraction wells, and horizontal gas collectors. The emission control system (ECS) consists of one enclosed flare and the PGF with two methane-fired engine generators. Note that Digester Gas (Digas), in addition to LFG, is burned in the enclosed flare. Both Digas and air-blended natural gas (ABNG), in addition to LFG, are used to fuel the PGF. The existing GCCS provides LFG control throughout the entire area of the Landfill property where municipal solid waste was placed. Additional details can be found in the GCCS Design Plan, which was prepared for the site by SCS in 2001 and submitted to the BAAQMD. A diagram of the GCCS displaying system component locations is shown in the site plan(s) provided in **Appendix A**.

On July 7, 2022, modifications to the LFG Collection Header (East Side of Landfill) were made. The Sunnyvale Water Pollution Control Plant (WPCP) rehabilitation project included installation of a 72-inch diameter storm pipeline. This storm pipeline intersected with a section of the LFG 8-inch pipeline in Carl Rd., just north of the landfill's South Hill. The 8-inch LFG header was re-routed over the 72-inch storm pipeline using 45-degree couplings. A j-trap was installed in-line with the landfill gas header, to the south of 72-inch storm pipeline, to minimize LFG condensate buildup. A permanent design for the re-route of the LFG header was submitted to the WPCP contractor and the final design was installed on March 23, 2023.

3.0 MONITORING AND RECORDS

3.1 CONTINUOUSLY MONITORED PARAMETERS

To comply with this regulation, the Landfill owner/operator is required to maintain full-time operation of the LFG collection system, control devices, and individual extraction wells. Operation is documented by continuously monitoring flow to the flare as well as flare combustion temperature, or flow to the PGF. Downtime for any of these components must be reported in the Rule 8-34 Semi-Annual Report. This information is summarized below and in the attached tables. Records of continuously monitored parameters are available for inspection at the site.

3.1.1 Gas Extraction System Downtime

During this reporting period, the gas extraction/collection system shut down on seven (7) occasions for a total elapsed time of 8.78 hours.

The WPCP, on which the PGF, the LFG Flare, and the blowers are located, is undergoing major construction and rehabilitation. The WPCP began operation in 1956, and the current subject reconstruction/rehabilitation project is anticipated to take 20 years to complete. This work is taking place on the same site as the existing WPCP that must remain operational during the construction/rehabilitation. Portions of the WPCP's electrical system, which includes the electrical components of the gas collection and control system (that provide electricity to the blowers, the LFG and the PGF, as well as the associated instrumentation, meters, etc.), occasionally require shutdowns to upgrade equipment, add new lines, or to incorporate new lines for new and improved processes/equipment.

Five (5) of the seven (7) downtime events involved the shutdown of the entire GCCS and was deemed by the City to meet the Rule 8-34-113 exemption criteria for downtime due to maintenance and inspection. These downtime events, totaling 6.98 hours, are shown in **Table 1** (attached), which also summarizes all Rule 8-34-113 downtime for the calendar year 2023. Downtime for inspection and maintenance purposes totaled 14.57 hours for 2023.

In addition, it is the City's understanding that the remaining two (2) downtime events, which were unplanned shutdowns, did not meet the District's Rule 8-34-113 exemption criteria, and the City submitted Reportable Compliance Activity (RCA) Notification Forms, requesting Breakdown relief for these occurrences.

The first event occurred on September 14, 2023 resulting in 1.25 hours of downtime. BAAQMD assigned Breakdown Relief ID 08U74 for this event. The second event also occurred on September 14, 2023 resulting in 0.55 hours of downtime. The BAAQMD assigned Breakdown Relief ID 08U081

for this event. City Staff submitted RCA notification forms as well as the 10-day/30-day Title V deviation reports for these events, which are provided as **Appendix E**. No NOV's were issued for this reporting period.

In the event of a shutdown of an ECS component due to unforeseen circumstances, the City is made aware of downtime events because personnel are automatically notified of the downtime via an alarm system. In addition, because the gas extraction system and ECS are designed to work in concert, downtime for the extraction system results in downtime for the flare and the PGF. However, if sufficient Digas and ABNG were available to maintain PGF operation, the operator could choose to run the PGF rather than purchase electricity.

3.1.2 Emission Control System Downtime

Because of the redundancies built into the GCCS at the Landfill (e.g., multiple control devices), it is unusual for both of the methane-fired engine generators and the enclosed flare to be unable to operate at the same time during an unplanned event. During this reporting period, total GCCS downtime was 8.78 hours. Five (5) downtime events totaling 6.98 hours were allowable under Rule 8-34-113 and two (2) downtime events totaling 1.80 hours were not allowed, as mentioned above. Total GCCS downtime allowable under Rule 8-34-113 for the calendar year 2023 was approximately 14.57 hours, well within the Rule limit of 240 hours per calendar year.

The City is generally aware of each flare downtime event, either because it was a scheduled maintenance event or, if it was an unplanned event, because facility personnel are automatically notified via an alarm system of such a shutdown. For unplanned events, facility personnel promptly performed inspection and corrective action as needed to avoid excess emissions. During all GCCS startup, shutdown, and malfunction events, City staff and/or their contractors or consultants inspected the system and conducted the necessary activities (e.g., inspections, maintenance, or repairs) to bring the GCCS back on-line, and maintain compliance.

Please note that because the LFG extraction system and control devices are designed to work in concert, downtime for the entire control system also results in downtime for the extraction system. When the LFG flare goes off-line, an automatic valve is actuated which interrupts LFG and Digas flow to the flare, and an electric relay is triggered, which turns off the extraction system (i.e., LFG blower). When the flare is off-line and both generator sets (gensets) are also not operating, there is no free venting of gas because the gas is constrained by the inoperative gensets and has no alternative outlet. In such circumstances, the blower would be shut down manually. During this reporting period, there were no instances where LFG flow passed through the control system uncontrolled (i.e., free venting). Additionally, there is no bypass that could allow the collected LFG stream to be diverted from the control devices.

3.1.3 Individual Well Downtime

Although the entire GCCS may not go off-line, individual extraction wells are occasionally taken off-line for inspection, maintenance, repair, and other unforeseen circumstances. These are generally planned events, although such events can occur without notice.

A summary of the instances of individual well downtime during the reporting period is provided in **Table 2**, including the date, well identification number, reason for the downtime, a description of what was done to bring the well back on-line, and the total elapsed downtime. At no time during the reporting period were more than five (5) wells offline concurrently, or a single well for more than 24

hours. The well identification numbers are listed on the drawing provided in **Appendix A**. Each of these instances were allowed under Section 117 of Rule 8-34.

3.1.4 Flow Meter and Temperature Gauge Downtime

The continuous operation of the LFG collection system and control devices is measured through the continuous measurement of LFG flow. Operation of the LFG flare in compliance with the PTO is monitored via flare temperature. As required by Rule 8-34, the GCCS at the Landfill is equipped with flow measuring devices and a temperature gauge, which provide continuous readout displays, as well as electronic data records from a video-graphic recorder. Additionally, flow and temperature data are recorded on the optical coupling device, "OPTO", which periodically backs up its data. The OPTO data allows retrieval of information to fill in any gaps in the video-graphic recorders' records. Review of the data from the OPTO and the video-graphic recorder indicates there were eight (8) operating periods when data were not recorded during the reporting period.

Per the requirements of BAAQMD Rule 8-34 Section 508, flow data were recorded every 15 minutes with the exception of eight (8) periods of operation during this reporting period. There were no periods which exceeded 24 hours, therefore no RCA's were submitted. A summary of the instances when data were not recorded during the reporting period is provided in **Table 3**, including the date, reason, and total elapsed time.

3.2 COMPONENT LEAK QUARTERLY MONITORING

3.2.1 Third Quarter 2023 Monitoring

The Landfill GCCS components and the PGF were both tested on September 26 and 29, 2023 for any leaks with a methane concentration of greater than 500 parts per million by volume (ppmv) as required by the California Air Resources Board (CARB) AB 32 Landfill Methane Rule (LMR), or greater than 1,000 ppmv as required by BAAQMD Rule 8-34-503. Testing was performed by SCS Field Services (SCSFS) using a Flame Ionization Detector (FID), which was calibrated on the same day. Calibration records are available upon request.

During the monitoring events, no leaks in excess of 500 ppmv as methane were detected in the Landfill GCCS components. Leaks were detected at the PGF valve and blower on September 26, 2023 showing 3,000 and 2,657 ppm, respectively. Upon completion of repairs by site personnel, SCSFS performed a recheck of the blower on September 29, 2023, with the results indicating a methane concentration of 425 ppm. Therefore, compliance was demonstrated. SCSFS results of monitoring for Third Quarter 2023 can be found in **Appendix B**.

3.2.2 Fourth Quarter 2023 Monitoring

The Landfill GCCS components and the PGF were both tested on December 18 and 29, 2023 for any leaks with a methane concentration of greater than 500 ppmv as required by the CARB AB-32 LMR, or greater than 1,000 ppmv as required by BAAQMD Rule 8-34-503. Testing was performed by SCSFS using an FID, which was calibrated on the same day. Calibration records are available upon request.

During the monitoring events, no component leaks in excess of 500 ppmv were detected in the Landfill GCCS components. Note that during monitoring, the PGF #2 engine results were 1000 ppm. SCS understands that WPCP staff performed necessary repairs on December 19, 2023. Upon

retesting of this location by SCS on December 29, 2023, the PGF engine returned to compliance with the results of 29.9 ppm. Therefore, the next required quarterly testing for all components is due by the end of March 2024. SCSFS results of monitoring for Fourth Quarter 2023 can be found in **Appendix B**.

3.3 CONTROL EFFICIENCY

The LFG flare (A-9) is required, under the provisions of the Initial Title V Permit, to be tested annually to demonstrate compliance with the control efficiency standard of greater than 98 percent (%) non-methane organic compound (NMOC) destruction efficiency or an outlet concentration of less than 30 ppmv of NMOCs as methane at 3 % oxygen (for flares) as required by BAAQMD Rule 8-34-301.4, 8-34-412 and 8-34-413. Initial testing of this flare was performed by Blue Sky Environmental, Inc. on October 2, 2013, followed by two annual flare testing events conducted in October 2014 and October 2015. Per Condition 11586 Part 12 of the City's PTO, after three consecutive annual source tests demonstrate compliance, the testing frequency can be reduced to once every three years. The most recent source test was conducted on September 20, 2021. The Source Test report dated November 9, 2021, indicated the flare was in compliance. A copy of the full report has been submitted to the District. The next LFG flare source testing is required by September 2024.

3.4 WELLHEAD AND SURFACE EMISSIONS MONITORING

There was no wellhead monitoring activity pursuant to Rule 8-34 performed at the site because the monitoring is not required per the limited exemption for small design capacity landfills (8-34-120). However, monthly wellhead monitoring for pressure is performed under the AB 32 LMR, and will be reported in a separate annual report to the BAAQMD, which has been delegated by the CARB to implement the LMR. Similarly, landfill surface emissions monitoring (SEM) is not required by Rule 8-34, however, SEM is performed annually at the subject site, as required under the AB 32 LMR.

3.5 COVER INTEGRITY MONITORING

The integrity of the landfill cover is monitored on a monthly basis by the City in accordance with BAAQMD Rule 8-34-510 using procedures specified in the GCCS Design Plan (SCS, 2001). During the reporting period, cover integrity monitoring was conducted on July 27, August 31, September 28, October 30, November 30, and December 21, 2023. Cover integrity observations during these monthly monitoring events generally indicated the landfill surface was in good condition. No cracks or subsidence were noted.

3.6 MONTHLY LANDFILL GAS FLOW RATES

The Sunnyvale Landfill is not subject to Rule 8-34-404 because the Landfill does not operate less than continuously. Therefore, monthly flow data are not required to be reported.

3.7 ANNUAL WASTE ACCEPTANCE RATE AND REFUSE IN PLACE

The Sunnyvale Landfill is a closed landfill that has not accepted waste since 1993. The City only has records of quantities of waste that the facility received since 1976. Earlier acceptance rates for the Landfill are estimated since no records are available to describe any previous waste disposal operations. The site has an estimated 2.29 million Mg of refuse in place.

3.7.1 Non-Degradable Waste Areas

A non-degradable monofill area exists at the Landfill between the East and South Hills. This Biosolids Monofill is not within the area covered by the GCCS and is not designated on the GCCS drawing. There was one (1) deposit made to the Biosolids Monofill during the reporting period. Approximately 35 cubic yards of sediment were removed during dredging and placed in the Biosolids Monofill. Records of materials placed in this area are maintained by the City.

SECTION II. TITLE V SEMI-ANNUAL REPORT

As specified in 40 Code of Federal Regulations (CFR) Part 70, reports of any required monitoring must be submitted at least every 6 months. All instances of deviations from permit requirements for the semi-annual reporting period, specified in the Landfill's Initial Title V Permit as January 1 through June 30 and July 1 through December 31, must be clearly identified in each report. This Title V Report covers the July 1, 2023 through December 31, 2023 reporting period.

This report has been prepared based on Part VII (Applicable Limits and Compliance Monitoring Requirements) of the Landfill's MFR Permit. The report includes a certification by a responsible official, consistent with §70.5(d).

The full Title V Semi-Annual Report, including certification by a responsible official, is provided as **Appendix C**.

Any RCA Notification Forms, follow-up letters, response letters for Notices of Violation (NOVs) issued by BAAQMD, or Title V Deviation Reports submitted to BAAQMD during this reporting period are provided for reference in **Appendix E**.

SECTION III. ANNUAL TITLE V COMPLIANCE CERTIFICATION

A Title V Annual Compliance Certification has been prepared for the annual period specified in the Title V permit. The annual certification period for this report extends from January 1, 2023 to December 31, 2023.

As specified in 40 CFR Part 70, the compliance certification shall include all of the following:

- The identification of each federally-enforceable term or condition of the permit that is the basis of the certification;
- The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; and
- The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent.

The full Compliance Certification is provided as **Appendix D**.

Any RCA Notification Forms, follow-up letters, response letters for Notices of Violation (NOVs) issued by BAAQMD, or Title V Deviation Reports submitted to BAAQMD during this reporting period are provided for reference in **Appendix E**.

Tables

Table 1

Log of Gas Collection and Control System (GCCS) Downtime OR Emission Control System (ECS) Downtime

(Total Allowed Time for either GCCS or ECS downtime is 240 hours per calendar year)

2023 Reporting Period (January 1, 2023 - December 31, 2023)

Date	Initial Cause of Downtime*			Reason for Downtime**	Time System Went Offline	Time System Came Online	Duration Offline	Balance of Hours***
	GCCS	ECS	Other					
								240.00
3/24/23	X			East Hill condensate trap modification/relocation.	06:55	12:45	5.83	234.17
3/31/23	X			Pumping condensate from CT-7E.	09:37	10:58	1.35	232.82
6/10/23			X	PG&E shutdown - flare connected to portable generator power	08:42	08:53	0.18	232.64
6/28/23			X	Maint SCADA update	09:55	10:10	0.25	232.46
6/10/23			X	PG&E shutdown - flare returned to normal power generation (disconnect generator)	10:28	10:31	0.05	232.41
8/5/23			X	PG&E shutdown switch LFGF pwr to 1 MW gen	08:52	09:13	0.35	232.06
8/5/23			X	PG&E shutdown switched from 1 MW to 52-6	18:19	18:27	0.13	231.93
9/14/2023****			X	Blown fuse and no power to UPS units	9:05	10:20	1.25	230.68
9/14/2023****			X	Blown fuse and no power to UPS units	15:53	17:26	0.55	230.13
9/22/23	X			LFG Flare Inspection	12:48	13:19	0.52	229.61
10/11/23	X			LFG Field Condensate System repairs	08:22	11:40	3.30	226.31
11/14/23	X			LFGF UPS Replacement	07:54	10:35	2.68	223.63

Total Time Off-Line 16.37

Notes:

- * Place a checkmark in the box under the system that was the initial cause of the shutdown. (e.g. A break in the GCCS system, a problem with the Flare or Gensets, and a plant power outage would result in the "GCCS", "ECS", and "other" box being checked, respectively.)
- ** Provide a brief explanation of the cause of the downtime. (eg: There was a break in a lfg line; while the engines were undergoing maintenance the flare malfunctioned; and a plant-wide power outage occurred.)
- *** Please convert minutes into hundredths of an hour (e.g. 5 hrs, 13 min would be recorded as 5.22 hours) and subtract from prior line's balance of hours.
- **** Downtime not covered under the Section 113 240 hour exemption.RCA submitted and provided in Appendix E.

Table 2

**Downtime of Individual Gas Collection Wells
Reporting Period - July 1, 2023 through December 31, 2023**

Well No.	Date Off-Line	Reason for Improvement	Corrective Action	Date On-Line	Time Offline
EW-17W	10/31/23	Damaged flex hose.	Replaced flex hose.	10/31/23	0.92
EW-19W	11/8/23	Damaged flex hose.	Replaced flex hose.	11/8/23	0.45

Table 3

Summary of Continuous Chart Recorder Data Gaps

Parametric Monitors January 1, 2023 through December 31, 2023

Date	Gaps - Continuous Chart Recorder Data	Notes
	(Under 24 Hours)	
	<i>January 1, 2023 through June 30, 2023</i>	
2/1/2023	No landfill gas flow data from approximately 2:05 to 3:08 (~1.05 hours). Flow meter not recording.	
	<i>July 1, 2023 through December 31, 2023</i>	
10/11/2023	LFG flare flow meter not recording flare flow correctly. Flare run approximately 11:45 to 13:20 (1.58 hours).	1
10/16/2023	LFG flare flow meter not recording flare flow correctly. Flare run approximately 5:10 to 16:50 (11.7 hours).	1
10/21/2023	LFG flare flow meter not recording flare flow correctly. Flare run approximately 8:10 to 1:20 on 10/22/23 (17.2 hours).	1
11/3/2023	LFG flare flow meter not recording flare flow correctly. Flare run approximately 4:30 to 18:50 (14.3 hours).	1
11/14/2023	LFG flare flow meter not recording flare flow correctly. Flare run approximately 10:40 to 11:20 (0.67 hours).	1
11/29/2023	LFG flare flow meter not recording flare flow correctly. Flare run approximately 5:30 to 17:25 (11.91 hours).	1
11/29/2023	LFG flow meter not recording flare flow correctly. Flare run approximately 17:50 to 11:15 on 11/30/23 (17.41 hours).	1
12/14/2023	LFG flow meter not recording flare flow correctly. Flare run approximately 11:00 to 13:40 (2.67 hours).	1

Notes:

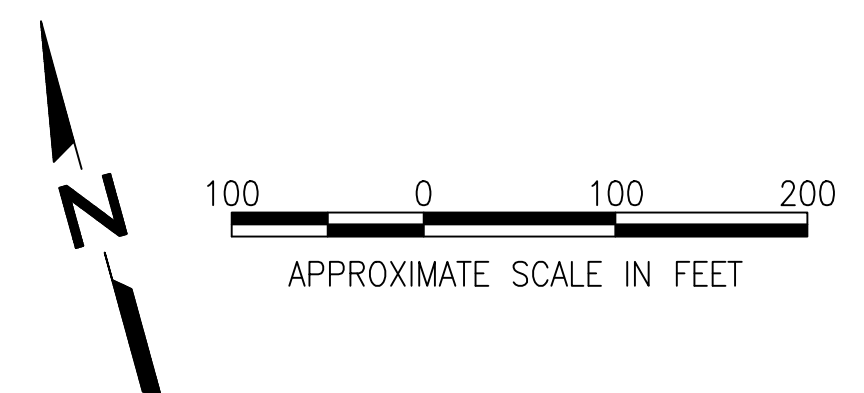
1. LFG flare flow meter replaced on 10/11/23. Parameters on meter caused the meter to record incorrectly. Flare flow meter recording is pinged at 400 scf. All other gas flow readings and flare temperature are correct. A work order submitted to correct meter.

Appendix A – GCCS Drawings



- NOTES:**
- (1) LOCATION OF LFG WELLS AND PIPING PROVIDED BY CITY OF SUNNYSVALE.
 - (2) THE LOCATION OF ALL EXISTING CONDENSATE SUMPS ARE APPROXIMATE. LOCATION OF CONDENSATE LINES AND AIR LINES FROM AS-BUILT DRAWINGS (SCS ENGINEERS, 12-11-2006).
 - (3) AERIAL TOPOGRAPHY BY AERO-GEODETTIC CORPORATION
 - (4) AERIAL PHOTOGRAPH FROM GOOGLE EARTH 2011.

LEGEND	
HV11	SURVEY BENCHMARK
Z 8.37	SURVEY BENCHMARK ELEVATION
EW-15E-V	LFG WELLHEAD/VALVE
EW-15E-H	LFG WELLHEAD
GR-6	LEACHATE WELL
GR-6-CON	CONNECTION POINT FOR LEACHATE WELL EXTRACTION
V-14	BUTTERFLY GATE VALVE
CT-4E	CONDENSATE TRAP (VERTICAL TYPE)
CT-5E	CONDENSATE TRAP (HORIZONTAL TYPE)
SWM-2	SURFACE WATER QUALITY MONITORING POINT
SG-6	SURFACE WATER ELEVATION STAFF GAUGE
G-32	GROUNDWATER ELEVATION MONITORING WELL
G-16	GROUNDWATER QUALITY MONITORING WELL
29	PERIMETER LFG MIGRATION COMPLIANCE PROBE
GX-24	GROUNDWATER EXTRACTION WELL
---	LFG EXTRACTION PIPING (BELOW GROUND)
---	LFG EXTRACTION PIPING (ABOVE GROUND)
---	FENCE
CB	GATCH BASIN
---	STREET LIGHT
---	UTILITY TRANSMISSION LINE
---	UTILITY POWER POLE
MH	MAN HOLE
---	EXTRACTION TRENCH
EH-1	STORM WATER SAMPLE LOCATION
---	LFG CONDENSATE LINES & AIR LINES
---	CONDENSATE & AIR LINE CHECK/ CONTROL VALVE



Rev.	Description	Date

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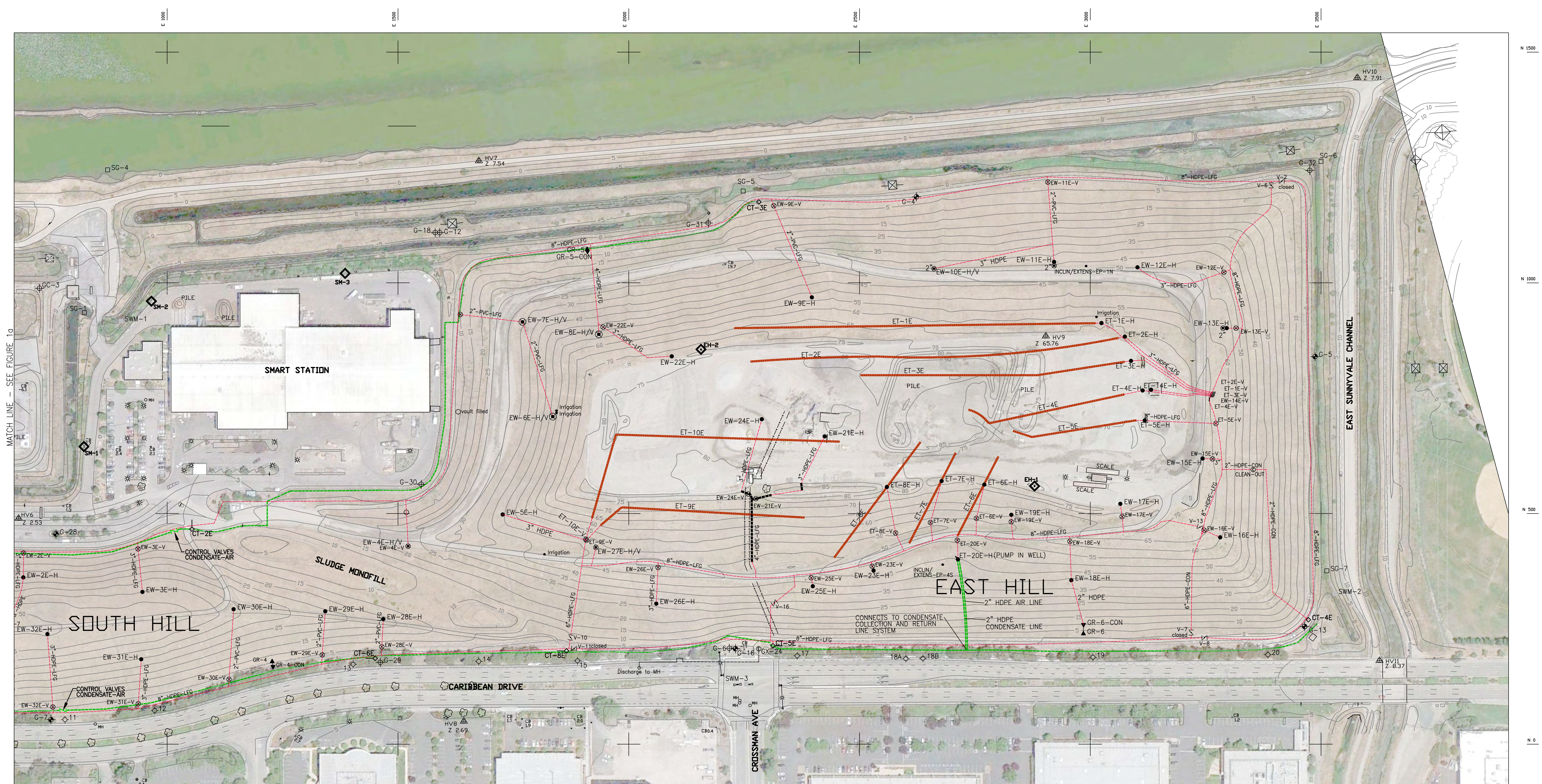
Scale:	AS SHOWN
Designed By:	TMS
Drawn By:	TMS
Checked By:	JJM
SCS Job No.:	01211339.00

SHEET TITLE:	SITE PLAN WEST
PROJECT TITLE:	LANDFILL GAS AND OTHER ENVIRONMENTAL MONITORING AND CONTROL SYSTEMS SUNNYSVALE LANDFILL

CITY OF SUNNYSVALE
 CALIFORNIA

City of Sunnysvale
 Environmental Services Department
 456 West Olive Avenue
 P.O. Box 3707
 Sunnysvale, California
 94088-3707

Date:	5/4/2012
Drawing No.:	1a

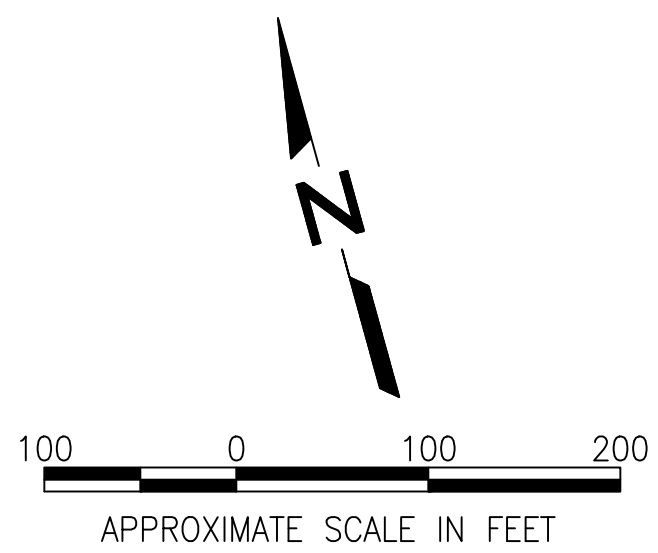


MATCH LINE - SEE FIGURE 1a

NOTES:

- (1) LOCATION OF LFG WELLS AND PIPING PROVIDED BY CITY OF SUNNYVALE.
- (2) THE LOCATION OF ALL EXISTING CONDENSATE SUMPS ARE APPROXIMATE. LOCATION OF CONDENSATE LINES AND AIR LINES FROM AS-BUILT DRAWINGS (SCS ENGINEERS, 12-11-2006).
- (3) AERIAL TOPOGRAPHY BY AERO-GEODETTIC CORPORATION
- (4) AERIAL PHOTOGRAPH FROM GOOGLE EARTH 2011.

LEGEND			
HV11 Z 8.37	SURVEY BENCHMARK	---	LFG EXTRACTION PIPING (BELOW GROUND)
EW-15E-V	SURVEY BENCHMARK ELEVATION	---	LFG EXTRACTION PIPING (ABOVE GROUND)
EW-15E-H	LFG WELLHEAD/VALVE	---	FENCE
GR-6	LFG WELLHEAD	CB	CATCH BASIN
GR-6-CON	LEACHATE WELL	SL	STREET LIGHT
V-14	CONNECTION POINT FOR LEACHATE WELL EXTRACTION	UT	UTILITY TRANSMISSION LINE
CT-4E	BUTTERFLY/ GATE VALVE	MP	UTILITY POWER POLE
CT-5E	CONDENSATE TRAP (VERTICAL TYPE)	MH	MAN HOLE
SWM-2	CONDENSATE TRAP (HORIZONTAL TYPE)	T-3W	EXTRACTION TRENCH
SG-6	SURFACE WATER QUALITY MONITORING POINT	EH-1	STORM WATER SAMPLE LOCATION
G-32	SURFACE WATER ELEVATION STAFF GAUGE	---	LFG CONDENSATE LINES & AIR LINES
G-16	GROUNDWATER ELEVATION MONITORING WELL	---	CONDENSATE & AIR LINE CHECK/ CONTROL VALVE
G-29	GROUNDWATER QUALITY MONITORING WELL		
GX-24	PERIMETER LFG MIGRATION COMPLIANCE PROBE		
	GROUNDWATER EXTRACTION WELL		



Rev.	Description	Date	SCS ENGINEERS		Scale:	AS SHOWN
			ENVIRONMENTAL CONSULTANTS		Designed By:	TMS
			6601 KOLL CENTER PKWY, SUITE 140 PLEASANTON, CA 94566 PH. (925) 426-0080 FAX. (925) 426-0707		Drawn By:	TMS
					Checked By:	JJM
					SCS Job No.:	01211339.00

SHEET TITLE:	SITE PLAN EAST
PROJECT TITLE:	LANDFILL GAS AND OTHER ENVIRONMENTAL MONITORING AND CONTROL SYSTEMS SUNNYVALE LANDFILL

City of Sunnyvale
Environmental
Services Department

456 West Olive Avenue
P.O. Box 3707
Sunnyvale, California
94088-3707

Date: 5/4/2012

Drawing No. 1b

Appendix B – SCSFS Quarterly LFG Collection System Component
Leak/Emissions Testing and Component Emissions Monitoring
Results

October 12, 2023
File No. 07218240.00

Mr. William Theyskens
City of Sunnyvale
Environmental Services Department
456 West Olive Avenue
Post Office Box 3707
Sunnyvale, California 94086

Subject: Third Quarter 2023 Landfill Gas (LFG) Collection System Component Leak/Emissions
Testing at the Sunnyvale Landfill, Sunnyvale, California

Dear Mr. Theyskens:

This letter provides results of the landfill gas collection system component leak/emissions monitoring for the third quarter of 2023 (July through September) as required by the Landfill Methane Rule (LMR) and Bay Area Air Quality Management District (BAAQMD) Regulation 8, Rule 34. All work was performed by SCS Field Services (SCS) in accordance with City approval and our approved Work Scope.

CONCLUSIONS AND RECOMMENDATIONS

On September 26, 2023, LFG component (e.g., well/valve vaults) leak/emissions monitoring showed no exceedances of the LMR limit of 500 ppmv or the BAAQMD Regulation 8, Rule 34 threshold of 1,000 parts per million (ppm), respectively. Therefore, no additional testing is recommended until the fourth quarter 2023.

BACKGROUND

The Sunnyvale Landfill site is an inactive organic refuse disposal site. By way of background, organic materials buried in a landfill decompose anaerobically (in the absence of oxygen) producing a combustible gas, which contains approximately 50 to 60 percent methane, 40 to 50 percent carbon dioxide, and trace amounts of various other gases, some of which are odorous. The Sunnyvale property contains a system to control the combustible gases generated in the landfill.

The gases produced in the landfill will either vent vertically to the atmosphere or migrate horizontally through subsurface soil to locations on adjacent properties. If the soil surrounding a landfill consists of permeable materials, there is a greater likelihood that the LFG will migrate to offsite locations. If the methane gas component of LFG is allowed to accumulate in a confined area (i.e., utility lines, irrigation valve boxes, vaults, basements, wall spaces, etc.) and is exposed to an ignition source, it can be explosive at concentrations between 5 and 15 percent by volume.



LFG COMPONENT EMISSIONS MONITORING

On September 26, 2023, LFG component leak/emissions monitoring was performed at the subject site. The intent of the monitoring was to identify any specific locations (e.g., well/valve vaults and components) with organic compound concentrations exceeding the LMR threshold of 500 ppmv or BAAQMD, Regulation 8, Rule 34 threshold limit value of 1,000 ppmv measured as methane, respectively.

TESTING INSTRUMENTATION/CALIBRATION

Instruments used to perform the LFG component leak/emissions testing consisted of the following:

- Thermo Scientific TVA-2020 portable Flame Ionization Detector (FID). This instrument measures methane in air over a range of 1 to 50,000 ppmv. The FID meets BAAQMD requirements and was calibrated in accordance with manufacturer specifications and EPA Method 21.

LFG COMPONENT EMISSIONS MONITORING PROCEDURES

LFG component leak/emissions monitoring was conducted in accordance with BAAQMD Regulation 8, Rule 34 and the LMR. Monitoring was performed with the FID inlet held within 1 to 2 centimeters above all accessible LFG system components including extraction well and control valve vault boxes and flanges, etc.

TESTING RESULTS

On September 26, 2023, quarterly LFG component/leak emissions testing of the collection system valve and wellhead boxes and flare station was performed as required by the BAAQMD. No methane gas concentrations in excess of the LMR limit of 500 ppmv or Rule 8-34 limit of 1000 ppmv limit were detected during this testing. See attached table for monitoring results. Therefore, the next required quarterly testing is due by the end of December 2023.

STANDARD PROVISIONS

This report addresses conditions of the subject site on the test date only. Accordingly, we assume no responsibility for any changes that may occur subsequent to our testing which could affect the emissions at the subject site.

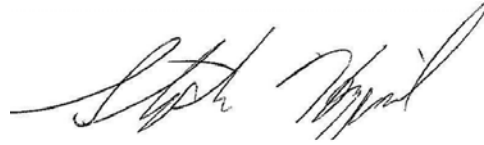
Mr. William Theyskens
October 12, 2023
Page 3

Should you have any questions, do not hesitate to contact either of the undersigned.

Sincerely,



Rebecca L. Lucero
Project Coordinator
SCS Field Services



Stephen Harquail
Project Manager
SCS Field Services

cc: Silviana Ruiz
Cameron Kostigen Mumper

**Third Quarter 2023
Component Emissions Testing
Sunnyvale Landfill, Sunnyvale, California**

Technician: Don Gibson
Date: 9-26-23
Weather: Sunny
 ppm = parts per million NR
 = Not Required

Temperature: 62
Barometric Pressure: 29
Wind Speed/Direction: W6
Instrument: TVA-2020
Calibration: zero-500

East Hill Horizontals

Monitoring Location (ET's)	Control Valve Vault (ppm)	Wellhead Vault (ppm)	Retesting Results
1E	2.3	2.0	
2E	2.2	2.0	
3E	2.2	2.0	
4E	2.2	2.0	
5E	2.3	2.0	
6E	2.3	2.0	
7E	2.0	2.0	
8E	2.2	2.1	
9E	2.1	2.0	
10E	2.2	2.2	



**Third Quarter 2023
Component Emissions Testing
Sunnyvale Landfill, Sunnyvale, California**

Technician: Don Gibson
Date: 9-26-23
Weather: Sunny
 ppm = parts per million
 NR = Not Required

Temperature: 62
Barometric Pressure: 29
Wind Speed/Direction: W6
Instrument: TVA-2020
Calibration: zero-500

East Hill Verticals

Monitoring Location (EW's)	Control Valve Vault (ppm)	Wellhead Vault (ppm)	Retesting Results
1E	2.1	2.0	
2E	2.2	2.0	
3E	2.0	2.0	
4E	2.1	2.0	
5E	2.2	2.0	
6E	2.3	2.0	
7E	2.2	2.0	
8E	2.3	2.0	
9E	2.2	2.0	
10E	2.0	2.0	
11E	2.2	2.0	
12E	2.0	2.0	
13E	2.0	2.0	
14E	2.0	2.0	
15E	2.1	2.0	
16E	2.3	2.0	
17E	2.2	2.0	
18E	2.2	2.0	
19E	2.2	2.0	
20E	2.1	2.0	
21E	2.0	2.0	
22E	2.0	2.0	



**Third Quarter 2023
Component Emissions Testing
Sunnyvale Landfill, Sunnyvale, California**

Technician: Don Gibson
Date: 9-26-23
Weather: Sunny
 ppm = parts per million
 NR = Not Required

Temperature: 62
Barometric Pressure: 29
Wind Speed/Direction: W6
Instrument: TVA-2020
Calibration: zero-500

East Hill Verticals (continued)

Monitoring Location (EW's)	Control Valve Vault (ppm)	Wellhead Vault (ppm)	Retesting Results
23E	2.2	2.0	
24E	2.0	2.2	
25E	2.1	2.2	
26E	2.1	2.0	
27E	2.2	2.1	
28E	2.0	2.2	
29E	2.1	2.2	
30E	2.0	2.1	
31E	2.0	2.2	
32E	2.2	2.0	
33E	2.1	2.0	
34E	2.0	2.0	
35E	2.2	2.0	
36E	2.0	2.0	

West Hill Horizontals

Monitoring Location (ET's)	Control Valve Vault (ppm)	Wellhead Vault (ppm)	Retesting Results
1W	2.2	1.9	
2W	2.0	1.3	
3W	2.0	1.7	



**Third Quarter 2023
Component Emissions Testing
Sunnyvale Landfill, Sunnyvale, California**

Technician: Don Gibson
Date: 9-26-23
Weather: Sunny
 ppm = parts per million
 NR = Not Required

Temperature: 62
Barometric Pressure: 29
Wind Speed/Direction: W6
Instrument: TVA-2020
Calibration: zero-500

West Hill Verticals

Monitoring Location (EW's)	Control Valve Vault (ppm)	Wellhead Vault (ppm)	Retesting Results
1W	2.3	1.7	
2W	2.2	1.4	
3W	2.0	1.7	
4W	2.0	1.5	
5W	2.0	1.1	
6W	2.0	2.2	
7W	2.0	2.1	
8W	2.2	1.5	
9W	2.2	1.2	
10W	2.1	1.2	
11W	2.2	1.7	
12W	2.1	1.8	
13W	2.0	1.3	
14W	2.1	1.3	
15W	2.0	1.6	
16W	2.2	1.9	
17W	2.4	2.0	
18W	2.1	2.1	
19W	2.1	2.3	
20W	2.2	2.0	
21W	2.1	1.9	

**Third Quarter 2023
Component Emissions Testing
Sunnyvale Landfill, Sunnyvale, California**

Technician: Don Gibson
Date: 9-26-23
Weather: Sunny
 ppm = parts per million
 NR = Not Required

Temperature: 62
Barometric Pressure: 29
Wind Speed/Direction: W6
Instrument: TVA-2020
Calibration: zero-500

West Hill Verticals (continued)

Monitoring Location (EW's)	Control Valve Vault (ppm)	Wellhead Vault (ppm)	Retesting Results
22W	2.2	1.2	
23W	2.1	1.2	
24W	2.0	1.3	
25W	2.2	2.0	
26W	2.2	1.0	
27W	2.1	1.8	
28W	2.0	1.6	
29W	2.2	1.3	
30W	2.2	1.6	



October 12, 2023
File No. 07218240.00

Mr. Cameron Kostigen Mumper
City of Sunnyvale
Post Office Box 3707
Sunnyvale, California 94086

Subject: Third Quarter 2023 Power Generation Facility (PGF) and Landfill Gas (LFG) Flare System Component Leak/Emissions Testing at the Sunnyvale Landfill, Sunnyvale, California

Dear Mr. Kostigen Mumper:

This letter provides results of the third quarter 2023 PGF and LFG flare system component leak/emissions monitoring as required by Bay Area Air Quality Management District (BAAQMD) Regulation 8, Rule 34 and the Landfill Methane Rule (LMR). All work was performed by SCS Field Services (SCS) in accordance with City approved Purchase Order.

CONCLUSIONS AND RECOMMENDATIONS

On September 26, 2023, PGF and LFG flare positive pressure component (e.g., leak/emissions) monitoring showed no exceedances of BAAQMD Regulation 8, Rule 34 or LMR threshold of 1000 and 500 parts per million (ppm), respectively with the exception of the PGF valve and blower (3000 and 2657 ppm, respectively) with the blower returning to compliance (112 ppm) upon completion of repairs by site personnel. On September 29, 2023, SCS, upon completion of repairs by site personnel, performed a recheck of the blower with the results indicating 425 ppm. Therefore, no additional testing is recommended until the fourth quarter 2023.

BACKGROUND

The Sunnyvale Landfill site is an inactive organic refuse disposal site. By way of background, organic materials buried in a landfill decompose anaerobically (in the absence of oxygen) producing a combustible gas, which contains approximately 50 to 60 percent methane, 40 to 50 percent carbon dioxide, and trace amounts of various other gases, some of which are odorous. The Sunnyvale property contains a system to control the combustible gases generated in the landfill.

The gases produced in the landfill will either vent vertically to the atmosphere or migrate horizontally through subsurface soil to locations on adjacent properties. If the soil surrounding a landfill consists of permeable materials, there is a greater likelihood that the LFG will migrate to offsite locations. If the methane gas component of LFG is allowed to accumulate in a confined area (i.e., utility lines, irrigation valve boxes, vaults, basements, wall spaces, etc.) and is exposed to an ignition source, it can be explosive at concentrations between 5 and 15 percent by volume. At higher concentrations, methane gas is flammable. However, the presence of methane gas in site soil does not mean there is an immediate threat of explosion because flames cannot typically propagate through soil.



LFG COMPONENT EMISSIONS MONITORING

On September 26 and 29, 2023, PGF and Flare landfill gas component leak/emissions monitoring was performed at the subject site. The intent of the monitoring was to identify any specific locations at the PGF with organic compound concentrations exceeding BAAQMD, Regulation 8, Rule 34 and LMR threshold limit value of 1000 ppmv or 500 ppmv, respectively measured as methane.

TESTING INSTRUMENTATION/CALIBRATION

Instruments used to perform the LFG component leak/emissions testing consisted of the following:

- Thermo-Scientific TVA-2020 (TVA). This instrument measures methane in air over a range of 1 to 50,000 ppmv. The TVA-2020 meets BAAQMD requirements and was calibrated in accordance with manufacturer specifications and EPA Method 21.

LFG COMPONENT EMISSIONS MONITORING PROCEDURES

LFG component leak/emissions monitoring was conducted in accordance with BAAQMD Regulation 8, Rule 34 and the LMR. Monitoring was performed with the TVA-2020 inlet held within 1 to 2 centimeters above all/accessible PGF system components under positive pressure including valves, flanges, blower seals, etc.

TESTING RESULTS

On September 26, 2023, quarterly LFG component/leak emissions testing of the PGF and LFG Flare Station were performed as required by the BAAQMD (see attached data table) with the exception of the PGF valve and blower (3000 and 2657 ppm, respectively) with the blower returning to compliance (112 ppm) upon completion of repairs by site personnel. On September 29, 2023, SCS, upon completion of repairs by site personnel, performed a recheck of the blower with the results indicating 425 ppm. Therefore, the next required quarterly testing for all components is due by the end of December 2023.

STANDARD PROVISIONS

This report addresses conditions of the subject site on the test date only. Accordingly, we assume no responsibility for any changes that may occur subsequent to our testing which could affect the emissions at the subject site.

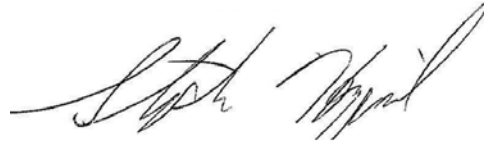
Mr. Cameron Kostigen Mumper
October 12, 2023
Page 3

Should you have any questions, do not hesitate to contact either of the undersigned.

Sincerely,



Rebecca L. Lucero
Project Coordinator
SCS Field Services



Stephen Harquail
Project Manager
SCS Field Services

cc: William Theyskens
Melody Tovar
Bryan Berdeen
Silviana Ruiz

**Third Quarter 2023
Component Emissions Testing
Sunnyvale Landfill, Sunnyvale, California**

Technician: Don Gibson
Date: 09-26, 29-23
Weather: cloudy
 ppm = parts per million
 NR = Not Required

Temperature: 77
Barometric Pressure: 30
Wind Speed/Direction: NW6
Instrument: TVA-2020
Calibration: 09-26-23

Flare Station

Monitoring Location	Testing Results (ppm)	Retesting Results (ppm)	Comments
Blowers	2		
Valves	2		
Piping	1		
Flanges	1		

Power Generation Facility

Monitoring Location	Testing Results (ppm)	Retesting Results (ppm)	Comments
Compressor	2.3		
Valves	3000	112.0	Repair performed by site personnel; retesting done on same day
Piping	5.6		
Flanges	8.2		
Blowers	2657	425.0	Recheck done on 9/29/23
Engines	2.2		



December 20, 2023
File No. 07218240.00

Ms. Sunanda Katragadda
City of Sunnyvale
Environmental Services Department
456 West Olive Avenue
Post Office Box 3707
Sunnyvale, California 94086

Subject: Fourth Quarter 2023 Landfill Gas (LFG) Collection System Component
Leak/Emissions Testing at the Sunnyvale Landfill, Sunnyvale, California

Dear Ms. Katragadda:

This letter provides results of the landfill gas collection system component leak/emissions monitoring for the fourth quarter of 2023 (October through December) as required by the Landfill Methane Rule (LMR) and Bay Area Air Quality Management District (BAAQMD) Regulation 8, Rule 34. All work was performed by SCS Field Services (SCS) in accordance with City approval and our approved Work Scope.

CONCLUSIONS AND RECOMMENDATIONS

On December 18, 2023, LFG component (e.g., well/valve vaults) leak/emissions monitoring showed no exceedances of the LMR limit of 500 ppmv or the BAAQMD Regulation 8, Rule 34 threshold of 1,000 parts per million (ppm), respectively. Therefore, no additional testing is recommended until the first quarter 2024.

BACKGROUND

The Sunnyvale Landfill site is an inactive organic refuse disposal site. By way of background, organic materials buried in a landfill decompose anaerobically (in the absence of oxygen) producing a combustible gas, which contains approximately 50 to 60 percent methane, 40 to 50 percent carbon dioxide, and trace amounts of various other gases, some of which are odorous. The Sunnyvale property contains a system to control the combustible gases generated in the landfill.

The gases produced in the landfill will either vent vertically to the atmosphere or migrate horizontally through subsurface soil to locations on adjacent properties. If the soil surrounding a landfill consists of permeable materials, there is a greater likelihood that the LFG will migrate to offsite locations. If the methane gas component of LFG is allowed to accumulate in a confined area (i.e., utility lines, irrigation valve boxes, vaults, basements, wall spaces, etc.) and is exposed to an ignition source, it can be explosive at concentrations between 5 and 15 percent by volume.



LFG COMPONENT EMISSIONS MONITORING

On December 18, 2023, LFG component leak/emissions monitoring was performed at the subject site. The intent of the monitoring was to identify any specific locations (e.g., well/valve vaults and components) with organic compound concentrations exceeding the LMR threshold of 500 ppmv or BAAQMD, Regulation 8, Rule 34 threshold limit value of 1,000 ppmv measured as methane, respectively.

TESTING INSTRUMENTATION/CALIBRATION

Instruments used to perform the LFG component leak/emissions testing consisted of the following:

- Thermo Scientific TVA-2020 portable Flame Ionization Detector (FID). This instrument measures methane in air over a range of 1 to 50,000 ppmv. The FID meets BAAQMD requirements and was calibrated in accordance with manufacturer specifications and EPA Method 21.

LFG COMPONENT EMISSIONS MONITORING PROCEDURES

LFG component leak/emissions monitoring was conducted in accordance with BAAQMD Regulation 8, Rule 34 and the LMR. Monitoring was performed with the FID inlet held within 1 to 2 centimeters above all accessible LFG system components including extraction well and control valve vault boxes and flanges, etc.

TESTING RESULTS

On December 18, 2023, quarterly LFG component/leak emissions testing of the collection system valve and wellhead boxes and flare station was performed as required by the BAAQMD. No methane gas concentrations in excess of the LMR limit of 500 ppmv or Rule 8-34 limit of 1000 ppmv limit were detected during this testing. See attached table for monitoring results. Therefore, the next required quarterly testing is due by the end of March 2024.

STANDARD PROVISIONS

This report addresses conditions of the subject site on the test date only. Accordingly, we assume no responsibility for any changes that may occur subsequent to our testing which could affect the emissions at the subject site.

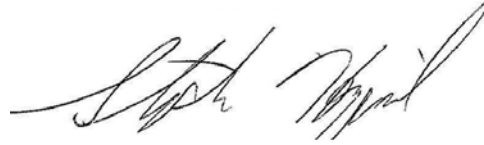
Ms. Katragadda
December 20, 2023
Page 3

Should you have any questions, do not hesitate to contact either of the undersigned.

Sincerely,



Rebecca L. Lucero
Project Coordinator
SCS Field Services



Stephen Harquail
Project Manager
SCS Field Services

cc: Silviana Ruiz
Cameron Kostigen Mumper
Julie Choun

**Fourth Quarter 2023
Component Emissions Testing
Sunnyvale Landfill, Sunnyvale, California**

Technician: Andrew Stone
Date: 12-18-23
Weather: Sunny
 ppm = parts per million
 NR = Not Required

Temperature: 55
Barometric Pressure: 29
Wind Speed/Direction: 7SE
Instrument: TVA-2020
Calibration: zero-500

East Hill Horizontals

Monitoring Location (ET's)	Control Valve Vault (ppm)	Wellhead Vault (ppm)	Retesting Results
1E	2.3	2.0	
2E	2.2	2.0	
3E	5.3	2.0	
4E	5.5	2.0	
5E	2.3	2.0	
6E	2.3	2.0	
7E	4.8	4.8	
8E	4.8	4.8	
9E	4.8	4.8	
10E	4.8	4.8	



**Fourth Quarter 2023
Component Emissions Testing
Sunnyvale Landfill, Sunnyvale, California**

Technician: Andrew Stone
Date: 12-18-23
Weather: Sunny
 ppm = parts per million
 NR = Not Required

Temperature: 55
Barometric Pressure: 29
Wind Speed/Direction: 7SE
Instrument: TVA-2020
Calibration: zero-500

East Hill Verticals

Monitoring Location (EW's)	Control Valve Vault (ppm)	Wellhead Vault (ppm)	Retesting Results
1E	4.7	4.7	
2E	2.2	2.2	
3E	2.0	2.0	
4E	2.1	2.1	
5E	2.2	2.2	
6E	2.3	2.3	
7E	2.2	2.3	
8E	2.3	2.3	
9E	2.2	2.2	
10E	2.0	2.0	
11E	2.2	2.2	
12E	2.0	2.0	
13E	2.0	2.0	
14E	2.0	2.0	
15E	2.1	2.0	
16E	2.3	2.0	
17E	2.2	2.0	
18E	2.2	2.0	
19E	2.2	2.0	
20E	2.1	2.0	
21E	2.0	2.0	
22E	2.0	2.0	

**Fourth Quarter 2023
Component Emissions Testing
Sunnyvale Landfill, Sunnyvale, California**

Technician: Andrew Stone
 Date: 12-18-23
 Weather: Sunny
 ppm = parts per million
 NR = Not Required

Temperature: 55
 Barometric Pressure: 29
 Wind Speed/Direction: 7SE
 Instrument: TVA-2020
 Calibration: zero-500

East Hill Verticals

Monitoring Location (EW's)	Control Valve Vault (ppm)	Wellhead Vault (ppm)	Retesting Results
23E	6.7	6.7	
24E	5.8	5.8	
25E	7.6	7.6	
26E	6.3	6.3	
27E	6.1	6.1	
28E	5.7	5.7	
29E	5.4	5.4	
30E	5.4	5.4	
31E	5.4	5.4	
32E	5.0	5.0	
33E	5.0	5.0	
34E	5.0	5.0	
35E	5.0	5.0	
36E	4.8	4.8	

West Hill Horizontals

Monitoring Location (ET's)	Control Valve Vault (ppm)	Wellhead Vault (ppm)	Retesting Results
1W	1.9	1.9	
2W	1.9	1.9	
3W	1.8	1.8	



**Fourth Quarter 2023
Component Emissions Testing
Sunnyvale Landfill, Sunnyvale, California**

Technician: Andrew Stone
Date: 12-18-23
Weather: Sunny
 ppm = parts per million
 NR = Not Required

Temperature: 55
Barometric Pressure: 29
Wind Speed/Direction: 7SE
Instrument: TVA-2020
Calibration: zero-500

West Hill Verticals

Monitoring Location (EW's)	Control Valve Vault (ppm)	Wellhead Vault (ppm)	Retesting Results
1W	1.8	1.8	
2W	1.8	1.8	
3W	1.6	1.6	
4W	1.5	1.5	
5W	1.5	1.5	
6W	1.5	1.5	
7W	1.6	1.6	
8W	1.6	1.6	
9W	1.5	1.5	
10W	1.6	1.6	
11W	1.6	1.6	
12W	1.7	1.7	
13W	1.7	1.7	
14W	1.7	1.7	
15W	1.5	1.5	
16W	1.5	1.5	
17W	1.4	1.4	
18W	1.4	1.4	
19W	1.4	1.4	
20W	1.7	1.7	
21W	1.7	1.7	



**Fourth Quarter 2023
Component Emissions Testing
Sunnyvale Landfill, Sunnyvale, California**

Technician: Andrew Stone
Date: 12-18-23
Weather: Sunny
 ppm = parts per million
 NR = Not Required

Temperature: 55
Barometric Pressure: 29
Wind Speed/Direction: 7SE
Instrument: TVA-2020
Calibration: zero-500

West Hill Verticals

Monitoring Location (EW's)	Control Valve Vault (ppm)	Wellhead Vault (ppm)	Retesting Results
22W	22.6	22.6	
23W	16.4	16.4	
24W	10.6	10.6	
25W	11.8	11.8	
26W	7.3	7.3	
27W	6.2	6.2	
28W	5.1	5.1	
29W	2.9	2.9	
30W	2.6	2.6	



December 20, 2023, Revised January 22, 2024
File No. 07218240.00

Ms. Julie Choun
City of Sunnyvale
Post Office Box 3707
Sunnyvale, California 94086

Subject: Fourth Quarter 2023 Power Generation Facility (PGF) and Landfill Gas (LFG) Flare System Component Leak/Emissions Testing at the Sunnyvale Landfill, Sunnyvale, California

Dear Ms. Choun:

This letter provides results of the fourth quarter 2023 PGF and LFG flare system component leak/emissions monitoring as required by Bay Area Air Quality Management District (BAAQMD) Regulation 8, Rule 34 and the Landfill Methane Rule (LMR). All work was performed by SCS Field Services (SCS) in accordance with City approved Purchase Order.

CONCLUSIONS AND RECOMMENDATIONS

On December 18, 2023, PGF and LFG flare positive pressure component (e.g., leak/emissions) monitoring showed no exceedances of BAAQMD Regulation 8, Rule 34 or LMR threshold of 1000 and 500 parts per million (ppm), respectively, with the exception of the PGF Engine (up to 1000 ppm) as noted below. SCS performed the required 10-day retesting on December 29, 2023, with this location returning to compliance (29.9 ppm) Therefore, no additional testing is recommended until the first quarter 2024.

BACKGROUND

The Sunnyvale Landfill site is an inactive organic refuse disposal site. By way of background, organic materials buried in a landfill decompose anaerobically (in the absence of oxygen) producing a combustible gas, which contains approximately 50 to 60 percent methane, 40 to 50 percent carbon dioxide, and trace amounts of various other gases, some of which are odorous. The Sunnyvale property contains a system to control the combustible gases generated in the landfill.

The gases produced in the landfill will either vent vertically to the atmosphere or migrate horizontally through subsurface soil to locations on adjacent properties. If the soil surrounding a landfill consists of permeable materials, there is a greater likelihood that the LFG will migrate to offsite locations. If the methane gas component of LFG is allowed to accumulate in a confined area (i.e., utility lines, irrigation valve boxes, vaults, basements, wall spaces, etc.) and is exposed to an ignition source, it can be explosive at concentrations between 5 and 15 percent by volume. At higher concentrations, methane gas is flammable. However, the presence of methane gas in site soil does not mean there is an immediate threat of explosion because flames cannot typically propagate through soil.



LFG COMPONENT EMISSIONS MONITORING

On December 18, 2023, PGF and Flare landfill gas component leak/emissions monitoring was performed at the subject site. The intent of the monitoring was to identify any specific locations at the PGF with organic compound concentrations exceeding BAAQMD, Regulation 8, Rule 34 and LMR threshold limit value of 1000 ppmv or 500 ppmv, respectively measured as methane.

TESTING INSTRUMENTATION/CALIBRATION

Instruments used to perform the LFG component leak/emissions testing consisted of the following:

- Thermo-Scientific TVA-2020 (TVA). This instrument measures methane in air over a range of 1 to 50,000 ppmv. The TVA-2020 meets BAAQMD requirements and was calibrated in accordance with manufacturer specifications and EPA Method 21.

LFG COMPONENT EMISSIONS MONITORING PROCEDURES

LFG component leak/emissions monitoring was conducted in accordance with BAAQMD Regulation 8, Rule 34 and the LMR. Monitoring was performed with the TVA-2020 inlet held within 1 to 2 centimeters above all/accessible PGF system components under positive pressure including valves, flanges, blower seals, etc.

TESTING RESULTS

On December 18, 2023, quarterly LFG component/leak emissions testing of the PGF and LFG Flare Station were performed as required by the BAAQMD (see attached data table). No location of the LFG flare tested exceeded the Rule 8-34 1000 ppmv limit and LMR 500 ppmv limit during our monitoring event. Note that during monitoring, the PGF engine results were 1000 ppm. SCS understands that WPCP staff performed necessary repairs on December 19, 2023. Upon retesting of this location by SCS on December 29, 2023, the PGF engine returned to compliance with the results of 29.9 ppm. Therefore, the next required quarterly testing for all components is due by the end of March 2024.

STANDARD PROVISIONS

This report addresses conditions of the subject site on the test date only. Accordingly, we assume no responsibility for any changes that may occur subsequent to our testing which could affect the emissions at the subject site.

Ms. Julie Choun
December 20, 2023
Revised January 22, 2024
Page 3

Should you have any questions, do not hesitate to contact either of the undersigned.

Sincerely,



Rebecca L. Lucero
Project Coordinator
SCS Field Services



Stephen Harquail
Project Manager
SCS Field Services

cc: Melody Tovar
Bryan Berdeen
Silviana Ruiz
Sunanda Katragadda

Fourth Quarter 2023
Power Generation Facility (PGF) and Landfill Gas Flare Station Component/Leak Emissions Testing
City of Sunnyvale, Sunnyvale, California

Technician: Andrew Stone
Date: 12-18-23
Weather: Sunny
 ppm = parts per million
 NR = Not Required

Temp: 55
Barometric Pressure: 29
Wind Speed/Direction: 7 SE
Instrument: TVA-2020
Calibration: 12-18-23

Flare Station

Monitoring Location	Testing Results (ppm)	Retesting Results (ppm)	Comments
Blowers	2		
Valves	2		
Piping	2		
Flanges	2		

Power Generation Facility

Monitoring Location	Testing Results (ppm)	Retesting Results (ppm) (12/29/23)	Comments
Compressor	9.8		
Valves	22.6		
Piping	33.7		
Flanges	10.8		
Blowers	59.2		
Engines	1000	29.9	



Appendix C – Title V Semi-Annual Report (with Certification)

City of Sunnyvale Landfill and SMaRT Station®
TITLE V SEMI-ANNUAL MONITORING REPORT

SITE: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	FACILITY ID#: A5905
REPORTING PERIOD: <i>from 07/1/2023 through 12/31/2023</i>	

CERTIFICATION:

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

Ramana Chinnakotla

1/26/2024

Signature of Responsible Official

Date

Ramana Chinnakotla

Name of Responsible Official (please print)

Director of Environmental Services

Title of Responsible Official (please print)

Mail to:

Director of Compliance and Enforcement

BAAQMD

375 Beale Street

San Francisco, CA 94105

Attn: Title V reports

City of Sunnyvale Landfill and SMaRT Station®
TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	Facility ID#: A5905
Permitted Unit: S-8 Sunnyvale Landfill with Gas Collection System and A-9 Landfill Gas Flare	Reporting Period: from 07/01/2023 through 12/31/2023

SITE: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	FACILITY ID#: A5905
REPORTING PERIOD: from 07/1/2023 through 12/31/2023	

List of Permitted Sources and Abatement Device

Permit Unit Number	Equipment Description
S-#	Description
S-1	Solid Waste Transfer Station
S-2	Wood Waste Unloading Operation
S-3*	Wood Shredder
S-4*	Conveyor
S-5	Wood Chip Processing
S-6**	Wood Chip Screening
S-7	Diesel Engine (Emergency Standby Generator)
S-8	Gas Collection System: 66 Vertical Extraction Wells and 13 Horizontal Collectors
S-10****	Wood Shredder
S-11****	Conveyor
A-1	Wet Suppression System
A-5	Bag House Dust Collector
A-8***	Landfill Gas Flare, 45 MM BTU/hr
A-9	Landfill Gas Flare, 600 SCFM of waste gas, 18 MM BTU/hr

Notes: *S-3 was replaced by S-10 and S-4 was replaced by S-11 per application #26967. Permit to Operate (PTO) issued August 6, 2015.
 **S-6 was taken out of service permanently on 12/5/2016.
 ***A-8 was taken out of service permanently on 9/3/13; A-9 was started up on 9/3/13
 ****S-10 and S-11 were included in the PTO issued January 21, 2022

City of Sunnyvale Landfill and SMaRT Station®

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	Facility ID#: A5905
Permitted Unit: S-8 Sunnyvale Landfill with Gas Collection System and A-9 Landfill Gas Flare	Reporting Period: from 07/01/2023 through 12/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.4	Operating records for all parametric monitors (gas flow meters and temperature monitors)	Periodic/ Daily	BAAQMD 1-523.1 and 1-523.2	Inoperation < 24 hours; ≤ 15 consecutive days per incident and ≤ 30 calendar days per 12-month period	Continuous	N/A
Opacity	None	NA	None	BAAQMD 6-1-301 and SIP 6-301	Ringelmann No. 1 for < 3 minutes in any hour (applies to flare)	Continuous	N/A
FP	None	NA	None	BAAQMD 6-1-310 and SIP 6-310	≤ 0.15 grains/dscf (applies to flare)	Continuous	N/A
Continuous Operation	BAAQMD 8-34-501.1, 8-34-501.2, 8-34-501.10, 8-34-508 and BAAQMD Condition # 11586, Parts 3, 6, and 7	Gas Flow Meter and Recorder (every 15 minutes) Records of Landfill Gas Flow Rates, Collection and Control Systems Downtime and Collection System Components	Continuous	BAAQMD 8-34-301 and 301.1 and BAAQMD Condition #11586, Parts 2-7	Landfill gas collection system shall operate continuously and all collected gases shall be vented to a properly operating control system.	Intermittent	Two unplanned shutdowns of the GCCS occurred on September 14, 2023. RCA Notification Forms and follow-up reports were submitted by the City and breakdown relief was requested. Submittals are provided in Appendix E.
Collection and Control Systems Shutdown Time	BAAQMD 8-34-501.1	Operating Records	Periodic/ Daily	BAAQMD 8-34-113.2	≤ 240 hours per year and ≤ 5 consecutive days	Continuous	N/A

City of Sunnyvale Landfill and SMaRT Station®

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	Facility ID#: A5905
Permitted Unit: S-8 Sunnyvale Landfill with Gas Collection System and A-9 Landfill Gas Flare	Reporting Period: from 07/01/2023 through 12/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Well Shutdown Limits	BAAQMD 8-34-117.6 and 501.1	Records	Periodic/ Daily	BAAQMD 8-34-117.4	No more than 5 wells at a time or 10% of total collection system, whichever is less	Continuous	N/A
Well Shutdown Limits	BAAQMD 8-34-501.6 and 503	Records	Periodic/ Daily	BAAQMD 8-34-117.5	≤ 24 hours per well	Continuous	N/A
TOC (Total Organic Compounds Plus Methane)	BAAQMD 8-34-501.6 and 503	Quarterly Inspection of collection and control system components with portable analyzer and Records	Periodic/ Quarterly	BAAQMD 8-34-301.2	Component Leak Limit: ≤ 1,000 ppmv as methane	Continuous	N/A
TOC	BAAQMD 8-34-415, 416, 501.4, 501.6, and 510	Monthly visual inspection of cover, quarterly inspection of surface with portable analyzer, various re-inspection times for leaking areas, and records	Periodic/ Monthly, Quarterly, and Event basis	BAAQMD 8-34-303	Surface Leak Limit ≤ 500 ppmv as methane at 2 inches above surface	Continuous	N/A
Non-Methane Organic Compounds (NMOC)	BAAQMD 8-34-501.4 and BAAQMD Condition # 11586, Part 12	Annual Source Tests and Records	Periodic/ Annual	BAAQMD 8-34-301.3 and BAAQMD Condition # 11586, Part 10	Flare Destruction Efficiency: > 98% removal by weight OR Flare Outlet Concentration: < 30 ppmv, expressed as methane, dry basis @ 3% O ₂	Continuous	N/A

City of Sunnyvale Landfill and SMaRT Station®

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	Facility ID#: A5905
Permitted Unit: S-8 Sunnyvale Landfill with Gas Collection System and A-9 Landfill Gas Flare	Reporting Period: <i>from 07/01/2023 through 12/31/2023</i>

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
SO ₂	None	N/A	None	BAAQMD 9-1-301	Property Line Ground Level Limits: ≤ 0.5 ppm for 3 minutes and ≤ 0.25 ppm for 60 min., and ≤ 0.05 ppm for 24 hours	Continuous	N/A
SO ₂	BAAQMD Condition # 11586, Parts 12-13	Source Tests, Sulfur analysis of landfill gas and Records	Periodic/ Annual	BAAQMD 9-1-302	For Flare: ≤ 300 ppm (dry basis)	Continuous	N/A
H ₂ S	None	N/A	None	BAAQMD 9-2-301	Property Line Ground Level Limits: ≤ 0.06 ppm averaged over 3 min. and ≤ 0.03 ppm for 60 min.	Continuous	N/A
NO _x	BAAQMD Condition # 11586, Part 12	Annual Source Test and Records (upon start-up of A-9 Flare).	Periodic/ Annual	BAAQMD Condition # 11586, Part 8	A-9 Flare: < 0.06 pounds NO _x (calculated as NO ₂) per MM BTU	Continuous	N/A
CO	BAAQMD Condition # 11586, Part 12	Annual Source Test and Records (upon start-up of A-9 Flare).	Periodic/ Annual	BAAQMD Condition # 11586, Part 9	A-9 Flare: ≤ 0.20 pounds CO per MM BTU	Continuous	N/A
Source Test Submittal	BAAQMD Condition # 11586, Part 12	Report Submittal	Annual	BAAQMD Condition # 11586, Part 12	60 days after testing performed	Continuous	N/A

City of Sunnyvale Landfill and SMaRT Station®

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	Facility ID#: A5905
Permitted Unit: S-8 Sunnyvale Landfill with Gas Collection System and A-9 Landfill Gas Flare	Reporting Period: <i>from 07/01/2023 through 12/31/2023</i>

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Temperature of Combustion Zone (CT)	BAAQMD 8-34-501.3, 8-34-507, and BAAQMD Condition # 11586, Part 11	Temperature Sensor and Recorder (continuous)	Continuous	BAAQMD Condition # 11586, Part 11	Flare CT: ≥ 1400 °F, averaged over any 3-hour period	Continuous	N/A
Shut Down Date	BAAQMD Condition # 11586, Part 14	Notification and Records	Periodic/ Event Basis	BAAQMD Condition # 11586, Part 14	Deleted after A-8 was removed from service	N/A	N/A

City of Sunnyvale Landfill and SMaRT Station®

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	Facility ID#: A5905
Permitted Unit: S-10 Wood Shredder and A-5 Baghouse Dust Collector	Reporting Period: from 07/01/2022 through 12/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Periods of In-operation for Parametric Monitors	BAAQMD 1-523.4	Operating Records for All Parametric Monitors (manometer at baghouse)	Periodic/ Event Based	BAAQMD 1-523.2	≤ 15 consecutive days per incident and ≤ 30 calendar days per 12-month period	Continuous	N/A
Opacity	BAAQMD Condition # 5369, Parts 5 and 6	Continuous Pressure Drop Across Baghouse, Weekly Inspections, and Records	Continuous and Periodic/ Weekly	BAAQMD Regulation 6-301 and SIP 6-301	≤ Ringelmann No. 1 for 3 minutes/hour	Continuous	N/A
Filterable Particulate (FP)	None	N/A	None	BAAQMD 6-1-310 and SIP 6-310	≤ 0.15 grains/dscf	Continuous	N/A
Particulate Matter (PM)	BAAQMD Condition # 5369, Part 7	Calculations and Records	Periodic/ Daily	BAAQMD 6-1-311 and SIP 6-311	$E = 0.026(P)^{0.67}$ where: E = Allowable Emission Rate (lb/hr); and P = Process Weight Rate (lb/hr) Maximum Allowable Emission Rate = 40 lb/hr For P > 57,320 lb/hr (or P > 28.66 tons/hr)	Continuous	N/A
Wood Waste Throughput	BAAQMD Condition # 5369, Part 7	Records	Periodic/ Daily	BAAQMD Condition # 5369, Part 3	< 255 tons per calendar day	Continuous	N/A

City of Sunnyvale Landfill and SMaRT Station®

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	Facility ID#: A5905
Permitted Unit: S-11 CONVEYOR AND S-5 WOOD CHIP PROCESSING HOPPERS	Reporting Period: from 07/01/2022 through 12/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Opacity	BAAQMD Condition # 5370, Part 3	Visual Observation of Operations	Periodic / Event basis	BAAQMD Regulation 6-301 and SIP 6-301	≤ Ringelmann No. 1 for 3 minutes/hour	Continuous	N/A
PM	BAAQMD Condition # 5370, Part 2	Calculations and Records	Periodic/ Daily	BAAQMD 6-1-311 and SIP 6-311	$E = 0.026(P)^{0.67}$ where: E = Allowable Emission Rate (lb/hr); and P = Process Weight Rate (lb/hr) Maximum Allowable Emission Rate = 40 lb/hr For P > 57,320 lb/hr (or P > 28.66 tons/hr)	Continuous	N/A
Wood Waste Throughput	BAAQMD Condition # 5370, Part 1	Records	Periodic / Daily	BAAQMD Condition # 5370, Part 2	≤ 255 tons per calendar day	Continuous	N/A

City of Sunnyvale Landfill and SMaRT Station®

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	Facility ID#: A5905
Permitted Unit: S-6 WOOD CHIP SCREENING OPERATION	Reporting Period: from 07/01/2022 through 12/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Opacity	BAAQMD Condition # 5371, Part 3	Visual Observation of Operations	Periodic / Event basis	BAAQMD Regulation 6-301 and SIP 6-301	≤ Ringelmann No. 1 for 3 minutes/hour	Continuous	N/A
PM	BAAQMD Condition # 5371, Part 4	Calculations and Records	Periodic/ Daily	BAAQMD 6-1-311 and SIP 6-311	$E = 0.026(P)^{0.67}$ where: E = Allowable Emission Rate (lb/hr); and P = Process Weight Rate (lb/hr) Maximum Allowable Emission Rate = 40 lb/hr For P > 57,320 lb/hr (or P > 28.66 tons/hr)	Continuous	NA
Wood Waste Throughput	BAAQMD Condition # 5371, Part 4	Records	Periodic / Daily	BAAQMD Condition # 5371, Part 1	≤ 255 tons per calendar day	Continuous	N/A

City of Sunnyvale Landfill and SMaRT Station®

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	Facility ID#: A5905
Permitted Unit: S-7 DIESEL ENGINE FOR AN EMERGENCY STANDBY GENERATOR	Reporting Period: from 07/01/2023 through 12/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Opacity	None	N/A	None	BAAQMD 6-1-303 and SIP 6-303	≤ Ringelmann 2.0 for 3 minutes in any hour	Continuous	N/A
FP	None	N/A	None	BAAQMD 6-1-310 and SIP 6-310	≤ 0.15 grains/dscf	Continuous	N/A
SO ₂	None	N/A	None	BAAQMD 9-1-301	Property Line Ground Level Limits: ≤ 0.5 ppm for 3 minutes and ≤ 0.25 ppm for 60 minutes and ≤ 0.05 ppm for 24 hours	Continuous	N/A
SO ₂	CCR Title 13 Title 13, Section 2281(a) (2 and 5), CCR, Title 17, Sections 93115.5 and 93115.10	CARB Diesel Fuel Sulfur Content Limits, Sales Restrictions, Usage Requirement and Records	Periodic / Event basis	BAAQMD 9-1-302	≤ 300 ppm (dry basis)	Continuous	N/A

City of Sunnyvale Landfill and SMaRT Station®

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	Facility ID#: A5905
Permitted Unit: S-7 DIESEL ENGINE FOR AN EMERGENCY STANDBY GENERATOR	Reporting Period: from 07/01/2023 through 12/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Liquid Fuel Sulfur Content	CCR Title 13 Title 13, Section 2281(a) (2 and 5), CCR, Title 17, Sections 93115.5 and 93115.10	CARB Diesel Fuel Sulfur Content Limits, Sales Restrictions, Usage Requirement and Records	Periodic / Event basis	BAAQMD 9-1-304	< 0.5 % sulfur by weight	Continuous	N/A
Liquid Fuel Sulfur Content	CCR, Title 17, Sections 93115.5 and 93115.10	CARB Diesel Fuel Sulfur Content Limits, Sales Restrictions, Usage Requirement and Records	Periodic / Event basis	CCR Title 17, Section 93115.5 (b) and CCR, Title 13, Section 2281(a) (2 and 5)	Standby Engines must use CARB Diesel Fuel or other CARB Approved Alternative Fuel, which has Fuel Sulfur Limits of: ≤ 15 ppmw of S	Continuous	N/A
Operating Hours	BAAQMD 9-8-530 and CCR, Title 17, Section 93115.10 (d)(1) and (f)(1) and BAAQMD Condition # 22820, Parts 3-4	Hour Meter and Records	Continuous and Periodic/ Monthly	BAAQMD 9-8-330.3 and CCR, Title 17, Section 93115.6 (b)(3)(A) (1)(a) and BAAQMD Condition # 22820, Part 1	Operating Hours for Reliability-Related Activities: ≤ 20 hours in a calendar year	Continuous	N/A

City of Sunnyvale Landfill and SMaRT Station®

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	Facility ID#: A5905
Permitted Unit: S-7 DIESEL ENGINE FOR AN EMERGENCY STANDBY GENERATOR	Reporting Period: from 07/01/2023 through 12/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Operating Hours	40 CFR 63.6625(f) and 63.6655(f)(2)	Hour Meter and Records		40 CFR 63.6640 (f)(1)(ii)	Operating Hours for Maintenance Checks, Readiness Testing, and Other Non-Emergency Operation: ≤ 100 hours in a calendar year	Continuous	N/A
Operating Hours	40 CFR 63.6625(f) and 63.6655(f)(2)	Hour Meter and Records		40 CFR 63.6640 (f)(1)(iii)	Operating Hours for Non-Emergency Operation: ≤ 50 hours in a calendar year	Continuous	N/A
Idle Time	None	N/A	None	40 CFR 63.6625(h)	≤30 minutes for start-up	Continuous	N/A

City of Sunnyvale Landfill and SMaRT Station®

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	Facility ID#: A5905
Permitted Unit: S-7 DIESEL ENGINE FOR AN EMERGENCY STANDBY GENERATOR	Reporting Period: from 07/01/2023 through 12/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Maintenance Events	40 CFR 63.6655(e)	Records	Periodic/ Event Basis	40 CFR, Part 63, Subpart ZZZZ, Table 2d 4.a.	Change Oil and Filter: Every 500 hours of operation or annually, whichever comes first	Continuous	N/A
Maintenance Events	40 CFR 63.6655(e)	Records	Periodic/ Event Basis	40 CFR, Part 63, Subpart ZZZZ, Table 2d 4.b.	Inspect Air Cleaner: Every 1,000 hours of operation or annually, whichever comes first	Continuous	N/A
Maintenance Events	40 CFR 63.6655(e)	Records	Periodic/ Event Basis	40 CFR, Part 63, Subpart ZZZZ, Table 2d 4.c.	Inspect Hoses and Belts and (if necessary) Replace Hoses and Belts: Every 500 hours of operation or annually, whichever comes first	Continuous	N/A

City of Sunnyvale Landfill and SMaRT Station®

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	Facility ID#: A5905
Permitted Unit: S-1 SOLID WASTE TRANSFER STATION AND A-1 WET SUPPRESSION SYSTEM	Reporting Period: from 07/01/2023 through 12/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Opacity	BAAQMD Condition # 5367, Part 3	Visual Observation of Operations	Periodic / Event basis	BAAQMD 6-1-301, SIP 6-301, and BAAQMD Condition # 5367, Part 2	≤ Ringelmann No. 1 for 3 minutes/hour	Continuous	N/A
Refuse Throughput	BAAQMD Condition # 5367, Part 4	Records	Periodic / Daily	BAAQMD Condition # 5367, Part 1	≤ 1500 tons per calendar day	Continuous	N/A

City of Sunnyvale Landfill and SMaRT Station®

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	Facility ID#: A5905
Permitted Unit: S-2 WOOD WASTE UNLOADING OPERATION	Reporting Period: from 07/01/2023 through 12/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Opacity	BAAQMD Condition # 5368, Part 5	Visual Observation of Operations	Periodic / Event basis	BAAQMD 6-1-301 and SIP 6-301	≤ Ringelmann No. 1 for 3 minutes/hour	Continuous	N/A
Wood Waste Throughput	BAAQMD Condition # 5368, Part 6	Records	Periodic / Daily	BAAQMD Condition # 5368, Part 3	≤ 298 tons per calendar day	Continuous	N/A

Appendix D – Title V Annual Compliance Certification

City of Sunnyvale Landfill and SMaRT Station®
TITLE V ANNUAL COMPLIANCE CERTIFICATION

SITE: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	FACILITY ID#: A5905
REPORTING PERIOD: <i>from 01/1/2023 through 12/31/2023</i>	

CERTIFICATION:

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

Ramana Chinnakotla

1/26/2024

Signature of Responsible Official

Date

Ramana Chinnakotla

Name of Responsible Official (please print)

Director of Environmental Services

Title of Responsible Official (please print)

Mail to:

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

*U.S. EPA Region IX
Air – 3
75 Hawthorne Street
San Francisco, CA 94105*

City of Sunnyvale Landfill and SMaRT Station®
TITLE V ANNUAL COMPLIANCE CERTIFICATION

SITE: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department	FACILITY ID#: A5905
REPORTING PERIOD: <i>from 01/1/2023 through 12/31/2023</i>	

List of Permitted Sources and Abatement Device

Permit Unit Number	Equipment Description
S-#	Description
S-1	Solid Waste Transfer Station
S-2	Wood Waste Unloading Operation
S-3*	Wood Shredder
S-4*	Conveyor
S-5	Wood Chip Processing
S-6**	Wood Chip Screening
S-7	Diesel Engine (Emergency Standby Generator)
S-8	Gas Collection System: 66 Vertical Extraction Wells and 13 Horizontal Collectors
S-10****	Wood Shredder
S-11****	Conveyor
A-1	Wet Suppression System
A-5	Bag House Dust Collector
A-8***	Landfill Gas Flare, 45 MM BTU/hr
A-9	Landfill Gas Flare, 600 SCFM of waste gas, 18 MM BTU/hr

*Notes: *S-3 was replaced by S-10 and S-4 was replaced by S-11 per application #26967. Permit to Operate (PTO) issued August 6, 2015.
 **S-6 was taken out of service permanently on 12/5/2016.
 ***A-8 was taken out of service permanently on 9/3/13; A-9 was started up on 9/3/13
 ****S-10 and S-11 were included in the PTO issued January 21, 2022.*

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®,
Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-8 Landfill and A-9 Flare

Source Name: City of Sunnyvale Sanitary Landfill and Flare

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
BAAQMD Regulation 1	General Provisions and Definitions (5/4/11)			
1-301	Public Nuisance	Y	Continuous	N/A
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	Continuous	N/A
1-523.1	Parametric monitor periods of inoperation >24 hours	Y	Continuous	N/A
1-523.2	Limit on duration of inoperation	Y	Continuous	N/A
1-523.3	Reports of Violations	Y	Continuous	N/A
1-523.4	Records	Y	Continuous	N/A
1-523.5	Maintenance and calibration	Y	Continuous	N/A
SIP Regulation 1	General Provisions and Definitions (6/28/99)			
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	Continuous	N/A
1-523.3	Reports of Violations	Y	Continuous	N/A
BAAQMD Regulation 6 Rule 1	Particulate Matter – General Requirements (12/5/07)			
6-1-301	Ringelmann No. 1 Limitation (applies to flare only)	Y	Continuous	N/A
6-1-305	Visible Particles (applies to flare only)	Y	Continuous	N/A
6-1-310	Particle Weight Limitation (applies to flare only)	Y	Continuous	N/A
6-1-401	Appearance of Emissions (applies to flare only)	Y	Continuous	N/A
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)			
6-301	Ringelmann No. 1 Limitation (applies to flare only)	Y	Continuous	N/A
6-305	Visible Particles (applies to flare only)	Y	Continuous	N/A
6-310	Particle Weight Limitation (applies to flare only)	Y	Continuous	N/A
6-401	Appearance of Emissions (applies to flare only)	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®,
Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-8 Landfill and A-9 Flare

Source Name: City of Sunnyvale Sanitary Landfill and Flare

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
BAAQMD Regulation 8, Rule 34	Organic Compounds – Solid Waste Disposal Sites			
8-34-113	Limited Exemption, Inspection and Maintenance	Y	Continuous	N/A
8-34-113.1	Emission Minimization Requirement	Y	Continuous	N/A
8-34-113.2	Shutdown Time Limitation	Y	Continuous	N/A
8-34-113.3	Recordkeeping Requirement	Y	Continuous	N/A
8-34-117	Limited Exemption, Gas Collection System Components	Y	Continuous	N/A
8-34-117.1	Necessity of Existing Component Repairs/Adjustments	Y	Continuous	N/A
8-34-117.2	New Components are Described in Collection and Control System Design Plan	Y	Continuous	N/A
8-34-117.3	Meet Section 8-34-118 Requirements	Y	Continuous	N/A
8-34-117.4	Limits on Number of Wells Shutdown	Y	Continuous	N/A
8-34-117.5	Shutdown Duration Limit	Y	Continuous	N/A
8-34-117.6	Well Disconnection Records	Y	Continuous	N/A
8-34-118	Limited Exemption, Construction Activities	Y	Continuous	N/A
8-34-118.1	Construction Plan	Y	Continuous	N/A
8-34-118.2	Activity is Required to Maintain Compliance with this Rule	Y	Continuous	N/A
8-34-118.3	Required or Approved by Other Enforcement Agencies	Y	Continuous	N/A
8-34-118.4	Emission Minimization Requirement	Y	Continuous	N/A
8-34-118.5	Excavated Refuse Requirements	Y	Continuous	N/A
8-34-118.6	Covering Requirements for Exposed Refuse	Y	Continuous	N/A
8-34-118.7	Installation Time Limit	Y	Continuous	N/A
8-34-118.8	Capping Required for New Components	Y	Continuous	N/A
8-34-118.9	Construction Activity Records	Y	Continuous	N/A
8-34-119	Limited Exemption, Inactive or Closed Landfills	Y	Continuous	N/A
8-34-120	Limited Exemption, Small Design Capacity Landfills	Y	Continuous	N/A

Compliance Certification Report

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Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-8 Landfill and A-9 Flare

Source Name: City of Sunnyvale Sanitary Landfill and Flare

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
8-34-301	Landfill Gas Collection and Emission Control System Requirements	Y	Continuous	N/A
8-34-301.1	Continuous Operation	Y	Intermittent	Seven unplanned shutdowns of the GCCS occurred on December 31, 2022 into January 1-2, 2023, January 9, January 16, January 19, January 31, and September 14, 2023. RCA Notification Forms and follow-up reports were submitted by the City and breakdown relief was requested. Submittals are provided in Appendix E. The RCAs from December 31, 2022 to January 19, 2023 resulted in an NOV, issued on March 8, 2023, for which a response was submitted and is included in Appendix E.
8-34-301.2	Collection and Control Systems Leak Limitations	Y	Continuous	N/A
8-34-301.3	Limits for Enclosed Flares (applies to flare only)	Y	Continuous	N/A
8-34-303	Landfill Surface Requirements	Y	Continuous	N/A
8-34-304	Gas Collection System Installation Requirements	Y	Continuous	N/A
8-34-304.1	Based on Waste Age For Inactive or Closed Areas	Y	Continuous	N/A
8-34-304.3	Based on Amount of Decomposable Waste Accepted	Y	Continuous	N/A
8-34-304.4	Based on NMOC Emission Rate	Y	Continuous	N/A
8-34-404	Less Than Continuous Operation Petition	Y	Continuous	N/A
8-34-405	Design Capacity Reports	Y	Continuous	N/A
8-34-408	Collection and Control System Design Plans	Y	Continuous	N/A
8-34-408.2	Sites With Existing Collection and Control Systems	Y	Continuous	N/A
8-34-411	Annual Report	Y	Continuous	N/A
8-34-415	Repair Schedule for Surface Leak Excesses	Y	Continuous	N/A
8-34-415.1	Records of Excesses	Y	Continuous	N/A
8-34-415.2	Corrective Action	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®,
Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-8 Landfill and A-9 Flare

Source Name: City of Sunnyvale Sanitary Landfill and Flare

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
8-34-415.3	Re-monitor Excess Location Within 10 Days	Y	Continuous	N/A
8-34-415.4	Re-monitor Excess Location Within 1 Month	Y	Continuous	N/A
8-34-415.5	If No More Excesses, No Further Re-Monitoring	Y	Continuous	N/A
8-34-415.6	Additional Corrective Action	Y	Continuous	N/A
8-34-415.7	Re-monitor Second Excess Within 10 days	Y	Continuous	N/A
8-34-415.8	Re-monitor Second Excess Within 1 Month	Y	Continuous	N/A
8-34-415.9	If No More Excesses, No Further Re-monitoring	Y	Continuous	N/A
8-34-415.10	Collection System Expansion for Third Excess in a Quarter	Y	Continuous	N/A
8-34-415.11	Operational Due Date for Expansion	Y	Continuous	N/A
8-34-416	Cover Repairs	Y	Continuous	N/A
8-34-501	Operating Records	Y	Continuous	N/A
8-34-501.1	Collection System Downtime	Y	Continuous	N/A
8-34-501.2	Emission Control System Downtime	Y	Continuous	N/A
8-34-501.3	Continuous Temperature Records for Enclosed Combustors (applies to flare only)	Y	Continuous	N/A
8-34-501.4	Testing	Y	Continuous	N/A
8-34-501.6	Leak Discovery and Repair Records	Y	Continuous	N/A
8-34-501.7	Waste Acceptance Records	Y	Continuous	N/A
8-34-501.8	Non-decomposable Waste Records	Y	Continuous	N/A
8-34-501.9	Wellhead Excesses and Repair Records	Y	Continuous	N/A
8-34-501.10	Gas Flow Rate Records for All Emission Control Systems	Y	Intermittent	Nine periods of control device operation during which gas flow was not recorded occurred during this reporting period. No period of inoperation exceeded 24 hours (See Applicable Requirement for 1-523.1 above)
8-34-501.12	Records Retention for 5 Years	Y	Continuous	N/A
8-34-503	Landfill Gas Collection and Emission Control System Leak Testing	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®,
Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-8 Landfill and A-9 Flare

Source Name: City of Sunnyvale Sanitary Landfill and Flare

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
8-34-504	Portable Hydrocarbon Detector	Y	Continuous	N/A
8-34-507	Continuous Temperature Monitor and Recorder (applies to flares only)	Y	Continuous	N/A
8-34-508	Gas Flow Meter	Y	Continuous	N/A
8-34-510	Cover Integrity Monitoring	Y	Continuous	N/A
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (3/15/95)			
9-1-301	Limitations on Ground Level Concentrations (applies to flare only)	Y	Continuous	N/A
9-1-302	General Emission Limitations (applies to flare only)	Y	Continuous	N/A
BAAQMD Regulation 9, Rule 2	Inorganic Gaseous Pollutants – Hydrogen Sulfide (10/6/99)			
9-2-301	Limitations on Hydrogen Sulfide	Y	Continuous	N/A
BAAQMD Condition # 11586				
Part 1	Waste disposal limitations (Regulation 2-1-301)	Y	Continuous	NA
Part 2	Landfill gas collection system operating requirements (Regulations 8-34-301, 8-34-303, 8-34-304)	Y	Intermittent	Seven unplanned shutdowns of the Gas Collection and Control System occurred during this report (see Requirements for 8-34-301.1 above)
Part 3	Landfill gas collection system description and alteration provisions modifications (Regulations 8-34-303, 8-34-304)	Y	Continuous	N/A
Part 4	Landfill gas control requirements (Regulations 8-34-301 and 8-34-301.1)	Y	Continuous	N/A
Part 5	Landfill gas flare operating and maintenance requirements (Regulations 8-34-301 and 8-34-301.1)	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®,
Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-8 Landfill and A-9 Flare

Source Name: City of Sunnyvale Sanitary Landfill and Flare

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
Part 6	Flow meter requirement for flares (Regulations 8-34-301.1 and 8-34-508 and Cumulative Increase)	Y	Continuous	N/A
Part 7	Alarm requirements for flares (Regulations 8-34-301)	Y	Continuous	N/A
Part 8	NOx emissions limit for A-9 Flare (RACT)	Y	Continuous	N/A
Part 9	CO emissions limit for A-9 Flare (RACT)	Y	Continuous	N/A
Part 10	NMOC emissions limit A-9 Flare (Cumulative Increase, Regulation 2-1-301.3, and 8-34-301.3)	Y	Continuous	N/A
Part 11	Flare temperature limits and monitoring requirements (Regulations 2-5-301, 8-34-301.3, 8-34-501.3, and 8-34-507)	Y	Continuous	N/A
Part 12	Flare source test requirements (Cumulative Increase, RACT, and Regulations 2-5-301, 8-34-301.3, 8-34-507, and 9-1-302)	Y	Continuous	N/A
Part 13	Landfill gas characterization testing requirements (AB-2588 Air Toxic Hot Spots and Regulation 2-5-302)	Y	Continuous	N/A
Part 14	Flare replacement project shut-down and notification submitted (Cumulative Increase)	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-1 Solid Waste Transfer Station

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
BAAQMD Regulation 1	General Provisions and Definitions (5/4/11)			
1-301	Public Nuisance	Y	Continuous	N/A
BAAQMD Regulation 6, Rule 1	Particulate Matter – General Requirements (12/5/07)			
6-1-301	Ringelmann No. 1 Limitation	Y	Continuous	N/A
6-1-305	Visible Particles	Y	Continuous	N/A
6-1-401	Appearance of Emissions	Y	Continuous	N/A
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)			
6-301	Ringelmann No. 1 Limitation	Y	Continuous	N/A
6-305	Visible Particles	Y	Continuous	N/A
6-401	Appearance of Emissions	Y	Continuous	N/A
BAAQMD Condition #5367				
Part 1	Throughput limit (Cumulative Increase)	Y	Continuous	N/A
Part 2	Particulate emission control measures and visible emissions and dust fallout limitations (Regulations 1-301, 2-1-403, 6-1-301, and 6-1-305)	Y	Continuous	N/A
Part 3	Visual monitoring and corrective action requirements (Regulation 2-1-403, 6-1-301, and 6-1-305)	Y	Continuous	N/A
Part 4	Record Keeping (Cumulative Increase)	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-2 Wood Waste Unloading

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
BAAQMD Regulation 1	General Provisions and Definitions (5/4/11)			
1-301	Public Nuisance	Y	Continuous	N/A
BAAQMD Regulation 6, Rule 1	Particulate Matter – General Requirements (12/5/07)			
6-1-301	Ringelmann No. 1 Limitation	Y	Continuous	N/A
6-1-305	Visible Particles	Y	Continuous	N/A
6-1-401	Appearance of Emissions	Y	Continuous	N/A
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)			
6-301	Ringelmann No. 1 Limitation	Y	Continuous	N/A
6-305	Visible Particles	Y	Continuous	N/A
6-401	Appearance of Emissions	Y	Continuous	N/A
BAAQMD Condition # 5368				
Part 1	Waste acceptance limitation (Cumulative Increase and Regulation 2-5-110)	Y	Continuous	N/A
Part 2	Waste handling limitation (Cumulative Increase)	Y	Continuous	N/A
Part 3	Throughput limit (Cumulative Increase)	Y	Continuous	N/A
Part 4	Abatement Requirements (Cumulative Increase)	Y	Continuous	N/A
Part 5	Visual monitoring and corrective action requirements (Regulation 2-1-403, 6-1-301, and 6-1-305)	Y	Continuous	N/A
Part 6	Record Keeping (Cumulative Increase and Regulation 2-1-403)	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-10 Wood Shredder and A-5 Baghouse Dust Collector

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
BAAQMD Regulation 1	General Provisions and Definitions (5/4/11)			
1-301	Public Nuisance	Y	Continuous	N/A
1-523	Parametric Monitoring and Record keeping Procedures	Y	Continuous	N/A
1-523.1	Reporting requirement for periods of inoperation > 24 hours	Y	Continuous	N/A
1-523.2	Limit on duration of inoperation	Y	Continuous	N/A
1-523.3	Reporting requirement for violations of any applicable limits	Y	Continuous	N/A
1-523.4	Records of inoperation, tests, calibrations, adjustments, & maintenance	Y	Continuous	N/A
1-523.5	Maintenance and calibration	Y	Continuous	N/A
SIP Regulation 1	General Provisions and Definitions (6/28/99)			
1-523	Parametric Monitoring and Record keeping Procedures	Y	Continuous	N/A
1-523.3	Reports of Violations	Y	Continuous	N/A
BAAQMD Regulation 6, Rule 1	Particulate Matter – General Requirements (12/5/07)			
6-1-301	Ringelmann No. 1 Limitation	Y	Continuous	N/A
6-1-305	Visible Particles	Y	Continuous	N/A
6-1-310	Particulate grain loading limitation	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-10 Wood Shredder and A-5 Baghouse Dust Collector

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
6-1-311	General Operations: emission limitation based on processing rate	Y	Continuous	N/A
6-1-401	Appearance of Emissions	Y	Continuous	N/A
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)			
6-301	Ringelmann No. 1 Limitation	Y	Continuous	N/A
6-305	Visible Particles	Y	Continuous	N/A
6-310	Particulate grain loading limitation	Y	Continuous	N/A
6-311	General Operations: emission limitation based on processing rate	Y	Continuous	N/A
6-401	Appearance of Emissions	Y	Continuous	N/A
BAAQMD Condition # 5369				
Part 1	Waste processing limitation (Cumulative Increase and Regulation 2-5-110)	Y	Continuous	N/A
Part 2	Enclosure requirement (Cumulative Increase)	Y	Continuous	N/A
Part 3	Throughput limit (Cumulative Increase)	Y	Continuous	N/A
Part 4	Baghouse control requirement (Cumulative Increase)	Y	Continuous	N/A
Part 5	Baghouse pressure monitoring requirement (Regulation 2-1-403)	Y	Continuous	N/A
Part 6	Baghouse Inspection and Maintenance Records (Regulation 2-1-403)	Y	Continuous	N/A
Part 7	Wood Waste Throughput Records (Cumulative Increase and Regulation 2-1-403)	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-10 Wood Shredder and A-5 Baghouse Dust Collector

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
BAAQMD Condition # 5370				
Part 1	Throughput limit (Cumulative Increase)	Y	Continuous	N/A
Part 2	Record Keeping (Cumulative Increase and Regulation 2-1-403)	Y	Continuous	N/A
Part 3	Visual monitoring and corrective action requirements (Regulation 2-1-403, 6-1-301, and 6-1-305)	Y	Continuous	N/A

Compliance Certification Report

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Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

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Zip Code: 94089

Source #: S-11 Conveyor and S-5 Wood Chip Processing Hoppers

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
BAAQMD Regulation 1	General Provisions and Definitions (5/4/11)			
1-301	Public Nuisance	Y	Continuous	N/A
BAAQMD Regulation 6, Rule 1	Particulate Matter – General Requirements (12/5/07)			
6-1-301	Ringelmann No. 1 Limitation	Y	Continuous	N/A
6-1-305	Visible Particles	Y	Continuous	N/A
6-1-311	General Operations: emission limitation based on processing rate	Y	Continuous	N/A
6-1-401	Appearance of Emissions	Y	Continuous	N/A
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)			
6-301	Ringelmann No. 1 Limitation	Y	Continuous	N/A
6-305	Visible Particles	Y	Continuous	N/A
6-311	General Operations: emission limitation based on processing rate	Y	Continuous	N/A
6-401	Appearance of Emissions	Y	Continuous	N/A
BAAQMD Condition # 5369				
Part 1	Waste processing limitation (Cumulative Increase and Regulation 2-5-110)	Y	Continuous	N/A
Part 2	Enclosure requirement (Cumulative Increase)	Y	Continuous	N/A
Part 3	Throughput limit (Cumulative Increase)	Y	Continuous	N/A
Part 4	Baghouse control requirement (Cumulative Increase)	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-11 Conveyor and S-5 Wood Chip Processing Hoppers

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
Part 5	Baghouse pressure monitoring requirement (Regulation 2-1-403)	Y	Continuous	N/A
Part 6	Baghouse Inspection and Maintenance Records (Regulation 2-1-403)	Y	Continuous	N/A
Part 7	Wood Waste Throughput Records (Cumulative Increase and Regulation 2-1-403)	Y	Continuous	N/A
BAAQMD Condition # 5370				
Part 1	Throughput limit (Cumulative Increase)	Y	Continuous	N/A
Part 2	Record Keeping (Cumulative Increase and Regulation 2-1-403)	Y	Continuous	N/A
Part 3	Visual monitoring and corrective action requirements (Regulation 2-1-403, 6-1-301, and 6-1-305)	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-6 Wood Chip Screening Operation

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
BAAQMD Regulation 6, Rule 1	Particulate Matter – General Requirements (12/5/07)			
6-1-301	Ringelmann No. 1 Limitation	Y	Continuous	N/A
6-1-305	Visible Particles	Y	Continuous	N/A
6-1-311	General Operations: emission limitation based on processing rate	Y	Continuous	N/A
6-1-401	Appearance of Emissions	Y	Continuous	N/A
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)			
6-301	Ringelmann No. 1 Limitation	Y	Continuous	N/A
6-305	Visible Particles	Y	Continuous	N/A
6-311	General Operations: emission limitation based on processing rate	Y	Continuous	N/A
6-401	Appearance of Emissions	Y	Continuous	N/A
BAAQMD Condition # 5371				
Part 1	Throughput limit (Cumulative Increase)	Y	Continuous	N/A
Part 2	Operating requirement (Cumulative Increase)	Y	Continuous	N/A
Part 3	Visual monitoring and corrective action requirements (Regulation 2-1-403, 6-1-301, and 6-1-305)	Y	Continuous	N/A
Part 4	Record Keeping (Cumulative Increase and Regulation 2-1-403)	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-7 Diesel engine for stand-by generator

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
BAAQMD Regulation 6, Rule 1	Particulate Matter – General Requirements (12/5/07)			
6-1-303	Ringelmann No. 2 Limitation	Y	Continuous	N/A
6-1-303.1	Internal combustion engines below 1500 cubic inches displacement or standby engines	Y	Continuous	N/A
6-1-305	Visible Particles	Y	Continuous	N/A
6-1-310	Particulate grain loading limitation	Y	Continuous	N/A
6-1-401	Appearance of Emissions	Y	Continuous	N/A
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)			
6-1-303	Ringelmann No. 2 Limitation	Y	Continuous	N/A
6-1-303.1	Internal combustion engines below 1500 cubic inches displacement or standby engines	Y	Continuous	N/A
6-305	Visible Particles	Y	Continuous	N/A
6-310	Particulate grain loading limitation	Y	Continuous	N/A
6-401	Appearance of Emissions	Y	Continuous	N/A
BAAQMD Regulation 8, Rule 1	Organic Compounds – General Provisions (6/15/94)			
8-1-110.2	Exemptions – internal combustion engine	Y	Continuous	N/A
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (3/15/95)			

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-7 Diesel engine for stand-by generator

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
9-1-301	Limitations on Ground Level Concentrations	Y	Continuous	N/A
9-1-304	Liquid and Solid Fuels	Y	Continuous	N/A
BAAQMD Regulation 9, Rule 8	Inorganic Gaseous Pollutants – Nitrogen Oxides and Carbon Monoxide from Stationary Internal Combustion Engines (7/25/07)			
9-8-110	Exemptions (from emission limits only)	Y	Continuous	N/A
9-8-110.5	For Emergency Standby Engines	Y	Continuous	N/A
9-8-330	Emergency Standby Engines, Hours of Operation	Y	Continuous	N/A
9-8-330.1	For Emergency Use	Y	Continuous	N/A
9-8-330.3	For Reliability-Related Activities	Y	Continuous	N/A
9-8-502	Record keeping	Y	Continuous	N/A
9-8-502.1	For Exempt Engines	Y	Continuous	N/A
9-8-530	Emergency Standby Engines, Monitoring and Record keeping	Y	Continuous	N/A
9-8-530.1	Hours of Operation (total)	Y	Continuous	N/A
9-8-530.2	Hours of Operation (emergency)	Y	Continuous	N/A
9-8-530.3	Nature of Each Emergency Condition	Y	Continuous	N/A
SIP Regulation 9, Rule 8	Inorganic Gaseous Pollutants – Nitrogen Oxides and Carbon Monoxide from Stationary Internal Combustion Engines (12/15/97)			
9-8-110	Exemptions	Y	Continuous	N/A
9-8-110.2	For Liquid Fueled Engines	Y	Continuous	N/A
40 CFR Part 63, Subpart A	National Emission Standards for Hazardous Air Pollutants- General Provisions (9/13/10)			

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-7 Diesel engine for stand-by generator

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
63.4	Prohibited activities and circumvention	Y	Continuous	N/A
63.5	Preconstruction review and notification requirements	Y	Continuous	N/A
63.5(b)	Requirements for existing, newly constructed, and reconstructed sources	Y	Continuous	N/A
63.6	Compliance with standards and maintenance requirements	Y	Continuous	N/A
63.8	Monitoring requirements	Y	Continuous	N/A
63.10	Record keeping and reporting requirements	Y	Continuous	N/A
63.10(b)	General record keeping requirements	Y	Continuous	N/A
63.10(c)	Additional record keeping requirements for sources with continuous monitoring systems	Y	Continuous	N/A
63.10(d)	General reporting requirements	Y	Continuous	N/A
63.10(e)	Additional reporting requirements for sources with continuous monitoring systems	Y	Continuous	N/A
40 CFR Part 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) (8/20/10)			
63.6585	Applicability	Y	Continuous	N/A
63.6585(a)	Applicable to stationary RICE	Y	Continuous	N/A
63.6585(c)	Applicable to area source of HAPs	Y	Continuous	N/A
63.6590	What parts of my plant does this subpart cover?	Y	Continuous	N/A
63.6590(a)	Affected source is any existing, new or reconstructed stationary RICE located at area source of HAP emission	Y	Continuous	N/A
63.6590(a)(1)	Existing stationary RICE is:	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-7 Diesel engine for stand-by generator

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
63.6590(a)(1)(iii)	Existing stationary RICE at an area source of HAP emissions	Y	Continuous	N/A
63.6595	When do I have to comply with this subpart?	Y	Continuous	N/A
63.6595(a)	Compliance Date for affected sources	Y	Continuous	N/A
63.6595(a)(1)	Compliance Date for an existing stationary RICE located at an area source of HAP emissions	Y	Continuous	N/A
63.6603	What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions? See Table 2d	Y	Continuous	N/A
63.6603(a)	Operating limitations for existing stationary RICE located at an area source of HAP emissions	Y	Continuous	N/A
63.6625	What are my monitoring, installation, collection, operation, and maintenance requirements?	Y	Continuous	N/A
63.6625(e)		Y	Continuous	N/A
63.6625(e)(3)	Operate and maintain the existing stationary RICE according to manufacturer's emission-related written instructions	Y	Continuous	N/A
63.6625(f)	Install a non-resettable hour meter for an existing emergency stationary RICE located at an area source of HAP emissions	Y	Continuous	N/A
63.6625(h)	Minimize existing stationary engine idle time, not to exceed 30 minutes	Y	Continuous	N/A
63.6640	How do I demonstrate continuous compliance with the emission limitations and operating limitations?	Y	Continuous	N/A
63.6640(f)	Requirements for emergency stationary RICE	Y	Continuous	N/A
63.6640(f)(i)	No time limit on use during emergency situations	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-7 Diesel engine for stand-by generator

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
63.6640(f)(ii)	Maintenance checks and readiness testing annual hour limit	Y	Continuous	N/A
63.6640(f)(iii)	Non-emergency operation annual hour limit	Y	Continuous	N/A
63.6645	What notifications must I submit and when?	Y	Continuous	N/A
63.6645(a)	Submit all notifications that apply	Y	Continuous	N/A
63.6645(a)(5)	Notification requirement do not apply for an existing stationary emergency RICE	Y	Continuous	N/A
63.6655	What Records must I keep?	Y	Continuous	N/A
63.6655(e)	Keep records of maintenance conducted	Y	Continuous	N/A
63.6655(e)(2)	Maintenance records for an existing stationary emergency RICE	Y	Continuous	N/A
63.6655(f)	Keep records of hours of operation using non-resettable fuel meter and document emergency hours and purpose of any other operation	Y	Continuous	N/A
63.6655(f)(2)	Hours of Operation for an existing emergency RICE	Y	Continuous	N/A
63.6660	In what form and how long must I keep records?	Y	Continuous	N/A
63.6665	What parts of the general provisions apply to me?	Y	Continuous	N/A
Table 2d to Part 63, Subpart ZZZZ	Requirements for Existing Stationary RICE located at Area Sources of HAP Emissions	Y	Continuous	N/A
Table 2d.4.a.	Schedule for oil and filter change	Y	Continuous	N/A
Table 2d.4.b.	Schedule for air cleaner inspection	Y	Continuous	N/A
Table 2d.4.c.	Schedule for hoses and belts inspection	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-7 Diesel engine for stand-by generator

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
Table 6 to Part 63, Subpart ZZZZ	Continuous Compliance With Emission Limitations, Operating Limitations, Work Practices, and Management Practices	Y	Continuous	N/A
Table 6.9.a.	Work or Management practices for existing emergency located at an area source of HAP emissions	Y	Continuous	N/A
CCR Title 17, Section 93115	Airborne Toxic Control Measure for Stationary Compression Ignition Engines (10/18/07)			
§93115.5	Fuel and Fuel Additive Requirements for New and In-Use Stationary CI Engines That Have a Rated Brake Horsepower of Greater Than (>50 bhp)	Y	Continuous	N/A
93115.5(b)	Fuel requirements, in-use emergency standby diesel CI engines	Y	Continuous	N/A
§93115.6	Emergency Standby Diesel-Fueled CI Engine (>50 bhp) Operating Requirements and Emission Standards	Y	Continuous	N/A
§93115.6(b)	For In-Use Emergency Standby Diesel Fueled CI Engines	Y	Continuous	N/A
§93115.6(b)(3)	Emission Standards and Operating Requirements	Y	Continuous	N/A
§93115.6(b)(3)(A)	Diesel PM Standards and Hours of Operation Limitations	Y	Continuous	N/A
§93115.6(b)(3)(A)(1)	General Requirements	Y	Continuous	N/A
93115.6(b)(3)(A)(1)(a)	Reliability related operating time limitation	Y	Continuous	N/A

Compliance Certification Report

Site #: A5905

Site Name: City of Sunnyvale Landfill and SMaRT Station®, Environmental Services Department

Reporting Period: 1/1/2023 to 12/31/2023

Address: 301 Carl Road

City: Sunnyvale

Zip Code: 94089

Source #: S-7 Diesel engine for stand-by generator

Source Name: Solid Waste Transfer Station

Applicable Requirement	Regulation Title or Description of Requirement	Compliance (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
§93115.10	Record keeping, Reporting and Monitoring Requirements	Y	Continuous	N/A
§93115.10(d)	Monitoring Equipment	Y	Continuous	N/A
93115.10(d)(1)	Non-resettable totalizing hour meter	Y	Continuous	N/A
§93115.10(f)	Reporting Requirements for Emergency Standby-Engines	Y	Continuous	N/A
§93115.10(f)(1)	Records and Monthly Summary	Y	Continuous	N/A
§93115.10(f)(2)	Records Retention and Availability	Y	Continuous	N/A
BAAQMD Condition # 22820				
Part 1	Operating Time Limitation (CCR, Title 17, Section 93115.6(b)(3)(A)(1)(a))	Y	Continuous	N/A
Part 2	Other Operational Limitations (CCR, Title 17, Section 93115.6(b)(3)(A)(1)(a))	Y	Continuous	N/A
Part 3	Meter Requirements (CCR, Title 17, Section 93115.10(d)(1))	Y	Continuous	N/A
Part 4	Record Keeping Requirements (CCR, Title 17, Section 93115.10(f) or Regulation 2-6-501)	Y	Continuous	N/A

Appendix E - BAAQMD Communication



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable
Compliance
Activity (RCA)

[See back of form for instructions](#) →

1. **BREAKDOWN RELIEF: *District Use Only* BREAKDOWN REFERENCE #:**

2. **MONITOR EXCESS EMISSION or EXCURSION: *District Use Only* REFERENCE #:**

3. **MONITOR IS INOPERATIVE: *District Use Only* REFERENCE #:**

4. **PRESSURE RELIEF DEVICE (PRD): *District Use Only* PRD REFERENCE #:**

SITE INFORMATION AND DESCRIPTION INFORMATION (REQUIRED)

Company	City of Sunnyvale, ESD, Solid Waste Div.	Site #	5905
Address	Borregas Avenue and Caribbean Drive	Source #	S-8
Reported by	William Theyskens	Phone #	408 730-7718
Indicated Excess		Fax #	
Allowable Limit		Averaging Time	
Start Time/Date	01:49, 11/8/22	Clear Time	02:30, 11/9/22
Monitor/device type(s)	<input type="checkbox"/> ▶ CEM <input type="checkbox"/> ▶ GLM <input type="checkbox"/> ▶ Parametric <input type="checkbox"/> ▶ PRD <input type="checkbox"/> ▶ Non-monitor		
Monitor description(s)			
Parameter(s) exceeded or not functioning due to inoperation			
<input type="checkbox"/> ▶ NO _x <input type="checkbox"/> ▶ SO ₂ <input type="checkbox"/> ▶ CO <input type="checkbox"/> ▶ CO ₂ <input type="checkbox"/> ▶ H ₂ S <input type="checkbox"/> ▶ TRS <input type="checkbox"/> ▶ NH ₃			
<input type="checkbox"/> ▶ O ₂ <input type="checkbox"/> ▶ H ₂ O <input type="checkbox"/> ▶ Opacity <input type="checkbox"/> ▶ Lead <input type="checkbox"/> ▶ Gauge Pressure <input checked="" type="checkbox"/> ▶ Flow			
<input type="checkbox"/> ▶ Hydrocarbon Breakthrough (VOC) <input type="checkbox"/> ▶ Temperature <input type="checkbox"/> ▶ Wind Speed			
<input type="checkbox"/> ▶ Wind Direction <input type="checkbox"/> ▶ Steam <input type="checkbox"/> ▶ Other (describe)			
Unit(s) of Measurement			
<input type="checkbox"/> ▶ ppm <input type="checkbox"/> ▶ ppb <input type="checkbox"/> ▶ min/hr > 20% <input type="checkbox"/> ▶ inches H ₂ O <input type="checkbox"/> ▶ mmHg			
<input type="checkbox"/> ▶ psig <input type="checkbox"/> ▶ pH <input type="checkbox"/> ▶ °Fahrenheit <input type="checkbox"/> ▶ Other (describe)			

Event Description:

Rainfall on November 7th through 9th, 2022, was apparently responsible for an inability to transport Landfill Gas to the PGF or to the LFG Flare. Efforts to remove the "liquid plug" present at condensate trap CT-1, adjacent to main Valve V-1, were not immediately successful. After pumping liquid from CT-1, and noting a decrease in the liquid level, additional attempts were made to start the flare and continue to clean out the pipe network. The LFGF was then started successfully at approximately 02:30. At approximately 03:00, the switch was successfully made to the PGF.

District Use Only

Received by

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 rca@baaqmd.gov
- ✓ **A 30-day written follow-up report is required for Breakdown Requests and PRD Releases.** Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference [Breakdown Admissions Advisory dated 12/3/04](#). Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: **You may have additional report requirements under Title V.**

Detailed Instructions

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

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

- 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 immediately upon discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

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

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

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

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

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

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

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

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

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



Sunnyvale

SMaRT Station®
301 Carl Road
Sunnyvale, CA 94089
TDD/TYY 408-730-7501
sunnyvale.ca.gov

November 18, 2022

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

Re: 10-day/30-day Deviation Report for S-8 City of Sunnyvale Sanitary Landfill, Facility #A5905

To whom it may concern,

This Deviation Report is submitted in compliance with Provision I.F of the Title V-Major Facility Review Permit for Plant #A5905, which states that, “...*all instances of non-compliance with permit shall be reported in writing to the District’s Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions.*” This report is intended to serve as the 10-day and 30-day Deviation Report, and the 30-day RCA report requirements for RCA #08N18 (Breakdown Relief) and #08N19 (Monitor Excess Emission or Excursion). The subject incident involves a relatively short-term shutdown of the Sunnyvale Landfill (Source S- 8) gas collection and control system (GCCS).

Incident Description

Rainfall from November 7th through November 9th is believed to have contributed to a higher than usual amount of LFG condensate generation, which appears to have contributed to issues encountered with the transport of LFG through the pipe network. At 0145 a blown transformer caused loss of power to the LFG and mixed gas (MG) flow meters. Temporary power was supplied to the LFG and MG flow meters at 1322. Although the MG meter showed flow the LFG showed zero flow. It was assumed the LFG meter was not functioning when in fact, it was functioning but LFG flows were too low for the meter to record. At 0242, LFG flows to PGF



started to decline, as indicated by an increase of MG flow to PGF. At 1556, one of the two PGF engines was secured due to a decline in LFG flow. Efforts were made to reduce the excess condensate in the pipe network in two locations in the field, which were suspected of restricting gas flow. Unfortunately, the resulting flow of gas was not sufficient to sustain PGF. It was later apparent that condensate trap CT-1E was full of condensate and backing up in the pipe network, causing a restriction of LFG flow. CT-1E is located directly in front of the LFGF station, where all LFG flow merges and is then directed to either the PGF or LFGF. The pump inside CT-1E had issues with pumping the large amounts of condensate as fast as it was coming into the trap. On 11/9/22 at 0915 the LFG field isolation valve was closed to allow the condensate level to be drawn down at CT-1E. At 1254 the field isolation valve was opened and unsuccessful efforts were made to start the PGF due to poor gas quality. The decision was made to start the LFGF. After a few attempts to start the LFGF, it was successfully started at 1313. At 1433, the LFGF was secured and #2 PGF was started. At 1454, #2 PGF was identified as being unstable, so it was taken offline and #1 PGF was started. At 1513 both the PGFs were in service at their normal 600kw output, signaling the gas system was back to normal operating mode.

Based on this data and the fact that it had rained for several days, we believe it is unlikely that a significant release of LFG would have occurred during the downtime.

Sincerely,

David Krueger

David Krueger
Solid Waste Programs Division Manager




1108 110922_10- and 30-day report

Final Audit Report

2022-11-19

Created:	2022-11-18
By:	McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAA6nLE4nzPIP7QPL7rXsGWJ7M8D9hweeV4

"1108 110922_10- and 30-day report" History

-  Document created by McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
2022-11-18 - 7:32:45 PM GMT
-  Document emailed to David Krueger (dkrueger@sunnyvale.ca.gov) for signature
2022-11-18 - 7:33:07 PM GMT
-  Email viewed by David Krueger (dkrueger@sunnyvale.ca.gov)
2022-11-19 - 0:47:50 AM GMT
-  Document e-signed by David Krueger (dkrueger@sunnyvale.ca.gov)
Signature Date: 2022-11-19 - 0:48:15 AM GMT - Time Source: server
-  Agreement completed.
2022-11-19 - 0:48:15 AM GMT



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable
Compliance
Activity (RCA)

[See back of form for instructions](#) →

1. **BREAKDOWN RELIEF: *District Use Only* BREAKDOWN REFERENCE #:**

2. **MONITOR EXCESS EMISSION or EXCURSION: *District Use Only* REFERENCE #:**

3. **MONITOR IS INOPERATIVE: *District Use Only* REFERENCE #:**

4. **PRESSURE RELIEF DEVICE (PRD): *District Use Only* PRD REFERENCE #:**

SITE INFORMATION AND DESCRIPTION INFORMATION (REQUIRED)

Company	City of Sunnyvale, ESD, Solid Waste	Site #	5905
Address	Borregas Avenue and Caribbean Drive	Source #	S-8
Reported by	William Theyskens	Phone #	408 730-7718
Indicated Excess		Fax #	
Allowable Limit		Averaging Time	
Start Time/Date	22:50; 31 December 2022	Clear Time	
Monitor/device type(s)	<input type="checkbox"/> ▶ CEM <input type="checkbox"/> ▶ GLM <input type="checkbox"/> ▶ Parametric <input type="checkbox"/> ▶ PRD <input type="checkbox"/> ▶ Non-monitor		
Monitor description(s)			
Parameter(s) exceeded or not functioning due to inoperation			
<input type="checkbox"/> ▶ NO _x	<input type="checkbox"/> ▶ SO ₂	<input type="checkbox"/> ▶ CO	<input type="checkbox"/> ▶ CO ₂
<input type="checkbox"/> ▶ O ₂	<input type="checkbox"/> ▶ H ₂ O	<input type="checkbox"/> ▶ Opacity	<input type="checkbox"/> ▶ Lead
<input type="checkbox"/> ▶ Hydrocarbon Breakthrough (VOC)	<input type="checkbox"/> ▶ Temperature	<input type="checkbox"/> ▶ Wind Speed	<input type="checkbox"/> ▶ H ₂ S
<input type="checkbox"/> ▶ Wind Direction	<input type="checkbox"/> ▶ Steam	<input type="checkbox"/> ▶ Other (describe)	<input type="checkbox"/> ▶ TRS
Unit(s) of Measurement			
<input type="checkbox"/> ▶ ppm	<input type="checkbox"/> ▶ ppb	<input type="checkbox"/> ▶ min/hr > 20%	<input type="checkbox"/> ▶ inches H ₂ O
<input type="checkbox"/> ▶ psig	<input type="checkbox"/> ▶ pH	<input type="checkbox"/> ▶ °Fahrenheit	<input type="checkbox"/> ▶ mmHg
			<input checked="" type="checkbox"/> ▶ Flow

Event Description:

Saturday (12/31/22) evening's rain event had a definite negative impact on the Landfill gas flow, with decreasing flows starting around 19:55 and dropping from 219 scfm to 144 ppm. Flow continued to drop through the night so condensate was pumped and flow increased to 200 scfm. PGF generator # 1 subsequently shut down at 22:50 due to poor gas quality, with LFG at 51 scfm. The heavy rains increased and at 02:00 on 1/1/23 LFG flow was fluctuating from 0 to 40 scfm.

District Use Only

Received by

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 rca@baaqmd.gov
- ✓ **A 30-day written follow-up report is required for Breakdown Requests and PRD Releases.** Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference [Breakdown Admissions Advisory dated 12/3/04](#). Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: **You may have additional report requirements under Title V.**

Detailed Instructions

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

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

- 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 immediately upon discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

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

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

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

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

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

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

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

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

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



Sunnyvale

January 10, 2023

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

SMaRT Station *
301 Carl Road
Sunnyvale, CA 94089
TDD/TYY 408-730-7501
sunnyvale.ca.gov

Re: 10-day/30-day Deviation Report for S-8 City of Sunnyvale Sanitary Landfill, Facility #A5905 - RCA #08P76 (Breakdown Relief) and RCA #08P77 (Monitor Excess Emission or Excursion)

To whom it may concern,

This Deviation Report is submitted in compliance with Provision I.F of the Title V-Major Facility Review Permit for Plant #A5905, which states that, “...*all instances of non-compliance with permit shall be reported in writing to the District’s Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions.*” This report is intended to serve as the 10-day and 30-day Deviation Report, and the 30-day RCA report requirements for RCA #08P76 (Breakdown Relief) and RCA #08P77 (Monitor Excess Emission or Excursion). The subject incident involves a moderate-term shutdown of the Sunnyvale Landfill (Source S-8) gas collection and control system (GCCS).

Incident Description

From 12/31/2022-1/2/2023, we received 5.38” of rainfall (per California Irrigation Management Information System (CIMIS)), which contributed to a higher than usual amount of landfill gas (LFG) condensate generation. As a result, we encountered issues with the transport of LFG through the pipe network.

During this RCA reporting period, the total downtime of the LFGF was 32 hours and 6 minutes. It began at 2302 on 12/31/22 and ended at 0708 on 1/2/23. During this duration, there were multiple short durations when the LFG Flare (LFGF) was running.

Background Information:

On 12/31/22 at 1955, LFG flows to the Power Generation Facility (PGF) engines started to decline, and gas flow continued to drop through 1/1/23.

Furthermore, on 1/31/22, at 0200 due to the decreasing gas flow PGF #1 shut down. Staff tried to pump out the LFG condensate line but were unable to keep up with the amount of condensate. Eventually, on 1/1/2023, at 1100, PGF#2 also went offline. Note that during this time period, the staff attempted to start the LFGF multiple times with little to no success. On 1/2/23, at 0708, the LFGF was back in service, with flow back to normal.

Based on this data, and the fact that it had rained for several days straight (5.38 inches during the three days of the RCA), we believe it is highly unlikely that a significant release of LFG through the landfill cover would have occurred during this downtime.

Sincerely,

Ramana Chinnakotla

Ramana Chinnakotla
Environmental Services Director

cc: Joe Muehleck (BAAQMD), email

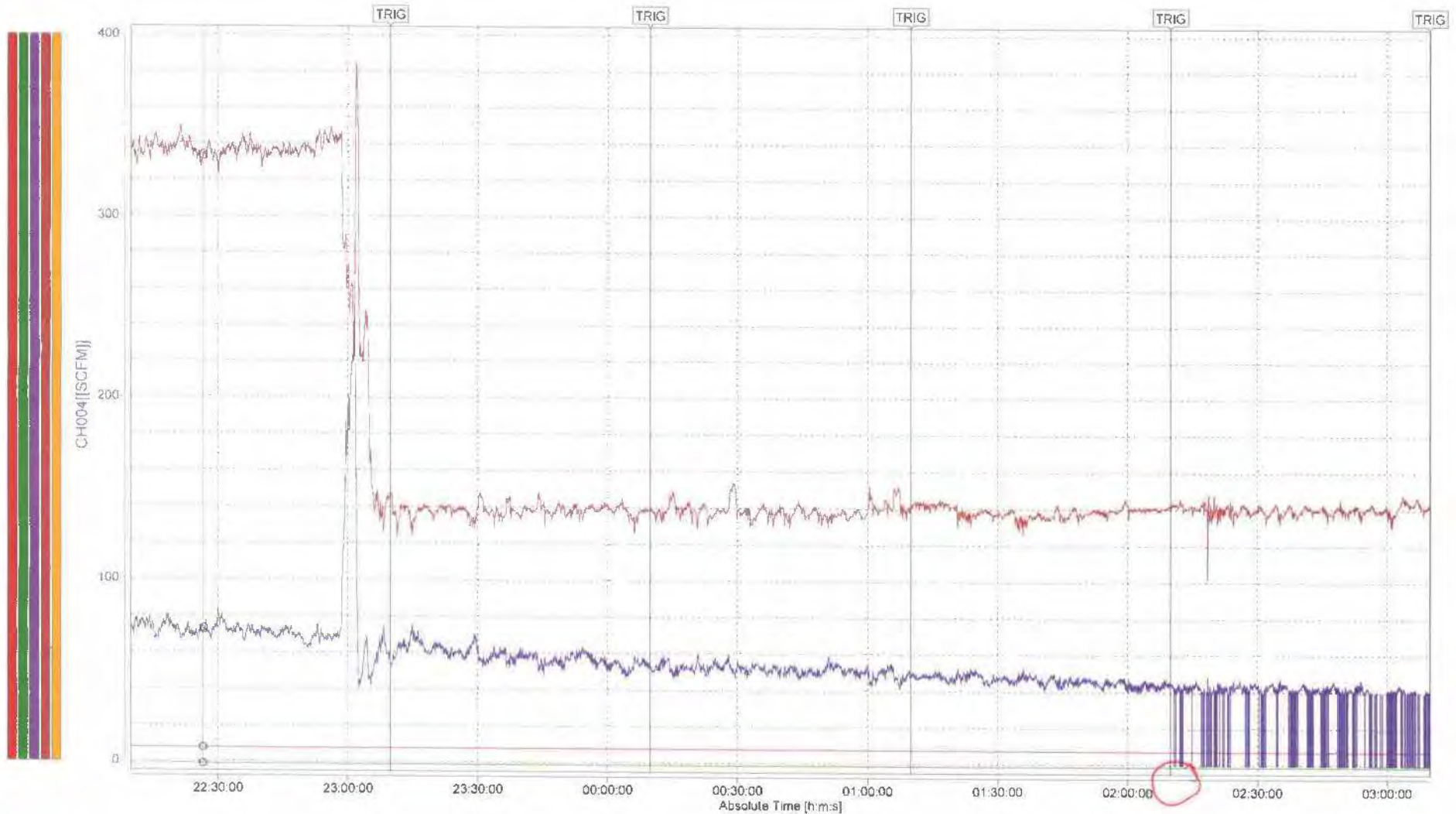
Attachment: Flow Chart

File Message :
File Name : 080899_221231_220954.DAD,....080903_230101_020954.DAD
Device Type : DX1000
Serial No. : S5N408394
Time Correction : None
Starting Condition : Auto
Dividing Condition : Auto
Meas Ch. : 6
Math Ch. : 0
Ext Ch. : 0

Data Count : 9000
Sampling Interval : 2.000 sec
Start Time : 2022/12/31 22:09:54.000
Stop Time : 2023/01/01 03:09:52.000
Trigger Time : 2023/01/01 03:09:52.000
Trigger No. : 8999
Damage Check : Not Damaged
Started by : [Key In]
Stopped by : [Running]

Printed Group : GROUP 1
Printed Range : 2022/12/31 22:09:54.000 - 2023/01/01 03:09:52.000
Comment :

12-31-22
1-1-23

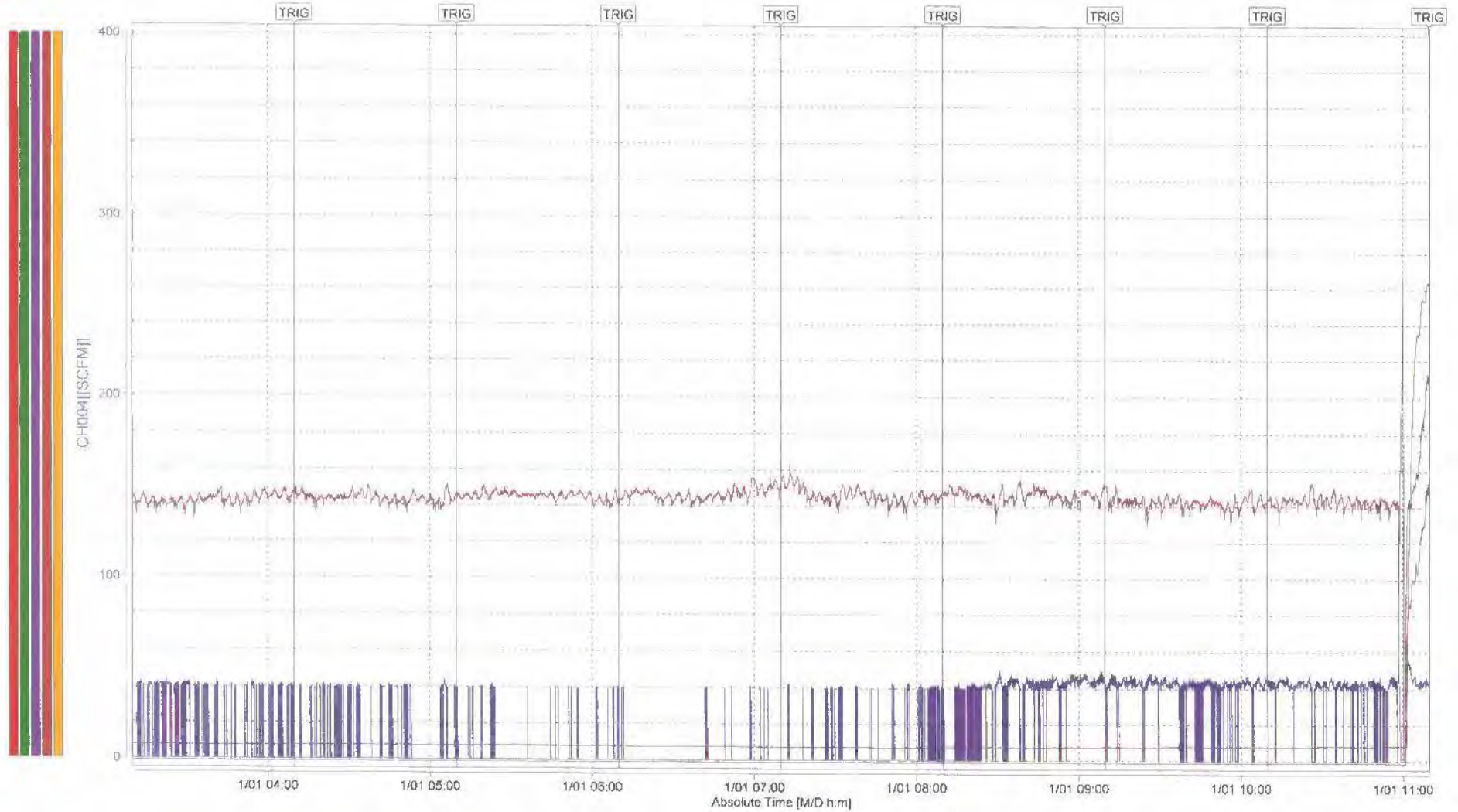


File Message :
File Name : 080904_230101_030954.DAD.....080911_230101_100954.DAD
Device Type : DX1000
Serial No. : SSN408394
Time Correction : None
Starting Condition : Auto
Dividing Condition : Auto
Meas Ch. : 6
Math Ch. : 0
Ext Ch. : 0

Data Count : 14400
Sampling Interval : 2.000 sec
Start Time : 2023/01/01 03:09:54.000
Stop Time : 2023/01/01 11:09:52.000
Trigger Time : 2023/01/01 11:09:52.000
Trigger No. : 14399
Damage Check : Not Damaged
Started by : [Key In]
Stopped by : [Running]

Printed Group : GROUP 1
Printed Range : 2023/01/01 03:09:54.000 - 2023/01/01 11:09:52.000
Comment :

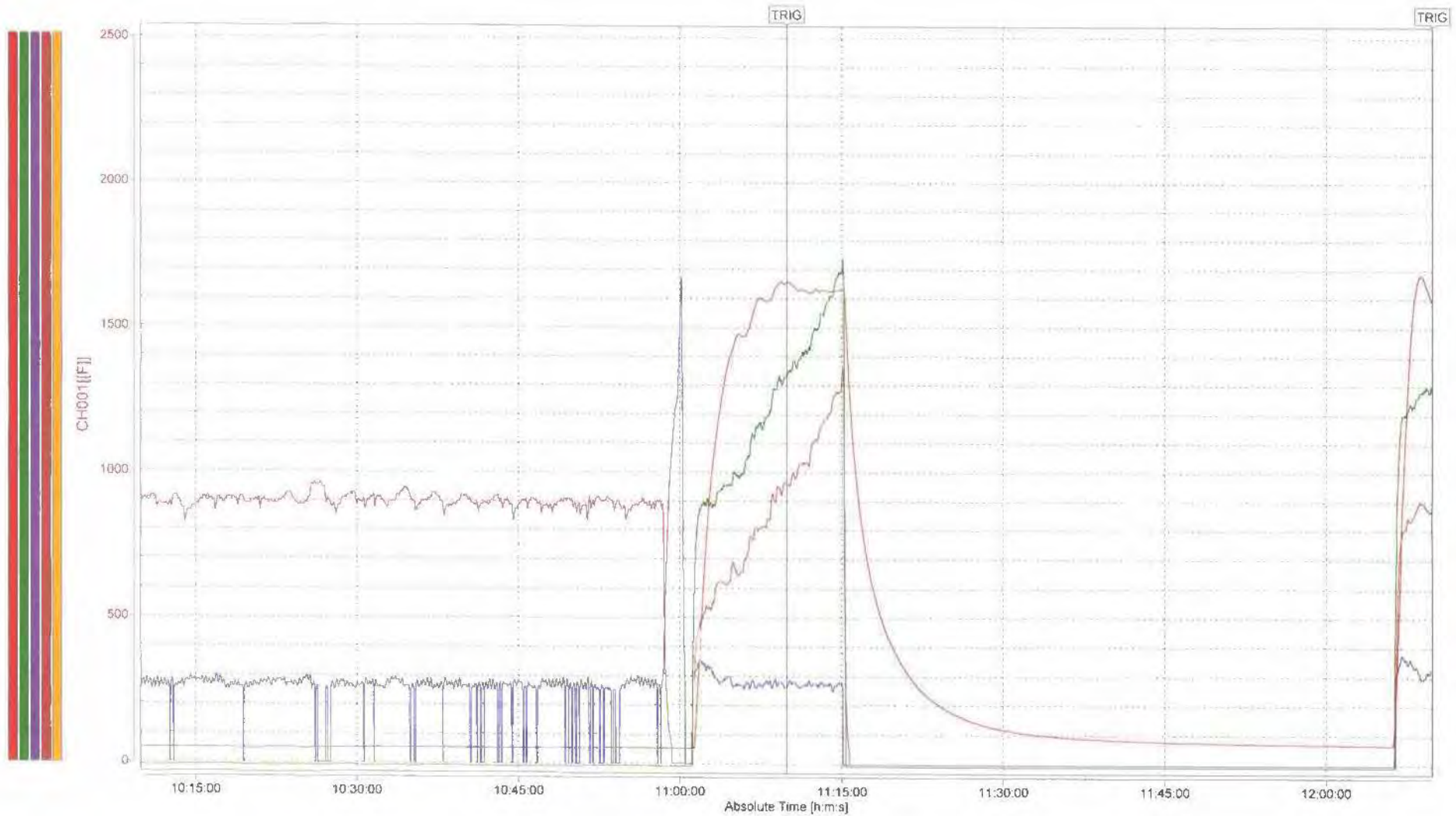
1-1-23



File Message :
File Name : 080911_230101_100954.DAD, 080912_230101_110954 DAD
Device Type : DX1000
Serial No. : S5N408394
Time Correction : None
Starting Condition : Auto
Dividing Condition : Auto
Meas Ch. : 6
Math Ch. : 0
Ext Ch. : 0

Data Count : 3600
Sampling Interval : 2.000 sec
Start Time : 2023/01/01 10:09:54.000
Stop Time : 2023/01/01 12:09:52.000
Trigger Time : 2023/01/01 12:09:52.000
Trigger No. : 3599
Damage Check : Not Damaged
Started by : [Key in]
Stopped by : [Running]

Printed Group : GROUP 1
Printed Range : 2023/01/01 10:09:54.000 - 2023/01/01 12:09:52.000
Comment :

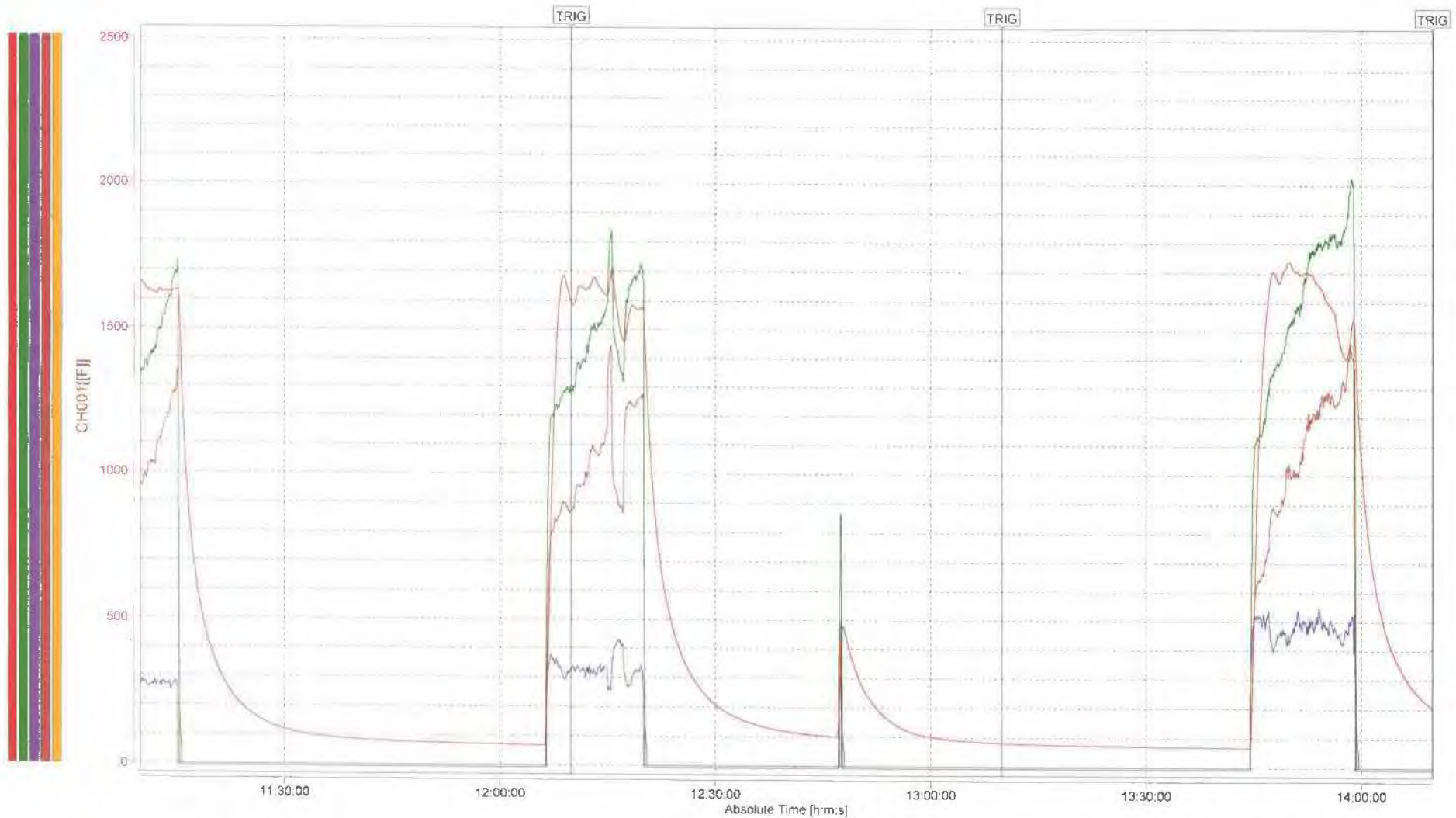


File Message

File Name : 080912_230101_110954.DAD.....080914_230101_130954.DAD
Device Type : DX1000
Serial No. : S5N408394
Time Correction : None
Starting Condition : Auto
Dividing Condition : Auto
Meas Ch. : 6
Math Ch. : 0
Ext Ch. : 0

Data Count : 5400
Sampling Interval : 2.000 sec
Start Time : 2023/01/01 11:09:54.000
Stop Time : 2023/01/01 14:09:52.000
Trigger Time : 2023/01/01 14:09:52.000
Trigger No. : 5399
Damage Check : Not Damaged
Started by : [Key In]
Stopped by : [Running]

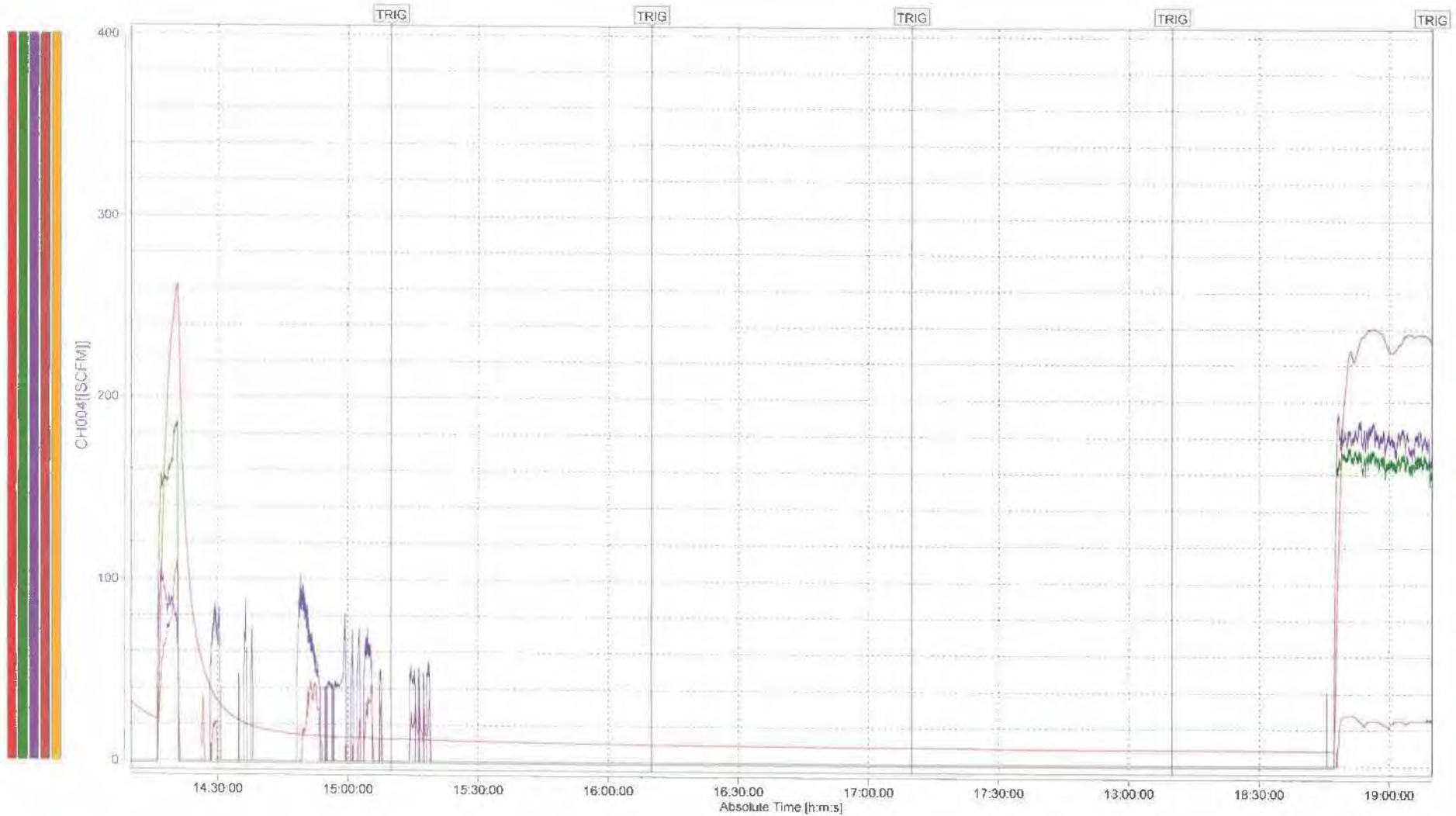
Printed Group : GROUP 1
Printed Range : 2023/01/01 11:09:54.000 - 2023/01/01 14:09:52.000
Comment :



File Message :
File Name : 080915_230101_140954.DAD,....080919_230101_180954.DAD
Device Type : DX1000
Serial No. : S5N408394
Time Correction : None
Starting Condition : Auto
Dividing Condition : Auto
Meas Ch. : 6
Math Ch. : 0
Ext Ch. : 0

Data Count : 9000
Sampling Interval : 2.000 sec
Start Time : 2023/01/01 14:09:54.000
Stop Time : 2023/01/01 19:09:52.000
Trigger Time : 2023/01/01 19:09:52.000
Trigger No. : 8999
Damage Check : Not Damaged
Started by : [Key In]
Stopped by : [Running]

Printed Group : GROUP 1
Printed Range : 2023/01/01 14:09:54.000 - 2023/01/01 19:09:52.000
Comment :



File Message

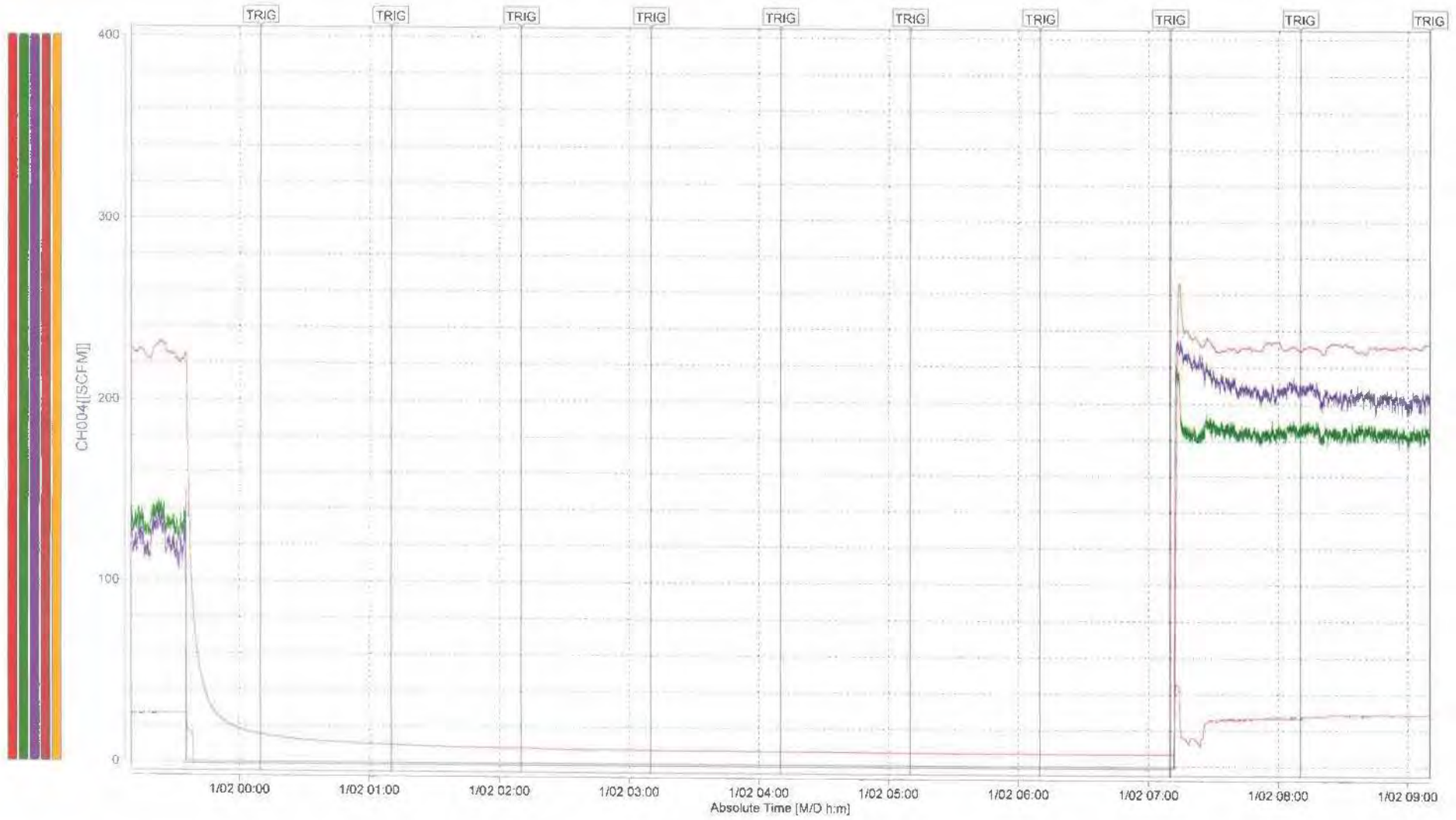
File Name : 080924_230101_230954.DAD, ... 080933_230102_080954.DAD
Device Type : DX1000
Serial No. : S5N408394
Time Correction : None
Starting Condition : Auto
Dividing Condition : Auto
Meas Ch. : 6
Math Ch. : 0
Ext Ch. : 0

Data Count : 18000
Sampling Interval : 2.000 sec
Start Time : 2023/01/01 23:09:54.000
Stop Time : 2023/01/02 09:09:52.000
Trigger Time : 2023/01/02 09:09:52.000
Trigger No. : 17999
Damage Check : Not Damaged
Started by : [Key In]
Stopped by : [Running]

Printed Group

Printed Range : GROUP 1
Printed Range : 2023/01/01 23:09:54.000 - 2023/01/02 09:09:52.000

1-1 +0 1-2



BAAQMD -FacilityA5905 RCA08P76 -10- and 30-day Deviation Report

Final Audit Report

2023-01-10

Created:	2023-01-10
By:	McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAA4QDAilygyzzSz8ou4dT9JUp-T4YpV8g

"BAAQMD -FacilityA5905 RCA08P76 -10- and 30-day Deviation Report" History

-  Document created by McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
2023-01-10 - 10:23:07 PM GMT
-  Document emailed to Ramana Chinnakotla (rchinnakotla@sunnyvale.ca.gov) for signature
2023-01-10 - 10:23:58 PM GMT
-  Email viewed by Ramana Chinnakotla (rchinnakotla@sunnyvale.ca.gov)
2023-01-10 - 10:58:07 PM GMT
-  Document e-signed by Ramana Chinnakotla (rchinnakotla@sunnyvale.ca.gov)
Signature Date: 2023-01-10 - 10:58:17 PM GMT - Time Source: server
-  Agreement completed.
2023-01-10 - 10:58:17 PM GMT



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable
Compliance
Activity (RCA)

[See back of form for instructions](#) →

1. **BREAKDOWN RELIEF: *District Use Only* BREAKDOWN REFERENCE #:**

2. **MONITOR EXCESS EMISSION or EXCURSION: *District Use Only* REFERENCE #:**

3. **MONITOR IS INOPERATIVE: *District Use Only* REFERENCE #:**

4. **PRESSURE RELIEF DEVICE (PRD): *District Use Only* PRD REFERENCE #:**

SITE INFORMATION AND DESCRIPTION INFORMATION (REQUIRED)

Company	City of Sunnyvale	Site #	5905
Address	Borregas Avenue and Caribbean Drive	Source #	S-8
Reported by	William Theyskens	Phone #	408 730-7718
Indicated Excess		Fax #	
Allowable Limit		Averaging Time	
Start Time/Date	09:15; 9 January, 2023	Clear Time	
Monitor/device type(s)	<input type="checkbox"/> ▶ CEM <input type="checkbox"/> ▶ GLM <input type="checkbox"/> ▶ Parametric <input type="checkbox"/> ▶ PRD <input type="checkbox"/> ▶ Non-monitor		
Monitor description(s)			
Parameter(s) exceeded or not functioning due to inoperation			
<input type="checkbox"/> ▶ NO _x	<input type="checkbox"/> ▶ SO ₂	<input type="checkbox"/> ▶ CO	<input type="checkbox"/> ▶ CO ₂
<input type="checkbox"/> ▶ O ₂	<input type="checkbox"/> ▶ H ₂ O	<input type="checkbox"/> ▶ Opacity	<input type="checkbox"/> ▶ Lead
<input type="checkbox"/> ▶ Hydrocarbon Breakthrough (VOC)	<input type="checkbox"/> ▶ Temperature	<input type="checkbox"/> ▶ Wind Speed	<input type="checkbox"/> ▶ H ₂ S
<input type="checkbox"/> ▶ Wind Direction	<input type="checkbox"/> ▶ Steam	<input type="checkbox"/> ▶ Other (describe)	<input type="checkbox"/> ▶ TRS
Unit(s) of Measurement			
<input type="checkbox"/> ▶ ppm	<input type="checkbox"/> ▶ ppb	<input type="checkbox"/> ▶ min/hr > 20%	<input type="checkbox"/> ▶ inches H ₂ O
<input type="checkbox"/> ▶ psig	<input type="checkbox"/> ▶ pH	<input type="checkbox"/> ▶ °Fahrenheit	<input type="checkbox"/> ▶ mmHg
<input type="checkbox"/> ▶ Flow			

Event Description:

Power Generation Facility (PGF) generator shutdown, with the Landfill Gas Flare (LFGF) not starting initially. At 0:925 the LFGF was in service. At 0:9:37, the LFGF shutdown. The PGF shutdown appeared to be caused by a loss of LFG flow resulting from condensate build-up in condensate trap CT-1E, located just south of the LFGF. Efforts were made to pump down the condensate in CT-1E. The LFGF was subsequently reported to be back in service.

District Use Only

Received by

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 rca@baaqmd.gov
- ✓ **A 30-day written follow-up report is required for Breakdown Requests and PRD Releases.** Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference [Breakdown Admissions Advisory dated 12/3/04](#). Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: **You may have additional report requirements under Title V.**

Detailed Instructions

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

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

- 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 immediately upon discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

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

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

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

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

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

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

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

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

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



Sunnyvale

January 13, 2023

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

SMaRT Station[™]
301 Carl Road
Sunnyvale, CA 94089
TDD/TYY 408-730-7501
sunnyvale.ca.gov

Re: 10-day/30-day Deviation Report for S-8 City of Sunnyvale Sanitary Landfill, Facility #A5905 - RCA #08P98 (Breakdown Relief) and RCA #08P99 (Monitor Excess Emission or Excursion)

To whom it may concern,

This Deviation Report is submitted in compliance with Provision I.F of the Title V-Major Facility Review Permit for Plant #A5905, which states that, “...*all instances of non-compliance with permit shall be reported in writing to the District’s Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions.*” This report is intended to serve as the 10-day and 30-day Deviation Report, and the 30-day RCA report requirements for RCA #08P98 (Breakdown Relief) and RCA #08P99 (Monitor Excess Emission or Excursion). The subject incident involves a moderate-term shutdown of the Sunnyvale Landfill (Source S-8) gas collection and control system (GCCS).

Incident Description

From 1/9/23 - 1/11/23, we received 2.03” of rainfall (per California Irrigation Management Information System (CIMIS)) which is believed to have contributed to a higher than usual amount of landfill gas (LFG) condensate generation. As a result, we encountered issues with the transport of LFG through the pipe network. We are continuing to investigate the higher than usual volume of condensate and the frequency of blockages in the piping system.

On 1/9/23 at 0918 LFG flow was lost to the #2 PGF (note that the #1 PGF is out of service for maintenance). The loss of landfill gas flow was attributed to a buildup of condensate in condensate trap CT-1E, which caused blockage of LFG flow, and resulted in the shutting down of the generator. During this time period, landfill staff pumped condensate in an effort to

increase LFG flow, and the flow was resumed at 1502. At 1547, the LFGF was set up to switch over to the PGF, and at 1620 the PGF (one genset) was in service.

This RCA episode started at 0918 and ended at 1620 on 1/9/23, a total of 7 hours and 2 minutes. During this episode, there was a relatively short duration of approximately 45 minutes when the LFG Flare was running.

Based on the available rainfall data and the saturated landfill cover, we believe it is highly unlikely that a significant release of LFG through the landfill cover would have occurred during this downtime.

Sincerely,

Ramana Chinnakotla

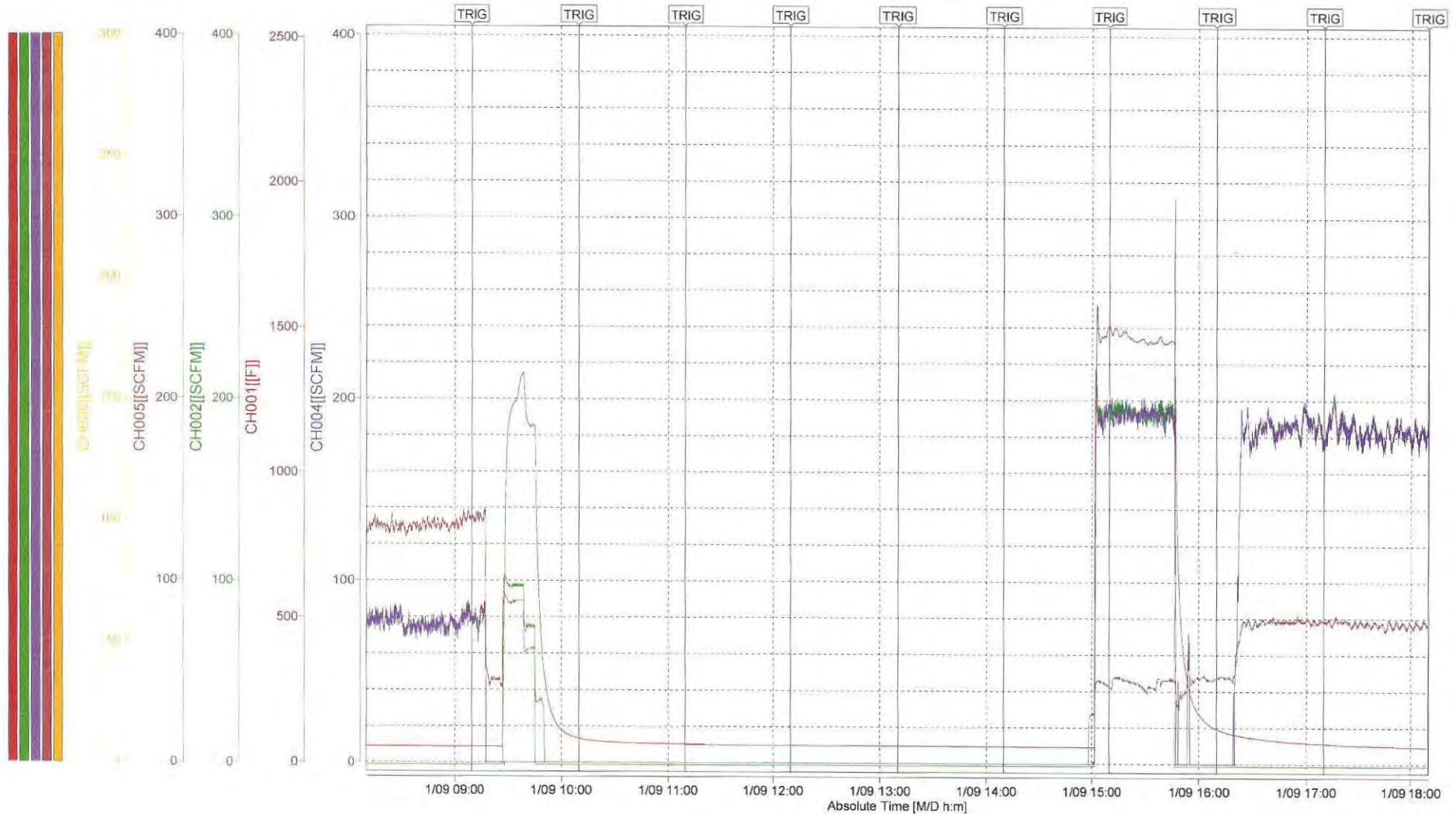
Ramana Chinnakotla
Environmental Services Director

cc: Joe Muehleck (BAAQMD), email

Attachment: Flow Chart

File Message :
File Name : 081101_230109_080954.DAD,081110_230109_170954.DAD
Device Type : DX1000
Serial No. : S5N408394
Time Correction : None
Starting Condition : Auto
Dividing Condition : Auto
Meas Ch. : 6
Math Ch. : 0
Ext Ch. : 0
Printed Group : GROUP 1
Printed Range : 2023/01/09 08:09:54.000 - 2023/01/09 18:09:52.000
Comment :

Data Count : 18000
Sampling Interval : 2.000 sec
Start Time : 2023/01/09 08:09:54.000
Stop Time : 2023/01/09 18:09:52.000
Trigger Time : 2023/01/09 18:09:52.000
Trigger No. : 17999
Damage Check : Not Damaged
Started by : [Key In]
Stopped by : [Running]








BAAQMD RCA report

Final Audit Report

2023-01-13

Created:	2023-01-13
By:	McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAAAnobDgeCeUBk8fik84s2cMQ1OfKAFZL

"BAAQMD RCA report" History

-  Document created by McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
2023-01-13 - 8:43:19 PM GMT
-  Document emailed to Ramana Chinnakotla (rchinnakotla@sunnyvale.ca.gov) for signature
2023-01-13 - 8:44:01 PM GMT
-  Email viewed by Ramana Chinnakotla (rchinnakotla@sunnyvale.ca.gov)
2023-01-13 - 9:18:31 PM GMT
-  Document e-signed by Ramana Chinnakotla (rchinnakotla@sunnyvale.ca.gov)
Signature Date: 2023-01-13 - 9:18:58 PM GMT - Time Source: server
-  Agreement completed.
2023-01-13 - 9:18:58 PM GMT



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable
Compliance
Activity (RCA)

See back of form for instructions →

1. **BREAKDOWN RELIEF: District Use Only** BREAKDOWN REFERENCE #: 08Q12

2. **MONITOR EXCESS EMISSION or EXCURSION: District Use Only** REFERENCE #: 08Q12

3. **MONITOR IS INOPERATIVE: District Use Only** REFERENCE #:

4. **PRESSURE RELIEF DEVICE (PRD): District Use Only** PRD REFERENCE #:

SITE INFORMATION AND DESCRIPTION INFORMATION (REQUIRED)

Company	City of Sunnyvale, ESD, Solid Waste	Site #	5905
Address	Borregas Avenue and Caribbean Drive	Source #	S-8
Reported by	William Theyskens	Phone #	408 730-7718
Indicated Excess		Fax #	
Allowable Limit		Averaging Time	
Start Time/Date	00:39/1/16/23	Clear Time	
Monitor/device type(s)	<input type="checkbox"/> ▶ CEM <input type="checkbox"/> ▶ GLM <input type="checkbox"/> ▶ Parametric <input type="checkbox"/> ▶ PRD <input type="checkbox"/> ▶ Non-monitor		
Monitor description(s)			
Parameter(s) exceeded or not functioning due to inoperation			
<input type="checkbox"/> ▶ NO _x	<input type="checkbox"/> ▶ SO ₂	<input type="checkbox"/> ▶ CO	<input type="checkbox"/> ▶ CO ₂
<input type="checkbox"/> ▶ O ₂	<input type="checkbox"/> ▶ H ₂ O	<input type="checkbox"/> ▶ Opacity	<input type="checkbox"/> ▶ Lead
<input type="checkbox"/> ▶ Hydrocarbon Breakthrough (VOC)	<input type="checkbox"/> ▶ Temperature	<input type="checkbox"/> ▶ Wind Speed	<input type="checkbox"/> ▶ H ₂ S
<input type="checkbox"/> ▶ Wind Direction	<input type="checkbox"/> ▶ Steam	<input type="checkbox"/> ▶ Other (describe)	<input type="checkbox"/> ▶ TRS
Unit(s) of Measurement			
<input type="checkbox"/> ▶ ppm	<input type="checkbox"/> ▶ ppb	<input type="checkbox"/> ▶ min/hr > 20%	<input type="checkbox"/> ▶ inches H ₂ O
<input type="checkbox"/> ▶ psig	<input type="checkbox"/> ▶ pH	<input type="checkbox"/> ▶ °Fahrenheit	<input checked="" type="checkbox"/> ▶ Flow

Event Description:

Heavy rains continued to have a negative impact on landfill gas flow (LFG), with flow dropping from 150 ppm at 2251, to between 0 and 40 scfm at 0039. At 0140 PGF #2 started, but UGP started dropping at 0142. Main engines were all put on Natural Gas (NG). At 1:55, PGF Genset # 2 shutdown again. An attempt to start the LFGF again failed, with LFGF at 0 scfm. Condensate in CT-1E and in the LFG east header P-trap in front of Gate D were pumped down. Started the PGF genset at 1448 hours, with it running at 600 KW output. Lost LFG flow indication at 1747.

District Use Only

Received by _____ Date _____ Time _____

General Instructions



Sunnyvale

January 24, 2023

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

SMaRT Station[®]
301 Carl Road
Sunnyvale, CA 94089
TDD/TYY 408-730-7501
sunnyvale.ca.gov

Re: 10-day/30-day Deviation Report for S-8 City of Sunnyvale Sanitary Landfill, Facility #A5905 - RCA #08Q12 (Breakdown Relief) and RCA #08Q13 (Monitor Excess Emission or Excursion)

To whom it may concern,

This Deviation Report is submitted in compliance with Provision I.F of the Title V-Major Facility Review Permit for Plant #A5905, which states that, “... all instances of non-compliance with permit shall be reported in writing to the District’s Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions.” This report is intended to serve as the 10-day and 30-day Deviation Report, and the 30-day RCA report requirements for RCA #08Q12 (Breakdown Relief) and RCA #08Q13 (Monitor Excess Emission or Excursion). The subject incident involves a moderate-term shutdown of the Sunnyvale Landfill (Source S-8) gas collection and control system (GCCS).

Incident Description

From 1/16/23 - 1/18/23 we received 1.07” of rainfall (per California Irrigation Management Information System (CIMIS)) which is believed to have contributed to a higher than usual amount of landfill gas (LFG) condensate generation. As a result, we encountered issues with the transport of LFG through the pipe network. We are continuing to investigate the higher than usual volume of condensate and the frequency of blockages in the piping system.

On 1/16/23 at 00:39 the Power Generation Facility (PGF) shutdown due to loss of LFG flow. The loss of LFG flow was attributed to a buildup of condensate in the landfill gas collection system, which caused blockage of LFG flow, and resulted in the shutting down of the PGF. During this time period, landfill staff inspected condensate pumps and portions of the landfill gas collection system to try to determine where the blockage was located. Landfill staff hired a

contractor to perform a camera inspection of the landfill pipes in several locations. It was determined there was a blockage in condensate trap CT-7E. Staff immediately pumped condensate at this location in an effort to increase LFG flow. At 1247 on 1/18/23, the LFGF was in service. At 1421, the LFGF was set up to switch over to the PGF, and at 1443 the PGF was in service.

This RCA episode started at 00:39 on 1/16/23 and ended at 1443 on 1/18/23, a total of 61.07 hours. During this episode, there was a duration of approximately 1.92 hours when the LFG Flare was running.

Based on the available rainfall data and the saturated landfill cover, we believe it is highly unlikely that a significant release of LFG through the landfill cover would have occurred during this downtime.

Sincerely,



Karen Gissibl (Jan 24, 2023 13:41 PST)

Karen Gissibl
Environmental Programs Manager

cc: Joe Muehleck (BAAQMD), email

Attachment: Flow Chart

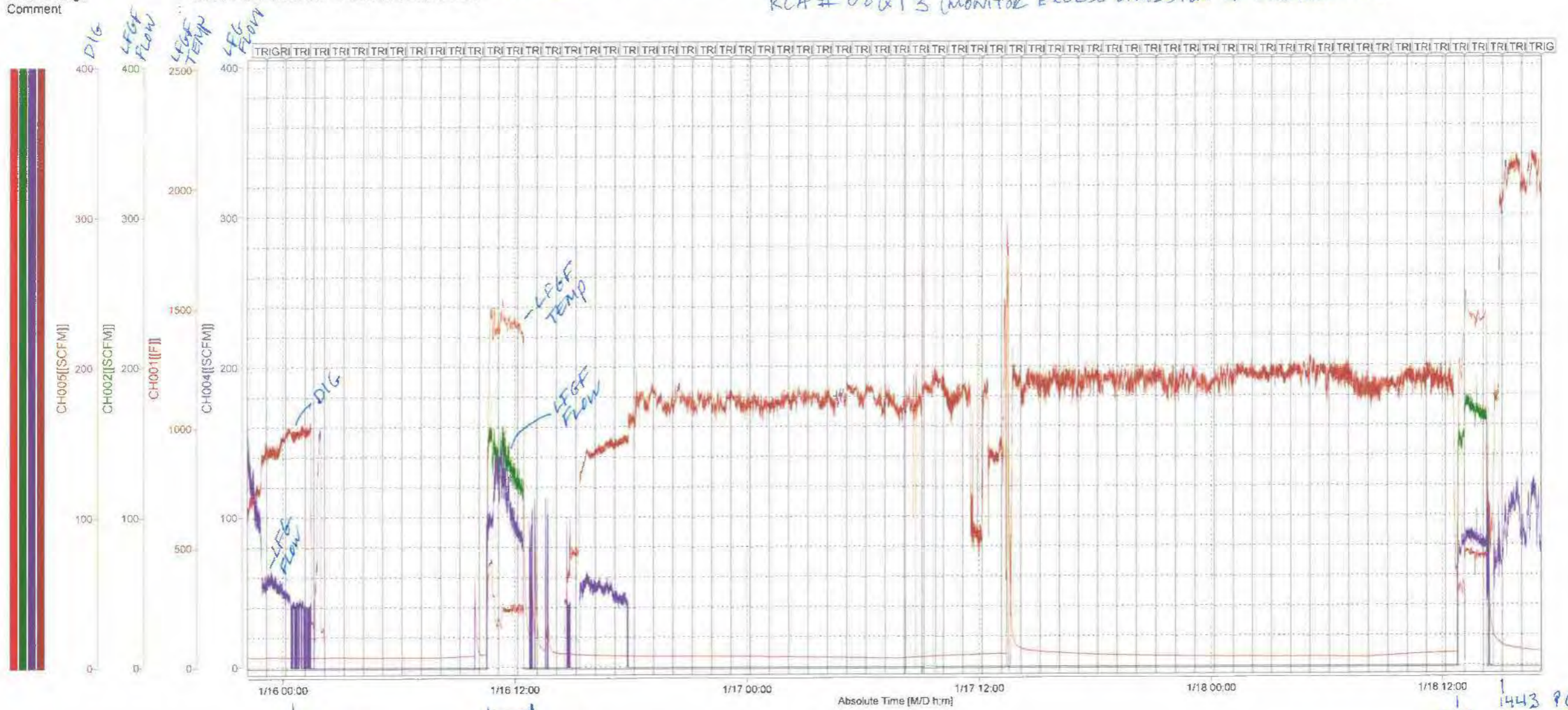
File Message
 File Name : 081259_230115_220954.DAD, 081325_230118_160954.DAD
 Device Type : DX1000
 Serial No. : S5N408394
 Time Correction : None
 Starting Condition : Auto
 Dividing Condition : Auto
 Meas Ch. : 6
 Math Ch. : 0
 Ext Ch. : 0

Data Count : 120600
 Sampling Interval : 2.000 sec
 Start Time : 2023/01/15 22:09:54.000
 Stop Time : 2023/01/18 17:09:52.000
 Trigger Time : 2023/01/18 17:09:52.000
 Trigger No. : 120599
 Damage Check : Not Damaged
 Started by : [Key In]
 Stopped by : [Running]

Printed Group : GROUP 1
 Printed Range : 2023/01/15 22:09:54.000 - 2023/01/18 17:09:52.000
 Comment :

1/16/23 to 1/18/23

RCA # 08Q12 (BREAKDOWN RELIEF)
 RCA # 08Q13 (MONITOR EXCESS EMISSION OR EXCURSION)



0039 LOSS OF LFG FLOW

TEMPORARILY RUN LFGF

1247 LFGF IN SERVICE
 1443 PGF IN SERVICE



BAAQMD- RCA 08Q12 and 08Q13_10- and 30-day report (1)

Final Audit Report

2023-01-24

Created:	2023-01-24
By:	McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
Status:	Signed
Transaction ID:	CEJCHBCAABAAeQKJ4CPRneEv_4kPF9tbSX07Lu7LWaUL

"BAAQMD- RCA 08Q12 and 08Q13_10- and 30-day report (1)" History

-  Document created by McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
2023-01-24 - 8:48:00 PM GMT
-  Document emailed to Karen Gissibl (kgissibl@sunnyvale.ca.gov) for signature
2023-01-24 - 8:48:40 PM GMT
-  Email viewed by Karen Gissibl (kgissibl@sunnyvale.ca.gov)
2023-01-24 - 9:39:15 PM GMT
-  Document e-signed by Karen Gissibl (kgissibl@sunnyvale.ca.gov)
Signature Date: 2023-01-24 - 9:41:10 PM GMT - Time Source: server
-  Agreement completed.
2023-01-24 - 9:41:10 PM GMT



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable
Compliance
Activity (RCA)

[See back of form for instructions](#) →

1. **BREAKDOWN RELIEF: *District Use Only* BREAKDOWN REFERENCE #:**

2. **MONITOR EXCESS EMISSION or EXCURSION: *District Use Only* REFERENCE #:**

3. **MONITOR IS INOPERATIVE: *District Use Only* REFERENCE #:**

4. **PRESSURE RELIEF DEVICE (PRD): *District Use Only* PRD REFERENCE #:**

SITE INFORMATION AND DESCRIPTION INFORMATION (REQUIRED)

Company	City of Sunnyvale, ESD, Solid Waste		Site #	
Address	Borregas Avenue and Caribbean Drive		Source #	
Reported by	William Theyskens		Phone #	
Indicated Excess			Fax #	
Allowable Limit			Averaging Time	
Start Time/Date	02:38/01/19/23		Clear Time	10:20/01/19/23
Monitor/device type(s)	<input type="checkbox"/> ▶ CEM	<input type="checkbox"/> ▶ GLM	<input type="checkbox"/> ▶ Parametric	<input type="checkbox"/> ▶ PRD <input type="checkbox"/> ▶ Non-monitor
Monitor description(s)				
Parameter(s) exceeded or not functioning due to inoperation				
<input type="checkbox"/> ▶ NO _x	<input type="checkbox"/> ▶ SO ₂	<input type="checkbox"/> ▶ CO	<input type="checkbox"/> ▶ CO ₂	<input type="checkbox"/> ▶ H ₂ S <input type="checkbox"/> ▶ TRS <input type="checkbox"/> ▶ NH ₃
<input type="checkbox"/> ▶ O ₂	<input type="checkbox"/> ▶ H ₂ O	<input type="checkbox"/> ▶ Opacity	<input type="checkbox"/> ▶ Lead	<input type="checkbox"/> ▶ Gauge Pressure <input checked="" type="checkbox"/> ▶ Flow
<input type="checkbox"/> ▶ Hydrocarbon Breakthrough (VOC)		<input type="checkbox"/> ▶ Temperature	<input type="checkbox"/> ▶ Wind Speed	
<input type="checkbox"/> ▶ Wind Direction		<input type="checkbox"/> ▶ Steam	<input type="checkbox"/> ▶ Other (describe)	
Unit(s) of Measurement				
<input type="checkbox"/> ▶ ppm	<input type="checkbox"/> ▶ ppb	<input type="checkbox"/> ▶ min/hr > 20%	<input type="checkbox"/> ▶ inches H ₂ O	<input type="checkbox"/> ▶ mmHg
<input type="checkbox"/> ▶ psig	<input type="checkbox"/> ▶ pH	<input type="checkbox"/> ▶ °Fahrenheit	<input type="checkbox"/> ▶ Other (describe)	

Event Description:

At 0238 Landfill Gas Flow (LFG) from the field was lost. The LFG flow reading was zero, and vacuum dropped considerably. Genset #1 was still running on other fuel so there was no need to run the flare. Efforts continued to pump condensate from the Gas Collection and Control System (GCCS). At 1020 enough condensate had been removed that LFG was again being pulled from the landfill in significant quantities. As of 1919 LFG flow was still being pulled from the landfill in significant quantities.

District Use Only

Received by

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 rca@baaqmd.gov
- ✓ **A 30-day written follow-up report is required for Breakdown Requests and PRD Releases.** Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference [Breakdown Admissions Advisory dated 12/3/04](#). Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: **You may have additional report requirements under Title V.**

Detailed Instructions

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

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

- 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 immediately upon discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

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

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

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

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

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

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

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

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

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



Sunnyvale

January 27, 2023

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

SMaRT Station[®]
301 Carl Road
Sunnyvale, CA 94089
TDD/TYY 408-730-7501
sunnyvale.ca.gov

Re: 10-day/30-day Deviation Report for S-8 City of Sunnyvale Sanitary Landfill, Facility #A5905 - RCA #08Q22 (Breakdown Relief) and RCA #08Q23 (Monitor Excess Emission or Excursion)

To whom it may concern,

This Deviation Report is submitted in compliance with Provision I.F of the Title V-Major Facility Review Permit for Plant #A5905, which states that, “... all instances of non-compliance with permit shall be reported in writing to the District’s Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions.” This report is intended to serve as the 10-day and 30-day Deviation Report, and the 30-day RCA report requirements for RCA #08Q22 (Breakdown Relief) and RCA #08Q23 (Monitor Excess Emission or Excursion). The subject incident involves a relatively short-term shutdown of the Sunnyvale Landfill (Source S-8) gas collection and control system (GCCS).

Incident Description

Large quantities of rain were received at the landfill site for the month of January, 8.24” of rainfall (per California Irrigation Management and Information System (CIMIS)), which contributed to a higher than usual amount of landfill gas (LFG) condensate generation. As a result, we encountered issues with the transport of LFG through the pipe network. We are continuing to investigate the higher than usual volume of condensate and the frequency of blockages in the piping system.

On 1/19/23 at 0238 there was a loss of LFG flow. The loss of LFG flow was attributed to a buildup of condensate in the landfill gas collection system, which caused blockage of LFG flow, and resulted in the shutting down of the GCCS. The #1 PGF continued to operate on mixed gas (MG), a combination of digester gas and air blended natural gas. During this time period,

landfill staff inspected condensate pumps and areas of the landfill gas collection system to determine where the blockage was located. It was determined there was a blockage in condensate trap CT-7E. Staff immediately pumped condensate at this location in an effort to increase LFG flow. Staff replaced the pump in CT-7E with a new one. At 1020, there was sufficient LFG flow available to send to the #1 PGF. At 1140, the #2 PGF was placed in service and both engines were operating at normal output.

This RCA episode started at 0238 and ended at 1020 on 1/19/23, a total of 7.7 hours.

Based on the available rainfall data, we believe it is highly unlikely that a significant release of LFG through the landfill cover would have occurred during this downtime.

Sincerely,



Karen Gissibl (Jan 27, 2023 09:08 PST)

Karen Gissibl
Environmental Programs Manager

cc: Joe Muehleck (BAAQMD), email

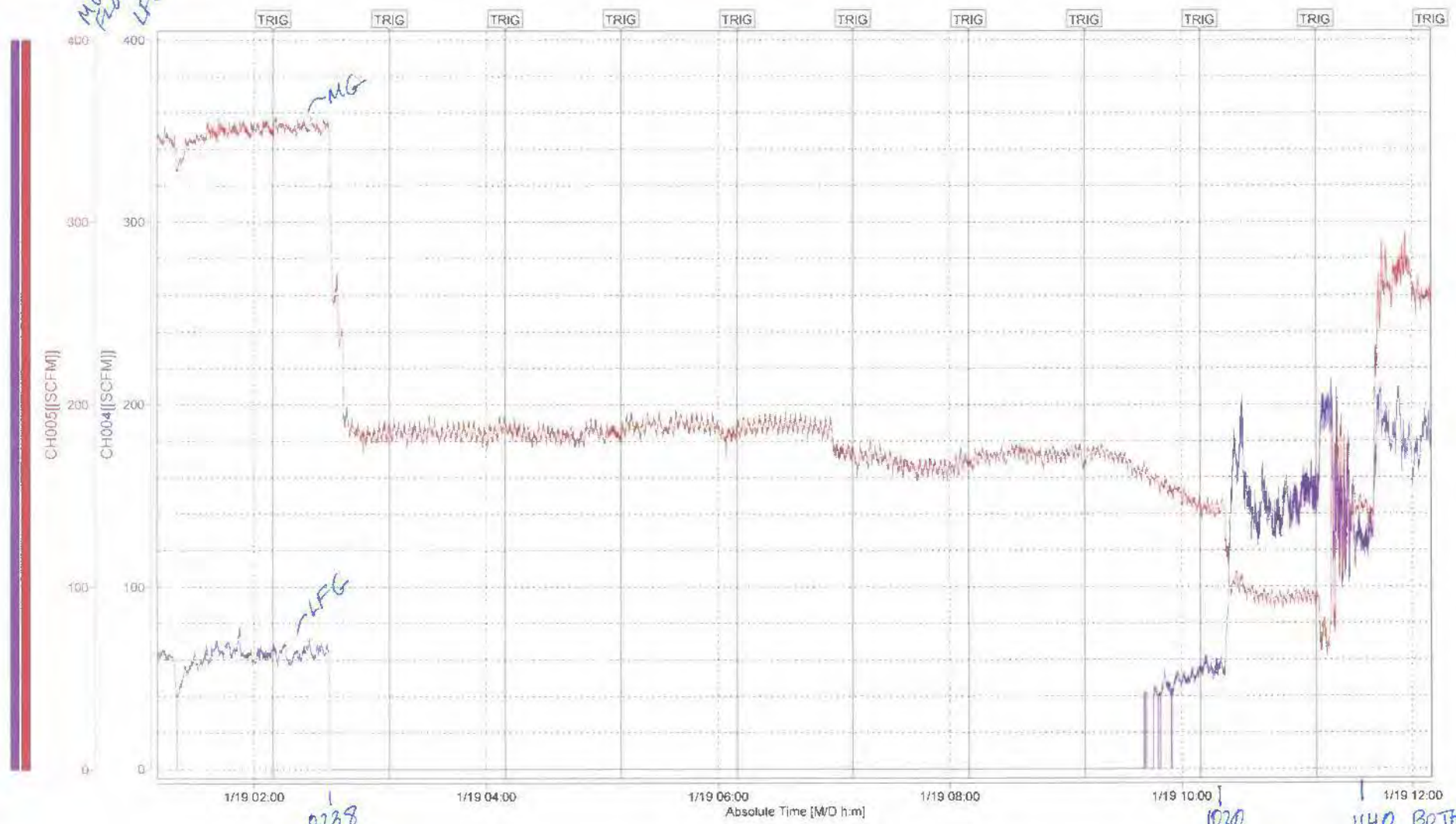
Attachment: Flow Chart

File Message :
 File Name : 081334_230119_010954.DAD,....081344_230119_110954.DAD
 Device Type : DX1000
 Serial No. : S5N408394
 Time Correction : None
 Starting Condition : Auto
 Dividing Condition : Auto
 Meas Ch. : 6
 Math Ch. : 0
 Ext Ch. : 0

Data Count : 19800
 Sampling Interval : 2.000 sec
 Start Time : 2023/01/19 01:09:54.000
 Stop Time : 2023/01/19 12:09:52.000
 Trigger Time : 2023/01/19 12:09:52.000
 Trigger No. : 19799
 Damage Check : Not Damaged
 Started by : [Key In]
 Stopped by : [Running]

Printed Group : GROUP 1
 Printed Range : 2023/01/19 01:09:54.000 - 2023/01/19 12:09:52.000
 Comment :

1/19/23 RCA # 08022
 08023



MG FLOW (MIXED GAS)
 LFG FLOW

0208
 LOSS OF
 LFG FLOW

1020
 LFG FLOW
 TO #1 PGF

1140 BOTH
 PGF'S IN SERVICE



BAAQMD- RCA 08Q22 and 08Q23_10- and 30-day report1 (1)

Final Audit Report

2023-01-27

Created:	2023-01-27
By:	McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
Status:	Signed
Transaction ID:	CEJCHBCAABAA-YH7_MH3_uCULZAb3JJfwFkuGTDVevMA

"BAAQMD- RCA 08Q22 and 08Q23_10- and 30-day report1 (1)" History

-  Document created by McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
2023-01-27 - 4:52:28 PM GMT
-  Document emailed to Karen Gissibl (kgissibl@sunnyvale.ca.gov) for signature
2023-01-27 - 4:53:22 PM GMT
-  Email viewed by Karen Gissibl (kgissibl@sunnyvale.ca.gov)
2023-01-27 - 5:04:43 PM GMT
-  Document e-signed by Karen Gissibl (kgissibl@sunnyvale.ca.gov)
Signature Date: 2023-01-27 - 5:08:36 PM GMT - Time Source: server
-  Agreement completed.
2023-01-27 - 5:08:36 PM GMT



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable
Compliance
Activity (RCA)

[See back of form for instructions](#) →

1. **BREAKDOWN RELIEF: *District Use Only* BREAKDOWN REFERENCE #:**

2. **MONITOR EXCESS EMISSION or EXCURSION: *District Use Only* REFERENCE #:**

3. **MONITOR IS INOPERATIVE: *District Use Only* REFERENCE #:**

4. **PRESSURE RELIEF DEVICE (PRD): *District Use Only* PRD REFERENCE #:**

SITE INFORMATION AND DESCRIPTION INFORMATION (REQUIRED)

Company	City of Sunnyvale, ESD, Solid Waste		Site #	5905
Address	Borregas Avenue and Caribbean Drive		Source #	S-8
Reported by	Silviana Ruiz		Phone #	408 730-7545
Indicated Excess			Fax #	
Allowable Limit			Averaging Time	
Start Time/Date	20:50; 31 January 2023		Clear Time	21:57; 31 Jan. 2023
Monitor/device type(s)	<input type="checkbox"/> ▶ CEM	<input type="checkbox"/> ▶ GLM	<input type="checkbox"/> ▶ Parametric	<input type="checkbox"/> ▶ PRD <input type="checkbox"/> ▶ Non-monitor
Monitor description(s)				
Parameter(s) exceeded or not functioning due to inoperation				
<input type="checkbox"/> ▶ NO _x	<input type="checkbox"/> ▶ SO ₂	<input type="checkbox"/> ▶ CO	<input type="checkbox"/> ▶ CO ₂	<input type="checkbox"/> ▶ H ₂ S <input type="checkbox"/> ▶ TRS
<input type="checkbox"/> ▶ O ₂	<input type="checkbox"/> ▶ H ₂ O	<input type="checkbox"/> ▶ Opacity	<input type="checkbox"/> ▶ Lead	<input type="checkbox"/> ▶ Gauge Pressure <input checked="" type="checkbox"/> ▶ Flow
<input type="checkbox"/> ▶ Hydrocarbon Breakthrough (VOC)	<input type="checkbox"/> ▶ Temperature		<input type="checkbox"/> ▶ Wind Speed	
<input type="checkbox"/> ▶ Wind Direction	<input type="checkbox"/> ▶ Steam		<input type="checkbox"/> ▶ Other (describe)	
Unit(s) of Measurement				
<input type="checkbox"/> ▶ ppm	<input type="checkbox"/> ▶ ppb	<input type="checkbox"/> ▶ min/hr > 20%	<input type="checkbox"/> ▶ inches H ₂ O	<input type="checkbox"/> ▶ mmHg
<input type="checkbox"/> ▶ psig	<input type="checkbox"/> ▶ pH	<input type="checkbox"/> ▶ °Fahrenheit	<input type="checkbox"/> ▶ Other (describe)	

Event Description:

PG&E performing planned maintenance to install new equipment. PGF was secured and LFGF in service during the PG&E work. WPCP lost power at 2050 when 52-0 (main breaker to WPCP utility) open, due to PG&E work. WPCP Maintenance staff enroute to close 52-0 to restore power and at 2157 LFGF placed back in service. Total downtime of LFG system is 1.78 hours.

District Use Only

Received by

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 rca@baaqmd.gov
- ✓ **A 30-day written follow-up report is required for Breakdown Requests and PRD Releases.** Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference [Breakdown Admissions Advisory dated 12/3/04](#). Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: **You may have additional report requirements under Title V.**

Detailed Instructions

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

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

- 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 immediately upon discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

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

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

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

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

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

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

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

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

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

February 9, 2023

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



Sunnyvale

SMaRT Station®
301 Carl Road
Sunnyvale, CA 94089
TDD/TTY 408-730-7501
sunnyvale.ca.gov

Re: 10-day/30-day Deviation Report for S-8 City of Sunnyvale Sanitary Landfill, Facility #A5905 - RCA #08Q50 (Breakdown Relief) and RCA #08Q51 (Monitor Excess Emission or Excursion)

To whom it may concern,

This Deviation Report is submitted in compliance with Provision I.F of the Title V-Major Facility Review Permit for Plant #A5905, which states that, “...*all instances of non-compliance with permit shall be reported in writing to the District’s Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions.*” This report is intended to serve as the 10-day and 30-day Deviation Report, and the 30-day RCA report requirements for RCA #08Q50 (Breakdown Relief) and RCA #08Q51 (Monitor Excess Emission or Excursion). The subject incident involves a relatively short-term shutdown of the Sunnyvale Landfill (Source S-8) gas collection and control system (GCCS).

Incident Description

PG&E had planned new equipment installation and notified the city about the power outage on 1/31/2023. Typically, during such PGE projects, Water Pollution Control Plant (WPCP) main service is switched to another source and PGF’s at the WPCP come offline. In anticipation of this planned activity, on 1/31/2023, the city prepared the PGF’s, and the flare to be put in service. Unfortunately, during switching from the main service to the other source, an underground cable failed resulting in a power outage at 2051. As a result, the main utility breaker 52-0 to the WPCP opened and the whole facility lost power and flow to the landfill flare was lost. The flow was restored at 2157. Total downtime during this incident was 1hr and 6 minutes. Attached are documents to demonstrate the timeline and PGE explanation.

Please reach out to me at 415-730-7791 or djain@sunnyvale.ca.gov if you have any questions.

Sincerely,

Deepti Jain

Deepti Jain

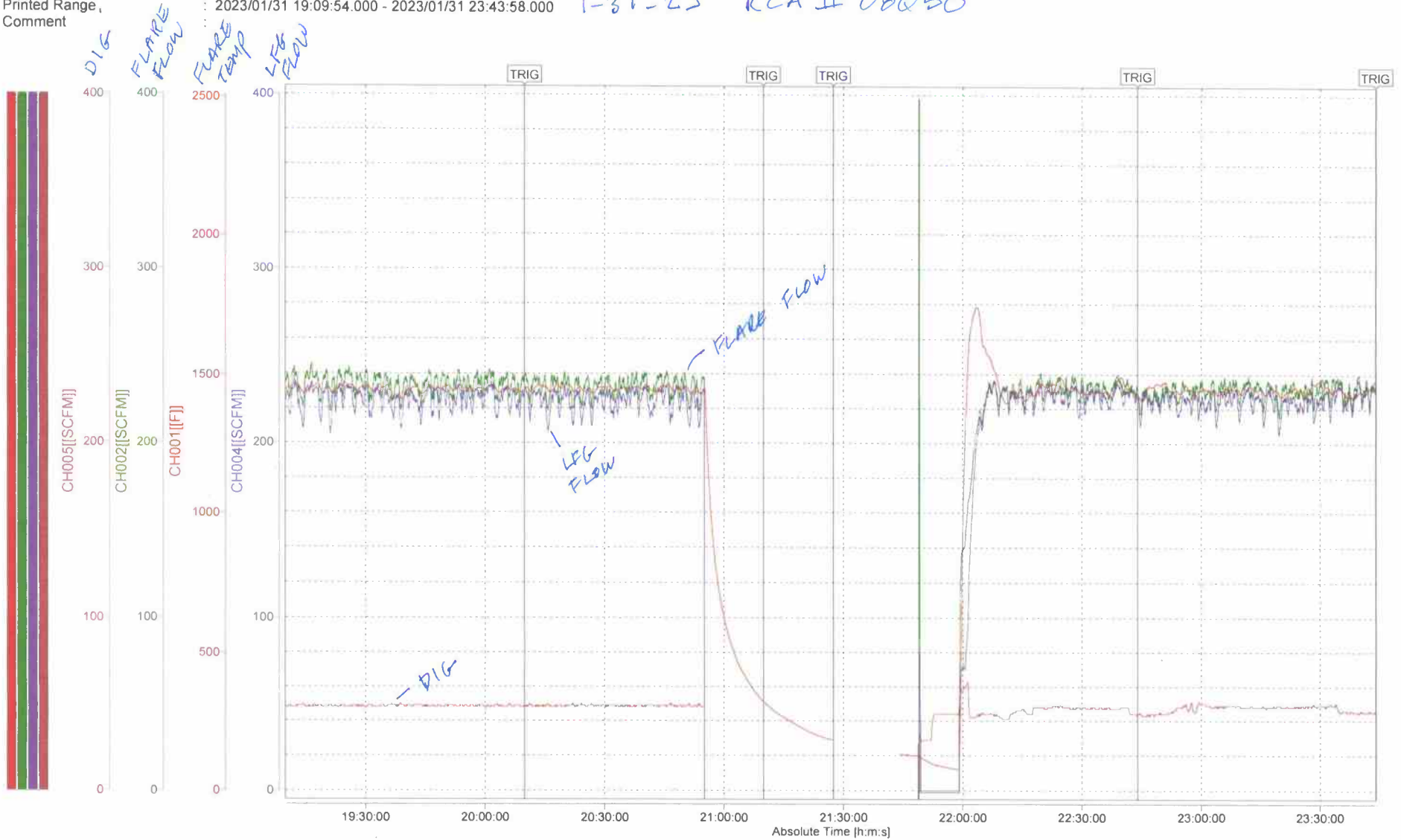
Environmental Programs Manager

cc: Joe Muehleck (BAAQMD), email

File Message :
File Name : 081640_230131_190954.DAD,081644_230131_224400.DAD
Device Type : DX1000
Serial No. : S5N408394
Time Correction : None
Starting Condition : Auto
Dividing Condition : Auto
Meas Ch. : 6
Math Ch. : 0
Ext Ch. : 0

Data Count : 8223
Sampling Interval : 2.000 sec
Start Time : 2023/01/31 19:09:54.000
Stop Time : 2023/01/31 23:43:58.000
Trigger Time : 2023/01/31 23:43:58.000
Trigger No. : 8222
Damage Check : Not Damaged
Started by : [Key In]
Stopped by : [Running]

Printed Group : GROUP 1
Printed Range, Comment : 2023/01/31 19:09:54.000 - 2023/01/31 23:43:58.000 1-31-23 RCA # 08050



A5905 - RCA # 08050 & 08051 - ATTACHMENT A - GAS FLOW GRAPH

Hi Bryan,
DEVCON is doing work out near your plant area. Unfortunately, Co Gen will need to come off line while your main service is switched to another source:

NOTICE OF PLANNED ELECTRIC SERVICE INTERRUPTION

CITY OF SUNNYVALE – WATER TREATMENT PLANT Co Gen only

PG&E will be installing new equipment which will impact one or more of your electric supply sources. Please be prepared to be without service on the following dates (weather permitting) and for the **estimated** times indicated:

DATE: Tuesday, January 31, 2023
TIME: 8:00 am to 6:30 pm
AFFECTED SERVICE: 1444 BORREGAS AVE, SUNNYVALE
METER #: Co Generator

1/31/23 AFW 23-0021555

TYPE B GEN. 1108/2 HAS DTT FOR SUNNYVALE WATER TREATMENT MUST COME OFFLINE WHEN 1108 IS OFFLOADED TO ANOTHER CIRCUIT

It is important to note the following: The distribution operator on the hot desk the day of will be making the customer contact to **408-398-4843**

We appreciate your cooperation and thank you for your patience.

Sincerely,

Teri

Therese (Teri) M Vetere
PGE
Local Customer Relationship Manager
De Anza & Central Coast Divisions
831-359-9933



www.pge.com/pspsupdates

We respect your privacy. Please review our privacy policy for more information.

<http://www.pge.com/en/about/company/privacy/customer/index.page>

From: [Vetere, Therese](#)
To: [Silviana Ruiz](#)
Cc: [Bryan Berdeen](#)
Subject: FW: PG&E - NOTICE OF PLANNED ELECTRIC SERVICE INTERRUPTION
Date: Tuesday, February 7, 2023 1:53:21 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
Importance: High

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Classification: Internal

Hello Silvana,
Please see below for outage response from our DO (distribution operations):

Yes the WWTP plant experienced an outage at 2051 on 1/31/23. During switching on the planned log an underground cable failed.

Let me know if you need anything more to complete your filing.

Sincerely,

Teri

Therese (Teri) M Vetere
PGE
Local Customer Relationship Manager
De Anza & Central Coast Divisions
831-359-9933



www.pge.com/pspsupdates

From: Silviana Ruiz <SRuiz@sunnyvale.ca.gov>
Sent: Monday, February 6, 2023 2:27 PM
To: Vetere, Therese <TXVE@pge.com>; Bryan Berdeen <BBerdeen@sunnyvale.ca.gov>; Patrick Lenoir <PLenoir@sunnyvale.ca.gov>; Leonard Espinoza <lespinoza@sunnyvale.ca.gov>; Michael Herrera <mherrera@sunnyvale.ca.gov>

ATTACHMENT C - PGE Explanation email
2/7/2023



March 20, 2023

Mr. Jeff Gove
Director of Compliance and Enforcement
Bay Area Air Quality Management District
Compliance & Enforcement Division
375 Beale Street, Suite 600
San Francisco, CA 94105

SMaRT Station®
301 Carl Road
Sunnyvale, CA 94089
TDD/TYY 408-730-7501
sunnyvale.ca.gov

Subject: 10-Day Response Letter for Notice of Violation ID A60929, City of Sunnyvale Landfill, Facility #A5905

Dear Mr. Gove

The City of Sunnyvale (Sunnyvale) is submitting this letter in response to NOV #A60929 issued on March 8, 2023, in response to the less than the continuous operation of the Landfill Gas Collection and Control System (LFGCCS), S-8 at the closed Sunnyvale Landfill (Facility #A5905). The following is a summary of the incident and corrective/preventive actions, documented in more detail in the 10/30-day Reports attached herein.

Excessive rainfall received between November 8, 2022, - January 16, 2023, has contributed to higher than the usual amount of Landfill Gas (LFG) condensate generation at two of the Condensate traps, which led to issues encountered with the transport of LFG through the landfill gas pipe network.

Condensate traps CT-1E and CT-7E, which had issues, are located where the two main LFG headers merge from the west and east sides of the landfill before LFG is sent to the Power Generation Facility (PGF) or the LFG Flare (LFGF). The pneumatic pumps inside these two condensate traps are low pump rate pumps and typically function well during normal field conditions. Apparently, during the heavy rains, the pump rates were insufficient for the amount of condensate generated.

Information related to five TV Deviations mentioned in the NOV A60929 and immediate corrective actions taken is described in Table 1, attached as Attachment B.

To prevent similar incidents in the future, Sunnyvale is taking the following preventive measures:

- On 3/7/23, two large diaphragm pumps (high pump rates), were purchased as an emergency backup.

- Staff is working with a contractor to modify the existing ancillary equipment for these new pumps and work on a solution to the vapor lock issues.
- In addition to re-establishing a pump maintenance service schedule with the contractor, staff is working on hiring an emergency service contractor in near future.
- Staff is coordinating efforts with the City Water Pollution Control Plant (WPCP) staff to ensure available support during evenings and weekends to respond to LFGCCS issues. City is also considering hiring a part-time staff person to assist landfill staff.
- To study condensate-related issues with the LFGCCS, staff is developing a Request for Proposals for an LFGCCS assessment study.

We humbly request that you consider the following factors concerning the subject violation when you review the need for a penalty:

- We self-reported all these incidents to the assigned Air District Inspector as soon as we discovered them.
- The LFGCCS has been in operation for over 30 years, and this is the first violation in the history of the landfill due to unprecedented weather conditions.

If you have questions regarding this letter, please contact Deepti Jain at 408-730-7791 or me at 408-730-7785.

Sincerely,

Ramana Chinnakotla

Ramana Chinnakotla
Environmental Services Director

Attachment A: Copy of the NOV#A60929

Attachment B: Table 1- Summary of TV deviations 7271, 7343, 7349, 7360, 7366

Attachment C: 10/30-day Deviation reports for S-8 (TV deviations 7271, 7343, 7349, 7360, 7366)

Attachment D: Site map of CT-1E and CT-7E locations and photographs of diaphragm pumps

Cc: Joseph Muehleck, Senior Air Quality Inspector, BAAQMD
Shikha Gupta, Solid Waste Programs Division Manager, Sunnyvale
Deepti Jain, Environmental Programs Manager, Sunnyvale



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

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

NOTICE OF VIOLATION

No. **A60929**

ISSUED TO: City of Sunnyvale P G N# A5905
 ADDRESS: 301 Carl Road
 CITY: Sunnyvale STATE: CA ZIP: 94089
 PHONE: (408) 730-7791
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 8 NAME: Landfill with gas collection system
 EMISSION PT: P# _____ NAME: _____
 DATE: 11/8/22 TIME: _____ HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input type="checkbox"/> REG 2 RULE _____ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input checked="" type="checkbox"/> REG <u>8</u> RULE <u>34</u> SECTION <u>301.1</u> CODE <input type="text"/>	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE <input type="text"/>	

Details: Less than continuous LGCS operation (TV Deviations 7271, 7343, 7349, 7360, 7366)

RECIPIENT NAME: Deepti Jain
 TITLE: Environmental Programs Manager

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X Deepti Jain

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

ISSUED BY: J. Muehleck (issued via email) INSP # 858
 DATE: 3/8/23 TIME: 1015 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

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

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

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

ALL OTHER VIOLATIONS

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

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

Table: Notice of Violation #A60929 - Summary of Title V Deviations					
Date(s) of Occurrence	TV Deviation #	Amount of Downtime (Hrs)	Root Cause	Rain (Inches)	Timeline Information
1 11/8/22 - 11/9/22	7271	34.52	Chart recorder lost power due to a blown transformer. Heavy rains caused loss of flow due to condensate blockage at CT-1E.	1.91	Power restored to chart recorder but LFG flow not indicated; condensate due to heavy rains blocked gas flow. On 11/8, CT-1E and CT-7E pumps were inspected and appeared to be ok. A p-trap, connected to header was pumped down, still no flow. On 11/9, CT-1E was pumped down and flow restored.
2 12/31/22 - 1/2/23*	7343	26.43**	Heavy rains caused loss of flow due to condensate blockage at CT-1E.	5.38	on 11/23, several attempts were made to manually pump condensate and to start LFG flare. A different pump (diaphragm pump) placed in service at CT-1E. Flow restored. Pump contractor called on site to check all condensate pumps.
3 1/9/2023	7349	6.28**	Heavy rains caused loss of flow due to condensate blockage at CT-1E.	1.35	Perform inspection on pump and it appears the pumps in the condensate sumps are experiencing a vapor lock (no space to exhaust) due to the high water level in the trap. A different pump was used to manually pump condensate. Flow restored after continual pumping of condensate.
4 1/16/23 - 1/18/23	7360	59.01**	Heavy rains caused loss of flow due to condensate blockage at CT-7E.	1.07	Hired contractor to conduct camera inspection of pipes in several sections of the landfill. Found blockage at CT-7E. Inspected pumps and manually pumped and restored flow as needed. A new diaphragm pump was purchased on 1/12 (before this RCA event) but the pump was not received until 1/19 due to shipping delays.
5 1/19/2023	7366	7.7	Heavy rains caused loss of flow due to condensate blockage at CT-7E.	0.03**	On 1/19, new pump was installed at CT-7E. Flow restored after manually pumping condensate. Inspected and repaired pump.

Notes:

*RCA Form submittal notates start of breakdown on 12/31/22 at 22:50. Actual start of breakdown (loss of flow) was on 1/11/23 at approximately 0200.

**Duration of landfill gas flare operation subtracted from reported downtime in 10 and 30 day reporting.

***Previous day (1/18/23) rain 0.27 inches

Rain data source: California Irrigation Management and Information System

Attachment C - Five Deviation Reports



SMaRT Station ®
301 Carl Road
Sunnyvale, CA 94089
TDD/TYY 408-730-7501
sunnyvale.ca.gov

November 18, 2022

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

Re: 10-day/30-day Deviation Report for S-8 City of Sunnyvale Sanitary Landfill, Facility #A5905

To whom it may concern,

This Deviation Report is submitted in compliance with Provision I.F of the Title V-Major Facility Review Permit for Plant #A5905, which states that, "...all instances of non-compliance with permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions." This report is intended to serve as the 10-day and 30-day Deviation Report, and the 30-day RCA report requirements for RCA #08N18 (Breakdown Relief) and #08N19 (Monitor Excess Emission or Excursion). The subject incident involves a relatively short-term shutdown of the Sunnyvale Landfill (Source S-8) gas collection and control system (GCCS).

Incident Description

Rainfall from November 7th through November 9th is believed to have contributed to a higher than usual amount of LFG condensate generation, which appears to have contributed to issues encountered with the transport of LFG through the pipe network. At 0145 a blown transformer caused loss of power to the LFG and mixed gas (MG) flow meters. Temporary power was supplied to the LFG and MG flow meters at 1322. Although the MG meter showed flow the LFG showed zero flow. It was assumed the LFG meter was not functioning when in fact, it was functioning but LFG flows were too low for the meter to record. At 0242, LFG flows to PGF

Deviation #7271



started to decline, as indicated by an increase of MG flow to PGF. At 1556, one of the two PGF engines was secured due to a decline in LFG flow. Efforts were made to reduce the excess condensate in the pipe network in two locations in the field, which were suspected of restricting gas flow. Unfortunately, the resulting flow of gas was not sufficient to sustain PGF. It was later apparent that condensate trap CT-1E was full of condensate and backing up in the pipe network, causing a restriction of LFG flow. CT-1E is located directly in front of the LFGF station, where all LFG flow merges and is then directed to either the PGF or LFGF. The pump inside CT-1E had issues with pumping the large amounts of condensate as fast as it was coming into the trap. On 11/9/22 at 0915 the LFG field isolation valve was closed to allow the condensate level to be drawn down at CT-1E. At 1254 the field isolation valve was opened and unsuccessful efforts were made to start the PGF due to poor gas quality. The decision was made to start the LFGF. After a few attempts to start the LFGF, it was successfully started at 1313. At 1433, the LFGF was secured and #2 PGF was started. At 1454, #2 PGF was identified as being unstable, so it was taken offline and #1 PGF was started. At 1513 both the PGFs were in service at their normal 600kw output, signaling the gas system was back to normal operating mode.

Based on this data and the fact that it had rained for several days, we believe it is unlikely that a significant release of LFG would have occurred during the downtime.

Sincerely,

David Krueger

David Krueger
Solid Waste Programs Division Manager

1108 110922_10- and 30-day report

Final Audit Report

2022-11-19

Created:	2022-11-18
By:	McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAA6nLE4nzPIP7QPL7rXsGWJ7M8D9hweeV4

"1108 110922_10- and 30-day report" History

-  Document created by McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
2022-11-18 - 7:32:45 PM GMT
-  Document emailed to David Krueger (dkrueger@sunnyvale.ca.gov) for signature
2022-11-18 - 7:33:07 PM GMT
-  Email viewed by David Krueger (dkrueger@sunnyvale.ca.gov)
2022-11-19 - 0:47:50 AM GMT
-  Document e-signed by David Krueger (dkrueger@sunnyvale.ca.gov)
Signature Date: 2022-11-19 - 0:48:15 AM GMT - Time Source: server
-  Agreement completed.
2022-11-19 - 0:48:15 AM GMT



January 10, 2023

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

SMaRT Station #
301 Carl Road
Sunnyvale, CA 94089
TDD/TTY 408-730-7501
sunnyvale.ca.gov

Re: 10-day/30-day Deviation Report for S-8 City of Sunnyvale Sanitary Landfill, Facility #A5905 - RCA #08P76 (Breakdown Relief) and RCA #08P77 (Monitor Excess Emission or Excursion)

To whom it may concern,

This Deviation Report is submitted in compliance with Provision I.F of the Title V-Major Facility Review Permit for Plant #A5905, which states that, “...all instances of non-compliance with permit shall be reported in writing to the District’s Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions.” This report is intended to serve as the 10-day and 30-day Deviation Report, and the 30-day RCA report requirements for RCA #08P76 (Breakdown Relief) and RCA #08P77 (Monitor Excess Emission or Excursion). The subject incident involves a moderate-term shutdown of the Sunnyvale Landfill (Source S-8) gas collection and control system (GCCS).

Incident Description

From 12/31/2022-1/2/2023, we received 5.38” of rainfall (per California Irrigation Management Information System (CIMIS)), which contributed to a higher than usual amount of landfill gas (LFG) condensate generation. As a result, we encountered issues with the transport of LFG through the pipe network.

During this RCA reporting period, the total downtime of the LFGF was 32 hours and 6 minutes. It began at 2302 on 12/31/22 and ended at 0708 on 1/2/23. During this duration, there were multiple short durations when the LFG Flare (LFGF) was running.

Background Information:

On 12/31/22 at 1955, LFG flows to the Power Generation Facility (PGF) engines started to decline, and gas flow continued to drop through 1/1/23.



Furthermore, on 1/31/22, at 0200 due to the decreasing gas flow PGF #1 shut down. Staff tried to pump out the LFG condensate line but were unable to keep up with the amount of condensate. Eventually, on 1/1/2023, at 1100, PGF#2 also went offline. Note that during this time period, the staff attempted to start the LFGF multiple times with little to no success. On 1/2/23, at 0708, the LFGF was back in service, with flow back to normal.

Based on this data, and the fact that it had rained for several days straight (5.38 inches during the three days of the RCA), we believe it is highly unlikely that a significant release of LFG through the landfill cover would have occurred during this downtime.

Sincerely,

Ramana Chinnakotla

Ramana Chinnakotla
Environmental Services Director

cc: Joe Muehleck (BAAQMD), email

Attachment: Flow Chart

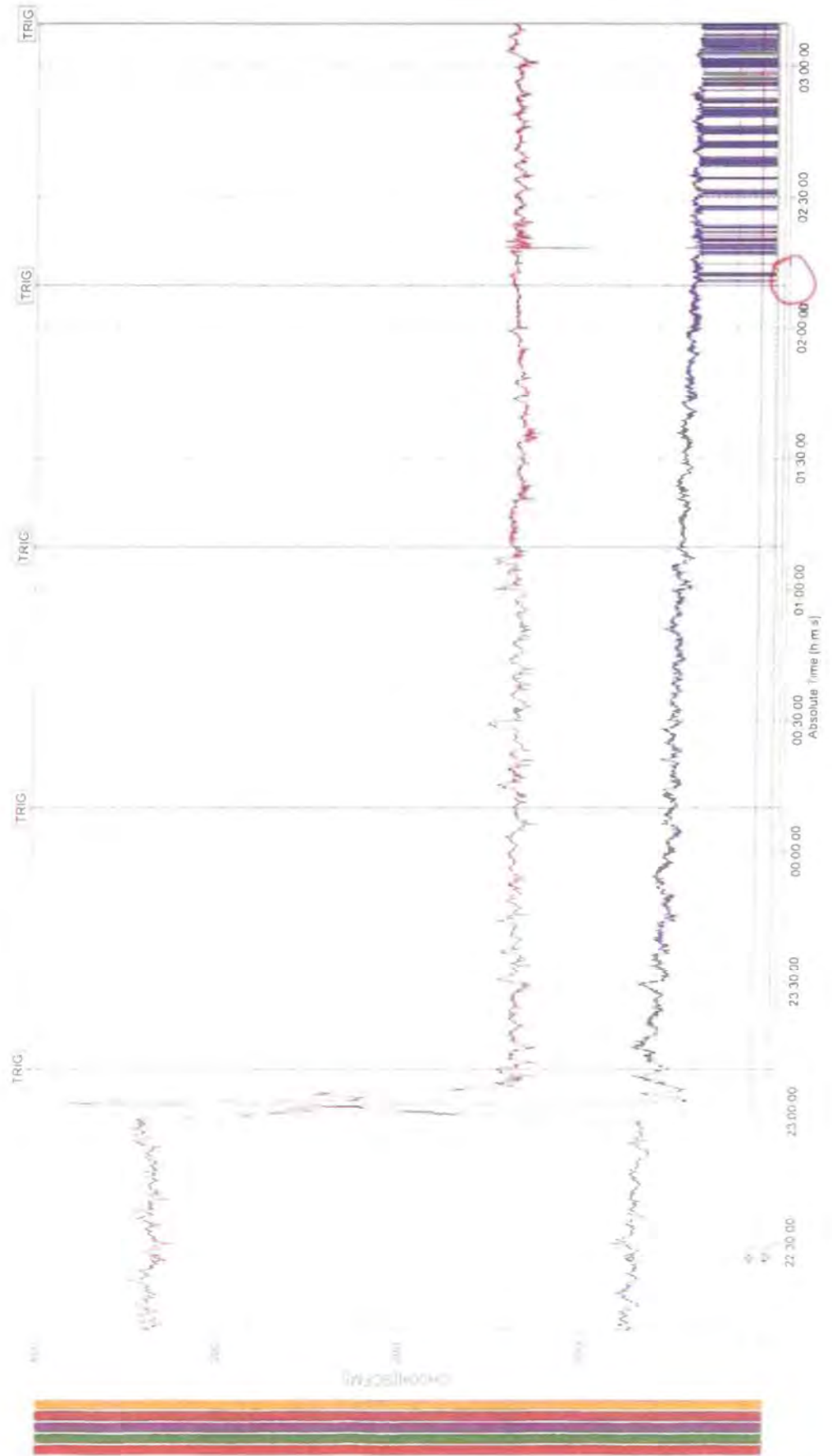
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 Dividing Condition Auto
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 Ext Ch 0

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 Stopped by [Running]

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 Printed Range 2022/12/31 22:09:54.000 - 2023/01/01 03:09:52.000
 Comment 1-1-23

12-31-22



File Message
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 Serial No
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 Dividing Condition
 Meas Ch
 Math Ch
 Ext Ch

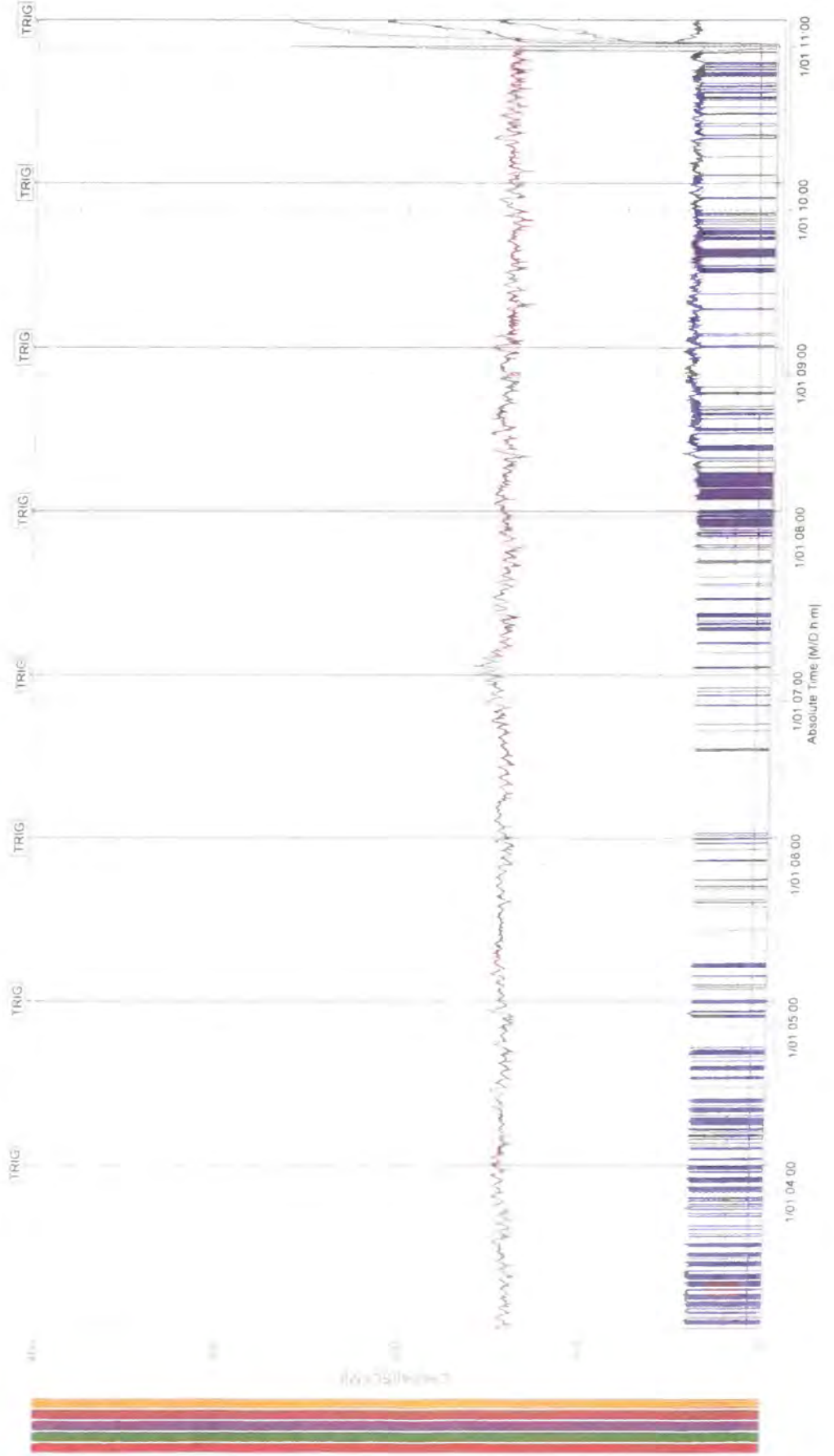
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 Damage Check Not Damaged
 Started by [Key In]
 Stopped by [Running]

Printed Group
 Printed Range
 Comment

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1-1-23

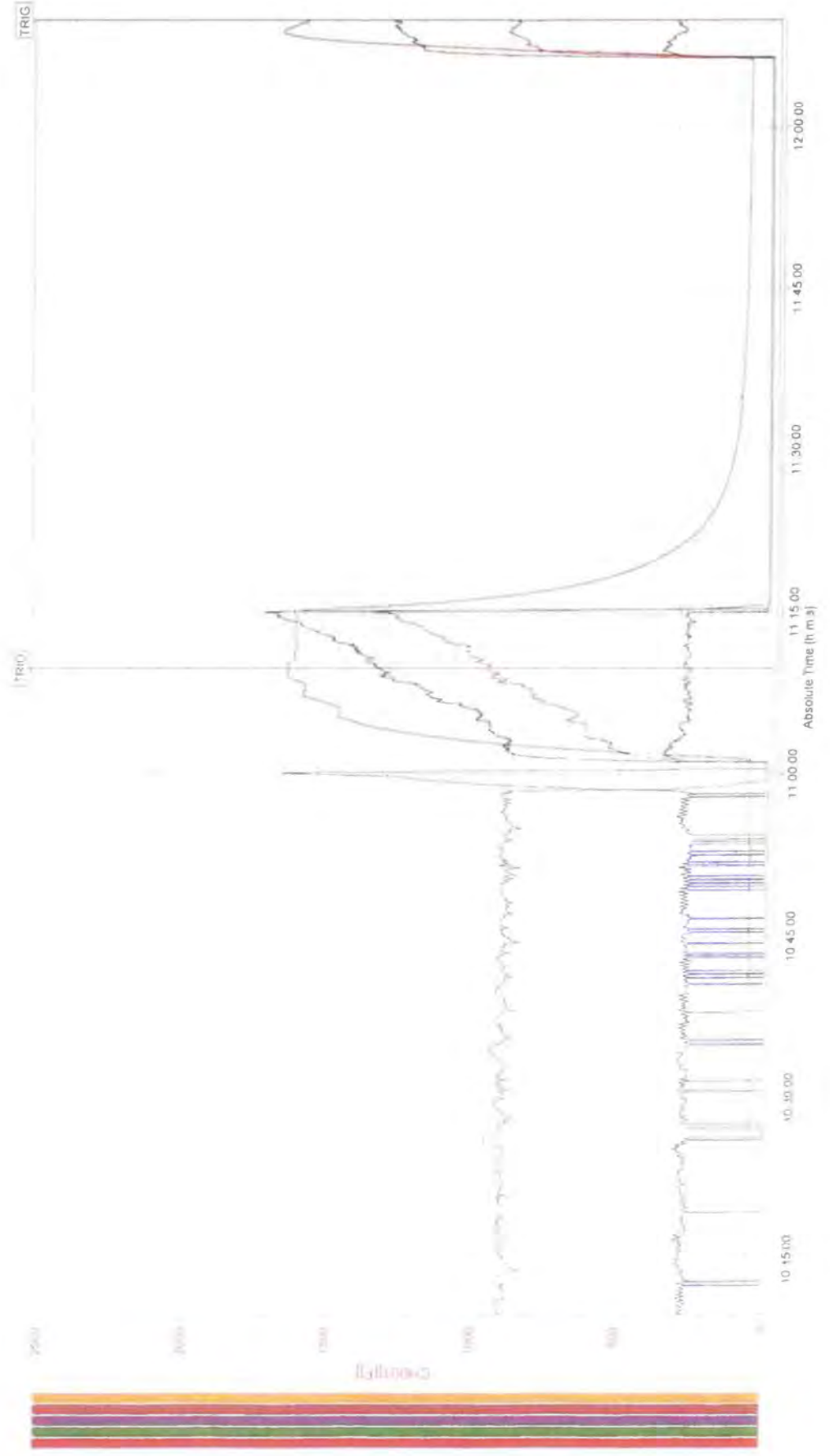


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 Meas.Ch 6
 Math.Ch 0
 Ext.Ch 0

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 Trigger Time 2023/01/01 12:09:52.000
 Trigger No 3599
 Damage Check Not Damaged
 Started by (Key In)
 Stopped by (Running)

Printed Group GROUP 1
 Printed Range 2023/01/01 10:09:54.000 - 2023/01/01 12:09:52.000
 Comment



File Message

File Name 080912_230101_110954.DAD_080914_230101_130954.DAD
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 Dividing Condition Auto
 Meas Ch 6
 Math Ch 0

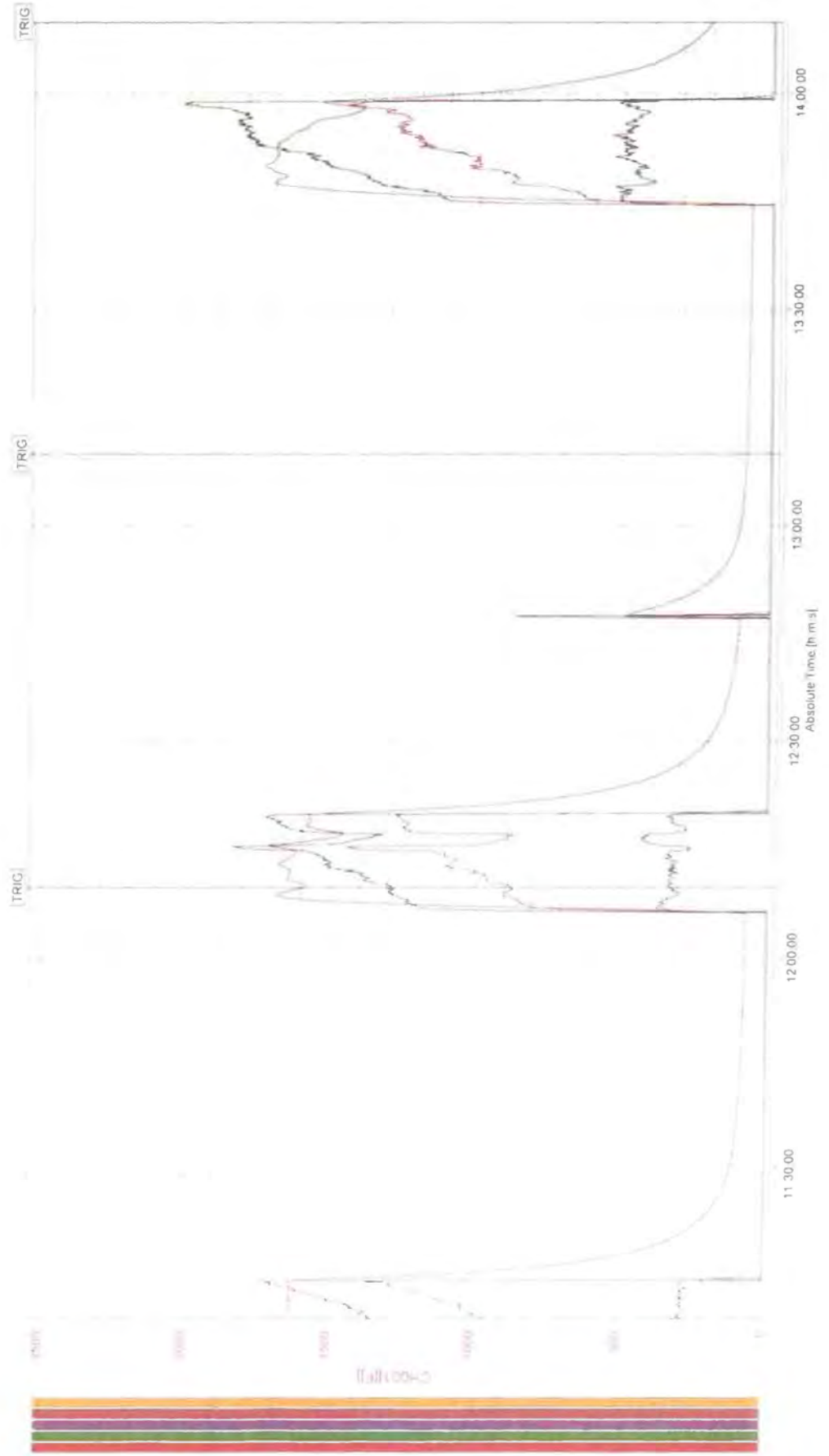
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 Started by [Key in]
 Stopped by [Running]

Printed Group

GROUP 1

Printed Range

Comment



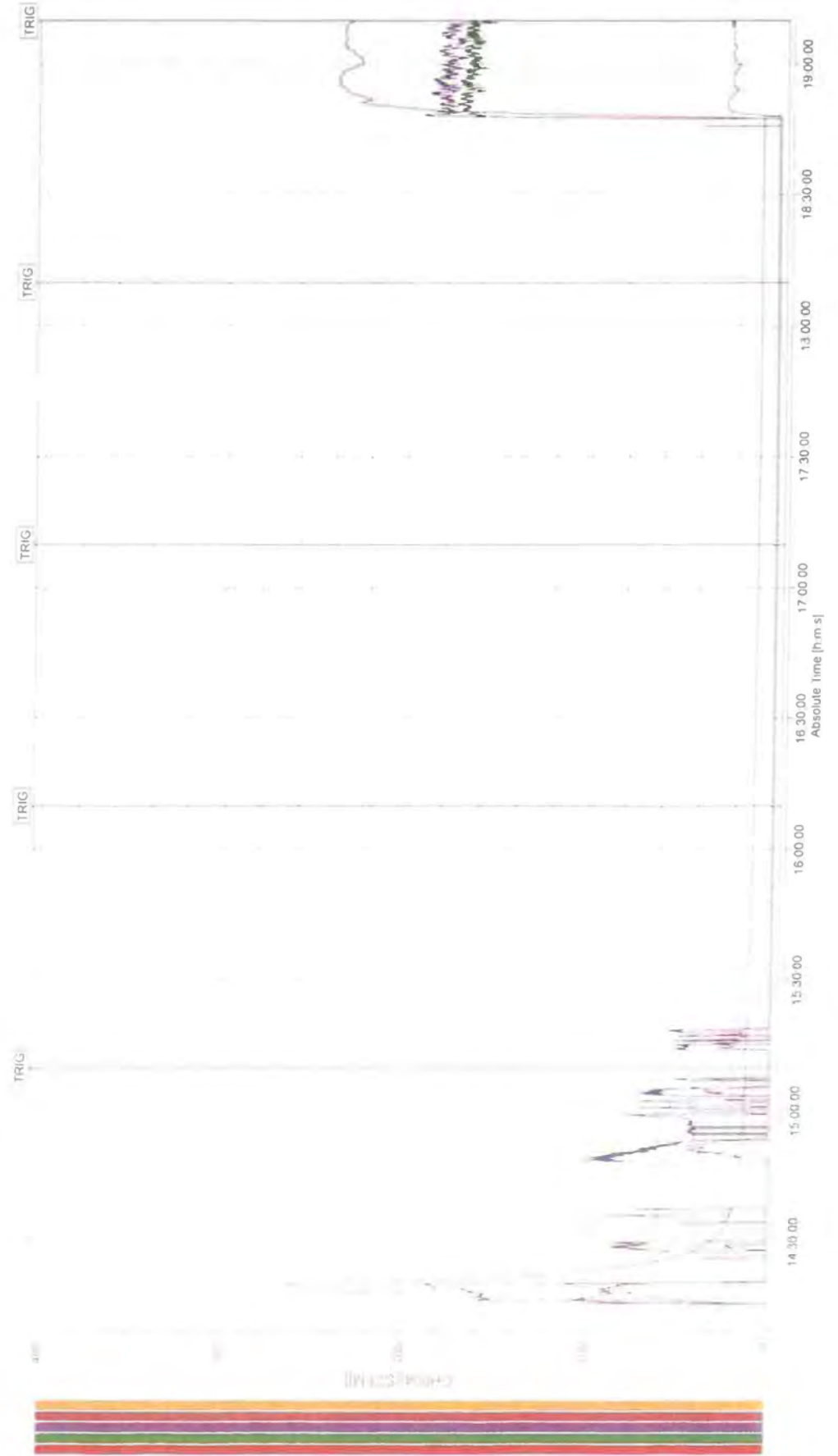
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Trigger Time 2023/01/01 19:09:52.000
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Started by [Key In]
Stopped by [Running]

Printed Group
Printed Range
Comment

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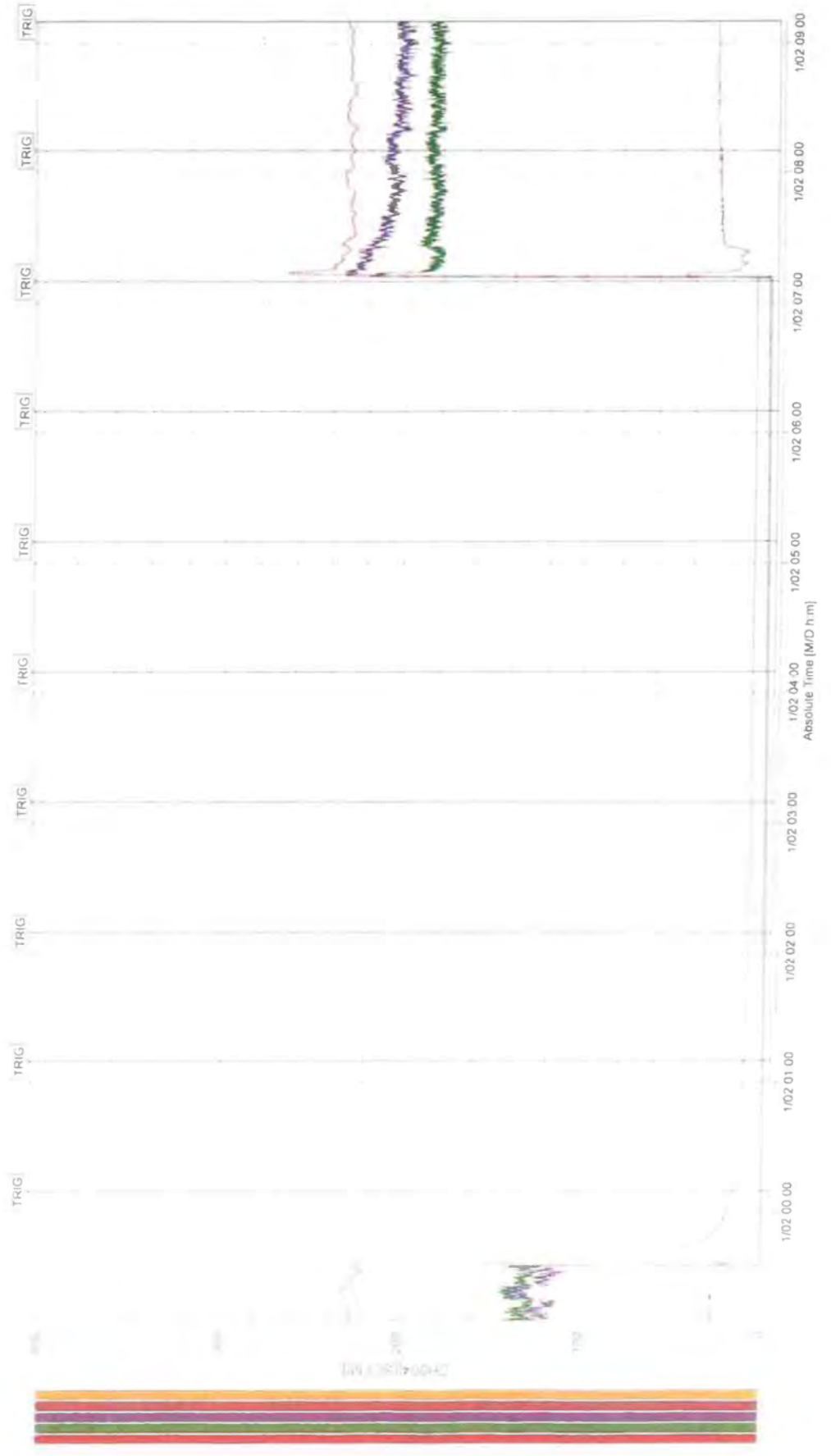
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 Device Type
 Serial No
 Time Correction
 Starting Condition
 Dividing Condition
 Meas Ch
 Math Ch
 Ext Ch

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 Auto
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 Start Time 2023/01/01 23:09:54.000
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 Trigger Time 2023/01/02 09:09:52.000
 Trigger No 17999
 Damage Check Not Damaged
 Started by [Key In]
 Stopped by [Running]

Printed Group
 Printed Range
 Comment

GROUP 1
 2023/01/01 23:09:54.000 - 2023/01/02 09:09:52.000
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BAAQMD -FacilityA5905 RCA08P76 -10- and 30-day Deviation Report

Final Audit Report

2023-01-10

Created:	2023-01-10
By:	McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAA4QDAilygyzzSz8ou4dT9JUp-T4YpV8g

"BAAQMD -FacilityA5905 RCA08P76 -10- and 30-day Deviation Report" History

-  Document created by McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
2023-01-10 - 10:23:07 PM GMT
-  Document emailed to Ramana Chinnakotla (rchinnakotla@sunnyvale.ca.gov) for signature
2023-01-10 - 10:23:58 PM GMT
-  Email viewed by Ramana Chinnakotla (rchinnakotla@sunnyvale.ca.gov)
2023-01-10 - 10:58:07 PM GMT
-  Document e-signed by Ramana Chinnakotla (rchinnakotla@sunnyvale.ca.gov)
Signature Date: 2023-01-10 - 10:58:17 PM GMT - Time Source: server
-  Agreement completed.
2023-01-10 - 10:58:17 PM GMT



January 13, 2023

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

SMaRT Station[®]
301 Carl Road
Sunnyvale, CA 94089
TDD/TYY 408-730-7501
sunnyvale.ca.gov

Re: 10-day/30-day Deviation Report for S-8 City of Sunnyvale Sanitary Landfill, Facility #A5905 - RCA #08P98 (Breakdown Relief) and RCA #08P99 (Monitor Excess Emission or Excursion)

To whom it may concern,

This Deviation Report is submitted in compliance with Provision I.F of the Title V-Major Facility Review Permit for Plant #A5905, which states that, “...*all instances of non-compliance with permit shall be reported in writing to the District’s Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions.*” This report is intended to serve as the 10-day and 30-day Deviation Report, and the 30-day RCA report requirements for RCA #08P98 (Breakdown Relief) and RCA #08P99 (Monitor Excess Emission or Excursion). The subject incident involves a moderate-term shutdown of the Sunnyvale Landfill (Source S-8) gas collection and control system (GCCS).

Incident Description

From 1/9/23 - 1/11/23, we received 2.03” of rainfall (per California Irrigation Management Information System (CIMIS)) which is believed to have contributed to a higher than usual amount of landfill gas (LFG) condensate generation. As a result, we encountered issues with the transport of LFG through the pipe network. We are continuing to investigate the higher than usual volume of condensate and the frequency of blockages in the piping system.

On 1/9/23 at 0918 LFG flow was lost to the #2 PGF (note that the #1 PGF is out of service for maintenance). The loss of landfill gas flow was attributed to a buildup of condensate in condensate trap CT-1E, which caused blockage of LFG flow, and resulted in the shutting down of the generator. During this time period, landfill staff pumped condensate in an effort to

Deviation # 7349

increase LFG flow, and the flow was resumed at 1502. At 1547, the LFGF was set up to switch over to the PGF, and at 1620 the PGF (one genset) was in service.

This RCA episode started at 0918 and ended at 1620 on 1/9/23, a total of 7 hours and 2 minutes. During this episode, there was a relatively short duration of approximately 45 minutes when the LFG Flare was running.

Based on the available rainfall data and the saturated landfill cover, we believe it is highly unlikely that a significant release of LFG through the landfill cover would have occurred during this downtime.

Sincerely,

Ramana Chinnakotla

Ramana Chinnakotla
Environmental Services Director

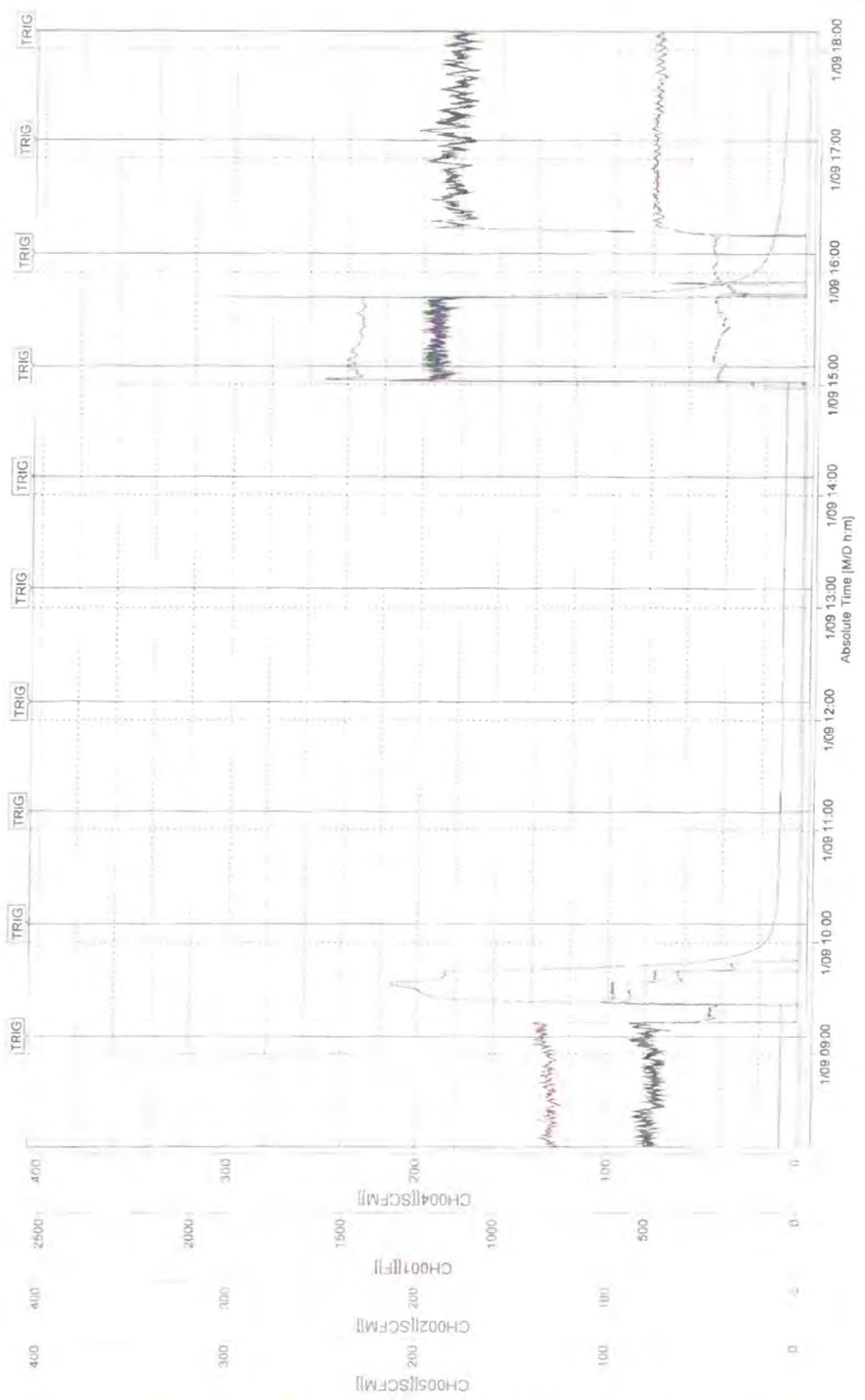
cc: Joe Muehleck (BAAQMD), email

Attachment: Flow Chart

File Message
 File Name : 081101_230109_080954.DAD
 Device Type : DX1000
 Serial No. : S5N408394
 Time Correction : None
 Starting Condition : Auto
 Dividing Condition : Auto
 Meas Ch. : 6
 Math Ch. : 0
 Ext Ch : 0

Data Count : 18000
 Sampling Interval : 2.000 sec
 Start Time : 2023/01/09 08:09:54.030
 Stop Time : 2023/01/09 18:09:52.030
 Trigger Time : 2023/01/09 18:09:52.030
 Trigger No. : 17999
 Damage Check : Not Damaged
 Started by : [Key In]
 Stopped by : [Running]

Printed Group : GROUP 1
 Printed Range : 2023/01/09 08:09:54.000 - 2023/01/09 18:09:52.000
 Comment :



BAAQMD RCA report

Final Audit Report

2023-01-13

Created:	2023-01-13
By:	McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAAAnobDgeCeUBk8flkt84s2cMQ1OfKAFZL

"BAAQMD RCA report" History

-  Document created by McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
2023-01-13 - 8:43:19 PM GMT
-  Document emailed to Ramana Chinnakotla (rchinnakotla@sunnyvale.ca.gov) for signature
2023-01-13 - 8:44:01 PM GMT
-  Email viewed by Ramana Chinnakotla (rchinnakotla@sunnyvale.ca.gov)
2023-01-13 - 9:18:31 PM GMT
-  Document e-signed by Ramana Chinnakotla (rchinnakotla@sunnyvale.ca.gov)
Signature Date: 2023-01-13 - 9:18:58 PM GMT - Time Source: server
-  Agreement completed.
2023-01-13 - 9:18:58 PM GMT



Sunnyvale

January 24, 2023

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

SMaRT Station ®
301 Carl Road
Sunnyvale, CA 94089
TDD/TYY 408-730-7501
sunnyvale.ca.gov

Re: 10-day/30-day Deviation Report for S-8 City of Sunnyvale Sanitary Landfill, Facility #A5905 - RCA #08Q12 (Breakdown Relief) and RCA #08Q13 (Monitor Excess Emission or Excursion)

To whom it may concern,

This Deviation Report is submitted in compliance with Provision I.F of the Title V-Major Facility Review Permit for Plant #A5905, which states that, “...*all instances of non-compliance with permit shall be reported in writing to the District’s Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions.*” This report is intended to serve as the 10-day and 30-day Deviation Report, and the 30-day RCA report requirements for RCA #08Q12 (Breakdown Relief) and RCA #08Q13 (Monitor Excess Emission or Excursion). The subject incident involves a moderate-term shutdown of the Sunnyvale Landfill (Source S-8) gas collection and control system (GCCS).

Incident Description

From 1/16/23 - 1/18/23 we received 1.07” of rainfall (per California Irrigation Management Information System (CIMIS)) which is believed to have contributed to a higher than usual amount of landfill gas (LFG) condensate generation. As a result, we encountered issues with the transport of LFG through the pipe network. We are continuing to investigate the higher than usual volume of condensate and the frequency of blockages in the piping system.

On 1/16/23 at 00:39 the Power Generation Facility (PGF) shutdown due to loss of LFG flow. The loss of LFG flow was attributed to a buildup of condensate in the landfill gas collection system, which caused blockage of LFG flow, and resulted in the shutting down of the PGF. During this time period, landfill staff inspected condensate pumps and portions of the landfill gas collection system to try to determine where the blockage was located. Landfill staff hired a



contractor to perform a camera inspection of the landfill pipes in several locations. It was determined there was a blockage in condensate trap CT-7E. Staff immediately pumped condensate at this location in an effort to increase LFG flow. At 1247 on 1/18/23, the LFGF was in service. At 1421, the LFGF was set up to switch over to the PGF, and at 1443 the PGF was in service.

This RCA episode started at 00:39 on 1/16/23 and ended at 1443 on 1/18/23, a total of 61.07 hours. During this episode, there was a duration of approximately 1.92 hours when the LFG Flare was running.

Based on the available rainfall data and the saturated landfill cover, we believe it is highly unlikely that a significant release of LFG through the landfill cover would have occurred during this downtime.

Sincerely,


Karen Gissibl (Jan 24, 2023 12:41 PST)

Karen Gissibl
Environmental Programs Manager

cc: Joe Muehleck (BAAQMD), email

Attachment: Flow Chart

BAAQMD- RCA 08Q12 and 08Q13_10- and 30-day report (1)

Final Audit Report

2023-01-24

Created:	2023-01-24
By:	McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAAeQKJ4CPRneEv_4kPF9IbSX07Lu7LWaUL

"BAAQMD- RCA 08Q12 and 08Q13_10- and 30-day report (1)" History

-  Document created by McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
2023-01-24 - 8:48:00 PM GMT
-  Document emailed to Karen Gissibl (kgissibl@sunnyvale.ca.gov) for signature
2023-01-24 - 8:48:40 PM GMT
-  Email viewed by Karen Gissibl (kgissibl@sunnyvale.ca.gov)
2023-01-24 - 9:39:15 PM GMT
-  Document e-signed by Karen Gissibl (kgissibl@sunnyvale.ca.gov)
Signature Date: 2023-01-24 - 9:41:10 PM GMT - Time Source: server
-  Agreement completed.
2023-01-24 - 9:41:10 PM GMT



January 27, 2023

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

SMaRT Station[®]
301 Carl Road
Sunnyvale, CA 94089
TDD/TYY 408-730-7501
sunnyvale.ca.gov

Re: 10-day/30-day Deviation Report for S-8 City of Sunnyvale Sanitary Landfill, Facility #A5905 - RCA #08Q22 (Breakdown Relief) and RCA #08Q23 (Monitor Excess Emission or Excursion)

To whom it may concern,

This Deviation Report is submitted in compliance with Provision I.F of the Title V-Major Facility Review Permit for Plant #A5905, which states that, “...all instances of non-compliance with permit shall be reported in writing to the District’s Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions.” This report is intended to serve as the 10-day and 30-day Deviation Report, and the 30-day RCA report requirements for RCA #08Q22 (Breakdown Relief) and RCA #08Q23 (Monitor Excess Emission or Excursion). The subject incident involves a relatively short-term shutdown of the Sunnyvale Landfill (Source S-8) gas collection and control system (GCCS).

Incident Description

Large quantities of rain were received at the landfill site for the month of January, 8.24” of rainfall (per California Irrigation Management and Information System (CIMIS)), which contributed to a higher than usual amount of landfill gas (LFG) condensate generation. As a result, we encountered issues with the transport of LFG through the pipe network. We are continuing to investigate the higher than usual volume of condensate and the frequency of blockages in the piping system.

On 1/19/23 at 0238 there was a loss of LFG flow. The loss of LFG flow was attributed to a buildup of condensate in the landfill gas collection system, which caused blockage of LFG flow, and resulted in the shutting down of the GCCS. The #1 PGF continued to operate on mixed gas (MG), a combination of digester gas and air blended natural gas. During this time period,

Deviation # 7366



landfill staff inspected condensate pumps and areas of the landfill gas collection system to determine where the blockage was located. It was determined there was a blockage in condensate trap CT-7E. Staff immediately pumped condensate at this location in an effort to increase LFG flow. Staff replaced the pump in CT-7E with a new one. At 1020, there was sufficient LFG flow available to send to the #1 PGF. At 1140, the #2 PGF was placed in service and both engines were operating at normal output.

This RCA episode started at 0238 and ended at 1020 on 1/19/23, a total of 7.7 hours.

Based on the available rainfall data, we believe it is highly unlikely that a significant release of LFG through the landfill cover would have occurred during this downtime.

Sincerely,


Karen Gissibl (Jan 27, 2023 09:08 PST)

Karen Gissibl
Environmental Programs Manager

cc: Joe Muehleck (BAAQMD), email

Attachment: Flow Chart

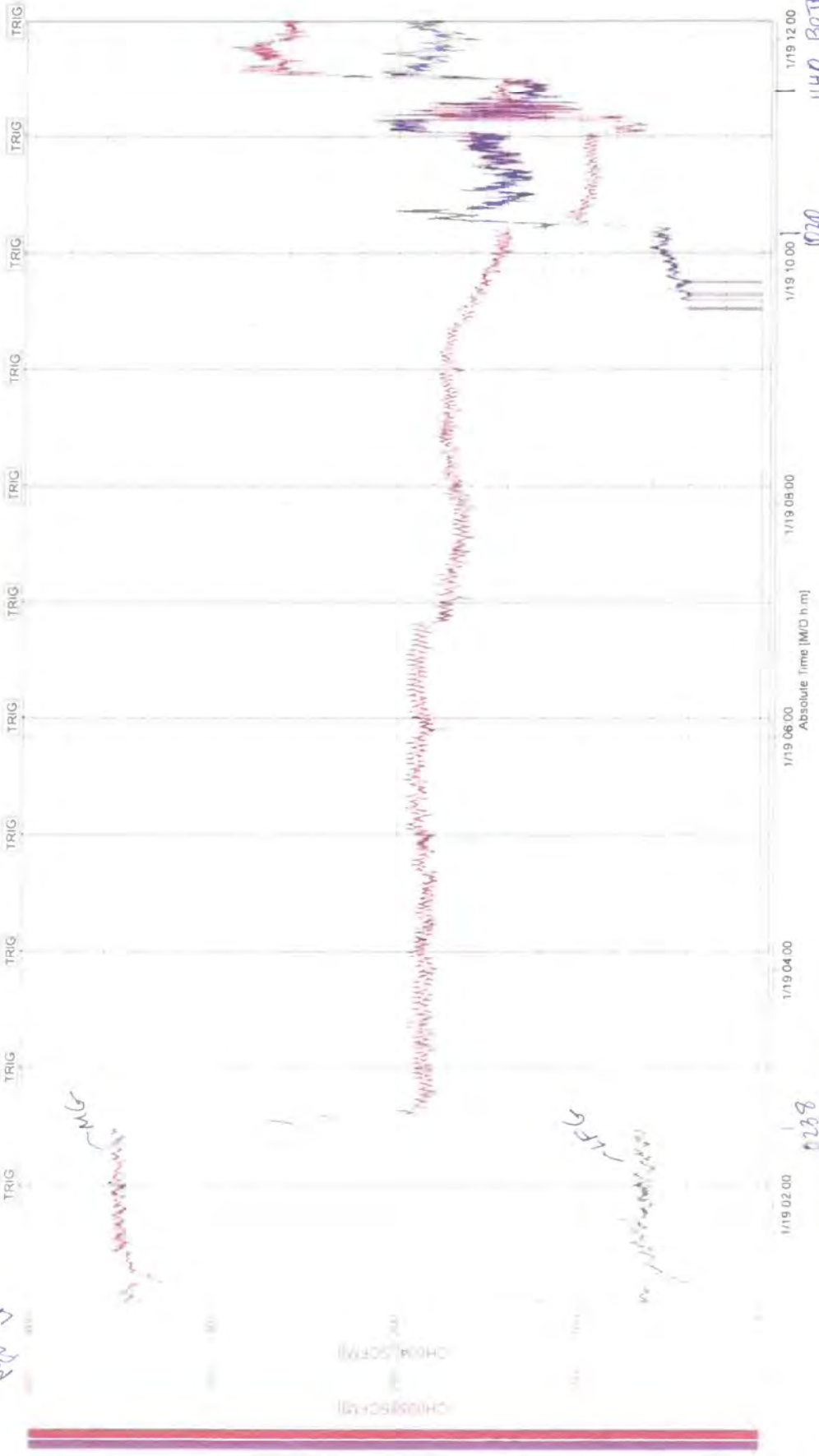
File Message
 File Name
 Device Type
 Serial No
 Time Correction
 Starting Condition
 Dividing Condition
 Meas Ch
 Math Ch
 Ext Ch

081334_230119_010954 DAD, .081344_230119_110954 DAD
 DX1000
 S5N408394
 None
 Auto
 6
 0
 0

Data Count 19800
 Sampling Interval 2.000 sec
 Start Time 2023/01/19 01 09 54 000
 Stop Time 2023/01/19 12 09 52 000
 Trigger Time 2023/01/19 12 09 52 000
 Trigger No 19799
 Damage Check Not Damaged
 Started by [Key In]
 Stopped by [Running]

Printed Group GROUP 1
 Printed Range 2023/01/19 01 09 54 000 - 2023/01/19 12 09 52 000
 Comment 1/1a123 RCA # 08022
 08023

Flow (MIXED GAS)
 LFG FLOW



Flow (MIXED GAS)
 LFG FLOW

Flow (MIXED GAS)
 LFG FLOW

0238
 LOSS OF
 LFG FLOW

1070
 LFG FLOW
 TO #1 P6F

1140 BOTH
 P6F'S IN SERVICE

BAAQMD- RCA 08Q22 and 08Q23_10- and 30-day report1 (1)

Final Audit Report

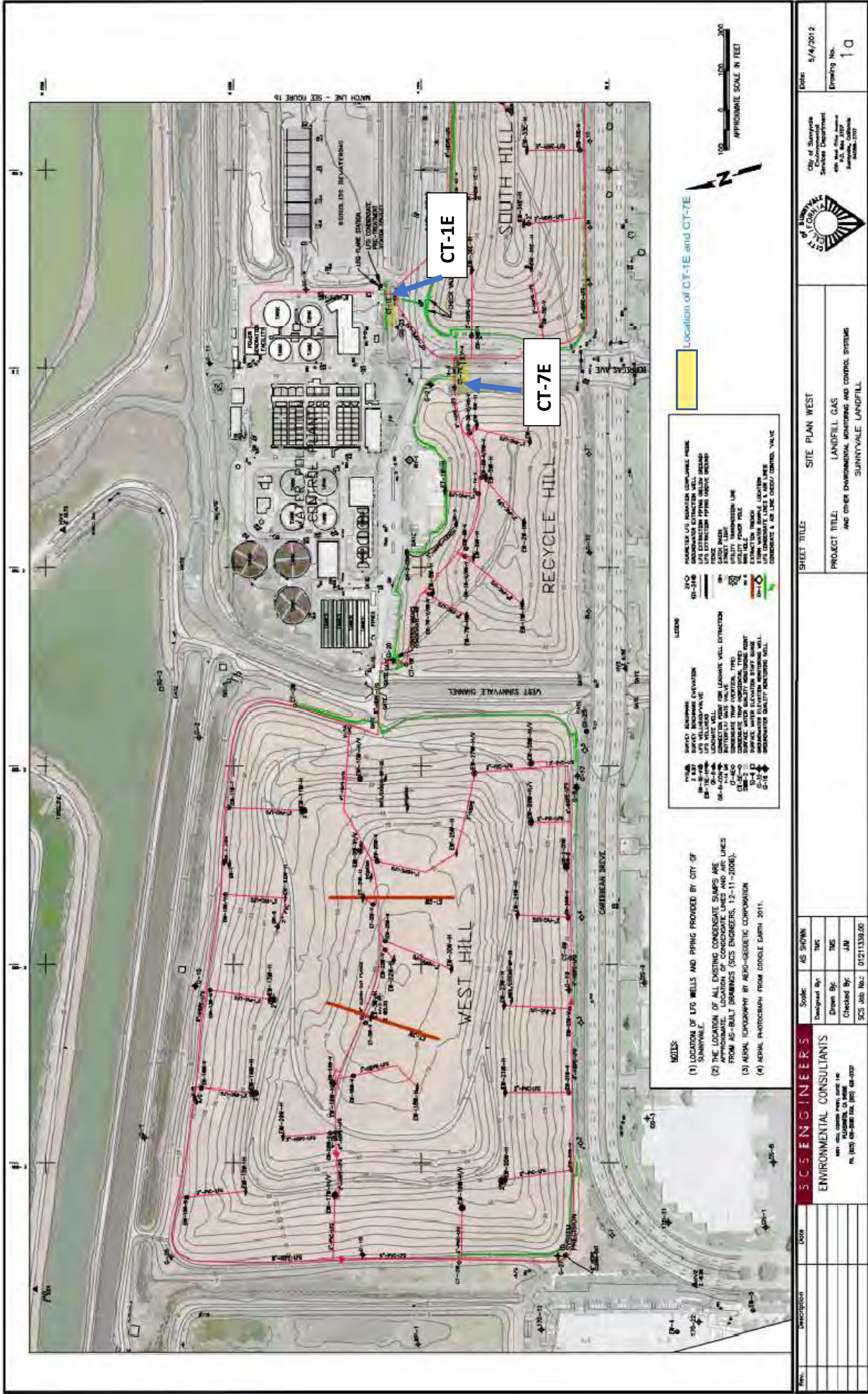
2023-01-27

Created:	2023-01-27
By:	McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAA-YH7_MH3_uCULZAb3JfWfkuGTDVevMA

"BAAQMD- RCA 08Q22 and 08Q23_10- and 30-day report1 (1)" History

-  Document created by McKendra Lafferty (MLafferty@sunnyvale.ca.gov)
2023-01-27 - 4:52:28 PM GMT
-  Document emailed to Karen Gissibl (kgissibl@sunnyvale.ca.gov) for signature
2023-01-27 - 4:53:22 PM GMT
-  Email viewed by Karen Gissibl (kgissibl@sunnyvale.ca.gov)
2023-01-27 - 5:04:43 PM GMT
-  Document e-signed by Karen Gissibl (kgissibl@sunnyvale.ca.gov)
Signature Date: 2023-01-27 - 5:08:36 PM GMT - Time Source: server
-  Agreement completed.
2023-01-27 - 5:08:36 PM GMT

Attachment D - CT-1E and CT-7E location map and photos of the new pumps



NOTES:
 (1) LOCATION OF LGS WELLS AND PIPING PROVIDED BY CITY OF SUNNYVALE.
 (2) THE LOCATION OF ALL EXISTING CONCREGATE SWAPS ARE FROM AS-BUILT DRAWINGS (SCS ENGINEERS, 12-11-2008).
 (3) AERIAL PHOTOGRAPH BY AERO-GEODETIC CORPORATION.
 (4) AERIAL PHOTOGRAPH FROM GOOGLE EARTH, 2011.

- LEGEND**
- 210 210" DIAMETER LGS MONITORING CONCREGATE SWAP
 - 120 120" DIAMETER LGS MONITORING CONCREGATE SWAP
 - S-1 12" DIAMETER LGS MONITORING WELL
 - L-1 12" DIAMETER LGS MONITORING LINE
 - L-2 12" DIAMETER LGS MONITORING LINE
 - L-3 12" DIAMETER LGS MONITORING LINE
 - L-4 12" DIAMETER LGS MONITORING LINE
 - L-5 12" DIAMETER LGS MONITORING LINE
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 - L-99 12" DIAMETER LGS MONITORING LINE
 - L-100 12" DIAMETER LGS MONITORING LINE



Location of CT-1E and CT-7E

DATE: 5/4/2012 DRAWING NO. 10	CITY OF SUNNYVALE SUNNYVALE LANDFILL DATE: 03.04.2007 SCALE: 1"=100'	SHEET TITLE: SITE PLAN WEST	PROJECT TITLE: LANDFILL GAS AND OTHER ENVIRONMENTAL MONITORING AND CONTROL SYSTEMS SUNNYVALE LANDFILL	DESIGNED BY: TUC	SCALE: AS SHOWN
				CHECKED BY: JLM	DRAWN BY: TUC
SCS ENGINEERS ENVIRONMENTAL CONSULTANTS 10000 SUNNYVALE BLVD., SUITE 100 SUNNYVALE, CA 94588 TEL: (925) 885-8800 FAX: (925) 885-8820		PROJECT TITLE: LANDFILL GAS AND OTHER ENVIRONMENTAL MONITORING AND CONTROL SYSTEMS SUNNYVALE LANDFILL		CHECKED BY: JLM	DATE: 05/04/2012

Attachment D - CT-1E and CT-7E location map and photos of the new pumps



New CT-7E Condensate Trap



New CT-1E Condensate Trap



Sunnyvale

SMaRT Station®
301 Carl Road
Sunnyvale, CA 94089
TDD/TYY 408-730-7501
sunnyvale.ca.gov

September 21, 2023

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

Re: 10-day/30-day Deviation Report for S-8 City of Sunnyvale Sanitary Landfill, Facility #A5905 - RCA #08U74 (Breakdown Relief), and RCA #08U80 (Monitor Indicates Excess Emission or Excursion)

To whom it may concern,

This Deviation Report is submitted in compliance with Provision I.F of the Title V-Major Facility Review Permit for Plant #A5905, which states that, “...*all instances of non-compliance with permit shall be reported in writing to the District’s Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions.*” This report is intended to serve as the 10-day and 30-day Deviation Report, and the 30-day RCA report requirements for RCA #08U74 (Breakdown Relief) and RCA #08U80 (Monitor Indicates Excess Emission or Excursion). The subject incident involves a moderate-term shutdown of the Sunnyvale Landfill (Source S-8) gas collection and control system (GCCS).

Incident Description

09/14/23, In preparations for a scheduled temporary shutdown of PG&E power related to planned contractor work at the new facility switchgear Water Pollution Control Plant (Plant) Site#A0733, power supply was switched to the emergency generator. After switching to generator power at 0905, the Landfill Gas Flare (LFGF) was unable to start. Efforts were immediately initiated to troubleshoot an apparent loss of power. The source of the power outage was traced to the Uninterruptible Power Supply (UPS) units that power the LFGF control panel. The UPS units were powered up and the control panel was reset by pressing a “reset” switch. The LFGF was put back in service at 1020, ending this event.

During this RCA reporting period, the total downtime for collection of LFG from the landfill was 1 hour and 15 minutes.

The Plant has submitted a work order to the maintenance department to have these UPS units replaced to prevent similar events. In addition, a label will be placed on the LFGF Control Panel adjacent to the reset switch, directing that the “reset” switch should be pressed whenever such an occurrence (UPS outage) takes place.

The long-term solution will be to connect the LFGF control panel to the Plants’ future standby backup generator power supply.

Sincerely,



Deepti Jain
Environmental Programs Manager

cc: Joe Muehleck (BAAQMD), email

Attachment A: Flow Chart

Attachment B: Plant Shutdown Request (PSR)



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable
Compliance
Activity (RCA)

See back of form for instructions →

1. FACILITY IS REQUESTING BREAKDOWN RELIEF (Regulation 1-431 and 1-432)

District Use Only BREAKDOWN REFERENCE #: 08074

2. MONITOR INDICATES EXCESS EMISSION or EXCURSION (Regulation 1-522.7, 1-523.3, 1-542)

District Use Only EXCESS or EXCURSION REFERENCE #:

3. MONITOR IS INOPERATIVE (Regulation 1-522.4, 1-523.2, 1-530)

District Use Only INOPERATIVE MONITOR REFERENCE #:

4. PRESSURE IS RELEASED FROM RELIEF DEVICE (PRD) (Regulation 8-28-401)

District Use Only PRD REFERENCE #:

SITE INFORMATION AND DESCRIPTION INFORMATION (REQUIRED)

Company	City of Sunnyvale Water Pollution Control Plant	Site #	5905
Address	1444 Borregas Ave, Sunnyvale CA 94088	Source #	8
Reported by	Kyle Markarian - Senior Operator	Phone #	408-730-7260
Indicated Excess		Fax #	
Allowable Limit		Averaging Time	
Start Time/Date	0905 hrs / 9-14-23	Clear Time	1020 hrs / 9-14-23
Monitor/device type(s)	<input type="checkbox"/> ▶ CEM <input type="checkbox"/> ▶ GLM <input type="checkbox"/> ▶ Parametric <input type="checkbox"/> ▶ PRD <input type="checkbox"/> ▶ Non-monitor		
Monitor description(s)			
Parameter(s) exceeded or not functioning due to inoperation			
<input type="checkbox"/> ▶ NO _x	<input type="checkbox"/> ▶ SO ₂	<input type="checkbox"/> ▶ CO	<input type="checkbox"/> ▶ CO ₂
<input type="checkbox"/> ▶ O ₂	<input type="checkbox"/> ▶ H ₂ O	<input type="checkbox"/> ▶ Opacity	<input type="checkbox"/> ▶ Lead
<input type="checkbox"/> ▶ Hydrocarbon Breakthrough (VOC)	<input type="checkbox"/> ▶ Temperature	<input type="checkbox"/> ▶ Wind Speed	<input type="checkbox"/> ▶ H ₂ S
<input type="checkbox"/> ▶ Wind Direction	<input type="checkbox"/> ▶ Steam	<input type="checkbox"/> ▶ Other (describe)	<input type="checkbox"/> ▶ TRS
Unit(s) of Measurement			
<input type="checkbox"/> ▶ ppm	<input type="checkbox"/> ▶ ppb	<input type="checkbox"/> ▶ min/hr > 20%	<input type="checkbox"/> ▶ inches H ₂ O
<input type="checkbox"/> ▶ psig	<input type="checkbox"/> ▶ pH	<input type="checkbox"/> ▶ °Fahrenheit	<input type="checkbox"/> ▶ mmHg
			<input type="checkbox"/> ▶ Other (describe)

Event Description: In preparation for scheduled loss of PG&E power for contractor work to be performed at new facility switchgear plant supply power moved to emergency generator. After switching to generator power at 0905 unable to start LFG flare. Discovered a blown fuse and no power to UPS units at the LFG flare. After replacing fuse and powering UPS units LFG flare was put in service ending this event at 1020.

District Use Only

Received by

Date

Time



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable
Compliance
Activity (RCA)

See back of form for instructions →

1. FACILITY IS REQUESTING BREAKDOWN RELIEF (Regulation 1-431 and 1-432)
District Use Only BREAKDOWN REFERENCE #:

2. MONITOR INDICATES EXCESS EMISSION or EXCURSION (Regulation 1-522.7, 1-523.3, 1-542)
District Use Only EXCESS or EXCURSION REFERENCE #:

3. MONITOR IS INOPERATIVE (Regulation 1-522.4, 1-523.2, 1-530)
District Use Only INOPERATIVE MONITOR REFERENCE #:

4. PRESSURE IS RELEASED FROM RELIEF DEVICE (PRD) (Regulation 8-28-401)
District Use Only PRD REFERENCE #:

SITE INFORMATION AND DESCRIPTION INFORMATION (REQUIRED)

Company	City of Sunnyvale Water Pollution Control Plant	Site #	5905
Address	1444 Borregas Ave, Sunnyvale CA 94088	Source #	8
Reported by	Kyle Markarian - Senior Operator	Phone #	408-730-7260
Indicated Excess		Fax #	
Allowable Limit		Averaging Time	
Start Time/Date	0905 hrs / 9-14-23	Clear Time	1020 hrs / 9-14-23
Monitor/device type(s)	<input type="checkbox"/> ▶ CEM <input type="checkbox"/> ▶ GLM <input checked="" type="checkbox"/> ▶ Parametric <input type="checkbox"/> ▶ PRD <input type="checkbox"/> ▶ Non-monitor		
Monitor description(s)			
Parameter(s) exceeded or not functioning due to inoperation			
<input type="checkbox"/> ▶ NO _x	<input type="checkbox"/> ▶ SO ₂	<input type="checkbox"/> ▶ CO	<input type="checkbox"/> ▶ CO ₂
<input type="checkbox"/> ▶ O ₂	<input type="checkbox"/> ▶ H ₂ O	<input type="checkbox"/> ▶ Opacity	<input type="checkbox"/> ▶ Lead
<input type="checkbox"/> ▶ Hydrocarbon Breakthrough (VOC)	<input type="checkbox"/> ▶ Temperature	<input type="checkbox"/> ▶ Wind Speed	<input type="checkbox"/> ▶ H ₂ S
<input type="checkbox"/> ▶ Wind Direction	<input type="checkbox"/> ▶ Steam	<input type="checkbox"/> ▶ Other (describe)	<input type="checkbox"/> ▶ TRS
Unit(s) of Measurement			
<input type="checkbox"/> ▶ ppm	<input type="checkbox"/> ▶ ppb	<input type="checkbox"/> ▶ min/hr > 20%	<input type="checkbox"/> ▶ inches H ₂ O
<input type="checkbox"/> ▶ psig	<input type="checkbox"/> ▶ pH	<input type="checkbox"/> ▶ °Fahrenheit	<input type="checkbox"/> ▶ mmHg
<input type="checkbox"/> ▶ Other (describe)			

Event Description: In preparation for scheduled loss of PG&E power for contractor work to be performed at new facility switchgear plant supply power moved to emergency generator. After switching to generator power at 0905 unable to start LFG flare. Discovered a blown fuse and no power to UPS units at the LFG flare. After replacing fuse and powering UPS units LFG flare was put in service ending this event at 1020.

9/15/2023 - Deepti Jain, EPM, Sunnyvale - Checking off box#2 and Parametric based on the discussion with Joe Muehleck, Air Quality Inspector.

District Use Only

Received by

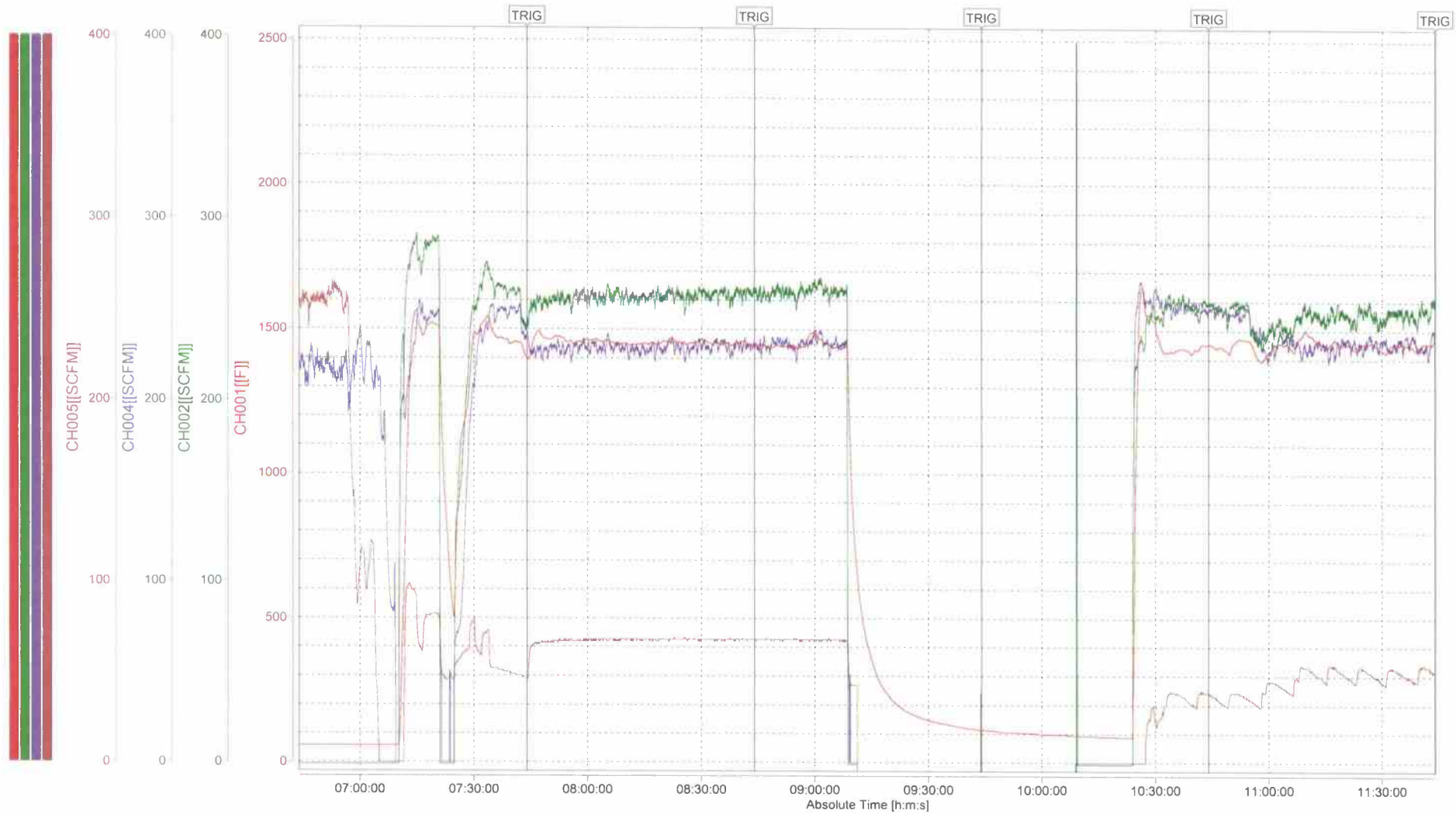
Date

Time

File Message :
File Name : 087051_230914_064400.DAD, ..., 087055_230914_104400.DAD
Device Type : DX1000
Serial No. : S5N408394
Time Correction : None
Starting Condition : Auto
Dividing Condition : Auto
Meas Ch. : 6
Math Ch. : 0
Ext Ch. : 0

Data Count : 9000
Sampling Interval : 2.000 sec
Start Time : 2023/09/14 06:44:00.000
Stop Time : 2023/09/14 11:43:58.000
Trigger Time : 2023/09/14 11:43:58.000
Trigger No. : 8999
Damage Check : Not Damaged
Started by : [Key In]
Stopped by : [Running]

Printed Group : GROUP 1
Printed Range : 2023/09/14 06:44:00.000 - 2023/09/14 11:43:58.000
Comment :





**Environmental Services Department
Water Pollution Control Plant
Plant Shutdown Request (PSR)**

*This form is intended for shutdowns that involve the need to cease the discharge of wastewater to the bay.
All sections of this form must be completed and approved before any Plant Shutdown.*

A. REQUESTED SHUTDOWN START DATE: Wednesday, September 13, 2023

B. REQUESTED SHUTDOWN START TIME: 2330 hours

The lab usually has samples concluding at 0800 hours in the morning - contact the lab and take this under consideration.

C. SPECIFIC SYSTEM/S TO SHUTDOWN: Tertiary -

D. NAME OF REQUESTOR: Psomas for Overaa – See attached SOR

E. WILL THE SHUTDOWN CAUSE POWER LOSS TO ANY OR ALL PARTS OF THE PLANT?

YES NO *If yes to all, be sure that critical process systems are evaluated.*

IF YES, CHECK TO SEE IF SYNAGRO IS OPERATING AND IF THE PSR WILL SECURE POWER TO SYNAGRO. IF YES, SYNAGRO WILL NEED AT LEAST A WEEK'S LEAD TIME UNLESS IT'S EMERGENCY WORK.

F. WILL THE SHUTDOWN CAUSE A LOSS OF 3 WATER TO THE SYNAGRO JOB SITE?

YES NO IF YES, ENOUGH LEAD TIME IS REQUIRED TO INFORM SYNAGRO OF THE NEED TO STOP PROCESSING SO THEY MAY SECURE THEIR SYSTEMS AND RE-SCHEDULE STAFF.

G. SYSTEM SHUTDOWN END DATE: Friday, September 15, 2023

H. SYSTEM SHUTDOWN END TIME: 0030 hours

SYSTEM SHUT DOWN NARRATIVE:

This ~ 24-hour shutdown is required to complete electrical distribution work on the new system. The Plant will be on the 1MW backup gen until the work is complete.

1. List other systems or processes that will be impacted during this time and cite a reason.

- If the Landfill gas collection or pretreatment condensate systems will be impacted, notify Solid Waste.

The entire Plant will be impacted by the power loss twice.

2. List any work orders, safety, or regulatory issues associated with this request.

See the attached email from Mike H



**Environmental Services Department
Water Pollution Control Plant
Plant Shutdown Request (PSR)**

Notifications are required in work areas that impact sections with completed hard copies to critical staff left in their mailboxes and soft copies emailed to rest. Always check with the Lab to see if any sampling may be impacted. Some sampling may need to be rescheduled.

Signatures:	
Supervisors on Duty on Requested Day/Time:	
Days I – Pat Lenoir / <u>Kyke Markarian</u>	
Days II – Luis Arribeno / Leo Carlino	
Graves I – <u>Stacy Peyton / Jonathan Washington</u>	
Graves II – Robert Rockett	
Maintenance Supervisor	
Operations Manager (Bryan Berdeen) approval:	
Maintenance & Facilities Manager (Leonard Espinoza) approval:	
LAB Manager (Alo Kauravlla) Notification: email & mailbox	N/A <input type="checkbox"/>
Senior Chemist (Allen Wan and/or Camnga Thach) Notification:	N/A <input type="checkbox"/>
Senior Pretreatment Inspector (xxx xxx) Notification:	N/A <input checked="" type="checkbox"/>
Regulatory Programs (Cameron and/or Julie) Notification: email & mailbox	N/A <input type="checkbox"/>
Support Services Notification:	N/A <input checked="" type="checkbox"/>
Solid Waste Notification: (Bill/Silviana) – By email	N/A <input type="checkbox"/>
Project Administration/PSOMAS Notification – By email	N/A <input type="checkbox"/>
Synagro Notification: email & phone call/site meeting	N/A <input checked="" type="checkbox"/>
SSR Placed onto WPCP Coordination Calendar by:	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>
* Use N/A <input checked="" type="checkbox"/> if section/person notification is NOT required and/or shut down does not impact workgroup	

Hello, please see the list of jobs we'd like to accomplish during the Contractor scheduled shutdown for Sep. 14th. Please let me know

Tom & Richard = Replace PGF Gas Dryer Isolation valves

Raffy = T-3 Sump level transmitter wiring, Flow Rate Control Valves high level sump closure

Oscar = While power is out and service air compressors offline Install a valve on Oil Separator, Re-install Tertiary control room UPS

Cyle = Modifications to the old Alum feed line (see Mark Somera for instructions)

Dave = #1 PGF Power Supply, #2 Filtered Water Pump controls into SCADA

Mark = While power is out and 3Water pumps offline replace isolation valve in Poly Room, Digester #3 Feed valve replacement -- SSI

Mike = Logic and wiring for Flow Rate Control Valve closure in DMF PLC, T-3 sump level transmitter into OPTO assistance

MIKE HERRERA
Senior Plant Mechanic
Water Pollution Control Plant
Environmental Services Department
Phone: 408-730-7760

Asco Power Technologies

Method of Procedure

MOP DATE: 6.6.23 (Rev1a_9/8/23)

JOB (PROJECT)	City of Sunnyvale WPCP
START DATE	9/14/23
END DATE	9/14/23

MOP NAME

Closed transition timer install

CONTRACTORS

ASCO-FSR: TBD

JOB DESCRIPTION/ COMMENTS

ASCO WILL CONDUCT A MODIFICATION TO THE EXISTING POWER CONTROL SYSTEM 12811P1. THIS MODIFICATION WILL CONSIST OF ADDING PG&E REQUIRED EXTENDED PARALLEL TIMERS TO BOTH UTILITY BREAKERS.

CUSTOMER IMPACT

DURING THE MODIFICATION IT WILL BE NECESSARY TRANSFER THE SYSTEM TO A SINGLE UTILITY FEED WHILE THE OTHER UTILITY BREAKER CONTROL IS BEING MODIFIED.

DURING MODIFICATIONS, THE SYSTEM WILL BE PLACED IN MANUAL MODE. IF A UTILITY FAILURE OCCURS, ASCO CAN PLACE THE SYSTEM BACK IN AUTO IN APPROXIMATELY ONE MINUTE.

LINE	STEPS	CUSTOMER IMPACT
1	Place system in manual.	Loss of utility will require manual intervention to restore power.
2	Open Utility 2 breaker (52-2)	Loads on bus 2 will be disconnected from utility power
2a.	Adjust rear doors of Sections 11-17	Loss of power for 1-2 hours
3	Close Tie 1 (52-T1)	
4	Close Tie 2 (52-T2)	Power is restored to bus 2.
5	Install mounting bracket inside utility 2 breaker section.	
6	Install wiring per drawing markup. Do not land wires on energized terminals until later step.	
7	Install new timer inside utility 2 breaker section and complete all wiring terminations to device.	
8	Open control breakers CB6_CBTR and CB1_CONV to isolate 125VDC and 24VDC circuits.	
9	Make final wire terminations.	
10	Close control breakers CB6_CBTR and CB1_CONV to return 125VDC and 24VDC circuits. Wait for all devices to power up before proceeding.	
11	Jumper inputs 21 and 13 and verify that timer activates the 86 lockout relay on utility breaker 2 door.	
12	Reset timer and 86 lockout relay.	
13	Open Tie 2 breaker (52-T2)	Loads on bus 2 will be disconnected from utility power
14	Close Utility 2 breaker (52-2)	Power is restored to bus 2.
15	Open Tie 1 (52-T1)	
16	Open Utility 1 (52-1)	Loads on bus 1 will be disconnected from utility power (this bus feeds the majority of the existing WPCP)

16a	Adjust rear doors of Sections 1-7	Loss of power for 1-2 hours
17	Close Tie 2 (52-T2)	
18	Close Tie 1 (52-T1)	Power is restored to bus 1.
19	Install mounting bracket inside utility 1 breaker section.	
20	Install wiring per drawing markup. Do not land wires on energized terminals until later step.	
21	Install new timer inside utility 1 breaker section and complete all wiring terminations to device.	
22	Open control breakers CB6_CBTR and CB1_CONV to isolate 125VDC and 24VDC circuits.	
23	Make final wire terminations.	
24	Close control breakers CB6_CBTR and CB1_CONV to return 125VDC and 24VDC circuits. Wait for all devices to power up before proceeding.	
25	Jumper inputs 21 and 13 and verify that timer activates the 86 lockout relay on utility breaker 1 door.	
26	Reset timer and 86 lockout relay.	
27	Open Tie 1 (52-T1)	Loads on bus 1 will be disconnected from utility power (this bus feeds the majority of the existing WPCP)
28	Close Utility 1 breaker (52-1)	Power is restored to bus 1.
29	Open Tie 2 (52-T2)	
30	Return system to Auto mode.	



Sunnyvale

SMaRT Station®
301 Carl Road
Sunnyvale, CA 94089
TDD/TYY 408-730-7501
sunnyvale.ca.gov

September 21, 2023

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

Re: 10-day/30-day Deviation Report for S-8 City of Sunnyvale Sanitary Landfill, Facility #A5905 - RCA #08U81 Breakdown Relief and RCA #08U82 Monitor Indicates Excess Emission or Excursion

To whom it may concern,

This Deviation Report is submitted in compliance with Provision I.F of the Title V-Major Facility Review Permit for Plant #A5905, which states that, “...*all instances of non-compliance with permit shall be reported in writing to the District’s Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions.*” This report is intended to serve as the 10-day and 30-day Deviation Report, and the 30-day RCA report requirements for RCA #08U81 (Breakdown Relief) and RCA #08U82 (Monitor Indicates Excess Emission or Excursion). The subject incident involves a shutdown of the Sunnyvale Landfill (Source S-8) gas collection and control system (GCCS).

Incident Description

On 9/14/23, the Water Pollution Control Plant (Plant), Site# A0733, contractor planned electrical work was completed and the Plant was switching from generator power supply to normal PG&E power. After restoring normal power at 1653, the Uninterruptible Power Supply (UPS) units lost power and the Landfill Gas Flare (LFGF) was unable to start. This is the same issue that occurred earlier in the day (reference RCA #08U74). The UPS units were restarted/repowered and the LFGF was back in service at 1726. The total duration of this event was 33 minutes.

The Plant has submitted a work order to the maintenance department to have these UPS Units replaced to prevent similar events in the future. In addition, a label will be placed on the LFGF



Sunnyvale

Control Panel adjacent to the reset switch, directing that the “reset” switch should be pressed whenever such an occurrence (UPS outage) takes place.

The long-term solution will be to connect the LFGF control panel to the Plants’ future standby backup generator power supply.

Sincerely,

Deepti Jain

Environmental Programs Manager

cc: Joe Muehleck (BAAQMD), email

Attachment A: Flow Chart

Attachment B: Plant Shutdown Request (PSR)



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable
Compliance
Activity (RCA)

See back of form for instructions →

1. FACILITY IS REQUESTING BREAKDOWN RELIEF (Regulation 1-431 and 1-432)

District Use Only BREAKDOWN REFERENCE #: 08U81

2. MONITOR INDICATES EXCESS EMISSION or EXCURSION (Regulation 1-522.7, 1-523.3, 1-542)

District Use Only EXCESS or EXCURSION REFERENCE #:

3. MONITOR IS INOPERATIVE (Regulation 1-522.4, 1-523.2, 1-530)

District Use Only INOPERATIVE MONITOR REFERENCE #:

4. PRESSURE IS RELEASED FROM RELIEF DEVICE (PRD) (Regulation 8-28-401)

District Use Only PRD REFERENCE #:

SITE INFORMATION AND DESCRIPTION INFORMATION (REQUIRED)

Company	City of Sunnyvale -Water pollution control plant	Site #	A5905
Address	1444 Borregas Ave, Sunnyvale CA 94088	Source #	8
Reported by	Deepti Jain, Env. Manager	Phone #	408-730-7791
Indicated Excess		Fax #	
Allowable Limit		Averaging Time	
Start Time/Date	1653 hrs / 9-14-23	Clear Time	1726 hrs / 9-14-23
Monitor/device type(s)	<input type="checkbox"/> ▶ CEM <input type="checkbox"/> ▶ GLM <input checked="" type="checkbox"/> ▶ Parametric <input type="checkbox"/> ▶ PRD <input type="checkbox"/> ▶ Non-monitor		
Monitor description(s)			
Parameter(s) exceeded or not functioning due to inoperation	<input type="checkbox"/> ▶ NO _x <input type="checkbox"/> ▶ SO ₂ <input type="checkbox"/> ▶ CO <input type="checkbox"/> ▶ CO ₂ <input type="checkbox"/> ▶ H ₂ S <input type="checkbox"/> ▶ TRS <input type="checkbox"/> ▶ NH ₃ <input type="checkbox"/> ▶ O ₂ <input type="checkbox"/> ▶ H ₂ O <input type="checkbox"/> ▶ Opacity <input type="checkbox"/> ▶ Lead <input type="checkbox"/> ▶ Gauge Pressure <input type="checkbox"/> ▶ Flow <input type="checkbox"/> ▶ Hydrocarbon Breakthrough (VOC) <input type="checkbox"/> ▶ Temperature <input type="checkbox"/> ▶ Wind Speed <input type="checkbox"/> ▶ Wind Direction <input type="checkbox"/> ▶ Steam <input type="checkbox"/> ▶ Other (describe)		
Unit(s) of Measurement	<input type="checkbox"/> ▶ ppm <input type="checkbox"/> ▶ ppb <input type="checkbox"/> ▶ min/hr > 20% <input type="checkbox"/> ▶ inches H ₂ O <input type="checkbox"/> ▶ mmHg <input type="checkbox"/> ▶ psig <input type="checkbox"/> ▶ pH <input type="checkbox"/> ▶ °Fahrenheit <input type="checkbox"/> ▶ Other (describe)		

Event Description: On 9/14/2023, in preparation for the scheduled loss of PG&E power for contractor work to be performed at new facility switchgear plant supply power moved to emergency generator at 0900. After switching to generator power at 0905, LFG flare failed to start. Staff discovered a blown fuse and no power to UPS units at the LFG flare. After replacing fuse and powering UPS units LFG flare was put in service ending this event at 1020. Total duration of the first incident reported as ID#08U74 was 1 hr and 15 minutes.

Later in the day, after restoring the plant to normal PG&E power, we experienced the same issue with the UPS units losing power and the flare not reigniting. The second event started at 1653 and ended at 1726 (total incident duration = 33 minutes) when the UPS units were restarted/repowered and the flare was back in service. Facility has submitted a work order to the maintenance department to have these UPS units replaced to prevent any similar events in the future.

District Use Only

Received by

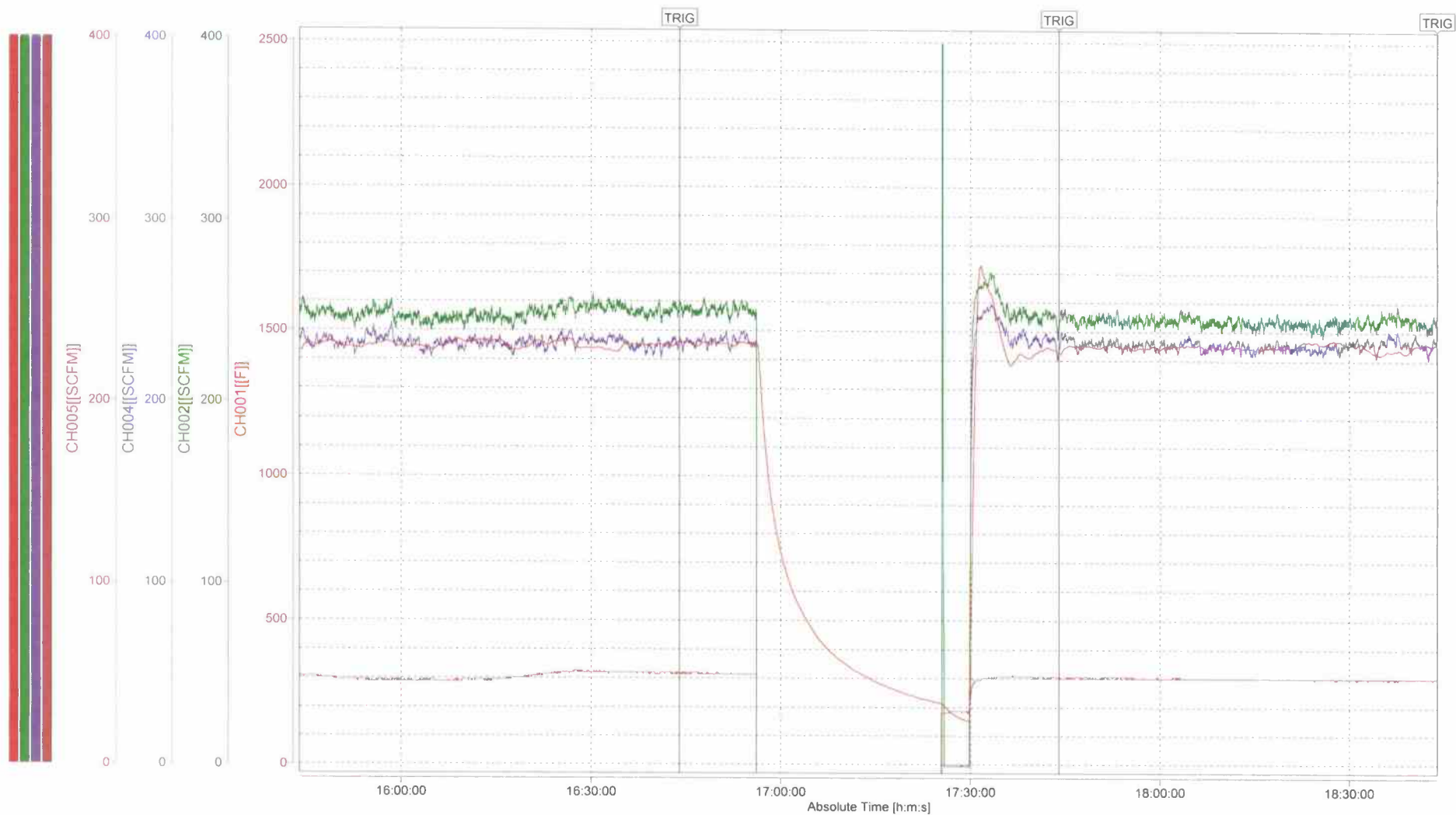
Date

Time

File Message :
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Time Correction : None
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Dividing Condition : Auto
Meas Ch. : 6
Math Ch. : 0
Ext Ch. : 0

Data Count : 5400
Sampling Interval : 2.000 sec
Start Time : 2023/09/14 15:44:00.000
Stop Time : 2023/09/14 18:43:58.000
Trigger Time : 2023/09/14 18:43:58.000
Trigger No. : 5399
Damage Check : Not Damaged
Started by : [Key In]
Stopped by : [Running]

Printed Group : GROUP 1
Printed Range : 2023/09/14 15:44:00.000 - 2023/09/14 18:43:58.000
Comment :





**Environmental Services Department
Water Pollution Control Plant
Plant Shutdown Request (PSR)**

*This form is intended for shutdowns that involve the need to cease the discharge of wastewater to the bay.
All sections of this form must be completed and approved before any Plant Shutdown.*

A. REQUESTED SHUTDOWN START DATE: Wednesday, September 13, 2023

B. REQUESTED SHUTDOWN START TIME: 2330 hours

The lab usually has samples concluding at 0800 hours in the morning - contact the lab and take this under consideration.

C. SPECIFIC SYSTEM/S TO SHUTDOWN: Tertiary -

D. NAME OF REQUESTOR: Psomas for Overaa – See attached SOR

E. WILL THE SHUTDOWN CAUSE POWER LOSS TO ANY OR ALL PARTS OF THE PLANT?

YES NO *If yes to all, be sure that critical process systems are evaluated.*

IF YES, CHECK TO SEE IF SYNAGRO IS OPERATING AND IF THE PSR WILL SECURE POWER TO SYNAGRO. IF YES, SYNAGRO WILL NEED AT LEAST A WEEK'S LEAD TIME UNLESS IT'S EMERGENCY WORK.

F. WILL THE SHUTDOWN CAUSE A LOSS OF 3 WATER TO THE SYNAGRO JOB SITE?

YES NO IF YES, ENOUGH LEAD TIME IS REQUIRED TO INFORM SYNAGRO OF THE NEED TO STOP PROCESSING SO THEY MAY SECURE THEIR SYSTEMS AND RE-SCHEDULE STAFF.

G. SYSTEM SHUTDOWN END DATE: Friday, September 15, 2023

H. SYSTEM SHUTDOWN END TIME: 0030 hours

SYSTEM SHUT DOWN NARRATIVE:

This ~ 24-hour shutdown is required to complete electrical distribution work on the new system. The Plant will be on the 1MW backup gen until the work is complete.

- List other systems or processes that will be impacted during this time and cite a reason.
 - If the Landfill gas collection or pretreatment condensate systems will be impacted, notify Solid Waste.

The entire Plant will be impacted by the power loss twice.

- List any work orders, safety, or regulatory issues associated with this request.

See the attached email from Mike H



Sunnyvale

Environmental Services Department Water Pollution Control Plant Plant Shutdown Request (PSR)

Notifications are required in work areas that impact sections with completed hard copies to critical staff left in their mailboxes and soft copies emailed to rest. Always check with the Lab to see if any sampling may be impacted. Some sampling may need to be rescheduled.

Signatures:	
Supervisors on Duty on Requested Day/Time:	
Days I – Pat Lenoir / <u>Kyke Markarian</u>	
Days II – Luis Arribeno / Leo Carlino	
Graves I – <u>Stacy Peyton / Jonathan Washington</u>	
Graves II – Robert Rockett	
Maintenance Supervisor	
Operations Manager (Bryan Berdeen) approval:	
Maintenance & Facilities Manager (Leonard Espinoza) approval:	
LAB Manager (Alo Kauravlla) Notification: email & mailbox	N/A <input type="checkbox"/>
Senior Chemist (Allen Wan and/or Camnga Thach) Notification:	N/A <input type="checkbox"/>
Senior Pretreatment Inspector (xxx xxx) Notification:	N/A <input checked="" type="checkbox"/>
Regulatory Programs (Cameron and/or Julie) Notification: email & mailbox	N/A <input type="checkbox"/>
Support Services Notification:	N/A <input checked="" type="checkbox"/>
Solid Waste Notification: (Bill/Silviana) – By email	N/A <input type="checkbox"/>
Project Administration/PSOMAS Notification – By email	N/A <input type="checkbox"/>
Synagro Notification: email & phone call/site meeting	N/A <input checked="" type="checkbox"/>
SSR Placed onto WPCP Coordination Calendar by:	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>
* Use N/A <input checked="" type="checkbox"/> if section/person notification is NOT required and/or shut down does not impact workgroup	

Hello, please see the list of jobs we'd like to accomplish during the Contractor scheduled shutdown for Sep. 14th. Please let me know

Tom & Richard = Replace PGF Gas Dryer Isolation valves

Raffy = T-3 Sump level transmitter wiring, Flow Rate Control Valves high level sump closure

Oscar = While power is out and service air compressors offline Install a valve on Oil Separator, Re-install Tertiary control room UPS &

Cyle = Modifications to the old Alum feed line (see Mark Somera for instructions)

Jave = #1 PGF Power Supply, #2 Filtered Water Pump controls into SCADA

Mark = While power is out and 3Water pumps offline replace isolation valve in Poly Room, Digester #3 Feed valve replacement – SSI

Mike = Logic and wiring for Flow Rate Control Valve closure in DMF PLC, T-3 sump level transmitter into OPTO assistance

MIKE HERRERA
Senior Plant Mechanic
Water Pollution Control Plant
Environmental Services Department
Phone: 408-730-7760

Asco Power Technologies

Method of Procedure

MOP DATE: 6.6.23 (Rev1a_9/8/23)

JOB (PROJECT)	City of Sunnyvale WPCP
START DATE	9/14/23
END DATE	9/14/23

MOP NAME

Closed transition timer install

CONTRACTORS

ASCO-FSR: TBD

JOB DESCRIPTION/ COMMENTS

ASCO WILL CONDUCT A MODIFICATION TO THE EXISTING POWER CONTROL SYSTEM 12811P1. THIS MODIFICATION WILL CONSIST OF ADDING PG&E REQUIRED EXTENDED PARALLEL TIMERS TO BOTH UTILITY BREAKERS.

CUSTOMER IMPACT

DURING THE MODIFICATION IT WILL BE NECESSARY TRANSFER THE SYSTEM TO A SINGLE UTILITY FEED WHILE THE OTHER UTILITY BREAKER CONTROL IS BEING MODIFIED.

DURING MODIFICATIONS, THE SYSTEM WILL BE PLACED IN MANUAL MODE. IF A UTILITY FAILURE OCCURS, ASCO CAN PLACE THE SYSTEM BACK IN AUTO IN APPROXIMATELY ONE MINUTE.

LINE	STEPS	CUSTOMER IMPACT
1	Place system in manual.	Loss of utility will require manual intervention to restore power.
2	Open Utility 2 breaker (52-2)	Loads on bus 2 will be disconnected from utility power
2a.	Adjust rear doors of Sections 11-17	Loss of power for 1-2 hours
3	Close Tie 1 (52-T1)	
4	Close Tie 2 (52-T2)	Power is restored to bus 2.
5	Install mounting bracket inside utility 2 breaker section.	
6	Install wiring per drawing markup. Do not land wires on energized terminals until later step.	
7	Install new timer inside utility 2 breaker section and complete all wiring terminations to device.	
8	Open control breakers CB6_CBTR and CB1_CONV to isolate 125VDC and 24VDC circuits.	
9	Make final wire terminations.	
10	Close control breakers CB6_CBTR and CB1_CONV to return 125VDC and 24VDC circuits. Wait for all devices to power up before proceeding.	
11	Jumper inputs 21 and 13 and verify that timer activates the 86 lockout relay on utility breaker 2 door.	
12	Reset timer and 86 lockout relay.	
13	Open Tie 2 breaker (52-T2)	Loads on bus 2 will be disconnected from utility power
14	Close Utility 2 breaker (52-2)	Power is restored to bus 2.
15	Open Tie 1 (52-T1)	
16	Open Utility 1 (52-1)	Loads on bus 1 will be disconnected from utility power (this bus feeds the majority of the existing WPCP)

16a	Adjust rear doors of Sections 1-7	Loss of power for 1-2 hours
17	Close Tie 2 (52-T2)	
18	Close Tie 1 (52-T1)	Power is restored to bus 1.
19	Install mounting bracket inside utility 1 breaker section.	
20	Install wiring per drawing markup. Do not land wires on energized terminals until later step.	
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22	Open control breakers CB6_CBTR and CB1_CONV to isolate 125VDC and 24VDC circuits.	
23	Make final wire terminations.	
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25	Jumper inputs 21 and 13 and verify that timer activates the 86 lockout relay on utility breaker 1 door.	
26	Reset timer and 86 lockout relay.	
27	Open Tie 1 (52-T1)	Loads on bus 1 will be disconnected from utility power (this bus feeds the majority of the existing WPCP)
28	Close Utility 1 breaker (52-1)	Power is restored to bus 1.
29	Open Tie 2 (52-T2)	
30	Return system to Auto mode.	