

## 2 COMBINED MONITORING REPORT

In accordance with Title V Permit Standard Condition 1.F, BAAQMD Rule 8-34-411 and §60.757(f) in the NSPS, this report is a Combined Semi-Annual Title V Report and Partial 8-34 Annual Report that is required to be submitted by Newby Island Landfill. The report contains monitoring data for the operation of the landfill gas collection and control system (GCCS). The operational records have been reviewed and summarized. The timeframe included in this report is August 1, 2011 through January 31, 2012. The following table lists the rules and regulations that are required to be included in this Combined Report.

**Table 2-1 Combined Report Requirements**

RULE	REQUIREMENT	LOCATION IN REPORT
8-34-501.1 §60.757(f)(4)	All collection system downtime, including individual well shutdown times and the reason for the shutdown.	Section 2.1, Appendices C & D
8-34-501.2 §60.757(f)(3)	All emission control system downtime and the reason for the shutdown.	Section 2.2, Appendix D
8-34-501.3, 8-34-507, §60.757(f)(1)	Continuous temperature for all operating flares and any enclosed combustor subject to Section 8-34-507.	Section 2.3, Appendix E
8-34-501.4, 8-34-505, 8-34-510	Testing performed to satisfy any of the requirements of this rule.	Section 2.4 & 2.10, Appendices F & J
8-34-501.5	Monthly landfill gas flow (LFG) rates and well concentration readings for facilities subject to 8-34-404.	Section 2.5, 2.11 Appendix L
8-34-501.6, 8-34-503, 8-34-506, §60.757(f)(5)	For operations subject to Section 8-34-503 and 8-34-506, records of all monitoring dates; leaks in excess of the limits in Section 8-34-301.2 or 8-34-303 that are discovered by the operator, including the location of the leak, leak concentration in parts per million by volume (ppmv), date of discovery, the action taken to repair the leak, date of the repair, date of any required re-monitoring, and the re-monitored concentration in ppmv.	Section 2.6 & 2.7, Appendices G & H
8-34-501.7	Annual waste acceptance rate and current amount of waste in-place.	Section 2.8, Appendix I
8-34-501.8	Records of the nature, location, amount, and date of deposition of non-degradable wastes, for any landfill areas excluded from the collection system requirement as documented in the GCCS Design Plan.	Section 2.9

RULE	REQUIREMENT	LOCATION IN REPORT
8-34-501.9, 8-34-505, §60.757(f)(1)	For operations subject to Section 8-34-505, records of all monitoring dates and any excesses of the limits stated in Section 8-34-305 that are discovered by the operator, including well identification number, the measured excess, the action taken to repair the excess, and the date of repair.	Section 2.10, 2.10.1, Appendices J & K
8-34-501.10, 8-34-508, §60.757(f)(1)	Continuous gas flow rate records for any site subject to Section 8-34-508.	Section 2.11, Appendices E and L
8-34-501.11, 8-34-509	For operations subject to Section 8-34-509, records or key emission control system operating parameters.	Section 2.2.2
8-34-501.12	The records required above shall be made available and retained for a period of five years.	Section 1.2
§60.757(f)(2)	Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under §60.756.	Section 2.2.1
§60.757(f)(6)	The date of installation and the location of each well or collection system expansion added pursuant to paragraphs (a)(3), (b), (c)(4) of §60.755.	Section 2.12, Appendices A & C
§60.10 (d)(5)(i)	Startup, Shutdown, Malfunction Events	Section 4.0, Appendices C & D

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

Appendix A contains a current map of Newby Island's existing GCCS. Section 2.1.1 includes the GCCS downtime for the reporting period. The information contained in Section 2.1.2 includes the individual well shutdown times and the reason for the shutdown.

### 2.1.1 Collection System Downtime

During the period covered in this report, the GCCS was not shut down for more than five days on any one occasion. The downtime for the reporting period of August 1, 2011 through January 31, 2012 was 18.97 hours. The total downtime for the 2011 calendar year and partial 2012 calendar was 64.55 and was 0.00 hours, respectively, out of an allowable 240 hours per year. Per direction from Republic Operations personnel no GCCS downtime is accrued unless Cornerstone is notified by AEGL technicians that all onsite (A-1 and A-2 Flares) and offsite (internal combustion (IC) engine power generators operated by Fortistar and IC engine power generators operated by the San Jose/Santa Clara Water Pollution Control Plant) emission control devices are not operating.

Appendix D contains the A-1 and A-2 Flare Downtime Reports which lists dates, times, and lengths of shutdowns for the reporting period and year-to-date. Appendix E contains the GCCS Downtime.

### **2.1.2 Well Start-Up & Disconnection Log**

There were 108 wellfield SSM events that occurred during the reporting period. There were 18 wells started-up and 54 wells decommissioned during the reporting period. See Appendix C, Wellfield SSM Log for details of well disconnection and reconnection events. Start-up and Decommissioning Notifications were submitted to the BAAQMD and are included in Appendix C.

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

The emission control system consists of two flares (A-1 and A-2), which began operation in 1997 and 2005, respectively. The control system was not bypassed at any time during the reporting period. Raw LFG was not emitted during the reporting period. The SSM logs for the A-1 and A-2 Flares are located in Appendix D.

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

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

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

BAAQMD Regulation 8-34-501.11 and 8-34-509 are not applicable to the A-1 and A-2 Flares because the A-1 and A-2 Flare is subject to continuous temperature monitoring as required in BAAQMD Regulation 8-34-507 and §60.757(f)(1).

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

The combustion zone temperatures of the flares are monitored with Thermo-Electric Thermocouples. The temperature is displayed with a Yokogawa digital recorder, which is downloaded and archived. There were no temperature deviations during the reporting period. Appendix F contains the Flare Temperature Deviation/ Inoperative Monitor/Missing Data Report for August 1, 2011 through January 31, 2012.

### *Inoperable Monitor*

From Tuesday, January 3, 2012 at 14:47 through Friday, January 6, 2012 at 15:15 for the A-1 Flare, and from Sunday, January 1, 2012 at 10:02 until Tuesday, January 10, 2012 at 13:46 for the A-2 Flare, it was determined that the flow computer which monitors and records flow and temperature data for the A-1 and A-2 Flares was unable to record due to an internal error. The portable data card used to store the data was

replaced and the Yokogawa chart recorder was fully inspected. As of 10:36 on January 11, 2012, the flow and temperature data recorded by the Yokogawa has been consistent and reliable. The Reportable Compliance Activity (RCA) form assigned RCA Number 06D10 was submitted to the BAAQMD on January 13, 2012. A combined 10- and 30-day follow-up deviation letter was submitted on January 20, 2012.

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

The cover integrity monitoring was performed on the following dates:

- August 24, 2011
- September 27, 2011
- October 31, 2011
- November 30, 2011
- December 17, 2011
- January 24, 2012

Surface cracks were discovered during the September monitoring event on the south upper deck. Republic was informed by AEGL personnel of the issues and immediately fixed the cover in the area. No cover issues were reported during the October and November monitoring event, however AEGL noted that the left entrance gate is missing and has discussed this with Republic. The Monthly Cover Integrity Monitoring Logs are included in Appendix G.

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

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

#### **2.6 Surface Emissions Monitoring (BAAQMD 8-34-501.6, 8-34-506, & §60.757(f)(5) & California Air Resources Board Assembly Bill 32 Methane Control Measure (CARB AB-32 LF MCM))**

Quarterly Surface Emissions Monitoring (SEM), was conducted for Third and Fourth Quarter 2011. Refer to the Third and Fourth Quarter 2011 SEM Reports, located in Appendix H, for detailed results.

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

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

- Third Quarter 2011 – September 22, 28, 29, 30, and October 1, 2011
- Fourth Quarter 2011 – December 20, 23, 24, 26, and 27, 2011

Refer to the Quarterly LFG Component Leak Monitoring Reports, located in Appendix I, for detailed results.

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

The Annual Waste Acceptance Rate was compiled for the timeframe of August 1, 2011 through January 31, 2012. The amount of waste accepted during the reporting period was approximately 530,106.58 tons. The current Waste-In-Place as of January 31, 2012 is approximately 9,750,977.37 tons.

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

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

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

Wellhead monitoring was performed on a monthly basis pursuant to 8-34-505. The well readings for August 1, 2011 through January 31, 2012 are included in Appendix J. Each well was monitored in accordance with the following requirements:

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

Wellhead monitoring was performed on the following dates:

- August 2, 5, 7, 8, 9, 12, 15, 17, 19, 22, 23, 24, 25, 29, and 30, 2011
- September 2, 7, 8, 12, 14, 15, 19, 26, 27, 28, 29, and 30, 2011
- October 4, 10, 12, 13, 14, 15, 19, 20, 21, 23, 25, 26, 27, and 31, 2011
- November 4, 7, 9, 10, 11, 15, 18, 19, 21, 28, 29, and 30, 2011
- December 1, 5, 6, 8, 9, 10, 12, 13, 14, 17, 19, 21, 22, 27, 28, 29, and 30, 2011
- January 4, 10, 11, 12, 13, 15, 19, 20, 24, 25, 26, 27, and 31, 2012

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

There were 89 wells with readings that exceeded the limits set forth in BAAQMD Regulation 8-34-305 during the reporting period. Corrective action for wells was initiated within the required 5-day time period and re-monitoring was completed within 15 days of the deviation pursuant to BAAQMD Regulation 8-34-414. See Appendix K, Wellfield Deviation Log, for more detail.

## 2.10.2 Higher Operating Value (HOV) Wells

As of January 31, 2012, the following wells are approved to operate at a HOV for oxygen and temperature pursuant to Permit Application Number 23393 Part 6c(i) and Part 6d(i), respectively:

### Oxygen HOV Wells

Pursuant to Permit Application Number 23393, Part 6(c)(i), the oxygen concentration limit does not apply to the wells listed below, provided that the oxygen concentration in the LFG at the main header does not exceed five percent oxygen by volume (dry basis) and the methane concentration is greater than 35 percent by volume (dry basis): EW-30R, EW-09, EW-13, 24, 54, 68, 71, 72, 101, 103, 13R, 20R, 213, 224, 235R, 237, 253, HC-201, HC-203, HC-204, HC-208, MW-12.

### Temperature HOV Wells

Pursuant to Permit Application Number 23393, Part 6(d)(i), the following wells are approved to operate at a temperate HOV of 145°F: EW-10R, EW-11R, EW-39R, EW-40R, EW-14, EW-14, EW-15, EW-24, EW-31R, EW-33, EW-35, 4, 5, A, B, B, D, E, 11, 14, 16, 19, 22, 25, 30, 3R, 9R, 106, 218, 241, 243, 31R, 51R.

The following wells are approved for both the temperature and oxygen HOV listed above: EW-9 and EW-33A.

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

The flare LFG flow rate is measured with a Rosemount flow meter. The General Electric data panel displays the LFG flow and the digital Yokogawa data recorder records LFG flow every minute and is downloaded and saved to a compact flash card. The flare flow meter meets the requirements of BAAQMD Regulation 8-34-508 by recording data at least every 15 minutes. The flow meter is maintained and calibrated pursuant to manufacturer's recommendations. The flow data for the flare is available for review at Newby Island. Appendix L contains a summary of the monthly LFG flow rates for the flares. Appendix F contains the Flare Temperature Deviation/ Inoperative Monitor/Missing Data Report for August 1, 2011 through January 31, 2012. Table 2-2 below is a summary of the total LFG flow for the reporting period of August 1, 2011 through January 31, 2012.

**Table 2-2 Total LFG Flow for August 1, 2011 through January 31, 2012**

Emission Control Device	Average Flow (scfm)	Average CH <sub>4</sub> (%) <sup>a</sup>	Total LFG Volume (scf)	Total CH <sub>4</sub> Volume (scf)	Heat Input (MMBTU)
A-1 Flare	1,157.2	40.8	697,246.0	284,476.4	288.2
A-2 Flare	1,455.3	43.9	358,531,714.5	158,534,444.7	159,441.5

scfm = standard cubic foot per minute

CH<sub>4</sub> = methane

scf = standard cubic feet

<sup>a</sup>Methane content determined from the June 9, 2011 Source Test

MMBTU = million British thermal units

### **2.12 Compliance with Title V Permit Condition Number 10423 Part 10**

Pursuant to Title V Permit Condition Number 10423, Part 10(a)(2), quarterly hydrogen sulfide (H<sub>2</sub>S) readings were taken using Draeger tubes. The Third and Fourth Quarter 2011 H<sub>2</sub>S readings and quarterly averages are included in Appendix O, H<sub>2</sub>S Weekly and Quarterly Monitoring.

### **2.13 Compliance with §60.757(f)(6)**

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

The GCCS was modified pursuant to Title V Permit Number A9013 during the reporting period.

There were 54 wells decommissioned and 18 wells started up during the reporting period pursuant to Application Number 23393 that was deemed complete on June 21, 2011. Well Decommissioning and Startup Notification Letters were submitted to the BAAQMD and are included in Appendix B.

Application Number 23393 still allows for the replacement of up to unlimited vertical wells, installation of up to 86 new vertical wells, installation of up to 20 new horizontal collectors, the decommissioning of up to 104 vertical wells, and the decommissioning of up to 9 horizontal collectors.

As of January 31, 2012, Newby Island consists of 202 vertical wells and 6 horizontal collectors.

### **2.14 Compliance with Title V Permit Condition Number 14098 for S-4 Non-Retail Gasoline Dispensing Facility G#9641**

Newby Island's gasoline throughput for the period of August 1, 2011 through January 31, 2012 is 3,990.4 gallons (gal). Newby Island's annual gasoline throughput for the period of February 1, 2011 through January 31, 2012 is 16,471.2 gal. Appendix P contains monthly throughput records for this reporting period. This is within the limit of 940,000 gal per any consecutive 12-month period pursuant to BAAQMD Toxic Section

Policy. Monthly gasoline throughput totals for the reporting period are listed in Table 2-3:

**Table 2-3 Gasoline Throughput for S-4**

<b>Month</b>	<b>Total Throughput (gallons)</b>	<b>Rolling 12-Month Fuel Usage (gallons)</b>
August 2011	528.4	7,894.0
September 2011	707.5	7,737.7
October 2011	583.4	7,727.9
November 2011	588.1	7,784.3
December 2011	688.8	7,791.9
January 2012	884.2	8040.0
<b>TOTAL:</b>	<b>3,990.4</b>	

These records are maintained at Newby Island and can be made available upon request.

**2.15 Compliance with Title V Permit Condition Number 15050 for S-5 Tub Grinder; S-7 Trommel Screen; and A-7 Water Sprays**

The S-5 Tub Grinder and the S-7 Trommel Screen are no longer operated on site. The equipment currently operated is registered under the California Air Resources Board (CARB) Portable Equipment Registration Program.

**2.16 Compliance with Title V Permit Condition Number 19498 for S-6 Tub Grinder Engine**

The S-6 Tub Grinder Engine is no longer operated on site. The equipment currently operated is registered under the CARB Portable Equipment Registration Program.



### 3 PERFORMANCE TEST REPORT

In accordance with BAAQMD Rule 8-34-413 and 40 CFR §60.757(g) in the NSPS, a Performance Test Report is required to be submitted from subject facilities containing performance and monitoring data for the operation of the GCCS. The operational records listed in Table 3-1 have been reviewed, summarized, and are included in the Performance Test Report section of this report. A copy of the most recent Performance Test conducted on March 11, 2011 is included in Appendix N.

**Table 3-1 Performance Test Requirements**

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

### 3.1 Flare (A-1 and A-2) Compliance Demonstration Test Results (BAAQMD 8-34-412)

The Compliance Demonstration Test (Performance Test) was performed on the A-1 and A-2 Flares by Blue Sky Environmental, Inc. on March 11, 2011, pursuant to BAAQMD Regulation 8-34-412. The results of the Performance Test for the A-1 and A-2 Flares indicate that the flares are in compliance with BAAQMD Regulation 8-34-301.3. As required by BAAQMD Regulation 8-34-301.3, the A-1 and A-2 Flares meet the non-methane organic compound (NMOC) emission concentration of less than 30 parts per million by volume (ppmv). Pursuant to Title V Permit Condition Number 10423 Part 10(b), the A-1 and A-2 Flares meet the nitrogen oxide (NO<sub>x</sub>) emission concentration of less than 60 ppmv, corrected to 15 percent oxygen. Pursuant to Title V Permit Condition Number 10423 Part 10(b), the A-1 and A-2 Flares meet the NO<sub>x</sub> (calculated as NO<sub>2</sub>) emission concentration of less than 0.05 pounds per million British thermal units (lb/MMBtu). Lastly, the A-1 and A-2 Flares meet the total reduced sulfur concentration of less than 1300 ppmv (reported as H<sub>2</sub>S, dry basis), pursuant to Title V Permit Condition Number 10423, Part 10(a)(1). Table 3-2 shows the results of the A-4 Flare Performance Test, averaged from three test runs. A copy of this Performance Test Report is included in Appendix N.

**Table 3-2 Flare Compliance Demonstration Test Results**

Condition	Flare (A-1) Average Results	Flare (A-2) Average Results	8-34-301.3 limit	Compliance Status
NMOC (ppmv @ 3% O <sub>2</sub> as Methane)	<1.0	<1.0	<30 ppmv	In Compliance
NMOC Destruction Efficiency (%)	>99.9%	>99.9%	>98%	In Compliance
NO <sub>x</sub> (ppm @ 15% O <sub>2</sub> )	9.0	7.5	60	In Compliance
NO <sub>x</sub> (lbs/MMBtu)	0.4	0.03	0.05 lbs/MMBtu	In Compliance
LFG TRS as SO <sub>2</sub> ppm	153.1	152.8	1300	In Compliance
LFG H <sub>2</sub> S ppm*	141.4	141	1300	In Compliance

### 3.2 Compliance with §60.757(G)(1)

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

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

### **3.3 Compliance with §60.757(G)(2)**

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

The existing GCCS has historically provided LFG wells and collectors spaced in accordance with standard industry practices. Based on continuous compliance and operational experience the installed collector density appears more than adequate for controlling surface emissions and subsurface LFG migration.

The landfill operator will conduct routine monitoring in accordance with NSPS requirements. If the GCCS at the Landfill does not meet the measures of performance set forth in the NSPS, the GCCS will be adjusted or modified as required.

The existing GCCS conveyance piping and emission control devices have sufficient capacity to handle all current and future LFG flow rates (based on quarterly surface emissions monitoring results and monthly wellhead readings). New emission control devices will be designed and permitted as appropriate for future landfill LFG generation rates.

### **3.4 Compliance with §60.757(G)(3)**

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

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

### **3.5 Compliance With §60.757(G)(4)**

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

There are not any non-productive areas that have been excluded from the coverage of the GCCS. Therefore, §60.757(g)(4) is not applicable.

### **3.6 Compliance With §60.757(G)(5)**

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

The existing GCCS conveyance piping and emission control devices have sufficient capacity to handle all current and future LFG flow rates. New emission control devices will be designed and permitted as appropriate for future landfill LFG generation rates.

### **3.7 Compliance with §60.757(G)(6)**

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

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

- Third Quarter 2011 – August 26 and September 22, 2011
- Fourth Quarter 2011 – November 17 and December 29 and 30, 2011

There were no exceedances detected during the Third Quarter 2011 or Fourth Quarter 2011 Probe and building monitoring events. The LFG Probe and In-Structure Monitoring Reports are included in Appendix M.

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

## 4 **STARTUP, SHUTDOWN, MALFUNCTION (SSM) PLAN**

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### **SSM Log for the GCCS at Newby Island**

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

NESHAP 40 CFR part 63, AAAA became effective on January 16, 2004. Those SSM events that occurred during the NSPS semi-annual reporting period are reported in this section (August 1, 2011 through January 31, 2012). The following information is included as required:

- During the reporting period, 12 A-1 Flare SSM events occurred. The A-1 Flare was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log.
- During the reporting period, 67 A-2 Flare SSM events occurred. The A-2 Flare was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log.
- During the reporting period, 108 Wellfield SSM events occurred. Details are included in Appendix C, Well SSM Log.
- There were 187 events in total. In all 187 events, automatic systems and operator actions were consistent with the standard operating procedures contained in the SSM Plan. There were no deviations from the SSM plan.
- Exceedances were not identified during the reporting period in any applicable emission limitation in the landfills NESHAP (§63.10(d)(5)(i)).
- Revisions of the SSM Plan to correct deficiencies in the landfill operations or procedures were neither required, nor prepared (§63.6(e)(3)(viii)).